Submission City Plan Part One
Brighton & Hove City Council's Local Development Framework
February 2013

Statement of Consultation

Appendix 5
Erratum to Appendix 5 of the Consultation Statement

Please note that officer responses to representations were made prior to the City Plan being agreed at Council on 31\textsuperscript{st} January 2013. Any amendments to the Plan made at Council will not have been taken into account in Appendix 5.
<table>
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<tr>
<th>Customer No:</th>
<th>129</th>
<th>Customer Name:</th>
<th>Michael Johnson</th>
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<td>Organisation:</td>
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**Further Details:**
Smarten up run down areas such as London Rd and Lewes Rd, areas around Hove station and Sackville Road.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Comments noted. The need for townscape and public realm improvements along London Road is addressed in DA4. The need for townscape and public realm improvements along Lewes Road is addressed in DA3 and the need for townscape and public realm improvements around the Hove Station area are addressed in DA6.
Customer No: 162  Customer Name: Duncan Cameron

Organisation: Regency Square Area Society  Support Status:

Rep Number: 4  Page/Para: /  Policy:

Section/Supporting Doc/Annexes

Further Details:
Various policies commented upon which are not of direct relevance to the Regency Square Area Society.

SA6 - The RSAS strongly supports plans involving the creation of Neighbourhood Fora in SA6 (3.151) and is ready to actively cooperate on such initiatives.

CP3 - Council is urged to facilitate marketing of unused office space in the Regency Square Conservation Area

CP4 - Notes that there will be considerable retail provision within Conservation area and along its boundaries

CP5 - i360 to generate around 500,000 to 800,000 visitors per year which equates to around 6% of annual visitors per annum. Council is urged to consider impacts on RSCA

CP6 - Central Brighton is identified as the main focus of new hotel development. We would like to receive clarification of implications of this policy for the RSCA.

CP10 - We note the council's commitment to biodiversity enhancement and to the concept of local biodiversity. We would wish to become involved in the application of these policies to RSCA.

CP12 - Urge council to develop policies for RSCA to underline its distinctiveness which 'respects the diverse character and urban grain'

CP13 - We welcome the commitment of the council to using improvements in streets and open spaces as a tool to 'enhance the local distinctiveness of the city’s neighbourhoods'. We also welcome the commitment to 'street trees and biodiversity' and how these can be used to enhance the RSCA. Public art in the RSCA should be of highest quality.

CP14 - We note that the council is committed to 'high standards of design' which 'reinforces or repairs' the character of areas such as the RSCA. The area has suffered in recent years from housing infill of low visual quality and urges the council to ensure that this slow and cumulative process of deterioration be brought under future control.

CP15 - We note in paragraph 1 the council's commitment to 'enhancement, conservation' and to an active policy towards Heritage Assets at risk. Many buildings in RSCA which have no protection but are in a poor state of repair e.g. along Preston Street. Council is urged to survey heritage assets at risk to increase protection. Also improve the conservation process. More listed buildings within RSCA would contribute to this process.

Statement of Changes:

Any Other Comment:
The RSCA is currently an island of relative calm in a busy and congested Central Brighton area and it retains its distinctive mix of residential, retail, hotel and bars and restaurants. The combination of i360, Churchill Square retail development, landmark hotel building and improvement to Preston Street will bring many more people into the area.

While we welcome the raising of the profile of the area and the end to planning blight, at worst this process could have a negative impact upon our area by swamping it with people and by creating pressure for the area to become less residential.

WE STRONGLY URGE THE COUNCIL THEREFORE TO CONSULT LOCALLY IN ORDER TO CREATE STRATEGIES TO MITIGATE NEGATIVE EXTERNALITIES, AND TO CONTROL THE IMPACT OF SO HUGELY AN INCREASED FOOTFALL.

Officer Response:
Welcome support for neighbourhood forums (SA6), biodiversity enhancements (CP10) and improvement of the public streets and places (CP13). These policies would apply to developments in the Regency Square area. The detailed Regency Square specific comments regarding biodiversity enhancement, local distinctiveness and design quality, could be addressed further through a neighbourhood plan policies.

CP3 encourages the refurbishment and upgrade of office accommodation in order that that existing accommodation is better utilised, remains competitive and attractive to the market. However the City Plan can not comply owners of unused office space to market the premise.

CP5 - The impact of the i360 will have been assessed at the planning application stage. The improvements to Preston Street is a recent council initiative to improve pedestrian linkages in the area.

CP6 - hotels are considered by the National Planning Policy Framework to be a town centre use and therefore in line with the NPPF new hotel developments are directed firstly to Central Brighton (as defined by SA2). The Regency Square area is located within the Hotel Core Zone for the purposes of the protection of existing visitor accommodation with certain test set out to assess change of use applications.

CP15 - All buildings in the Regency Square conservation area, including in Preston Street, have additional protection under planning law by virtue of being within the conservation area. The council takes action to require the repair and redecoration of unlisted historic buildings as well as listed buildings and the council welcomes reports from local amenity societies of buildings in disrepair in their areas. The statutory listing of buildings is a matter for English Heritage not the council.

With regards to concerns on impact of future developments on footfall through the area; the council will be working to ensure that any redevelopment of the Brighton Centre and Churchill Square area achieves a very high standard of urban design, respects adjoining conservation areas and enhances the surrounding townscape and public realm. There would be local consultation with any application for redevelopment proposals.

Smarten up run down areas such as London Rd and Lewes Rd, areas around Hove station and Sackville Road.

Comments noted. The need for townscape and public realm improvements along London Road is addressed in DA4. The need for townscape and public realm improvements along Lewes Road is addressed in DA3 and the need for townscape and public realm improvements around the Hove Station area are addressed in DA6.
Cathedral Group fully supports para 2.3 of the draft City Plan (the city will have made significant progress towards becoming a resource efficient, Zero Carbon City and a cit that is adapting well to climate change).

The proposal at Circus street with assist with the delivery of the draft City Plan's aims on page 18 - Raising the standard of sustainable design to reduce greenhouse emissions.

Statement of Changes:

Officer Response:

Support welcomed and comments noted.

Madeira Drive is currently such a neglected space, which has such potential. I would really like to see this road made much more attractive with landscaping and attractions giving local people and tourists alike a reason to walk along it. A regular market, improved artists area, more healthy activities and a year round Volks Railway would mean this area wasn't just used for the car events that tend to dominate it. The 28 or so events are no doubt important for bringing more money into the city but they need to complement year round attractions, businesses and regular local events so that the drive is not dead and dreary for the other 330 odd days of the year. Landscaping similar to New Rd / Jubilee Library area would create a wonderful new area to Brighton that would be highly desirable to new business and in the long run bring more money into the city/council. A bus service, better pedestrian access and smarter short term parking tariffs would mean this area of the seafront could still be used by local people to enjoy. The 3.50/hr tariff simply stops local people from a summer's evening stroll, a swim or a windswept walk and a coffee at one of the local cafes. Madeira Drive has such amazing potential to link the central seafront/city centre and Marina / Black Rock area - a short and long term vision is desperately needed.

Statement of Changes:

Officer Response:

Comments noted and welcomed.

The Seafront special area policy SA1 sets out the priorities for the seafront east of Palace Pier to the Marina. The first bullet point sets out the need for the regeneration of Madeira drive as a centre for sports and family based activities supported by a landscaping and public art strategy for improved public realm. The emerging Seafront Strategy will detail how this vision will be implemented.
Further Details:
The City College would argue that one of the core challenges omitted from paragraph 1.23 is the need for the city and its academic institutions to deliver student accommodation in appropriate areas such as Pelham Street, to meet the demand in the city and relieve pressure on the HMO market in the city.

Statement of Changes:

Any Other Comment:

Officer Response:
Objection noted, the need for provision of appropriate student accommodation has been added to the relevant bullet point in paragraph 1.23

Further Details:
it identifies relatively small ambitions for providing academic floor space and student accommodation to 2030 within the Lewes Road Development Area and again, the University requests that this be amended in line with the changes sought to Policy DA3.

In the section of the Implementation and Monitoring Plan concerning Policy CP21, there is no reference to the East Slope strategic allocation despite its inclusion in the main Plan. This error should be addressed by the council in future revisions to the document.

Statement of Changes:

Any Other Comment:

Officer Response:
The University's comments about the allocated floorspace within the Lewes Road corridor are noted. Policy DA3 does not preclude a greater level of development across the development area and the council would be supportive of efforts to maximise use of sites. However, given that details of most proposed schemes are not yet available, that the University's masterplan is under review and the proximity of many sites to the South Downs National Park, it is not felt appropriate to require a higher density at this stage.

The East Slope allocation was previously omitted in error from the list and has now been added.
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<tr>
<th>Customer No:</th>
<th>236</th>
<th>Customer Name:</th>
<th>James Brown</th>
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<tr>
<td>Organisation:</td>
<td>Stonebridge Brighton Ltd</td>
<td>Support Status:</td>
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<td>Rep Number:</td>
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<td>Section/Supporting Doc/Annexes</td>
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Further Details:
The Spatial Distribution of Development Paras 2.16-2.20

Stonebridge Brighton Ltd are supportive of the approach to focus the majority of new housing, employment and retail development within eight specific designated areas (DA1-DA8) and acknowledge that this is essential to help ensure the protection of the city’s countryside and the South Downs National Park.

This strategy does, however, mean that there will be considerable pressure (and undoubtedly competing demands) on brownfield sites to accommodate the various uses needed to support growth and ensure a diverse and productive economy over the Plan period. It is essential, therefore, that the Strategic policies and Development Area Guidance set a framework to guide development but that this is not rigidly applied and includes clear flexibility to enable rapid response to change.

Statement of Changes:
The DPD should support a more flexible, as opposed to prescriptive approach to mixed use development on the identified sites.

Any Other Comment:
Officer Response:
Objection and comments noted. The City is a tightly constrained compact city and the spatial strategy seeks a balance in accommodating the city's development needs. It is considered that the Development Area proposals and strategic allocations provide an appropriately flexible approach to mixed use development whilst ensuring identified needs are planned for.
Customer No: 226   Customer Name: Mrs Katherine Laux

Organisation:   Support Status: Object
Rep Number: 1   Page/Para: General comment

Section/Supporting Doc/Annexes

Further Details:
As local parents we are concerned about the lack of detailed planning in respect of schools and schools provision contained in the draft City Plan. There is a lot of detail in the plan relating to retail space, recycling, tourism, housing etc. but very little in respect of educational provision across the city. Having spoken to officers we understand more detailed planning will come later, however, even that fact is not highlighted in the current wording. The Schools Planning Team produced, well before the date of the Draft Plan, a Schools Planning Document but, again, there is no mention of this in the Plan which gives the impression of a lack of joined up thinking between council departments. As it is currently presented it gives the impression that schools are of a low priority to this administration and we are disappointed not to see this important area addressed more robustly. We have collected 120 paper based signatures and over 100 epetition signatures.


Statement of Changes:
* The City Plan needs to set SMART objectives that other city-wide strategies are answerable to - it cannot be as vague as 'we need more schools'
* The City Plan needs to forecast how the additional 11,300 residential units planned for the city translate into the forecasted increase in school place provision
* The City Plan needs to show how the additional planned residential units will affect areas where there is a shortage of school places, now and in the future, especially in Central and West Hove.
* The City Plan needs to outline how quality of educational provision will be continuously improved and show that any strategies put forward help increase the quality of provision in the city.
* In addition, there needs to be a clear indication of how the City Plan and the School's Plan relate to one another

Any Other Comment:
Katherine Laux is a parent member of the King's School Steering Group.

Officer Response:
The objection is noted.

The city council recognises primary and secondary schools as vital infrastructure for the future of the city. In response to your concerns and the findings of the Schools Organisation Plan, Strategic Objective 21 has been amended to emphasise the need to provide sufficient school places and that this will be achieved by expanding successful schools and providing new schools. In addition, the supporting text of policy SA6 Sustainable Neighbourhood has been amended to emphasise the importance of school places to meet the city's needs.

The Infrastructure Delivery Plan (IDP) Annex document identifies the broad locations for new schools and extensions or improvements to existing provisions to the west of and across the whole of the city. The IDP will be updated annually with further detail and Part 2 of the City Plan will identify potential sites.
Further Details:

Planning for new school places – The City Plan has a target to provide at least 11,300 extra homes by 2030 (which we think is too many), yet planning around the infrastructure to support those homes, particularly the provision of school places, is virtually non-existent. We are concerned that the numbers of extra residential units will put an overwhelming pressure on schools that are already struggling to cope. The centre and west of the city have the highest need for school places. From current projections, we also know that there will need to be approximately 500 extra places (maybe more) at secondary school level – and that is just to meet demand from the existing population. Therefore, the City Plan should explicitly identify the school places and sites required for families already living in the Brighton and Hove area, and for those moving into the area, especially in parts of the city where there is already an acute shortage of school places.

Statement of Changes:

Any Other Comment:

Officer Response:

The objection is noted.

The city council recognises primary and secondary schools as vital infrastructure for the future of the city. In response to your concerns and the findings of the Schools Organisation Plan strategic objective 21 has been amended to emphasise the need to provide sufficient school places and that this will be achieved by expanding successful schools and providing new schools. In addition, the supporting text of policy SA6 Sustainable Neighbourhood has been amended to emphasise the importance of school places to meet the city's needs.

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Further Details:

Table 3 provides a summary of the City Plan Development Proposals which sets out the specific amount of housing, B1 employment and new retail space to be distributed across the City during the plan period. With regard to B1 space, this proposes a figure well in excess of the maximum estimate set out within the 2006 Employment Land Study. The Employment Land Study forecasts a shortfall of between 96,100 sq m and 121,000 sq m B1a and B1b employment land over the period 2006-2026. (Para 2.11). Whilst it is important to make appropriate provision for traditional employment floorspace, this should be based on up-to-date estimates of demand.

The need to deliver housing, employment and retail as well as other supporting uses will place significant pressure on brownfield sites. The approach to the specific allocation of sites therefore needs to be carefully balanced and the selection of one specific use (i.e. B1 employment space) should not be unduly favoured against the provision of other uses.

Before any specific commitments are made to the designation of employment sites it is vital that the Council have an accurate and up-to-date understanding of realistic demand for B1 space. This need should then be carefully balanced against the pressures and demands to accommodate a wide range of other uses on a limited number of brownfield sites.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection noted. An up to date assessment of employment land requirements has been undertaken - The Employment Land Study Review 2012. This up to date assessment of need and supply is reflected in amendments in Table 3.
Further Details:

s local parents we are concerned about the lack of detailed planning in respect of schools and schools provision contained in the draft City Plan. There is a lot of detail in the plan relating to retail space, recycling, tourism, housing etc. but very little in respect of educational provision accross the city. Having spoken to officers we understand more detailed planning will come later, however, even that fact is not highlighted in the current wording. The Schools Planning Team produced, well before the date of the Draft Plan, a Schools Planning Document but, again, there is no mention of this in the Plan which gives the impression of a lack of joined up thinking between council departments. As it is currently presented it gives the impression that schools are of a low priority to this administration and we are disappointed not to see this important area addressed more robustly. We have collected 120 paper based signatures and over 100 epetition signatures.


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* The City Plan needs to show how the additional planned residential units will affect areas
  where there is a shortage of school places, now and in the future, especially in Central and West Hove.
* The City Plan needs to outline how quality of educational provision will be continuously improved and show that any strategies put forward help increase the quality of provision in the city
* In addition, there needs to be a clear indication of how the City Plan and the School's Plan relate to one another

Any Other Comment:

Officer Response:

The objection is noted.

The city council recognises primary and secondary schools as vital infrastructure for the future of the city. In response to your concerns and the findings of the Schools Organisation Plan strategic objective 21 has been amended to emphasise the need to provide sufficient school places and that this will be achieved by expanding successful schools and providing new schools. In addition, the supporting text of policy SA6 Sustainable Neighbourhood has been amended to emphasise the importance of school places to meet the city's needs.

The Infrastructure Delivery Plan (IDP) Annex document identifies the broad locations for new schools and extensions or improvements to existing provisions to the west of and across the whole of the city. The IDP will be updated annually with further detail and Part 2 of the City Plan will identify potential sites.
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* The City Plan needs to outline how quality of educational provision will be continuously improved and show that any strategies put forward help increase the quality of provision in the city
* In addition, there needs to be a clear indication of how the City Plan and the School's Plan relate to one another

Any Other Comment:

Officer Response:

The objection is noted. The Infrastructure Delivery Plan (IDP) Annex document identifies the broad locations for new schools and extensions or improvements to existing provisions to the west of and across the whole of the city. The IDP will be updated annually with further detail and Part 2 of the City Plan will identify potential sites.
Further Details:
The University of Sussex entry does not reflect information on its future development plans for the campus previously submitted to the City Council and which will be reflected in the updated master-plan currently being prepared.

Statement of Changes:

Any Other Comment:

Officer Response:
The objection is noted. The Infrastructure Delivery Plan Annex document has been updated with further detail on development plans for the campus. The council would welcome sight of the updated master-plan that is currently being prepared.
Further Details:

This section does not adequately address the issue of education provision in the city. We have a shortage of school provision for primary places now and for secondary places which will shortly become a serious problem. A more strategic approach to provision of education places within the city is needed and this is the section where it should be included, not just in other sections for particular locations. The new school provision mentioned in other parts of the plan is inadequate and will leave children needing secondary school places in East Brighton with extremely long journeys to school or without a place at all.

Statement of Changes:

Plans for the provision of a new secondary school in the east of the city. The chance to use St Marys was missed but a school could be built on the Freshfield Industrial Estate (possibly in partnership with Brighton College?) or other locations on this side of town such as the old barracks on Lewes Road....be more ambitious or you will fail our children!

Any Other Comment:

Please consider these comments on any section of the plan regarding education provision. As a busy working parent I do not have time to spend ages filling in separate forms for each section or to attend any of the consultation events (which were held at inappropriate times for working parents with young children).

Officer Response:

The objection is noted.

The city council recognises primary and secondary schools as vital infrastructure for the future of the city. In response to your concerns and the findings of the Schools Organisation Plan strategic objective 21 has been amended to emphasise the need to provide sufficient school places and that this will be achieved by expanding successful schools and providing new schools. In addition, the supporting text of policy SA6 Sustainable Neighbourhood has been amended to emphasise the importance of school places to meet the city's needs.

The Infrastructure Delivery Plan (IDP) Annex document identifies the broad locations for new schools and extensions or improvements to existing provisions to the west of and across the whole of the city. The IDP will be updated annually with further detail and Part 2 of the City Plan will identify potential sites.

Comments noted regarding consultation, we endeavour to organise consultation events at times and places that will be accessible to all groups. Whilst the online consultation portal and website provided forms for representations the city council also accepts letters and email responses.
Further Details:
As the city develops more housing we need to make sure that land for schools and playing fields are provided for.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and noted.

The city council recognises primary and secondary schools as vital infrastructure for the future of the city. In response to your concerns and the findings of the Schools Organisation Plan strategic objective 21 has been amended to emphasise the need to provide sufficient school places and that this will be achieved by expanding successful schools and providing new schools. In addition, the supporting text of policy SA6 Sustainable Neighbourhood has been amended to emphasise the importance of school places to meet the city's needs.

Sites for schools will be identified through Part 2 of the City Plan.
Further Details:

Part 2 the strategy, Para 2.10 - The assessed housing requirements …… much higher than the city can realistically accommodate. This is very clear - the housing targets should be re-assessed. I believe that the absence of policies encouraging windfall redevelopments is a critical issue, and suspect it goes some way towards explaining why the inspector had no confidence that the council would deliver the rate and level of windfall dwellings indicated in the original draft LDF. This should be followed by further discussions with other Local Authorities who do have the capacity to build more residential dwellings.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection and comments noted.

The National Planning Policy Framework (March 2012) requires Local Planning Authorities to objectively assess their full housing requirements with reference to demographic and economic factors. The city’s Housing Requirements Study (2011) has been updated following publication of 2011 Census headline population figures. The City’s housing requirements (for market and affordable housing) are now assessed to be 15,800 additional homes required to 2030.

Given the significant physical and environmental constraints facing the city, the City Plan housing target for 11,300 new homes has been upon a thorough capacity exercise. The NPPF requires specific sites or broad locations to be identified to meet the first ten years’ target requirement. An allowance for small windfall sites has been included for the period post 2024. Development on small windfall sites throughout the plan period will help provide a measure of ‘contingency’ should there be non-delivery on identified sites and may also provide for additional housing provision over and above the housing target which is set as a minimum. This approach is considered sound and in accordance with government guidance.

The Core Strategy Inspector’s significant concern with the submitted Core Strategy was whether there was sufficient evidence of genuine local circumstances which prevented the identification of sites before a reliance on windfall could be considered. The approach in the City Plan has been to reduce the heavy reliance on windfall and identify sufficient specific sites to meet targets for housing over the first ten years of the Plan which is in accordance with government guidance and thus sound.

Discussions have taken place with adjoining local authorities under the duty to co-operate but adjoining authorities have indicated their own constraints and that they are not in a position to consider allowing for additional housing provision to help meet Brighton & Hove’s unmet requirements.
I live in my own home and have never been homeless; I am appalled by the conditions many people have to live in - in vehicles, under the pier, in sheds, and in multiple-occupancy houses where they are forced to pay high rents for sub-standard accommodation. Compared with many councils, BHCC has a large property portfolio including some buildings that could be converted to housing. I strongly believe this is the highest priority for the Council; lack of housing for low-paid workers will hold the whole city back in the long run. N.B. - low-paid workers, not students or those on benefits.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection and comments noted. The Council does consider the delivery of affordable housing to be a key priority and this is reflected in the City Plan through SO4 and CP20. The Brighton & Hove Housing Development Partnership is the key delivery vehicle in the city, working to develop and promote new affordable housing. The partnership is made up of the council, the Homes & Communities Agency and five ‘Registered Providers’.

All references to City Plan Part 2

The document is confusing as it refers to the City Plan Part 2 this document does not seem to be part of this consultation but as it refers to site allocations it is important this should be open to public consultation.

Statement of Changes:

Could you please explain what the process is with regards to the City Plan Part 2 and when this will be available for public consultation

Any Other Comment:

Officer Response:

Objections and comments noted. The City Plan part 1 is now divided into sections to avoid confusion.

The City Plan Part 2 will set out the remaining allocations and development management policies. Work on the City Plan Part 2 will commence following the examination into City Plan Part 1 (estimated September 2013).
Further Details:

There is a lack of sufficient information and detail on on various draft policies with which to make reasoned responses. I do not accept that filling the missing detail later after adoption of the City Plan will represent an adequate process of public consultation. There should be more detail provided on many policies and further public consultation on the changes.

Please note that I reserve my right to further comment on and object to the Plan and the lack of comments on the remaining policies does not represent an expression of support.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection noted. There is further opportunity to comment on the City Plan prior to submission to the Secretary of State. It would be helpful if your further comments could outline where you consider the Plan to be lacking sufficient information or detail for you to be able to make a reasoned response.
Further Details:

For very many years, in the opinion of many local landlords/developers, Brighton & Hove City Planning Department has operated a culture of challenging planning applications to the extent of "How can it refuse the application or at least place so many objections / unreasonable requirements so as to ensure that the proposed development does not go ahead or, if it does, to ensure that it is unviable?"

The City Plan sets out a number of objectives. For example, sustainable homes of high design standards to blend with the existing mix of properties in the locality at prices affordable to those wishing to occupy them. In addition, it states that attention must be given as to whether sites would be better utilised for employment purposes. Those landlords who own land/properties where additional accommodation can be provided are faced with meeting such conflicting demands of the Planning Department, who often use those differing requirements to reject simple applications, sometimes to the extent that in the end no development takes place and valuable housing opportunities are lost.

The Core Strategy, with its conflicting objectives, does nothing to change this unsatisfactory culture. In fact, it only encourages it. As has been seen with other organisations over recent times, unless the culture changes, nothing will improve, and over very many years the culture of the Planning Department has worked against the interests of the small landlord/developer and, in fact, also of the city in general, and a priority should be firstly to change the whole culture of the Planning Department so that its first priority is to say "How can we help and what can we do to achieve at reasonable cost any development put forward for approval?"

The aim as stated in the City Plan is to obtain affordable and sustainable accommodation of the highest quality, meeting local priorities and reducing inequalities. These are grand words that will only delay / make impossible clear guidance or planning directions. Nothing in the City Plan will encourage small landlords that the local Planning Authority is other than setting out a base of conflicting objectives that will cause delay and eventually refusal where much-needed housing is required. The Plan is not robust in a positive way. In fact, just the opposite.

Our members believe that the City Plan, as it affects opportunities for private landlords, is without merit. Once again, it is a theoretical paper which deals with political aspirations rather than the reality in the city. It is accepted that there are large sites where clear development plans can be made. These are not the sites that could come in for development as windfall sites owned by our members. The contribution by landlords to housing residents in the city, other than by percentage, is ignored. The ability of landlords to provide additional rental accommodation by development is also ignored and any landlord wishing to increase his stock by development will be constrained by the affordable housing conditions applied to any property speculator.

Unless the culture of the Housing Department is changed, our members do not see a good future for developments in this city for rent at all.

HEALTH AND BALANCED COMMUNITIES
(Officer insert: the following comments also allotted to CP19 and CP20)
Private landlords understand that housing contributes to a healthy life, but it is not the main factor. How a person lives is far more important. Exercise, clean living, appropriate diet, etc are just as (or even more) important. The Director of Health has stated that where a person lives is the most important factor. Our members say "how a person lives" is the most important factor. The way people use their lives, as mentioned above, in the opinion of many landlords, needs to change, and the home only forms one part of those elements.

For many years our members have provided more rented accommodation in this city than both the Local Authority and housing associations combined. Private landlords' contribution to housing residents in this city is often ignored and their ability to provide additional accommodation has also been, in the main, ignored in this report, yet the private landlord rented sector in the city is the only sector that is really expanding. Private landlords should be considered as an individual group in the Core Strategy for providing additional homes in this city, not simply included as part of a wider process.
The City Plan makes reference to the significant number of under-occupied properties in the city. However, no recommendations or suggestions are made arising from that statement. We would like to make it absolutely clear that our members would not support any inference to the effect that such occupation is unacceptable and must point out that it is a free country for people to purchase and occupy properties as they wish, and this should not change. Our members do not accept that it is necessary to secure family housing on all suitable sites.

Statement of Changes:

Any Other Comment:

Officer Response:

Objections and comments noted.

It is not considered that the strategic objectives set out in the City Plan are in conflict or set unreasonable requirements on the private rental sector.

The council fully recognises and supports the important role played by private landlords and the rented sector in housing the city's residents. We also recognise the housing needs of single people, including students, within the city and those people who choose to share accommodation.

The City Plan at CP18 Healthy City identifies the role of planning in reducing health inequalities and promotion of healthier lifestyles and does not consider housing to be the only factor.
Stonebridge Brighton Ltd (SBL) are concerned that the content of the City Plan exceeds the appropriate scope for the Part 1 document. Specifically, it is considered that the identification of specific employment allocations should be more appropriately left to the Site Specific Allocations stage of the Plan which will be covered in the Part 2 document (as recognised in para 1.4).

Leaving these important decisions to Part 2 of the plan will enable specific smaller sites (such as Blackman Street) to be assessed in a greater and a more focused and balanced assessment to be undertaken before their specific allocation is fixed. In this regard, it is considered essential that the Council undertake an update of their Employment Land Study (see comments to CP2 and CP3). The Draft Local Plan itself acknowledges that the Council intend to undertake a review of employment land evidence (Para. 4.30) and SBL consider it vital that this work provides a comprehensive reassessment and is fully completed before the plan progresses any further forward.

SBL are also concerned that the current focus within the strategic level (Part 1) document on the specific allocation of potential employment sites could cause land supply problems for other uses and could lead to the continued stagnation of brownfield sites which would otherwise come forward.

Unsound: policy approach to allocating employment sites in the Part 1 plan would fail to be fully justified given the need for update employment land evidence. If left unchecked this could lead to an ineffective plan which fails to ensure that the finite brownfield resources are utilised for all land requirements.

**Statement of Changes:**
Delete specific employment allocations from the Part 1 plan and undertake a thorough re-assessment of employment evidence.

**Any Other Comment:**

**Officer Response:**
Objections noted. An Employment Land Study Review 2012 has been undertaken to inform the City Plan. It is considered appropriate and in accordance with the NPPF for the city council to prepare its City Plan in two parts and for the first part to contain strategic and site allocations.
Further Details:
The introduction consists of three pages of detailed descriptive and statistical context, of the geography, economy, infrastructure, demographics and culture of the city. In all of this there appears to be only one reference to the architectural heritage.

In view of the precarious condition and lacklustre appearance of much of this heritage, and the pressures of unsympathetic usage and intrusive development, we feel that this statement, a rare claim of international status, should be matched by a statement in the lengthy list of “challenges.” The challenge is to raise, among the city’s own priorities, the status of its architectural heritage to the level of its national and international reputation.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection and comments noted. Paragraph 1.23 has been amended to include in the list of challenges reference to the appropriate enhancement and conservation of the historic and architectural quality of the city.
Further Details:

As local parents we are concerned about the lack of detailed planning in respect of schools and schools provision contained in the draft City Plan. There is a lot of detail in the plan relating to retail space, recycling, tourism, housing etc. but very little in respect of educational provision across the city. Having spoken to officers we understand more detailed planning will come later, however, even that fact is not highlighted in the current wording. The Schools Planning Team produced, well before the date of the Draft Plan, a Schools Planning Document but, again, there is no mention of this in the Plan which gives the impression of a lack of joined up thinking between council departments. As it is currently presented it gives the impression that schools are of a low priority to this administration and we are disappointed not to see this important area addressed more robustly. We have collected 120 paper based signatures and over 100 epetition signatures.


Statement of Changes:

* The City Plan needs to set SMART objectives that other city-wide strategies are answerable to - it cannot be as vague as 'we need more schools'
* The City Plan needs to forecast how the additional 11,300 residential units planned for the city translate into the forecasted increase in school place provision
* The City Plan needs to show how the additional planned residential units will affect areas where there is a shortage of school places, now and in the future, especially in Central and West Hove.
* The City Plan needs to outline how quality of educational provision will be continuously improved and show that any strategies put forward help increase the quality of provision in the city
* In addition, there needs to be a clear indication of how the City Plan and the School's Plan relate to one another

Any Other Comment:

Officer Response:

The objection is noted.

The city council recognises primary and secondary schools as vital infrastructure for the future of the city. In response to your concerns and the findings of the Schools Organisation Plan strategic objective 21 has been amended to emphasise the need to provide sufficient school places and that this will be achieved by expanding successful schools and providing new schools. In addition, the supporting text of policy SA6 Sustainable Neighbourhood has been amended to emphasise the importance of school places to meet the city's needs.

The Infrastructure Delivery Plan (IDP) Annex document identifies the broad locations for new schools and extensions or improvements to existing provisions to the west of and across the whole of the city. The IDP will be updated annually with further detail and Part 2 of the City Plan will identify potential sites.
Further Details:

There should be more radical policies to claw back some out of town retail sites for employment us, such as the creation of reuse/recycling/upcycling parks to help achieve the city's zero waste ambitions. Many of these sites have a poor public realm, actively encourage car use with large car parks and because pedestrian links between stores can be long and convoluted. Without a clamp down on these large car traffic generators, BHFOE does not believe that carbon emissions will fall as quickly as is needed and nor will people be encouraged to walk and cycle or use public transport more. The sites could also be created as centres of excellence for employment and eco-technologies.

Statement of Changes:

Please add policies about using out of town retail for other uses.

Any Other Comment:

Officer Response:

Partial objection and comments noted. The City Plan does not support the development of out of town retail developments. CP4 sets out the national planning policy tests that would be required to be addressed. The City Plan does seek the most efficient use of sites (CP1 Housing Delivery and CP14 Housing Density and CP8 Sustainable Buildings) and recognises the potential for more efficient uses of sites within the Hove Station area for employment uses (see part 5). Should proposals come forward for the redevelopment of out-of-town retail sites the opportunities for improved public realm and more efficient use of the site would be supported by these policies. It is not considered appropriate to include a policy in the City Plan to re-allocate out of town retail sites to other uses.

Further Details:

The vision for the City Should recognise that economic growth is not purely generated by traditional B-Class uses. Other employment generating uses are equally important, such as hospitals, education, leisure and retail. The wording of the paragraph should ensure that these other employment generating uses are fully embraced and not unwittingly excluded.

Statement of Changes:

Bullet 3 should be amended to read: “sustainable economic growth will be achieved by ensuring that a range of suitable sites and premises for all employment generated uses...”

Any Other Comment:

Officer Response:

The City Plan does address Non B Class needs. The Development Area proposals set out the requirements for new health, education, leisure and retail provision. This will be reflected in an additional bullet point under paragraph 2.2.
### Further Details:

While we understand the need for more housing and the optimisation of the use of previously developed land, we are concerned (given experience in our neighbourhood) that infill developments proposed impact on the amenity and potentially the health of neighbouring properties. Raising the height of buildings in already dense neighbourhoods, where open space/gardens are in short supply reduces available sunlight, inhibiting the ability of residents to grow food in their gardens (we have experience of this). This is in conflict with policies to improve access to open space and local food set included in 2.8. Also, loss of solar gain increases need for artificial heat and light, increading carbon emissions.

**Statement of Changes:**

We want to see acknowledgement of the importance of maintaining access to sunlight for residential properties and gardens. We want to see an urban design framework that prevents the loss of sunlight to gardens and properties. CP8 2.e. proposes this for new development, so existing development should not be compromised.

**Any Other Comment:**

**Officer Response:**

Partial objections and comments noted. Planning Applications for infill development are carefully considered with respect to amenity of neighbouring properties and the council will aim to ensure that high quality is maintained through the rigorous enforcement of planning permissions. Sunlight/daylight assessment required for all major new build applications and tall buildings.

Whilst policies CP12 and CP14 encourage higher density development they do not mean that such development must be taller than existing buildings. CP12 states that 'density will be raised through predominantly low-to-medium rise development' and CP14 states that proposals must demonstrate that they would 'respect, reinforce or repair the character of the neighbourhood'. The supporting text goes on to say that 'successful higher density developments will depend upon a ‘design-led’ approach that respects its local context and minimises impacts on its surroundings'.

### Further Details:

Biodiversity

Greater consistency needs to be shown in the City Plan towards biodiversity. Sometimes it talks of developments contributing towards Biodiversity Action plan objectives. In other places it talks of promoting the city’s UNESCO Biosphere objectives. It really needs to say one thing or the other but then explain the relationship between the two.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Comments noted and welcomed. Amendments have been made to the ensure greater consistency in the City Plan and in SO4 and CP10 in particular. It should be noted that the Local Biodiversity Action Plan will be part of the Biosphere project and will be included in the submission to UNESCO.
### Customer No: 165  Customer Name: Chris Todd

**Organisation:** City Sustainability Partnership  
**Support Status:** Partly Object  
**Rep Number:** 5  
**Page/Para:** /  
**Policy:**  
**Section/Supporting Doc/Annexes:** Annex 1: Implementation and Monitoring

**Further Details:**

Monitoring

This is considered essential to ensure that the Plan is delivering on its aims. However, it is also important in terms of raising awareness with the public and local businesses as well as helping to shape future action. There are considerable gaps on the monitoring arising from the Plan and the performance framework must be set so that it evolves and is in line with One Planet Living objectives.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

An Implementation and Monitoring Plan accompanies the City Plan and this sets out the targets for monitoring progress of the Policies in the City Plan. Further the AMR (Authority Monitoring Report) will allow the City Plan performance framework to evolve. The Council produces a City Performance Plan and this will be the source of headline Sustainability Indicators and a Sustainability Action Plan is being prepared which will ensure that all appropriate council efforts are co-ordinated and focused on achieving the priority of a more sustainable city and a more sustainable council. The City Plan has been amended to more fully reflect One Planning Living principles.

### Customer No: 67  Customer Name: Mr Andrew Whitaker

**Organisation:** Home Builders Federation Ltd  
**Support Status:** Partly Object  
**Rep Number:** 1  
**Page/Para:** /  
**Policy:**  
**Section/Supporting Doc/Annexes:** Part One: Introduction

**Further Details:**

HBF would have hoped that the Council would have been able to move to the new system in a single step rather than producing Part 1 City Plan followed by Part 2. Part 1 City Plan will not be a comprehensive document and nor will it accord with the NPPF in this respect.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Partial objection noted, however the NPPF allows for local authorities to decide how their Local Plan is prepared.
Further Details:

Delivering One Planet Living objectives
The approach to delivering One Planet Living objectives in the City Plan is the right one but there is concern that the policies are not strong enough to deliver the city’s ambitions in terms of One Planet Living (OPL) and other targets relating to reduction in resource use and greenhouse gas emissions in particular. There is also a concern that policies will get left behind by rapid changes in technology and circumstances, which could undermine the integrity and ambition of the Plan. To help address this, the Plan needs to develop robust targets and regularly monitor progress against these.

Food infrastructure
The City Plan does not appear to recognise the need to develop local food infrastructure that could enable the re-localisation of the food system. One Planet Living ambitions will not be achieved without local infrastructure provision for food. At present, local farm animals have to travel long distances to be slaughtered and their meat brought back to the city for sale, increasing its carbon footprint. Without provision for local abattoirs and other infrastructure, the current damaging system will remain in place. The development of Toads Hole Valley could provide an opportunity to provide space for some local food infrastructure.

Statement of Changes:

Any Other Comment:

Officer Response:

Amendments have been made to the City Plan to make it clearer how the City Plan policies and proposals support the delivery of the One Planet City. Implementation of the policies is supported by SPD08 Sustainable Buildings and the checklist. It is considered that CP8 provides sufficient flexibility to allow for changes in technology and circumstances.

An Implementation and Monitoring Plan accompanies the City plan and this sets out targets for monitoring progress.

It is not considered that the City Plan would deter the provision of local food infrastructure in appropriate locations.
Further Details:

1. There should be more flexibility regarding change of planning use, particularly when this is for conversion into housing units, bearing in mind the evolution of areas and the need for affordable housing in the city.

2. A regular survey or audit (e.g. every 2 or 3 years) would help identify office and retail space which is redundant or underused. The findings of these audits could be used to encourage the owners to bring them back into use and enable Officers of the Council to provide information/advice about the available options, including conversion to residential use.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial objection and comments noted. It is considered that the City Plan policies provide the appropriate framework to assess change of use applications.

Regular assessment of employment land needs and retail needs are undertaken. Potential land available for housing is also assessed through the Strategic Land Availability Assessment which is updated annually. It is considered that this provides a robust assessment of opportunities for housing.

Further Details:

The NLCA is concerned that there is a contradiction between the City Plan and supporting Annex 2. The City Plan, p186 states 300 bedspaces for City College. Annex 2, p51 states up to 600 students.

(Officer insert: comments also allotted to CP21)

Statement of Changes:

Any Other Comment:

Officer Response:

The partial objection is noted. The Infrastructure Delivery Plan (IDP) Annex document has been amended to state 300 bed spaces for City College and accords with that same number in the City Plan.
Further Details:

INFRASTRUCTURE
My final comment concerns an essential infrastructure project.

7. Continue Hangleton Link Road to Shoreham Harbour - new policy
There has long been a problem of severance between north and south Hove, and between north and south Portslade, due to the Coastway West railway. There are very limited opportunities to cross the Coastway West railway:

Church Road/ Trafalgar Road Portslade, which is the designated lorry route to the Shoreham Port but passes through the conservation area of south Portslade;

the level crossing in Boundary Road, Portslade, where for health and safety the gates appear to be closed more often than open, and buses as well as private cars are persistently delayed;

Olive Road, which is a very popular crossing but is entirely unsuited to large volumes of traffic or heavy vehicles;

Sackville Road, where there appears to be permanent traffic congestion, and

The Drive where capacity was reduced when the cycleways were introduced.

None of these routes, moreover, is really suitable for the heavy vehicles that ply between the trunk road and Shoreham Port.

The solution to this problem, which has long been acknowledged, is for the Hangleton Link Road from the A27 to be extended to Shoreham Port, thereby creating a new route between the A27 and the A259 suitable for HGVs and a free flow route for all vehicles across the Coastway West.

For over 25 years politicians of all parties have prevaricated about construction of this road, most probably because its line lies close to the historic boundary between East and West Sussex, and close to the boundary of our city with the district of Adur. It is acknowledged it would involve the compulsory acquisition of about 100 properties (according to the Shoreham Port Authority), but most of those would be commercial. Even given that some residential properties would have to be acquired, that would be a small price to pay for a massive improvement to the city’s infrastructure, and the city could find ways of ensuring any homeowners were adequately compensated.

It is timely to renew pressure for this road to be constructed because the Government has recognised it should fund infrastructure projects to ‘kick start’ the economy. Few projects South of London could be more worthwhile, because it is a small infrastructure project that would generate significant returns given that Shoreham Port is not only important to the local economy, but also a major gateway for construction products serving London and the South East.

Statement of Changes:

Any Other Comment:

Officer Response:

Adur District Council has commissioned a transport study which will inform the consideration of sustainable transport options to adequately mitigate the impact of strategic development. This study will inform the emerging Shoreham Harbour Transport Strategy, which is currently being prepared by West Sussex County Council and will include the area within Brighton & Hove. The strategy will contain a set of integrated transport measures that will guide the provision of transport infrastructure in the area for the next 15 years. Whilst development at Shoreham Harbour will require some investment in the road network, substantial new road building is unlikely to be deliverable on both
environmental and cost grounds. The Shoreham Harbour Transport Strategy will include improvements to the existing road network and measures to encourage the use of sustainable modes of transport. These measures will be comprised of infrastructure and behaviour change initiatives where these would be considered effective and appropriate.

Further Details:

6. Preferred areas for developments - linking land use with transportation - new policy
Linking land use allocations to transportation used to underpin all planning strategies. With the focus now on sustainable development, that principle is even more important. The city has no less than eight railway stations, all well served by regular services, with three on the main lines. Whilst the development potential around some stations is being fully realised, the scope around others is not being addressed. In particular, the plan should exploit the potential around Portslade station and encourage redevelopments in its vicinity. Network Rail itself floated the idea of upgrading/redeveloping Aldrington station and surroundings; if through redevelopments it were possible to improve the services to that station, it could have a major impact on the potential for further redevelopments in West Hove.

Similarly policies should welcome housing redevelopments around other public transport nodes, such as neighbourhood centres; the Policy SA6 in the draft plan appears only to support commercial developments around those centres. (Criterion 8, the only one that mentions residential development, refers to housing mix but not to its location relative to public transport nodes.)

Statement of Changes:

Any Other Comment:

Officer Response:

The Spatial Strategy from the outset looked at opportunities for development to be focussed in areas which either benefit already from close proximity to good sustainable transport links or are areas where accessibility can be improved.

The eight Development Areas account for just over half of the planned amount of new housing delivery for the city. In other parts of the city, there are also a range of opportunities for new residential development (through, for example conversions, redevelopment and changes of use) and such development will help to promote and secure the establishment of sustainable communities. TheSpatial Strategy at paragraph 2.19 and wording to CP1 Housing Deliver parts a) to e) have been amended to clarify that the City Plan encourages housing to come forward across the City in accessible locations, making the most efficient use of sites and ensuring the creation and/or maintenance of mixed and sustainable communities. This approach is supported by CP12, CP14 and SA6.
### Customer Details

- **Customer No:** 233  
- **Customer Name:** Colette Blackett  
- **Organisation:** Adur and Worthing Councils  
- **Rep Number:** 7  
- **Page/Para:** 17/  
- **Section/Supporting Doc/Annexes:** Part Two: The Strategy  
- **Support Status:** Partly Object  
- **Policy:**  

### Further Details:

Strategic Objective SO6 on page 17. It would be useful if this Objective for Shoreham Harbour could refer to joint working with Adur District Council, West Sussex County Council and Shoreham Port Authority given the cross boundary nature of the site.

### Statement of Changes:

Any Other Comment:

### Officer Response:

Partial objection noted and comment welcomed. SO6 has been amended as requested.
Annexe 2 Infrastructure Delivery Plan, Page 39
Southern Water is unable to support the Draft City Plan because the Infrastructure Delivery Plan is incomplete. As you will see from our representations to the draft City Plan, we have assessed the proposed strategic sites to identify whether there is sufficient capacity in the local water supply and sewerage systems to meet the anticipated demand. Two spreadsheets have also been submitted that show the full results from this work. In respect of the Infrastructure Delivery Plan (IDP) it has not included the water and wastewater infrastructure that Southern Water identified in previous consultation. Southern Water’s previous representations, dated Feb 2012, have been submitted as these have not been fully incorporated in the version of the IDP published with the Core Strategy. These are as follows:

(We have not remodelled the impact of the strategic sites on the sewerage system as we believe it is premature to do so until the sites are identified in a draft development plan document.) A potential constraint has been identified at Shoreham Wastewater Treatment Works (WTW), which treats wastewater arising in Adur as well as the following areas within Brighton & Hove: Shoreham Harbour, Portslade and small parts of Hove. Southern Water commissioned a study to inform Adur District and Brighton & Hove City Councils’ Core Strategies. The WTW is physically constrained, and will require expansion if the level of proposed development in the catchment exceeds around 4000 homes. If nitrogen removal is required by the Environment Agency, expansion will also be required to accommodate the additional treatment process. Land will be required to allow expansion. Delivery of additional treatment capacity is also dependent on a new or amended environmental permit from the Environment Agency, planning permission from West Sussex County Council and funding through Ofwat’s five yearly price review process. Please see the table submitted for further details.

Statement of Changes:

Any Other Comment:

Officer Response:

The partial objection is noted. The policy indicates the requirement for utility infrastructure including water provision and wastewater treatment and drainage. The Infrastructure Delivery Plan (IDP) Annex document to the City Plan has been amended to include requirement for timely provision of new or improved water and wastewater infrastructure to be co-ordinated to meet needs generated by new development. The IDP has been further amended to include further reference for any necessary expansion for Shoreham Wastewater Treatment Works to be identified in a future Joint Area Action Plan (JAAP).
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**Support Status:** Partly Object

**Further Details:**
We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

**Statement of Changes:**
Any Other Comment:

**Officer Response:**
Thank you for your representation. Your comments have been noted. References to the One Planet approach have been added to the supporting text for all Development Area policies with the exception of DA7 to reflect that Toad Hole Valley is a greenfield site.

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**Support Status:** Partly Object

**Further Details:**
Proposed Development Area - Shoreham Harbour (page 73)
The development area boundary as shown on the map must be seen as indicative at this stage and will be determined through the joint Area Action Plan. (Officer note: these representations allotted to DA8, Key Diagram and Proposals Map booklet)

**Statement of Changes:**
Any Other Comment:

**Officer Response:**
The policy diagram and policies map (formerly the proposals map) will be amended to reflect the issue raised.
Further Details:

Representations are made in relation to land to the north of No. 40 Rosebery Avenue, Woodingdean.

The land appears to be covered by the City Plan, but lies outside both the built-up area and the countryside boundary. The land is privately owned. It is already partly developed with one house and the location of the built-up area is incorrect. The remaining land to the north should be designated as suitable for housing development.

Strongly object to the land being designated as an area of open space.

Statement of Changes:

1. Adjustment of the built up area boundary to include the existing house on the site.
2. Inclusion of the remainder of the site for housing development

Any Other Comment:

Officer Response:

In respect of this area the built up area boundary accords with that in the Local Plan. The City Plan Part 1 considers strategic allocations. Smaller site allocations and/or minor built up area boundary amendments will be considered through Part 2 of the City Plan. Proposed changes can be put forward as part of this work. For this reason it is not therefore felt appropriate to amend the built up area boundary or to consider the identification of the site for housing at this stage.

The City Plan merely reflects the Nature Improvement Area which was designated separately to the development plan. An audit of open space was undertaken in 2006/7 and helps to set a benchmark by which future gains and losses can be assessed. The audit of open space included both public and private open space for the reasons detailed in paragraph 4.165 of the draft City Plan Part 1. The open space sites identified on the policies map accord with the audit. Due to the scope of the City Plan Part I it is not considered the identified open space in this area should be amended at this stage.
Further Details:

Waste Water Treatment
As you are aware, the capacity of the current waste water treatments works at Shoreham Harbour is limited and any enhancement/expansion needs will need to be addressed in the joint Area Action Plan for this site. The works serve Shoreham as well as the western parts of the City. The approximate limit is for a further 4000 dwellings and there is also a biological limit in terms of future population. This is an infrastructure constraint which needs to be taken into account and may impact on the timing of delivery of key developments not only in Shoreham but also in the western parts of the City. This may impact on the proposed development area of Toads Hole Valley if this is within the catchment area.
(Officer note: these representations allotted to SA1, CP7, DA8, DA7 and Annex 2 ‘Infrastructure Delivery Plan’)

Statement of Changes:

Any Other Comment:

Officer Response:

Comments noted. A paragraph has been added to the supporting text to emphasise that the Councils are aware of the potential for the waste water treatment works to be expanded.

The partial objection is noted. The Infrastructure Delivery Plan (IDP) Annex document to the City Plan has been amended to include requirement for timely provision of new or improved water and wastewater infrastructure to be co-ordinated to meet needs generated by new development. The IDP has been further amended to include further reference for any necessary expansion for Shoreham Wastewater Treatment Works to be identified in a future Joint Area Action Plan (JAAP).
We have assessed the proposed strategic sites to identify whether there is sufficient capacity in the local water supply and sewerage systems to meet the anticipated demand. Two spreadsheets that show the full results from this work have been submitted with these representations.

Southern Water supplies water to Brighton & Hove City. Southern Water has a statutory duty to serve new development located within its water supply area. The company’s Water Resources Management Plan (WRMP) shows how the company proposes to secure water supplies to meet demand from customers during the next 25 years. The WRMP incorporates new development at the level identified in the South East Plan.

A key role of Brighton & Hove’s City Plan is to ensure that the quality and potential yield of water resources are protected from any adverse effects caused by new development. This will help to ensure that public water supplies are not put at risk. Development should not be allocated in groundwater Source Protection Zones (SPZs) unless mitigation measures are possible to the satisfaction of the Environment Agency.

We recognise that some of the site and area policies makes provision for protection of water resources, for example DA7 (Toad's Hole Valley), SA4 (Urban Fringe) and SA5 (The South Downs). However, a more generic policy is required that can be applied to all future new development, including windfall sites. The City Plan cannot secure sustainable development unless it contains a policy that protects against unacceptable impacts on the quality and potential yield of public water supplies.

Statement of Changes:
We therefore propose the following policy:

Strategic policy: Protecting the quality and potential yield of water resources:

Proposals for new development in the City will not be permitted if it has an unacceptable impact on the quality and potential yield of local water resources used for public water supplies.

Any Other Comment:

Officer Response:

DA3, DA7, SA4 and SA5 reflect the need to protect sensitive aquifer/groundwater source protection zones. These references were included in consultation with the Environment Agency. A generic city wide policy on protecting the quality and potential yield of water resources was not requested by the Environment Agency on previous consultation exercises on the City Plan.

CP8 Sustainable Buildings requires all new development to incorporate facilities to recycle, harvest and conserve water resources. In relation to CP8, the requirement to meeting various building standards will also address minimising water consumption, and that the requirement to reduce surface water run off can also help to address pollution of water resources.

CP11 refers to incorporating SUDs, again which can also help in relation to preventing pollution of water resources.

These policies has been supported by the Environment Agency.

It is therefore considered that a generic city-wide policy is not considered appropriate to include in the City Plan Part 1.
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<th>Colette Blackett</th>
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**Further Details:**

Key Diagram
Proposed Development Area - Shoreham Harbour (page 73)
The development area boundary as shown on the map must be seen as indicative at this stage and will be determined through the joint Area Action Plan. (Officer note: these representations allotted to DA8, Key Diagram and Proposals Map booklet)

**Statement of Changes:**

Any Other Comment:

**Officer Response:**
Comments agreed. Text will be amended to indicate this.

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**Further Details:**

It should be considered that this oversupply of hotel rooms (see detailed representation to CP5) is of sufficient importance to be featured in the Challenges section 1.23.

This will help to support any changes to previous procedures as the changes will be seen as a requirement to support a response to a challenge.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**
Comments noted and welcomed an additional bullet point has been added to the challenges section related to recent rapid expansion in the hotel sector and the need for an appropriate balance of supply.
Further Details:

The NPPF requires authorities to objectively assess the full housing requirements for its area. It requires authorities to be proactive in meeting the identified requirements and to “boost significantly the supply of new homes”.

The requirements for new homes should be met in full, if the City’s constraints prevent the delivery of the full amount, the City Council should ensure, in accordance with the NPPF, that neighbouring authorities help to meet the identified needs.

Statement of Changes:

Any Other Comment:

Officer Response:

The National Planning Policy Framework requires Local Planning Authorities to plan positively to meet assessed housing requirements. Given the significant physical and environmental constraints which restrict growth and expansion of the City, the Plan has had to look positively for all realistic housing opportunities wherever possible. The housing target of 11,300 is considered realistic and deliverable and is considered consistent with the other strategic aims of the Plan.

Discussions have taken place with adjoining local authorities under the duty to cooperate but adjoining authorities have indicated due to their own constraints, they are not in a position to consider additional housing provision unmet from Brighton & Hove.
Further Details:

Representations are made in relation to land to the north of No. 40 Rosebery Avenue, Woodingdean.

The land appears to be covered by the City Plan, but lies outside both the built-up area and the countryside boundary. The land is privately owned. It is already partly developed with one house and the location of the built-up area is incorrect. The remaining land to the north should be designated as suitable for housing development.

Strongly object to the land being designated as an area of open space.

Statement of Changes:

1. Adjustment of the built up area boundary to include the existing house on the site.

2. Inclusion of the remainder of the site for housing development.

Any Other Comment:

Officer Response:

In respect of this area the built up area boundary accords with that in the Local Plan. The City Plan Part 1 considers strategic allocations. Smaller site allocations and/or minor built up area boundary amendments will be considered through Part 2 of the City Plan. Proposed changes can be put forward as part of this work. For this reason it is not therefore felt appropriate to amend the built up area boundary or to consider the identification of the site for housing at this stage.

The City Plan merely reflects the Nature Improvement Area which was designated separately to the development plan. An audit of open space was undertaken in 2006/7 and helps to set a benchmark by which future gains and losses can be assessed. The audit of open space included both public and private open space for the reasons detailed in paragraph 4.165 of the draft City Plan Part 1. The open space sites identified on the policies map accord with the audit. Due to the scope of the City Plan Part I it is not considered the identified open space in this area should be amended at this stage.
Further Details:

Part Two – The Strategy

Our comments here focus primarily on the potential transition of Brighton and Hove to a low carbon City:

1. A profile of Brighton and Hove, context and challenges: para 1.23: in the bullet point on low carbon economy and city: make a reference to the lack of suitable infrastructure that reduces the city carbon foot print – highlight that this is one of the biggest challenges the city faces in terms of infrastructure investment;

2. A strong and prosperous city: Para 2.2 Add: Brighton and Hove will work together with the energy and water industry to create a renewables infrastructure in the city which will make B&H a low carbon model for the UK

3. Strategic Objectives: Add a policy after SO6: B&H CC will use any opportunities to initiate and support major renewables infrastructure work, with associated employment and skills development opportunities, to help B&H become the UK leading low carbon city.

4. A sustainable city: Para 2.3: Add by 2030 B&HCC will have mobilised energy and water providers to invest substantially in renewables infrastructure, made provision for land needed for major solar thermal and photovoltaic installations, major heat recovery and piped heat installations to help B&H become the UK leading low carbon city.

5. Strategic objectives: Add a policy after SO10: as above...

6. Strategy for the future of Brighton and Hove: Para 2.7 State here the ambition of the Council to move B&H to the UK forefront in terms of a city that visually demonstrates its commitments to zero carbon technologies above and below ground. The combination of Rampion off shore wind farm and corresponding renewables investment on land must be a key part of the city plan. This needs a bit of imagination.

7. para 2.15, referring to infrastructure requirements should highlight the immense challenge in adapting the city’s energy supply and be less dependent on fossil fuels. Piped heat as a way of decarbonising the city’s energy dependence should be highlighted.

8. The spatial distribution of development: The 8 areas are well chosen and argued and we support these and we believe that best use must be made of these areas to meet the many needs of the city. It should be made clear that these are also the key nodes for an emerging piped heat system for the city and that they will need to play a key role in a network of renewables installations for the city. The comment made in the Annex that proposals should explore opportunities for district heating / combined heat and power technologies across all DA1-DA8 Development Areas should be elevated to policy. It is essential to highlight this as there will be land use implications for such installations.

9. General comment on Strategy: Generally speaking we recognise that there are references to renewables infrastructure in various parts of the plan, but this in no way reflects the opportunities and the central position such infrastructure should have if the council is serious about going down the path of zero-carbon. We expect the City Energy Study to start identifying heat demands and various ways of satisfying them. This will allow details to emerge. Policy at this stage should clearly set out that the city’s heat and power infrastructure will need to change if we are going to make any substantive inroads into moving towards zero-carbon. In this context we must not ignore the key role that Shoreham power station could play to very substantially reduce the City’s carbon footprint. We would expect some sort of diagram to show how the plan aims to facilitate renewables infrastructure and piped heat for the City.

10. We have also the following additional comments on the strategy referring to other subjects:

   - In the context of policy SO5 we also believe that there should be a reference to strengthening and promoting the cultural, tourism and retail mix of Hove and Portslade centres
   - In para 2.3 on sustainable design a reference to the need to provide housing with adequate space standards is required
   - In the section An attractive City we would like to see a commitment to promote and support public art to enhance the urban environment and celebrate local creativity.
   - In Policy SO16 we would like to see a commitment to restoring the Victorian street tree heritage
   - In the section Healthy and balanced communities: Para 2.5 a commitment for all new private homes to meet adequate dwelling size standards should be added
   - Para 2.12: Whilst recognising the importance of Brighton Town Centre we believe more attention needs to be paid to Hove and Portslade shopping centres and the need for diversifying and strengthening them

Statement of Changes:

Any Other Comment:

Officer Response:
A heat map and analysis of district heating opportunity was developed for the Energy Study. The recommendations from this have been fully integrated into CP8, CP7, and additional text inserted into the Introduction and the Strategy sections of the Plan. Shoreham Port was identified within one of the long list of priority areas for district heating and text has been added to DA8. It is considered that these amendments will address the comments made by Hove Civic Society. The energy study has generated maps showing heat loads in the city and opportunities for renewables. These maps are referred to in CP8 text and are likely to be used within supplementary guidance developed to support CP8. Further policy on renewables will be developed within City Plan 2.

It is considered that there are a number of strategic objectives that would relate to Portslade and Hove regarding promoting retail, cultural and tourism (SO3 and SO13). The specific reference to central brighton in SO5 reflects its sub-regional role.

Strategic Objective 4 (SO4) sets out the overarching objectives around housing mix, sizes, and high standards. Minimum size standards are not covered in Part 1 of the City Plan but this is a matter that can be considered under Part 2 of the City Plan which will deal with more detailed development policies and site allocations. Further background evidence to support application of a minimum standard will be required.

The provision of public art and its role in creating and enhancing local distinctiveness in the public realm is addressed in CP 13 Public Streets and Spaces.

It is not considered appropriate in the overarching Spatial Objective on heritage to include that specific refer to restoring the victorian street tree heritage. CP13 Public Streets and Spaces refers to incorporating street trees and biodiversity wherever possible.

CP4 Retail Provision sets out the hierarchy of shopping centres across the city and the need for them to be maintained and enhanced by encouraging a range of facilities and uses, consistent with the scale and function of the centre.

**Customer No:** 152  
**Customer Name:**

**Organisation:** The Hyde Group  
**Support Status:** Partly Object

**Rep Number:** 26  
**Page/Para:**  
**Policy:**

**Section/Supporting Doc/Annexes**  
Annex 3: Housing Implementation Str

**Further Details:**

Whilst Paragraph 1.3 states that the housing trajectory includes the delivery of both market and affordable housing, the Housing Implementation Strategy does not indicate a target or trajectory of affordable housing delivery either in percentage or actual terms. Such an approach is crucial if the appropriate level of affordable housing is to be provided and actively monitored. The planned under-provision of housing in the Implementation Strategy is inconsistent with the National Planning Policy Framework and could result in the City Plan being rejected on the basis that it is unsound.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your comments. The updated HIS will indicate a target based trajectory for affordable housing delivery. However, it is not possible to set out a detailed trajectory with any accuracy due to longer term uncertainties regarding the funding of affordable housing provision.
Further Details:

It is not clear on a per annum basis what the percentage of AH likely to come forward will be. The total housing figure in the City Plan does not indicate the % it anticipates will be AH and this is not reflected in the HIS either. The housing target should be determined by the housing requirement and additional sites considered. It is not discussed whether this option has been fully considered by the Council. HIS gives no indication to the expected rate of affordable housing delivery alone - considered not to meet NPPF, para. 47. No discussion or mention of the NPPF requirement for 5% buffer for the 5 year supply. The Strategy outlines that the City Plan will fall below in delivery of its target however it does not consider the implications this may have. Should a shortfall be recognised now then measures should be put into place to rectify this rather than waiting for the second 10 year period of the plan.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. The updated HIS will indicate the percentage of affordable housing that that the Plan anticipates to come forward over the plan period. However, because this is very much dependent upon funding mechanisms it is not possible to indicate with any accuracy what this might be beyond the first few years of the plan. In terms of the overall housing target set out in the Plan, this has been based on the capacity of the city to accommodate further housing development alongside other citywide development requirements and this is explained under Policy CP1. A range of housing target options were considered at the Policy Options stage of Plan Preparation (Autumn 2010).

Further Details:

The identification of eight development areas which can accommodate a substantial amount of development due to capacity and regeneration reasons is a logical approach for the plan in principle. However, such an approach should not prejudice proposals for significant amounts of development in other areas where the conditions are considered to be appropriate.

Statement of Changes:

Any Other Comment:

Officer Response:

Whilst the Spatial Strategy indicates the opportunities for significant housing development to come forward within 7 of the 8 development areas, it also acknowledges that opportunities for housing also exist in the rest of the city outside the Development Areas and this is reflected in CP1 Housing Delivery where c. 4,000 new homes will be distributed across the rest of the city as a whole and will largely take place through conversions of existing buildings and the redevelopment of previously developed land. In order to help provide for the need for additional housing, high densities are promoted in the city see CP13.
Further Details:

We support the policy that there should be
- a reduction in car use of 10–20%, less air borne pollution and less traffic noise and far lower carbon emissions.
This objective would be more meaningful and likely be more incentive for achieving reductions to air and noise if goals are stated here in terms of meeting regulatory requirements and/or % reductions, as for car use.

Also, there is no mention here of efficient and appropriate lighting which can and does have an impact on carbon footprint as well as the public realm and individual dwellings.

Statement of Changes:

On air pollution there should be an aim to meet legal limits by 2030. We believe this is critical for the health of residents both in our neighbourhood and across the city, and given that this is an EU requirement and potentially could lead to any fines imposed for breaches being bourne by the City.

On traffic noise we hope the draft plan will be amended to acknowledge that planning has a role in preventing, minimising and mitigating traffic noise impacts as set out in the Noise Action Plan for the Brighton and Hove Agglomeration

On lighting we would like to see objectives on reducing the impact of lighting both on energy use and on neighbouring buildings.

Any Other Comment:

Officer Response:

Welcome partial support. Targets relating to air quality are set out in the Local Transport Plan.

City Plan has been amended to address the issue of traffic noise and noise quality.

CP8 Sustainable Buildings requires development to maximise the use of natural light. The Council is committed to reducing carbon emissions and new energy saving technology is being introduced to street lighting wherever possible and when funding permits. It is hoped that this will become the standard for the future. Details of any lighting scheme, including a light pollution assessment is required for all applications that involve any external lighting scheme.
Further Details:

Strategy - One Planet (p23): The agreed wording on the OPL-BR relationship is the following if this is relevant to include within the City Plan:

'The One Planet approach is the practical framework chosen to plan and deliver sustainable development in Brighton & Hove, and also represents the agreed approach to sustainable socio-economic development within the main urban part (the City Plan built-up area) of the proposed Biosphere Reserve. UNESCO Biosphere status seeks to bring people and nature closer together across a wider area - including the surrounding South Downs National Park, neighbouring local authorities, and part of the sea - focussed on nature conservation and environmental knowledge as well as our development.'

Thus the Biosphere management strategy would be best considered as one of the ‘Sub-regional local strategy statements’ according to your plan relationships diagram of p6. (see representation 6)

I’d be happy to discuss any of the above with you further, and please let me know what changes you decide to incorporate.

Statement of Changes:

Any Other Comment:

Officer Response:

Comments noted and welcomed. The relationship between One Planet Living and the Biosphere Reserve status has been clarified in paragraph 2.8
Further Details:
The South Downs National Park Authority (SDNPA) supports the overall aims of the draft City Plan.

We support the aims and objectives of the Brighton Biosphere Reserve which align with the Purposes and Duty of the South Downs National Park (SDNP) and the objectives of the Nature Improvement Area - ‘South Downs Way Ahead’.

The SDNPA appreciate that the split in responsibility for planning within the administrative area of Brighton and Hove Unitary Authority can cause some confusion. However, it would be useful to make it clearer throughout the document how the division of responsibility for planning matters within the Unitary Authority operates and that all planning policy for the SDNP will be dealt with by the SDNP Local Plan. Notwithstanding, it is understood that Brighton and Hove City Council are substantial landowners of land which now falls within the South Downs National Park, and the National Park Authority would therefore seek to continue the close working relationship with the City Council when establishing a planning policy framework for this area (in the South Downs National Park Authority Local Plan).

The South Downs National Park Authority would request policy SA5 be removed from the City Plan. With regard to the important discursive text supporting the policy, especially describing the role and aspirations of the City Council as landowners, it is suggested that this text be inserted elsewhere in the document to retain this important commentary.

There is a requirement for particular care over development proposed on the urban fringe of the city. As these proposals could have a significant impact on the surrounding landscape of the South Downs National Park careful consideration must be given to the impact of any proposals on the setting of the South Downs National Park and its two Purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA supports the overall aim of the spatial distribution of development to minimise transport impacts and the continued protection of the South Downs National Park.

Statement of Changes:

Any Other Comment:

Officer Response:

Welcome support on the overall aim of the draft City Plan, aims and objectives of Brighton Biosphere Reserve and spatial distribution of developments.

It is considered that with amendments to address issue of clarity of responsibility , SA5 South Downs is an appropriate strategic and spatial policy to contain in the City Plan part 1 which sets out the council's aspirations and priorities for land within its administrative area within the National Park. Amendments to SA5 clarify that development proposals must not have any adverse impact on the setting of the National Park and its purpose.
Further Details:

1. The Draft City Plan is an impressive and informed document which contains much that should contribute to Brighton and Hove's future. It rightly focuses on the development of the City as a prosperous, sustainable and attractive place with healthy and balanced communities.

2. Difficult times: given the national economic situation and current government policies, it is clear that plans have to be realistic and not overly ambitious. Good things: the Plan identifies important areas and policies which influence and offer benefits for all, including housing development, transport, public spaces, economic development, business and employment, urban design and healthy communities.

4. "A vibrant city" This is a phrase often used to describe Brighton & Hove today. Certainly it is a thriving and busy place, attracting many visitors, with holiday, shopping and leisure activities. It has much to offer, including two successful universities, and a lively night time economy. Equally important is the emerging creative industry sector which should lead to valuable economic development. Yet side-by-side with these positive elements, there exist in Brighton and Hove significant areas of social and economic deprivation where many of the poorest and most isolated older and disabled people live. Not all older people are poor or isolated but many are (ask anyone working in the community and voluntary sector), and the scale of this older population should be borne in mind: the Council's own Community Safety, Crime Reduction and Drugs Strategy 2011-14 suggested recently that "there are 74,500 people aged 50 or over living in Brighton and Hove, 29% of the population", and that figure is projected to rise to about 85,000 by 2020. I note also that in the City Plan you record that there are "relatively high numbers of residents aged 85 ears or more", and that "a number of the city's areas have been identified as facing high levels of disadvantage. 12 per cent of the city's local areas are in the ten per cent most deprived in England, ... (and) there are marked differences in physical and mental health and life expectancy between the most deprived and most affluent neighbourhoods in the city. Reducing the gap between deprived neighbourhoods and the rest of the city is a priority." (City Plan, pp12-13).

5. An ageing society: ours is an ageing society. This has been increasingly recognised in 2 independent commissions, 3 public consultations and 3 White Papers over the past 13 years into the funding of Health and Social Care - most recently the Dilnot Commission report of 2010, and the proposals in the Health and Social Care White Paper announced on 11 July in Parliament. These reflect national government concerns about the cost of caring for the ageing population, but for local authorities there is of course the broad responsibility for meeting a wide range of day-to-day local needs of the older residents.

Statement of Changes:

A conclusion: The changes that lie ahead suggest that almost every aspect of planning for and managing the needs of the community should take account of the needs of an increasing older population: planning (making the city age-friendly), transport (helping reduce the corrosive effects of social isolation), environment (to help older people take part as broadly as possible in civic life), health and social care (absolutely crucial), housing (much excellent work has been achieved already in the Council's work on the Older People’s Housing Strategy 2008-13), and community safety, anti-social behaviour, and culture and leisure (to create and sustain a safe and accessible community in which older people, including minority and excluded groups,

Any Other Comment:

Officer Response:

Welcome partial support and detailed comments. The need to address an ageing population has now been included as a separate bullet point in the list of challenges set out in section 1.23. Planning for the needs of older people have been identified in policies CP18 Healthy City, CP13 Public Realm and CP19 Housing Mix.
Further Details:
SO14 (p20 box): Biosphere could be equally used/add to LBAP here; furthermore earlier this year I produced a revised high level set of Downland Initiative objectives framed around the concept of 'ecosystem services' provision (nb. unclear whether these have been adopted as amended Council policy yet).

I'd be happy to discuss any of the above with you further, and please let me know what changes you decide to incorporate.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments noted and welcomed. Spatial Objective 14 will be amended to reflect the relationship between the Local Biodiversity Action Plan and the Biosphere Reserve Management Strategy objectives.

Further Details:
Vision & Objectives - Sustainable City (p18): Suggest amending to 'Achieve the objectives of UN BR status..' 

I’d be happy to discuss any of the above with you further, and please let me know what changes you decide to incorporate.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments noted and welcomed the vision and objective has been amended as suggested.
Further Details:

Annex 2, page 55
This schedule refers to a multipractice GP surgery being delivered in the Kemp Town area, together with the need for social and youth care facilities. However, the Trust for Futurehealth believes that the policy should be specific to health requirements in the area and be more explicit that the Black Rock site could be an appropriate location to deliver them. It believes that a separate infrastructure provision entry is needed for this.

The Trust believes that the Black Rock site should be referred to as a potentially suitable location for such provision. Without such a specific reference, there is a risk that no suitable site will be identified.

The delivery target for the project is referred to as being 2020. However, the Trust believes that 2015 / 2016 is a more appropriate target and is achievable.

In relation to the list of project partners, the Trust believes that it should be identified.

Statement of Changes:

A new project should be included in the schedule, as follows:-

Provision Essential / Important / Desirable: Important

Infrastructure Needs / Requirement: Health and leisure facilities, including GP provision

Area and / or scale: Black Rock area

Responsibilities for delivery / partners & funding sources: Local health providers

Short, medium or long term phasing and costs: By 2015 / 2016, costs to be determined

Any Other Comment:

Officer Response:

The partial support is noted and welcomed. The Infrastructure Delivery Plan (IDP) Annex document identifies agreed known sites or other broad locations for health facilities. The IDP will be updated annually with further detail and Part 2 of the City Plan will identify potential sites.
Further Details:

While we support the strategic objective to make full use of previously developed land, we believe regard should be given to physical restraints in neighbourhoods, alongside the geographical physical restraints, we believe infill development in already dense neighbourhoods should avoid restricting light into existing buildings and gardens thereby reducing potential solar gain in buildings and gardens. For example, there are instances in our neighbourhood where light lost due to building extensions means residents are no longer able to grow vegetables as well as losing daylight. Current planning applications in the area for higher than existing buildings threaten to extend these restrictions. We believe allowing inappropriate development in neighbourhoods would contradict the objectives of SO8 on biodiversity; SO10 on supporting Biosphere objectives and SO22 on delivering healthy urban planning.

Statement of Changes:

SO9 - Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs, and in neighbourhoods existing properties and open spaces

Any Other Comment:

Officer Response:

Welcome partial support and comments noted. Planning Applications for infill development are carefully considered with respect to amenity of neighbouring properties and the council will aim to ensure that high quality is maintained through the rigorous enforcement of planning permissions.

Whilst policies CP12 and CP14 encourage higher density development they do not mean that such development must be taller than existing buildings. CP12 states that 'density will be raised through predominantly low-to-medium rise development' and CP14 states that proposals must demonstrate that they would 'respect, reinforce or repair the character of the neighbourhood'. The supporting text goes on to say that 'successful higher density developments will depend upon a ‘design-led’ approach that respects its local context and minimises impacts on its surroundings'.
Further Details:

The Biosphere
There are a number of references to the UN Biosphere Reserve in the Plan to cover the City and parts of the South Downs National Park. Adur and Worthing Councils are currently considering the issues associated with a Biosphere designation and as such, it may be useful to have further discussions with the relevant Officers in the City Council working on this. There will certainly be a number of cross boundary issues and impacts to discuss.

(Officer note: these representations allotted to Part 2 and also CP10. Please note however that references in draft City Plan to Biosphere currently occur on page 18 in a bullet and SO10, para 2.13 and within the following policies and/or their supporting text : DA2, DA3, DA6, DA7, SA1, SA4, SA5, SA6, CP10, CP13, CP16 and CP18)

Statement of Changes:

Any Other Comment:

Officer Response:
Partial support noted.

Further Details:

Introduction, page 6  The agreed wording on the OPL-BR relationship is the following if this is relevant to include within the City Plan (Strategy Section? See representation 5): 'The One Planet approach is the practical framework chosen to plan and deliver sustainable development in Brighton & Hove, and also represents the agreed approach to sustainable socio-economic development within the main urban part (the City Plan built-up area) of the proposed Biosphere Reserve. UNESCO Biosphere status seeks to bring people and nature closer together across a wider area - including the surrounding South Downs National Park, neighbouring local authorities, and part of the sea - focussed on nature conservation and environmental knowledge as well as our development.'

Thus the Biosphere management strategy would be best considered as one of the ‘Sub-regional local strategy statements’ according to your plan relationships diagram of p6.

I’d be happy to discuss any of the above with you further, and please let me know what changes you decide to incorporate.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial support noted and comments welcomed. Reference to Urban Biosphere has been added to the Links to Neighbouring Areas section as an example of cross border working and the relationship between One Planet Living and the Biosphere Reserve status has been clarified in paragraph 2.8.
Further Details:
The infrastructure delivery plan notes that mitigation may be required at several junctions on the A27 dependent upon the impacts. Clarification is requested as to how the work is progressing to understand what mitigation is required. The HA will need to be involved at the earliest opportunity once mitigation plans are formalised.

Statement of Changes:

Any Other Comment:

Officer Response:
The partial support is noted and welcomed. The Infrastructure Delivery Plan Annex document will be annually updated and will include further details for highways infrastructure needs due to development impacts at A27 junctions.

Further Details:
4. Systematically review the council’s landholding - new policy
A policy should be included in the plan requiring a systematic review of the council’s whole property portfolio with a view to releasing small sites for housing development. Such a review would explore the development potential of each property by evaluating existing uses, and identifying the scope to reorganise and relocate uses, thereby creating small sites suitable for development.

Not only would this approach identify additional land for housing (or business uses), it would also generate much needed capital receipts for the council. If the council does not have the capacity to undertake this work, there are now companies that specialise in realising the development potential of a council’s property portfolio.

Statement of Changes:

Any Other Comment:

Officer Response:
The council does systematically review its property portfolio and it is not considered appropriate to include a policy in the City Plan to this effect.

Brighton & Hove City Council’s Asset Management Plan & Corporate Property Strategy (AMP) 2008 to 2011 provides a strategic overview of the City Council’s property and land assets and the systems, processes and policies already in place or being progressed to manage and maintain them. The strategy sets out how the council will use its property and land assets to support the Council’s objectives.

The council is looking at the potential to increase housing supply from its own assets through the Housing Revenue Account Estates Masterplan. The City Plan housing target includes a figure of 500 additional units over the plan period from this source.
Further Details:
Welcome the recognition of the bid to become a Biosphere Reserve but it there are also references to Biodiversity Action Plans and it is confusing which is used when and why

Statement of Changes:
Can the differences between the Biodiversity Action Plans and the Biosphere Reserve bid be outlined and made clear why each process is referred to at different points

Any Other Comment:

Officer Response:
Comments noted and welcomed. The emerging Local Biodiversity Action Plan is part of the Biosphere project and will be included in the submission to UNESCO. However the role and relationship of these documetns will be clarified in the City Plan.

Further Details:
Adaptation to climate change is not mentioned in this section, while only flooding and coastal erosion is mentioned under the Attractive City section. There is nothing about the urban heat island effect, water scarcity, biodiversity migration, or other impacts of climate change.

Statement of Changes:
While some parts of the plan might contribute towards adaptation, and it is mentioned specifically under CP8, adaptation is sufficiently important enough to be included in the strategy section, with some explanation of the types of adaptation measures that can be deployed.

Any Other Comment:

Officer Response:
Partial support and comments noted.

The section Sustainable City does includes reference to creating a city that is adapting well to climate change at paragraph 2.3 and in Strategic Objective 8 - which refers to responding positively to the challenges posed by local impacts to climate change. City- wide policies CP8 Sustainable Buildings, CP10 Biodiversity and CP11 Flood Risk to refer to impacts of climate change. It is not considered appropriate to include an explanation of the types of potential adaptation measures in this section of the City Plan.
Further Details:
The Partnership welcomes the Council’s objective in Paragraph 2.11 to improve the employment rate in the city. However, the Partnership feels that retaining land for employment purposes which is of a poor quality or which is in unsuitable locations, whilst meeting the objective of increasing employment floorspace, may do little to actually improve the number and quality of jobs in the city. A flexible approach to releasing poor quality employment sites for affordable housing use and re-providing floor space in more suitable and sustainable locations would allow the Council to make ‘quick wins’ in delivering new supply of affordable homes, whilst creating more sustainable communities through the reduction of anti social behaviour and vandalism in unused employment spaces.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial support and comments noted. The approach to safeguarding employment land in the city is set out in CP3 and has been amended to reflect the findings of the Employment Land Study Review 2012. It is considered that CP3 provides a sufficiently flexible approach to release of secondary employment sites.

Further Details:
The South Downs Society, the national park society for the South Downs, has well in excess of 2,000 members. Core business is campaigning and fundraising for the conservation and enhancement of the landscape of the South Downs National Park and its quiet enjoyment, recognising that these qualities can only be realised if the setting of the park - the land nearby -- is also respected and protected. It is essential the City Plan affords appropriate priority to the conservation and enhancement of the park.

These representations follow those submitted by the Society on the housing Delivery Option Paper and the Park & Ride Options Paper and on the Core Strategy which was withdrawn.

For the City Plan to meet its vision and objectives through to 2030, the Society recognises that there are many challenges and key issues that will need to be addressed including a growing population. The Society also recognises the national trend towards increased car use. Accompanied by the anticipated future development in the city this will lead to worsening congestion and air quality by 2030 without positive measures to mitigate this. This is a particular concern to the Society given the traffic and traffic congestion via the gateways in and out of the City and through the National Park. We recognise that Transport is the main cause of the poor air quality in this area.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial support and comments noted. Addressing the cause of air quality is a priority for the council. Air quality issues are integrated into the city’s Local Transport Plan and a number of initiatives are being proposed to tackle the cause of air quality in the city and this is reflected in CP9 Sustainable Transport.

The council has joined with Sussex partners to initiate a low emission strategy pilot to address the problem county-wide.
Further Details:
Vision & Objectives - Attractive City (p19): 'The city's open spaces will be well maintained' I’d suggest changing the last word to 'managed' instead, which would fit better with City Park’s growing focus on less intensive more sustainable management regimes.

I’d be happy to discuss any of the above with you further, and please let me know what changes you decide to incorporate.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments noted and welcomed. The bullet point will be amended as suggested.

Further Details:
Annex 1, page 6 (Policy DA2)
The Trust for Futurehealth believes that health providers should be identified as a partner in relation to Policy DA2.

Statement of Changes:
Health providers should be identified in the list of delivery partners.

Any Other Comment:

Officer Response:
Your comments are noted and health providers have been added as one of the delivery partners.
5. Welcome redevelopments within the built up area, outside conservation areas - new policy
The draft plan is too much focused on allocating sites for development, rather than creating a framework that encourages the development industry itself to identify sites. From the draft plan, it is difficult to discern where the council would welcome redevelopments, other than on the sites that are specifically identified in policy CP1. It ought to be acknowledged within the plan that, for the built-stock of the city to remain in good condition over the decades, it is essential for a percentage to be redeveloped every year. Whilst the heritage assets of the city should be conserved, much of the stock wasn’t designed to last forever and will have to be renewed.

Therefore, the plan should carry a clear message that redevelopments would be welcome outside the conservations areas, subject to certain criteria such as: respecting the existing character of an area, increasing the number of housing units on a site, not reducing the number of jobs, and not impacting adversely on the essential amenities of surrounding homes (e.g. day-lighting and sun-lighting). Broadly speaking, having regard to the NPPF, the council could encourage sustainable redevelopments within the built up area, outside conservation areas.

Statement of Changes:

Any Other Comment:

Officer Response:

Whilst the Spatial Strategy indicates the opportunities for significant housing development to come forward within 8 development areas, the City Plan also acknowledges that opportunities for housing also exist in the rest of the city outside the Development Areas and this is reflected in CP1 Housing Delivery.

The eight Development Areas account for just over half of the planned amount of new housing delivery for the city. In other parts of the city, there are also a range of opportunities for new residential development (through, for example conversions, redevelopment and changes of use) and such development will help to promote and secure the establishment of sustainable communities.

The wording to The Spatial Strategy at paragraph 2.19 and CP1 Housing Deliver parts a) to e) have been amended to clarify that the City Plan encourages housing to come forward across the City, largely through conversions of existing buildings and the redevelopment of previously developed land, in accessible locations, making the most efficient use of sites and ensuring the creation and/or maintenance of mixed and sustainable communities. This approach is supported by CP12, CP14 and SA6. where c. 4,000 new homes will be distributed across the rest of the city as a whole and will In order to help provide for the need for additional housing, high densities are promoted in the city see CP13.
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Further Details:

Provision of AH should be included within the IDP. See comments on CP7. AH is considered an important element of community infrastructure. Additional contributions can add to the financial burden which is already present in developing AH units; rendering schemes unviable and/or reducing the amount which can be provided. By introducing relief to AH will help safeguard delivery of AH.

Statement of Changes:

Any Other Comment:

Officer Response:

The partial support is noted and welcomed. Provision of Affordable Housing is a strategic objective and is identified in other policies in the Plan. The purpose of the IDP is to set out the strategic physical and social facilities to enable and support all development including provision of affordable housing. For this reason affordable housing is not included in the IDP.

There is clear guidance under the Community Infrastructure (CIL) Regulations that Planning Obligations may only be sought where they are necessary and directly related to development. Development will be expected contribute and Planning Obligations will be sought on all appropriate schemes taking viability issues into account. To ensure deliverability of each scheme then viability testing for specific developments may be necessary. In the longer term any move to a CIL will have regard to viability and if introduced then Affordable Housing will be exempt from the Levy and contributions will continue to be sought through Planning Obligations.
Further Details:

There are some very central areas that have been marked for further substantial residential development. The centre of our city has a lot of residential space in its centre already compared to other commercial cities in the South East (you do not perceive as much housing around central sites in Guildford, Crawley, Maidstone etc).

Areas such as the New England Quarter, London Road Area and Hove Station Area are extremely well served by rail and road networks and could grow to be a commercial and employment powerhouses for our city, linking the mini-commercial centres of Preston Road, New England/ Trafalgar St. Whilst some office and other business space (well, quite a lot - 20,000 m2) has been earmarked, I do not see the need for this area to have further residential space.

The reason for my concern is that I do not wish to see Brighton become even more of a dormitory city for London/ Crawley/ Haywards Heath. An improved business biosphere will have benefits for the businesses already in existence (more clients/ chance for inward investment) and also for those living in Brighton (fewer people having to endure the daily commute - having more time (and money) to spend in Brighton, and an increase in the average salaries).

Statement of Changes:

Officer Response:
Partial support and comments noted.

The approach set out in the Spatial Strategy is to accommodate growth (housing, employment and other needs) in areas accessible by sustainable transport; in areas in need of regeneration and areas containing redevelopment opportunities. The need to address our particular, local housing requirements over the plan period means that the New England Quarter and London Road Area (DA4) does need to accommodate both employment and residential needs.

Further Details:

We support policies DA1 to DA8 and SA1 to SA4 with the comments set out in the following paragraphs. We welcome the references to district heating and combined heat and power technology in several of these policies. We believe that the reference in the Infrastructure Annex (p42) (Proposals should explore opportunities for district heating/combined heat and power technologies linked to new development across all DA1-DA8 Development Areas) should be elevated to policy for all development areas.

Statement of Changes:

Officer Response:
Comments noted. In light of the recommendations of the Brighton & Hove Energy Study 2012 there have been amendments made to Development Area and Special Area policies to reflect identified priority areas for District Heating Networks.
Further Details:
Specific reference should be made in para. 2.2 to affordable housing given the shortfall.
Suggest:
'New housing will be provided, market but particularly affordable housing of different types and tenures and in suitable locations to match a range of requirements and lifetime needs'.
Similarly, specific reference to affordable housing should be included in the bullet point which refers to new housing.
Welcome SO4.
Para. 2.5 support first bullet point re. Ensure a mix of accessible and affordable new housing types and tenures in suitable locations.
Table 3 - housing provision is significantly less than forecast requirements - see later comments.
DAs - DA2 sets out to deliver a significant amount of residential development including affordable housing - but this is not reflected in DA1 or DA3 - 8. Given the need for affordable housing, each policy should set out that provision of affordable housing will be a priority.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial support noted and comments welcomed.

Paragraph 2.2 has been amended to refer to affordable housing.

Support for SO4 welcomed.

Within Development Areas, affordable housing will be required to be provided in accordance with CP20 Affordable Housing.
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**Further Details:**

Annex 2: Infrastructure delivery plan: We welcome the reference to District Heating on page 42. We believe this should be coloured ‘essential’. We believe the statement that proposals should explore opportunities for district heating / combined heat and power technologies across all DA1-DA8 Development Areas should be elevated to policy as commented above.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The partial support is noted and welcomed. The District Heating / Combined Heat and Power (CHP) is identified in the category as ‘Important’ as the provision is necessary but alternative capacity may be able to incorporate incremental impacts of new development. The Infrastructure Delivery Plan (IDP) includes reference for proposals to be explored across DA1-DA8 Development Areas. The IDP has been amended to further reference ‘energy savings’ under District Heating / CHP technologies and reference to DA8 Shoreham to investigate future possibilities in association with the existing Power Station in the future Joint Area Action Plan (JAAP).

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**Further Details:**

SO10 (p18 box): change from ‘To support the implementation of the objectives of the Biosphere Reserve’ to ‘To support the implementation of the Biosphere Reserve management strategy’ - this is the high-level overarching document now being drafted to consult on in Jan ’13 and accompany our UNESCO application Sep ’13 and thereafter guide our implementation actions.

The example that follows the initial part of the sentence (above) is fine but rather selective - perhaps changing ‘including’ to ‘such as’ would make this evident.

I’d be happy to discuss any of the above with you further, and please let me know what changes you decide to incorporate.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Comments noted and welcomed. Spatial Objective 10 will be amended as suggested.
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**Further Details:**
The second bullet point under a Sustainable City does not make sense.

**Statement of Changes:**
Rather than saying 'having reduced the ecological footprint', it should say 'Reducing the ecological footprint'?

**Any Other Comment:**

**Officer Response:**
Comments noted and welcomed the bullet point has been amended as requested.
The University of Sussex is a highly successful and respected academic institution. In the top 20 in the UK and top 100 in world rankings.

The reference in paragraph 1.18 to the contribution of the universities is welcomed and supported by the University. However it still considers that this contribution is underplayed in the document and this should be corrected through the introduction of additional text in the City Plan.

For example the council should note that the University employs over 2,000 staff and its annual spending for the year ended 31st July 2011 was over £165 million. Further the Sussex Innovation Centre based at the campus provides a thriving business environment for over 70 high-growth companies within IT, biotech, media and engineering sectors. At a time of limited growth in the local economy, the continued expansion of the University should be particularly welcomed by the Council and given more emphasis in the wider strategy.

The latest independent studies by the University of Strathclyde show that the Universities of Sussex and the University of Brighton inject more than £1bn into the UK economy and most (£976m) is spend in Brighton and Hove and the South East. The research carried out in October 2010 (for the academic year ending 2009) details for the first time how they have grown and confirms the importance of higher education to the local economy:

- The two universities supported 12,000 jobs, the majority of them in the city.
- Both universities undertook activities and businesses for public- and private-sector clients and 32 per cent of revenue during the year came from the private sector and overseas income.
- The combined export earnings alone amounted to £32m.
- The universities provided 4,231 full time equivalent (FTE) jobs, making them among the biggest employers in Brighton & Hove.
- Students spent money on accommodation, food, clothing, entertainment, travel and consumer goods and services, and generated a total £151m output.

Welcome the recognition under Challenges at paragraph 1.23 that the two universities are growing.

The council should be aware that owing to its national and international reputation the University's student population will grow to 15,000 by 2015/16 academic year and would reach 20,000 well before 2030. The University will be seeking to accommodate much of this growth on the Falmer Campus and the intention is to engage with the city council on an updated masterplan - a part of which will be available later this year.

Statement of Changes:

Any Other Comment:

The University is keen to continue to work with the City Council during the future preparation of the City Plan - not only to ensure its aspirations are reflected in the document, but also, where possible, to support the ultimate delivery of the wider strategy of growth and enhancement of the city with its wider benefits for the local population.

Officer Response:

Partial support noted and comments welcomed. Paragraph 1.18 has been amended to reflect the substantial contribution the Universities make to the city.

Welcome the University of Sussex's intention to produce and engage with the Council on an updated masterplan.
Further Details:
The inclusion of an Infrastructure Delivery Plan (IDP) is seen as a positive move forward in achieving successful developments in the city. However, affordable housing is a key part of community infrastructure and needs to be included in the IDP and reviewed annually with the key Registered Providers (including The Hyde Group).

Statement of Changes:

Any Other Comment:

Officer Response:
The partial support is noted and welcomed. Provision of Affordable Housing is a strategic objective and is identified in other policies in the Plan. The purpose of the IDP is to set out the strategic physical and social facilities to enable and support all development including provision of affordable housing. For this reason affordable housing is not included in the IDP.
Further Details:

Whilst the University is broadly supportive of the overall vision and objectives for Brighton & Hove, it is extremely disappointed that there is no identification of the contribution it can make to 'A Strong and Prosperous City'.

It considers the potential contribution of both universities to the growth of the City's economy should be recognised in this sub-section and the accompanying Spatial Objectives. This would be consistent with the recognition of the important contribution the universities make to the local economy, confirmed elsewhere in the City Plan but also given their acknowledged expansion plans during the life of the City Plan that will make a significant contribution to strengthening the local economy. It would also be consistent with SO2.

The University generally welcomes the other identified elements of the strategy concerning sustainable development, the reduction in carbon emissions, design and the protection and enhancement of the built and natural environment and considers these initiatives are broadly in line with national planning policy.

Support reference to higher and further education under Healthy and Balanced Communities and SO20 and SO21. It considers that other elements of the council's strategy and vision can be supported by the University through its growth and development.

Statement of Changes:

A further bullet point should be added to those listed at paragraph 2.2 that reads:

the growth of the city's two universities will be supported given their important contribution to the local economy in terms of providing a local skilled workforce, local employment, spending in the City and the generation of new business opportunities.'

An accompanying Strategic Objective should be introduced that states:

Support the continued expansion of the City's two universities through renewal and further development of their campuses and appropriate development on land near to the campuses and other appropriate locations within the city.

Any Other Comment:

Officer Response:

Welcome the broad support for the vision and objectives SO20 and SO21. An additional bullet point has been added at paragraph 2.2 which supports the appropriate growth of the two universities given their contribution to the local economy. It is not considered a further Spatial Objective is required.
Further Details:

Brownfield Land
The CSP supports the emphasis on developing brownfield sites first but would like to see an emphasis on getting the maximum out of these sites to minimise pressure on greenfield areas and to cope with the need in the city for both housing and community facilities. There are also opportunities for some brownfield sites to have temporary local community developments on them until such time as their permanent redevelopment can be brought forward. This can help prevent an area being blighted by vandalism and neglect.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial Support and comments noted. The City Plan seeks the most efficient and effective use of brownfield sites for development through the overarching spatial strategy and through CP8 Sustainable Buildings at part d) and also for housing through policies through CP1 housing delivery and CP14 housing densities. The temporary use of vacant commercial buildings for creative industries, arts and cultural sector is supported in CP5 Culture and Tourism. It is considered that the use of vacant sites for temporary local community developments would be best dealt with on a case by case basis through the development control process.
We are pleased to see the range of references to culture and heritage and the acknowledgement of the importance of the Royal Pavilion. As the organisations working in the city’s grade 1 Royal Pavilion Estate and as the largest and most significant providers of cultural activity in the City for residents and tourists we would like to ensure that the future development plans for the city take full account of the unique assets on the Royal Pavilion Estate, not just the Royal Pavilion, and the ambitions of the organisations. Both organisations are Arts Council England partners and therefore have national recognition for our work and are national cultural leaders in our respective sectors. What makes this city stand out from others is its international profile for Culture which stems from the assets that we steward for the city and from our cultural and heritage offer.

Page 10 Profile of Brighton and Hove
Paragraph 1.13 sounds apologetic and some of the charm and its inherent attraction to residents, visitors and businesses, is its compactness. It would be better to start with

Paragraph 1.16 which describes Brighton and what differentiates it from other cities. Within paragraph 1.16: Whist we acknowledge that the Royal Pavilion is the city’s architectural jewel, its full context i.e. the Royal Pavilion Estate should be acknowledged as conceived by the Prince Regent and John Nash which therefore includes the gardens and William Porden’s Dome (the Stables) and Corn Exchange (the Riding House) as well as Brighton Museum and Art Gallery built within the Stables 1873.

The Royal Pavilion Estate has set the tone for the city as a city of culture. Brighton is the only city to be defined by a building i.e. 'The Pavilion'. Created over 200 years ago, the now world famous Royal Pavilion was innovative and highly controversial, pushing the boundaries of art, culture and society. Brighton offered the freedom for its creation. Today the Pavilion's enduring legacy sets the tone for the city's cultural and creative activity challenging, innovate and diverse.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Partial support welcomed, paragraph 1.16 has been amended to reference the Royal Pavilion Estate. Comments noted regarding the ordering of paragraphs within the ‘Profile of the Brighton & Hove’ section. However it is considered that this is an appropriate order for the purpose of the City Plan.
**Further Details:**

This response is based on the feedback received from the CSP’s Sustainability Partnership Workshop 14 June 2012 combined with wider input from members. Overall, the CSP supports much of what is in the plan and the direction it is headed. However, there is a feeling across a number of issues that the plan lacks ambition and sometimes definition in how it is going to help meet the ambitions of the Sustainable Community Strategy and One Planet Living (OPL). In terms of the Plan itself, it could be shorter and sharper as there is a lot of duplication between citywide policies and development and special area policies. This is true across a number of policy areas. Citywide policies should define the framework across the whole city including in the development areas and for strategic allocations. Policies for the development areas and strategic allocations should not repeat citywide policy but instead should focus on outlining how and why a particular policy might be applied more or less vigorously in a particular area, or defining what the implementation of that policy would mean on the ground to aid clarity.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Welcome the overall support from the City Sustainability Workshop for the Plan.

Amendments have been made to the Plan to make it clearer how the City Plan policies and proposals support the delivery of the One Planet city approach. It is considered that the City Plan has addressed how it will help deliver the ambitions of the Sustainable Community Strategy. In particular CP8 Sustainable Buildings

Comments are noted regarding the length and of the City Plan and concerns with duplication and ordering of the Plan however it considered the structure of the City Plan is appropriate.
I approve of the City Plan's emphasis on sustainability and reduction of CO2 emissions. However I have a few points:

1. Air Quality: I'm sure you know poor air quality is a big killer. When I went to the exhibition on the Lewes Road development I was told by a Council Officer that meeting EU directives on air quality was not part of the Lewes Road plan. We should be meeting EU directives on this. I'd like to see the Council get VOSA and the police involved in getting vehicles that emit too many particulates taken off the road. Brighton Buses do now have some new vehicles but as any cyclist can tell you the older ones chuck out a lot of pollutants. I think the Council should remember that the bus company is virtually a capitalist monopoly in this city and although we do want people to get out of their cars pressure should be maintained on Mr. French to keep his fleet's engines and exhausts up to the mark.

2. Waste and Air Quality: We are locked into a terrible deal with Veolia: our waste is now trucked out of the city to Newhaven to be burnt, turned into dioxins and released into the atmosphere. This seems to me a dreadful thing and the Council should do all it can to increase recycling. We are at present exporting our emissions both on the road and by incinerating our rubbish in another town.

Statement of Changes:

Officer Response:

Addressing the cause of poor air quality is a priority for the council. The government's Local Sustainable Transport Fund has given the council £4 million to spend in the Lewes Road corridor. Together with external partnership and council funds, plus support from the local community, the Lewes Road Corridor project will be worth approximately £6 million over four years. The combined effect of the proposed improvements is likely to be a significant reduction in carbon emissions from traffic and a reduction in local air pollution.

It is recognised that the increase in ambient NO2 in Brighton & Hove is likely to be due to factors such as an ageing vehicle fleet on the road; a higher proportion of diesel vehicles that show no real performance improvement in emissions of NO and NO2 and a higher proportion of older petrol vehicles with catalytic converters that perform less well with time as well as other factors. The mechanisms available to address these issues are set out in the BHCC Air Quality Action Plan 2011.

The contract with Veolia has enabled a network of modern waste management facilities to be constructed across Brighton & Hove and East Sussex, and consequently the amount of household waste that is landfilled is now close to zero. Planning for waste management facilities is not dealt with by the City Plan, it is instead covered by the Waste & Minerals Plan produced jointly by the City Council, East Sussex County Council and the South Downs National Park Authority. This Plan includes ambitious, yet achievable targets for the recycling of household waste to increase from 35% in 2010/11 to 55% by 2025/26. Targets for commercial and industrial waste are higher still, with the aim being to recycle 70% of these wastes by 2015/16.
Further Details:
A Strong and Prosperous City - We recognise and understand the desired aim for a Strong and Prosperous City. This overarching aim will inevitably put pressure on the environment but must not be at the cost of the surrounding countryside including in particular the South Downs National Park.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial support and comments noted. The spatial strategy and city wide policies such as CP8 Sustainable Buildings and CP10 Biodiversity will ensure that development takes place in locations and ways which protect and enhance the highly valued natural and built environment.
Further Details:

CPRE commented on the four policy options papers and have concerns that some City Plan changes have gone against the views they expressed, particularly on Toads Hole Valley. They see no evidence on working with neighbouring authorities under the "duty to cooperate" which is necessary before the City Plan can be finalised. CPRE note the large number of people relocating from London each year and that many continue to commute, which raises concerns about sustainability, One Planet Living etc. The projected population growth does not reflect this movement from London. More regard should be had to student housing, related infrastructure and bringing vacant flats and offices back into use. This should be reflected in the housing numbers. There needs to be a commitment to the "duty to cooperate" with neighbouring authorities to ensure the best solution for the city, the Sussex countryside and the economy. No greenfield land should be developed before brownfield sites have been used, including sites with contamination issues such as asbestos. Development should take place above ground level car parks in the city to provide flats or business premises in low rise buildings. These measures would relieve pressure on our open space, greenfield land and the countryside.

Statement of Changes:

Any Other Comment:

Officer Response:

Discussions have taken place with adjoining local authorities under the duty to co-operate but adjoining authorities have indicated their own constraints and that they are not in a position to consider allowing for additional housing provision to help meet Brighton & Hove’s unmet requirements. This has been evidence in a Duty to Cooperate Statement that will be published alongside the publication of the City Plan Part 1.

The projected population growth does reflect movement from London (both into and out of the city), these are are accounted for by the migration assumptions incorporated within the projections.

Most of the housing development identified in the City Plan will take place on brownfield sites - 94% will be on ‘brownfield’ sites (previously developed land). The capacity led approach to identifying housing sites has looked at all potential sources of housing supply. Under the requirements of the National Planning Policy Framework the City Plan has to show we have looked positively for housing opportunities and done the best we can to try and meet our full housing requirements. Because of this, we have identified Toads Hole Valley to help provide much needed family sized and affordable housing.

It should be noted that the NPPF does not require a ‘brownfield first’ approach - merely that brownfield land should be used and re-used effectively provided that it is not of high environmental value.
Stonebridge Brighton Ltd (SBL) support the general analysis of the Brighton District set out at paragraphs 1.13 to 1.22, however, it is considered that the role of the City as a core tourist destination for 'study/educational tourism' is not appropriately recognised. Study/educational tourism is characterised by short and medium term visits by students (typically international students) to attend; language schools, International business schools and University pathfinder colleges- Such as Bellerby's College which is run by Study Group. The role of existing universities and colleges is recognised elsewhere in the plan, however, the broader role of private educational establishments and the positive impact that these uses can have on the local economy and in diversifying the tourism market should be given specific recognition.

**Statement of Changes:**

It is considered important that in assessing the Council's development needs for the future further consideration is given to the broader economic and tourism role of education and this should be reflected in the City Plan analysis/assessment.

**Any Other Comment:**

**Officer Response:**

Partial support noted. Paragraph 1.21 has been amended to include reference to international business schools and University pathfinder colleges.
Further Details:

The plan is too long and could be shortened by avoiding the repetition that is found within the development and special area policies. It would make sense to have the citywide policies in part 3 of the City Plan and the development and special area policies follow in part 4. This will allow the content of the citywide policies to set the context before the detail in the development and special area policies is described.

There are four parts to the City Plan but it is called City Plan Part 1 - this is confusing.

All new development should be built with future adaptation possible. Although this is mention in CP8, it should be reinforced at a strategic level to avoid it becoming lost in the plan.

Welcome reference to the Biosphere Reserve bid, but inconsistency in plan with some mention of Biodiversity Action Plans and Biosphere. Relationship between two needs to be clearer and which one has priority.

Policy references to air pollution in the plan should use something like the wording: 'contribute to improving air quality', rather than the rather odd phrase 'do not increase the number of people exposed to poor air quality'. With an increasing population the current wording is going to be rather difficult to achieve, or could only be achieved in rather perverse ways.

Better use of out of town retail sites, which are huge car generators, for employment uses. More radical policies to 'clamp down' on these site which encourage car use to bring about a reduction in carbon emissions.

Greater promotion of car free development especially within transport corridors. Cars prevent the free flow of public transport. The list of areas where only car-free developments should be considered are the areas around: Western Road, North Street, Queens Road, West Street, the whole central Valley Gardens area, including Circus Street, London Road, Lewes Road to the Vogue Gyratory, 7 Dials and Sackville Road.

Statement of Changes:

Any Other Comment:

Overall, BHFOE supports much of the plan, but it is concerned that there is a lack of ambition around carbon reduction, sports provision, allotments and tackling air quality and transport. It is concerned that the proposals put forward will not deliver the carbon reduction and ecological footprint targets as set out in the Sustainable Community Strategy, nor have they demonstrated how they will help reduce air pollution and help the city avoid hefty European fines.

Officer Response:

Welcome support for much of the Plan.

Note comments regarding the length and structure of the City Plan. However it is considered the structure is appropriate.

Amendments have been made and the City Plan Part 1 is now divided into 4 sections to avoid confusion.

Amendments have been made to clarify the role and relationship of the Urban Biosphere and Biodiversity Action Plan. It should be noted that The Local Biodiversity Action
The wording used regarding improving air and reducing exposure to air pollution is consistent with the council’s Air Quality Management Plan and Action Plan.

The City Plan does not support the development of out of town retail developments. CP4 sets out the National Planning Policy tests that would be required to be addressed. The City Plan does seek the most efficient use of sites (CP1 Housing Delivery, CP14 Housing Density and CP8 Sustainable Buildings) and recognises the potential for more efficient use of sites within the Hove Station area for employment uses (see part 5 of DA6). Should proposals come forward for the redevelopment of out of town retail sites, the opportunities for improved public realm and more efficient use of the site would be supported by these policies.

CP9 Sustainable Transport indicates that opportunities for car free developments will be addressed in a SPD.
City Plan Part 1 Responses Received 27th May to 20th July 2012

Customer No: 175  Customer Name: Chris Todd
Organisation: Brighton and Hove Friends of the Earth
Support Status: Partly Support
Rep Number: 2  Page/Para: /
Policy: 
Section/Supporting Doc/Annexes Part Two: The Strategy

Further Details:

The second bullet point under a Sustainable City does not make sense. Rather than saying 'having reduced the ecological footprint', it should say 'Reducing the ecological footprint'.

Adaptation to climate change is not mentioned in this section. Flooding and coastal erosion is mentioned in Attractive City. There is nothing about the urban heat island effect, water scarcity, biodiversity migration, or other impacts of climate change. Acknowledge that it is mentioned in CP8, but this issue is important enough to be worth mentioning in the strategy.

Adapting buildings for future use. Although building in flexibility is mentioned in CP8, it is not supported or mention in other text and is therefore lost in the plan.

Promoting sport and sports provision does not get enough attention in the plan. SO15 has a short sentence on it but this strategic objective is predominantly about parks and green spaces. SO22 mentions sports but in an equalities context, not in an overall need context. Given the importance of sport in getting and keeping people active, and the current deficiency in sports facilities, this really deserves its own strategic objective to provide a bit more detail and emphasis.

SO20 and SO22 have an element of duplication. As SO20 is around reducing inequalities, this does not need to be repeated in SO22. SO22 could then focus on healthy urban planning and include a statement around promoting active living.

Statement of Changes:

Would like to see SO10 amended regarding links to South Downs as follows: "including the creation of green links between open spaces and the wider South Downs..." Open space referred to in context of green space in urban areas and should be reinforced to include South Downs.

Any Other Comment:

Officer Response:

Comments noted and the bullet point relating to ecological footprint has been amended as requested.

Adaptation to climate change has been addressed in the Spatial Objectives and Vision which includes reference to creating a city that is adapting well to climate change at paragraph 2.3 and in SO8 which refers to responding positively to the challenges posed by local impacts to climate change. City wide policies CP8 Sustainable Buildings, CP10 Biodiversity and CP11 Flood Risk refer to impacts of climate change.

Promoting sport and recreation provision is specifically mentioned in the Plan which is the supported by a specific policy on sports provision CP17. It is not considered a separate Spatial Objective is required.

SO20 recognises that the identified groups in the spatial objective may have specific needs in relation to the provision and improvement of accessible and appropriate community facilities, healthcare, education, housing, safety and employment. Whereas SO22 talks more generally of healthy urban planning and improving equality of opportunities and outcomes.

SO10 has for clarification been amended to refer to the downlands.
Further Details:

The Vision for Brighton and Hove in 2030

The Vision for Brighton and Hove sets out a package of objectives to guide development within the District. In terms of economic objectives one of the seven underlying goals for the plan period set out in para. 2.2 is to ensure that the ‘...city’s tourism will have grown significantly but sustainably into a year round profitable business.’ To achieve this goal it is clear that the Council must embrace new and innovative forms of tourism including the ‘study/educational tourism market.’ (See above and attached). The role of tourism is also acknowledged in Strategic Objectives SO3 and SO5 and these objectives should be expanded to specifically encourage diversification.

SO2 seeks to support the continued improvement of the economic performance of the City through ‘identifying and safeguarding an appropriate range of sites and premises to meet the demands of high growth and key employment sectors.’

This objective raises a number of important considerations:
1) The identified and safeguarded sites should be appropriate. A critical part of this test should be that there is a reasonable prospect of the site coming forward for the allocated use (SBL have specific concerns regarding the viability and delivery of identified sites, in particular Blackman Street -Land adjacent to Britannia House). The wider approach set out within paragraph 22 of the NPPF should also be appropriately applied in this assessment process.
2) The policy objective strives to meet the demands of high growth across the plan period. It is, however, considered essential that the Council revisit their employment evidence base work in light of the rapid changes in economic conditions over the last few years to ensure that this remains robust.
3) The key employment sectors will continue to develop and expand over the plan period. As has been seen through the previous sharp decline of the manufacturing sector employment trends change over time and thus it is essential that the policy framework is sufficiently flexible to embrace both traditional and newly emerging employment sectors across a lengthy plan period.

Policy SO4 advocates that the housing needs of all communities in the City should be addressed. This should include the needs for student housing and should embrace and support innovative approaches to student housing.

Paragraph 2.13 raises an important consideration that other needs (aside from; employment, housing and retail) arising from a growing population need to be accommodated. These wider uses should include provision for uses which will contribute positively to the economy such as; ‘study/educational tourism’. The need to plan for such a wide range of different uses, the majority of which will be focused on a finite number of brownfield sites within the urban area, emphasises the importance of a co-ordinated approach to site selection.

SBL consider that overall the City Plan vision represents a SOUND basis for guiding the future pattern of development, provided that the package of strategic objectives are applied in a holistic manner and informed and supported by a thorough re-assessment of the employment evidence base.

Statement of Changes:

The vision advocates the importance of diversification and flexibility in both the approach to economic development and new tourism proposals. To ensure that these objectives are realised the City Plan policies need to be appropriately drafted to reflect these goals and decisions on the allocation of specific sites should be left to the Part 2 document where an appropriate balancing exercise can be undertaken.

Any Other Comment:

Officer Response:

Partial Support and comments noted. Welcome that City Plan vision is considered overall to be sound.
An Employment Land Study Review 2012 has been undertaken and this has informed the final version of the City Plan. It is considered that this provides up to date justification for the sites that are safeguarded through the City Plan Part 1 and those sites that are identified for new employment floorspace. It is considered that the City Plan Part 1 provides an appropriate consideration and balance of leisure, retail, tourism, health and education needs over the Plan period.

The need for student accommodation has been addressed in the City Plan through CP22 and appropriate allocations within Development Area proposals.

Brighton and Hove as a creative and cultural hub should come through strongly from the earliest opportunity. We would also wish to see strong references to the cultural profile of the city in any summary document that is produced.

Statement of Changes:
1.13 is geographical statement – maybe swap it around with 1.16 and start with that instead to give a better sense of what the city is all about

Any Other Comment:

Officer Response:
Partial support noted. The City Plan acknowledges and supports the role of the city as a cultural and creative hub (in policies such as CP2, DA4, CP5). For the role and purpose of the section ‘Profile of Brighton and Hove’ it is considered that the ordering of the paragraphs is appropriate.

To include:
1) Plans for open public WiFi in city centre and tourist areas
2) Consideration of reducing light pollution at late night on the sea front

Statement of Changes:

Any Other Comment:

Officer Response:
The partial support is noted and welcomed. The Infrastructure Delivery Plan (IDP) Annex document has been amended to include reference to ‘energy saving’ and investigation into ‘free city centre WiFi’.
The identification of eight development areas which can accommodate a substantial amount of development due to capacity and regeneration reasons is a logical approach for the plan in principle. However, such an approach should not prejudice proposals for significant amounts of development in other areas where the conditions are considered to be appropriate. Furthermore, no reference is made to the delivery of affordable housing in DA1, DA3, DA4, DA5, DA6, DA7 or DA8. In order to help meet the significant need in the city, these policies should all include the provision of affordable housing in the mix of proposed uses and a clear indication of the preferred number of units. This target should also be included in Table 3.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial support and comments noted.

Whilst the Spatial Strategy indicates the opportunities for significant housing development to come forward within 7 of the 8 development areas, it also acknowledges that opportunities for housing also exist in the rest of the city outside the Development Areas and this is reflected in CP1 Housing Delivery where c. 4,000 new homes will be distributed across the rest of the city as a whole and will largely take place through conversions of existing buildings and the redevelopment of previously developed land. In order to help provide for the need for additional housing, high densities are promoted in the city see CP13.

The provision of affordable housing will need to comply with city wide policy CP20 Affordable Housing.
Further Details:

Strategy Best location for Biosphere more detailed reference?: Presently this is in CP10 Biodiversity 4.123, which does not really properly represent the holistic nature of the Biosphere focus but instead puts it in part of one of the three Biosphere objectives only (see draft text on relation with OPL below). In my view it would be better handled as an overarching integrated strategy in the way that OPL is placed in the initial Strategy section.

Draft text re relationship with one planet living:
'The One Planet approach is the practical framework chosen to plan and deliver sustainable development in Brighton & Hove, and also represents the agreed approach to sustainable socio-economic development within the main urban part (the City Plan built-up area) of the proposed Biosphere Reserve. UNESCO Biosphere status seeks to bring people and nature closer together across a wider area - including the surrounding South Downs National Park, neighbouring local authorities, and part of the sea - focussed on nature conservation and environmental knowledge as well as our development.'

I'd be happy to discuss any of the above with you further, and please let me know what changes you decide to incorporate.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial support noted and comments welcomed. Reference to Urban Biosphere has been added to the Links to Neighbouring Areas section as an example of cross border working and the relationship between One Planet city approach and the Biosphere Reserve status has been clarified in paragraph 2.8.
Further Details:

Strong and Prosperous City, page16

Paragraph 2.2
The current economy and the future economy will be driven by the city’s creative and entrepreneurial spirit. The cultural and heritage offer and infrastructure are vital to making the city a place which is attractive to business and tourism. Growing and keeping the cultural and heritage offer and infrastructure relevant for today’s and future audiences is critical to the economic growth of the city. For tourism to flourish it requires a new and changing offer.

We would suggest the need for a separate bullet point along the lines of:
‘A world class cultural and heritage offer with a strong connection to the character of Brighton and Hove, providing the best for residents and tourists.’

A Sustainable City P17
There should be something about an aspiration which ensures that the existing historic buildings are used sustainably and adapted to achieve carbon reductions and minimise impacts on the environment.

Culture has a role in communicating sustainability messages this should be referenced perhaps within the bullet point on Biosphere.

An Attractive City P19
The care and respect for the Royal Pavilion Estate is critical to the city’s attractiveness, image and reputation of the city (NB links to enabling Strong and Prosperous City) - its upkeep and the presentation of the gardens (which are blighted by anti-social behaviour) needs to be tackled. The Royal Pavilion Estate should be viewed and regarded as a ‘World Heritage Site.’

Need to be mindful about the future heritage that the city needs to create through excellence in art, design and architecture and pushing boundaries.

Healthy and Balanced Communities p21
The importance of culture in providing opportunities to connect and build communities is missing; also the importance of culture in relation to learning, participation and supporting mental health. Healthy isn’t just physical. Cultural participation is recognised as vital for tackling isolation, as an example.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial support noted and comments welcomed.

Paragraph 2.2 has been amended to include a reference to world class cultural and heritage offer.
The role historic buildings play in delivering a sustainable city is addressed in CP8 Sustainable Buildings which applies to historic buildings and CP15 Heritage which reflects the opportunity of historic buildings to contribute to climate change objectives. It is not considered necessary to include further reference in paragraph 2.3.

The importance of Royal Pavilion Estate is acknowledged in the City Plan.

Cultural activity has been added to the bullet point in paragraph 2.5

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Further Details:

Strong and Prosperous City
Could we say more about the role of culture here? about innovation? perhaps the overall heading should be ‘a creative, strong and prosperous city’.

An Attractive City
Add to 2.4 (i) Role of art and design in creating the spaces and places and buildings that people can enjoy
Add to 2.4 (ii) Add ‘the importance of building the heritage of the future’ onto point about heritage
2.4 (iii) add something in here about aspiration for spaces for arts and cultural events
2.4 (iv) Add cultural aspiration in relation to whole point – there should be a range of cultural and leisure opportunities in relation to the sites mentioned here

Healthy and Balanced Communities
Could we articulate the role of art and design in creating spaces and places where people are brought together; where a sense of community and participation is encouraged.
2.5 (i) – add cultural participation to that

Statement of Changes:

There should be an additional bullet point about role of art and design in the development of medical facilities and the important function they play - there are many examples of good practice already in the city - the new hospital being the most recent and large scale.

Any Other Comment:

Officer Response:

Partial support and comments noted. The role of arts and culture has been recognised and integrated throughout the City Plan; in particular SA6 Sustainable Neighbourhoods, CP6 Culture and Tourism and CP13 Public Streets and Spaces.

Additional reference has been made to to the role of culture in the Strong and Prosperous City section, Attractive City and Healthy and Balanced Communities to reflect the suggested changes.
Further Details:
Paragraph 1.8 refers to the movement of households from London to Brighton which is a key feature of the housing market. It is worth noting as well that there is a not an insignificant amount of out-migration from the City westwards into Adur (approximately 750 persons per year of an age range of between 25 and 44). Whilst this helps to ensure that Adur’s population does not decline, it also impacts on Adur’s housing supply and the capacity of existing services. As such, this re-enforces the need to ensure an appropriate supply of affordable housing in the City (Policy CP20 on Affordable Housing is noted in this regard).
(Officer note: these comments also allotted to CP20)

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments and partial support are welcomed. CP20 seeks to ensure that an appropriate supply of affordable housing can be secured over the plan period.

Further Details:
The desire to enhance the natural beauty, wildlife and cultural heritage of the SDNP and enjoyment of its special qualities by the public is an admirable statement and working in partnership with the NPA is to be commended providing this is what does happen!

Statement of Changes:

Any Other Comment:

Officer Response:
Support and comments noted.
Further Details:
The housing distribution for new homes and new B1 employment floor space shown in Table 3 for development area DA8 Shoreham Harbour is supported. It is considered that there are appropriate sites within DA8 which can assist in achieving this development proposal in a sustainable way and in accordance with the plans strategic aims and objectives.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted. The amounts of development identified with the DA8 Shoreham Harbour policy has been amended to reflect the emerging development briefs for the area and the findings of the Employment Land Study Review 2012.

Further Details:
Strategic Objective (SO)9 - ‘Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs’. We supported this aim in the 2010 Core Strategy and continue to believe that better use of land that has already been developed, whether it is or is not in current use, is paramount.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted.
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<th>Steve Ankers</th>
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**Further Details:**

An Attractive City

We are pleased that the downland countryside will be conserved and its links to urban green spaces strengthened via a green network across the city where biodiversity is enhanced and equality of access to natural open space is achieved.

We welcome the Council’s commitment to taking a key role in promoting the city as a gateway to the South Downs National Park and look forward to receiving details as to how this will be achieved.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed and comments noted.

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**Further Details:**

We fully support SO14 “Conserve and enhance the South Downs National Park, including the promotion of an enhanced downland landscape which delivers Local Biodiversity Action Plan objectives; more sustainable farming practices and improved public access. Enhance and promote physical and sustainable transport links between the city and the Downs.” With regard to “Conserve and enhance the South Downs National Park” we will expect the City Council to adopt this principle not only for land within the National Park itself, for which they are not the planning authority, but also other areas which are adjacent, outside the boundary and within the setting of the Park.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcome and comments noted. SA4 Urban Fringe sets out the approach to protect and enhance the wider landscape role of the land within the urban fringe and the setting of the national park.
| Customer No: | 122 | Customer Name: | Andrew Boag | Support Status: | Support |
| Organisation: | Brighton Area Buswatch | | | | |
| Rep Number: | 2 | Page/Para: | / | Policy: | |
| Section/Supporting Doc/Annexes | Part One: Introduction |

Further Details:

The council's City Plan (part 1) is a vast improvement on the earlier LDF document, and there are now a number of references to buses.

Statement of Changes:

Any Other Comment:

Officer Response:

Support noted and comments welcomed.

| Customer No: | 232 | Customer Name: | Susan Moffat | Support Status: | Support |
| Organisation: | | | | | |
| Rep Number: | 4 | Page/Para: | / | Policy: | |
| Section/Supporting Doc/Annexes | Part Two: The Strategy |

Further Details:

The plan overall is a thoughtful, well written and well presented document. It clearly presents the hard choices that have to be made to balance needs, whilst maintaining for future generations what is special about our city. Its strategy is coherent and well-justified by concise but cogent arguments. Having prepared development plans in an adjoining part of the Sussex coast I appreciate the difficult balance that had to be made, but consider that the City Plan takes the right course. Inevitably consideration of representations made on individual policies and proposals will result in adjustments and improvements, but it is important that the plan maintains its currently proposed overall direction.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted.
Further Details:
We support the recognition of the quality of the natural environment within and surrounding the city, its biodiversity, and its value in terms of eco-services (notably the extensive chalk downland).

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed.

Overarching Conclusions in respect of City Plan
This City Plan Part One is the first Development Plan Document which provides a high level strategic and spatial vision plan for the future of Brighton & Hove. Overall the Society considers it to be a positive plan which gives high regard for the city's environment and surrounding area including the South Downs National Park. Policies that include detail as to how the aims are to be achieved will no doubt be subject to further consultation. We look forward to hearing more in due course

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted.
Further Details:

Guinness Partnership is committed to continue to work in partnership with the City Council to ensure the delivery of affordable housing to meet local needs and the council's targets.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed.

Further Details:

Strategic Objective SO4 is welcomed. Para 2.5 (bullet 1) also sets a positive message that accessible and affordable new housing types and tenures in suitable locations forms a key part of creating strong and sustainable communities.

Welcomes objective in para 2.11 to improve employment rate. However, there is an absence of a defined objective to increase the number and quality of employment opportunities, with a focus (instead) on employment floorspace and land. Hyde notes that retaining employment land which is of poor quality or which is in unsuitable locations may do little to improve the number and quality of jobs in the city. A flexible approach is required to allow quick wins for supply of affordable homes.

Statement of Changes:

Any Other Comment:

Officer Response:

Support for SO4 welcomed and comments noted.

The Spatial Objectives 1 and 2 reflect the aims and objectives of the Sustainable Community Strategy and other city wide employment strategies.
A Sustainable City: We welcome the aspiration that by 2030 the city will have made significant progress towards becoming a resource-efficient, Zero Carbon City and a city that is adapting well to climate change. We would be interested to learn more as to how this will be measured as the period up to 2030 progresses and where the information will be held.

We support the overall aim to introduce/encourage low carbon transport - achieving a flexible transport network.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted.

Annexe 1 to the City Plan - the Implementation and Monitoring Plan sets out targets to monitor the effectiveness of the policies contained with the City Plan for example against CP8 Sustainable Buildings there is a monitoring indicator relating to carbon emissions - % of new developments and conversions that are:

a) zero carbon
b) carbon neutral

The Annual Monitoring Report will publish progress against the targets.

The Brighton & Hove Strategic Partnership also monitor the city’s progress against local carbon footprint and ecological footprint targets set out in the city’s Sustainable Community Strategy.

SO2 - Support the identification and safeguarding of employment land to ensure the future economic prosterity of the City.

Statement of Changes:

Any Other Comment:

Officer Response:

Support noted and comments welcomed.
Further Details:

We particularly support:

# the recognition of the quality of the natural environment within and surrounding the city, its biodiversity, and its value in terms of eco-services (notably the extensive chalk downland)

# the ambition to achieve UN Biosphere Reserve status

# the Strategic Objectives, notably seeking to deliver environmental sustainability - development that responds positively to the challenges of climate change and delivers biodiversity and improvements to accessible natural green space, makes efficient use of previously developed land (although consideration should be given to the value of urban sites in terms of habitat and amenity)

# Strategic Objective 10 - including the creation of green links between open spaces and changes in spaces to create a Green Infrastructure Network, the conservation and enhancement of priority areas for biodiversity, the provision of good access for everyone to natural open space and search for opportunities to meet Local Biodiversity Action Plan objectives.

# the recognition (para 2.4) that a protected and enhanced natural environment is key to generating an attractive city, including "The downland countryside will be conserved and its links to urban green spaces strengthened via a green network across the city where biodiversity is enhanced and equality of access to natural open space is achieved".

# Strategic Objective 14 - including the support for the South Downs National Park, the promotion of downland landscape and the delivery of Local Biodiversity Action Plan objectives; sustainable farming practices and public access.

# Strategic Objective 17 - including protecting and enhancing the quality of the coastal and marine environment.

# One Planet Principles of Sustainability - however the principles does not appear to embrace the need to deal with the natural environment and habitat networks at the "landscape scale"

It is assumed that all allocations and subsequent windfalls will be tested against a range of policies and criteria (particularly relating landscape and biodiversity) to ensure that development takes place in the right location and that the natural environment in and around the city are protected and enhanced.

Natural England looks forward to hearing more about your Biosphere project.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted. The One Planet Living approach is the practical framework chosen to plan and deliver sustainable development in Brighton & Hove. Meeting the objectives of the Biosphere Status will focus on nature conservation as well as environmental knowledge and development. The Local Biodiversity Action Plan will become part of the management strategy for the Biosphere reserve and address the issues of natural environment and habitat networks at the landscape scale.

A Sustainability Appraisal has been undertaken of the proposals and policies in the City Plan Part 1. This assessment has included criteria relating to the natural


environment. Policy CP10 sets out the approach to protecting and enhancing the natural environment.

Customer No: 230  Customer Name: University of Brighton  Support Status: Support
Rep Number: 1  Page/Para: Page 22/ SO21  Policy:
Section/Supporting Doc/Annexes  Part Two: The Strategy

Further Details:
This objective reflect the University's aspirations.

Statement of Changes:

Any Other Comment:

Officer Response:
Support for SO21 welcomed.

Customer No: 91  Customer Name: Rob Sloper  Organisation: Cathedral Group plc  Support Status: Support
Rep Number: 7  Page/Para: 21/ 2.5  Policy:
Section/Supporting Doc/Annexes  Part Two: The Strategy

Further Details:
The Cathedral Group fully supports para 2.5 of the draft City Plan and the Circus Street site will assist in the delivery of the City Plan's aims on page 21 in particular the first and second from last bullet points.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted.
Customer No: 91  Customer Name: Rob Sloper
Organisation: Cathedral Group plc  Support Status: Support
Rep Number: 6  Page/Para: 19/2.4  Policy:
Section/Supporting Doc/Annexes  Part Two: The Strategy

Further Details:
The Cathedral Group fully supports para 2.4 of the City Plan and Circus Street will help to deliver those aims.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted.

Customer No: 224  Customer Name: 
Organisation: Maritime Atlantic Limited  Support Status: Support
Rep Number: 1  Page/Para: 24/2.16 -  Policy:
Section/Supporting Doc/Annexes  Part Two: The Strategy

Further Details:
The identification of DA8 - Shoreham Harbour as a Development Area is supported.

This area can accommodate mixed development to assist in achieving the Councils city wide targets for housing, employment and other uses. There are sites within DA8 which can be developed whilst meeting the city councils and central government aims and objectives as detailed in the draft city plan and the NPPF. These include the strategic objectives of the City Council and the sustainability considerations as set out in Paras 6 - 16 of the NPPF which includes a presumption in favour of sustainable development.

The redevelopment of sites within DA8 can also help achieve local priorities for transport improvements, community safety, open space and public realm improvements as identified in the draft city plan.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted.
We welcome the policy on Shoreham Harbour and the references to the Area Action Plan being prepared for the site jointly with Adur Council and West Sussex County Council. Such partnership working accords with the new NPPF and we welcome the references to Duty to Co-operate in the Plan in this regard. This Council is working with Brighton and Hove City Council on a number of joint issues including Shoreham Harbour, the Duty to Co-operate (e.g. on housing) and CIL. We look forward to continuing this partnership working on these and other strategic issues.

(Officer note: this comment also allotted to Part 2, para 1.10 and DA8)

**Statement of Changes:**

**Officer Response:**

Support welcomed and comments noted.

We welcome the policy on Shoreham Harbour and the references to the Area Action Plan being prepared for the site jointly with Adur Council and West Sussex County Council. Such partnership working accords with the new NPPF and we welcome the references to Duty to Co-operate in the Plan in this regard. This Council is working with Brighton and Hove City Council on a number of joint issues including Shoreham Harbour, the Duty to Co-operate (e.g. on housing) and CIL. We look forward to continuing this partnership working on these and other strategic issues.

(Officer note: this comment also allotted to Part 2, para 4.5 and DA8)

**Statement of Changes:**

**Officer Response:**

Support welcomed and comments regarding continued partnership working on strategic issues noted.
Further Details:

At the outset, we welcome the draft in that it will provide a clear planning and investment framework for the City and it seeks to address a number of issues which span the City boundary impacting on Adur District. In particular, we welcome the policy on Shoreham Harbour and the references to the Area Action Plan being prepared for the site jointly with Adur Council and West Sussex County Council. Such partnership working accords with the new NPPF and we welcome the references to Duty to Co-operate in the Plan in this regard. This Council is working with Brighton and Hove City Council on a number of joint issues including Shoreham Harbour, the Duty to Co-operate (e.g. on housing) and CIL. We look forward to continuing this partnership working on these and other strategic issues.

(Officer note: In part also applied to para's 1.10, 4.5 and DA8)

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted.

Further Details:

The Cathedral Group fully supports para 2.2 of the draft city plan in particular the paragraph beginning 'Brighton & Hove will have a resilient local economy with sufficient jobs at all levels.'.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted.
### Customer No: 152  Customer Name: The Hyde Group  Support Status: Support
### Rep Number: 1  Page/Para: /  Policy:
### Section/Supporting Doc/Annexes  Part One: Introduction

**Further Details:**

Overall direction of draft City Plan is welcomed by Hyde. Welcomes recognition in Introduction that access to suitable, decent, affordable housing is difficult for many of the city’s households. Whilst housing can be an effective enabler for other uses, adequate supply of affordable housing must remain a strategic objective in its own right.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed and comments noted. Delivery of affordable housing is a key priority for the council and the City Plan and it is considered that this priority is adequately addressed in SO4 and CP20.

### Customer No: 160  Customer Name: Mr Paul Westbrook  Support Status: Support
### Rep Number: 1  Page/Para: /  Policy:
### Section/Supporting Doc/Annexes  Part Two: The Strategy

**Further Details:**

Firstly, Brighton College is delighted to welcome the City Plan – the aims and objectives of Brighton & Hove City Council overlap considerably with those of the College’s own agenda – specifically as regards: job creation, inward investment, sustainable development, celebrating heritage, encouraging sport and culture and enhancing community – and accordingly we support the initiative.

In addition, I hope that Brighton College’s input to date (our active involvement with the community engagement and public consultation in relation to the City Plan, through the hosting of the City Plan Question Time Debate and further communication with Brighton & Hove City Council) has been welcomed and been seen to reinforce our commitment to these aims and the community focus. The College looks forward to seeing the City Plan progress to adoption in 2013.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed and comments noted.
6. Sustainability Appraisal

We are pleased to see that you have amended your SA Indicator for SA objective 7 ‘Minimise the risk of pollution of water resources in all development’ to refer to Water Framework Directive status.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments of support for the Sustainability Appraisal are welcomed.

The Regency Society welcomes the overall vision set out in part 2 of the Plan. We are particularly pleased to support strategic objective SO12, with its emphasis on design excellence and the distinctive character of the city’s various neighbourhoods. We would encourage the use of limited architectural competitions for particularly important sites.

We also support fully the reference in SO13 to enhancing and maintaining the city’s heritage. We suggest that SO13 should be strengthened by referring to the need to protect and promote the unique character for which the City is well known and admired.

Statement of Changes:

Any Other Comment:

Officer Response:

Welcome support and comments regarding the use architectural competitions for important sites noted.
Further Details:
Strongly support the strategic priority to support investment in education provision, including the expansion of the universities and the development of purpose built student accommodation which will deliver a number of significant social and economic benefits for the region.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted.

Further Details:
Para.1.23 - agree bullet point which sets out 'access to suitable and affordable housing remains difficult for many households'. The need for affordable housing continues to expand at a time when delivery has significantly reduced over recent years. As such, the delivery of affordable housing should be a key priority for the City Plan.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted. The delivery of affordable housing os a key priority for the council and the City Plan addressed in SO4 and CP20.
Further Details:

The College fully supports paragraphs 2.3 - 2.5.

The proposed regeneration of the College's Pelham Street campus will assist the delivery of the City Plan's aims:

- third and fourth bullet points on page 16
- third bullet point on page 19
- fourth and seventh bullet point page 18
- fifth bullet point page 21

City College believe that the proposed uses for the Pelham Street campus including an element of student accommodation of c.500 units will align with and meet ambitions set out in the city's Community Strategy. It will support the delivery of the aim set out in the Enterprise and Learning theme, namely to support business to grow, encourage investment, innovating and a healthy sustainable economy. The regeneration of the Pelham Street Campus will support the city council and Local Planning Authority in delivering of the following City Plan objectives:

SO1, SO2, SO3, SO4, SO5, SO8, SO9, SO12, SO18, SO21

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted. Future proposals for the regeneration of Pelham Street Campus will be be considered against relevant adopted local plan policies and other material considerations which in accordance with the NPPF includes the publication version of the City Plan.

Further Details:

Whilst housing can also be an effective enabler for other uses, adequate supply of affordable housing must remain a strategic objective in its own right rather than in an enabling role. The inclusion of Strategic Objective SO4 which states that the City Council will work in partnership to address housing needs and to deliver an appropriate mix of housing types, size and tenures that is affordable and accessible is welcomed. The Partnership looks forward to continuing a successful and fruitful relationship with the City Council over the plan period.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted.
Further Details:
We support the application of the principles of healthy urban planning and to improve the quality of the our natural resources and reduce pollution impacts. There is no mention of light pollution though which can impact on human health where it is intrusive at night, and on biodiversity.

Statement of Changes:
Include the reduction/avoidance of light pollution.

Any Other Comment:

Officer Response:
Support welcomed. The issue of lighting proposals for open space is addressed in CP16 part f) and with regard to Biodiveristy at CP10 part b). Details of any lighting scheme, including a light pollution assessment is required for all applications that involve any external lighting scheme.

Further Details:
We support the pledge to achieve parity of quality of schools and imbalance in provision across the city

Statement of Changes:
There is specific reference to secondary education in the document but small consideration has been given to primary - this needs to be addressed.

Any Other Comment:

Officer Response:
Support welcomed.

The city council recognises primary and secondary schools as vital infrastructure for the future of the city. Strategic Objective 21 has been amended to emphasise the need to provide sufficient school places and that this will be achieved by expanding successful schools and providing new schools. In addition, the supporting text of policy SA6 Sustainable Neighbourhood has been amended to emphasise the importance of school places to meet the city's needs.

The Infrastructure Delivery Plan (IDP) Annex document identifies the broad locations for new schools and extensions or improvements to existing provisions to the west of and across the whole of the city. The IDP will be updated annually with further detail and Part 2 of the City Plan will identify potential sites.
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<th>Customer No:</th>
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<th>Customer Name:</th>
<th>Chris Sevink</th>
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<td>Section/Supporting Doc/Annexes</td>
<td>Part Two: The Strategy</td>
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**Further Details:**

We support the endorsement of design excellence responding positively to the characteristics of neighbourhoods on p.19 and in SO12, and also to the historic environment in SO16.

**Statement of Changes:**

Our experience to date is that planning applications for infill development are very frequently inappropriate in character, volume and height – in particular where loss of access to light is threatened which can impact on established gardens and on the well being of existing residents. This links to SO15 as gardens contribute to sustaining the biodiversity of parks and open spaces.

**Any Other Comment:**

**Officer Response:**

Welcome support and comments noted. Planning Applications for infill development are carefully considered with respect to amenity of neighbouring properties and the council will aim to ensure that high quality is maintained through the rigorous enforcement of planning permissions.

Whilst policies CP12 and CP14 encourage higher density development they do not mean that such development must be taller than existing buildings. CP12 states that 'density will be raised through predominantly low-to-medium rise development' and CP14 states that proposals must demonstrate that they would 'respect, reinforce or repair the character of the neighbourhood'. The supporting text goes on to say that 'successful higher density developments will depend upon a ‘design-led’ approach that respects its local context and minimises impacts on its surroundings'.

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<tr>
<th>Customer No:</th>
<th>178</th>
<th>Customer Name:</th>
<th>Tom Shaw</th>
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<tr>
<td>Organisation:</td>
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**Further Details:**

The Partnership welcomes acknowledgement in paragraph 1.23 that access to suitable, decent, affordable housing is difficult for many households is an important recognition. This problem is a major issue which the City Plan needs to address by facilitating the delivery of new affordable housing to meet identified local needs. Good quality housing underpins health and wellbeing outcomes and education attainment, reduces deprivation and creates safer and more sustainable communities.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed and comments noted. The delivery of affordable housing is a key priority for the council and the City plan and has been addressed in SO4 and CP20.
Further Details:

SO3
Support is given to the strategic objectives, particularly the recognition in SO3 to develop Brighton & Hove as a major centre for, amongst other things retail provision.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed.

Further Details:

TCSL fully supports paragraphs 2.2, 2.3, 2.4, 2.5

The proposed regeneration of the Falmer Released Land site will assist the delivery of the City Plan's aims:

The first, third and fourth bullet points on page 16.
The third and fourth bullet points on page 17-18.
The first and fourth bullet points on page 19.
The second and fourth bullet points on page 21.

Strategic Objectives

TCSL believe that a robust and deliverable mixed-use regeneration scheme comprising a mix of uses including suidtent accommodation, residential, car parking for the American Express Community Stadium, permanent accommodation for the Bridge Community Education Centre and the Pupil Referral Unit for BACA on the Falmer Released Land will meet the city's core community and economic strategic objectives and deliver the following City Plan objectives: SO1, SO2, SO3, SO8, SO9, SO13, SO15, SO19, SO20, SO21

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted.
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**Further Details:**
Support is given to Strategic Policy SO9. However there is concern that other policies of the Plan, particularly Policy CP3 and DA6 will restrict or preclude the full and efficient use of previously developer land in the City.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Support welcomed and comments noted. It is not considered that CP3 Employment Land or DA6 Hove Station restrict/ preclude the full and efficient use of previously developed land in the city.

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**Further Details:**
The Sustainability Appraisal acknowledges that transport noise is the main source of noise in the city therefore it is anomalous that it is missed out of objectives for improving transport.

**Statement of Changes:**
We believe SO11 should read:
Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion, reduce noise and promote active travel.

**Any Other Comment:**

**Officer Response:**
Comments noted and welcomed SO11 has been amended as requested. Noise quality is also referred to in SO22.
Further Details:

We disagree with the chosen option of 11,300 additional homes. Our preference is for Option 1 from the Housing Delivery Options Paper – i.e. 9,800 new homes (the lowest option) plus the 400 homes allocated to the Shoreham Harbour site, making a total of 10,200.

- We support this option because it would mean all new housing would be developed within the existing built up urban area and open space would be protected. It would support a sustainable level of population growth in the City and would protect existing and potential employment sites. Latest figures from the 2011 Census indicate that city’s population has increased by 10.3% to 273,400 in the last 10 years. We believe it is simply not sustainable for the city to continue growing at this rate.

Statement of Changes:

Any Other Comment:

Officer Response:

The National Planning Policy Framework requires Local Planning Authorities to plan positively to meet assessed housing requirements. Given the significant physical and environmental constraints which restrict growth and expansion of the City, the Plan has had to look positively for all realistic housing opportunities wherever possible. The housing target of 11,300 is considered realistic and deliverable and is considered consistent with the other strategic aims of the Plan. This has been assessed through the Sustainability Appraisal.
City Plan Part 1 Responses Received 27th May to 20th July 2012

Customer No: 147 Customer Name:
Organisation: The Guinness Partnership Support Status: Object
Rep Number: 7 Page/Para: / Policy: CP1 Housing Delivery

Section/Supporting Doc/Annexes

Further Details:
Planned housing provision is 11,300 but this is significantly below forecast housing requirements. Contrary to NPPF, Para. 47. Should be an annual 5 year supply of deliverable sites plus 5%. AMR indicates this will not be met until later in plan period.
Has there been any consideration of release of protected land to increase housing provision. Have impacts of planned provision on population of the city been assessed? E.g. increases in numbers of households having to remain in unsuitable accommodation or on the council's housing register?

Statement of Changes:

Any Other Comment:

Officer Response:
The housing delivery policy is in accordance with para. 14 of the NPPF which sets out the presumption in favour of sustainable development and what this means for plan making and decision-taking. In terms of plan making, the council has planned positively for housing against a context of significant physical and environmental constraints and the need to also plan positively for other development requirements. The council will demonstrate that the housing target is justified and in accordance with the NPPF when taken as a whole.
Updated AMR will indicate progress has been made in relation to 5 year land supply position.
The SHLAA exercise takes account of land/sites protected for other uses (e.g. employment sites) and indicates the potential for mixed use development in many instances.
Paragraph 4.2 identifies a housing requirement of between 15,800 and 19,400 new dwellings over the plan period to 2030 (790-970 new homes per annum). However, Policy CP1 only makes provision for 11,300 new homes to be built (565 units per annum). This approach is inconsistent with the National Planning Policy Framework which requires Local Plans to meet the need for market and affordable housing in full (Paragraph 47). Whilst the supporting text acknowledges the shortfall, the City Plan provides little explanation as to the options reviewed (for example whether limited release of protected land is possible) before concluding that 11,300 dwellings is the maximum number that can be delivered. The consequence of a failure to plan for and meet anticipated local demand could lead to households and families’ continuing to be housed in unsuitable accommodation and to an expansion of the Council’s housing register.

In particular, the following options should be thoroughly reviewed:
The allocation of suitable urban fringe sites for 100% affordable housing; In light of the shortfall, a review of the tall building zones should be carried out (the previous study was published in 2005) with an acceptance that locations previously found to be unacceptable may have to be reconsidered; A relaxation of policies which protect land for other uses. In particular, the five sites listed in Policy CP3(4) which make little contribution in terms of employment provision could be allocated for affordable housing.

Paragraph 2.10 explains that the target for new housing supply over the life of the City Plan has been set below locally identified needs. The Partnership would urge the Council to continue to recognise the benefits of an adequate supply of housing, particularly affordable housing, in its own right and to adopt a flexible approach to land use in order to maximise opportunities for delivering new homes where they are needed.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The housing delivery policy is in accordance with para. 14 of the NPPF which sets out the presumption in favour of sustainable development and what this means for plan making and decision-taking. In terms of plan making, the council has planned positively for housing against a context of significant physical and environmental constraints and the need to also plan positively for other citywide land use and development requirements. The council will demonstrate that the housing target is justified and in accordance with the NPPF when taken as a whole.

A range of options for the City Plan housing target were consulted upon November 2011. The preferred housing target of 11,300 was well supported. The housing target of 11,300 is considered realistic, deliverable and is considered consistent with the other strategic aims of the Plan.

The housing target takes account of opportunities for suitable taller buildings and higher density development in suitable locations; mixed use development on sites in employment/other uses and the potential for development on suitable sites within the urban fringe; hence the strategic allocation of Toads Hole Valley.
Further Details:

Paragraph 4.2 identifies a housing requirement of between 15,800 and 19,400 new dwellings over the plan period to 2030 (790-970 new homes per annum). However, Policy CP1 only makes provision for 11,300 new homes to be built (565 units per annum). This approach is inconsistent with the National Planning Policy Framework which requires Local Plans to meet the need for market and affordable housing in full (Paragraph 47). Whilst the supporting text acknowledges the short fall, the City Plan provides little explanation as to the options reviewed (for example whether limited release of protected land is possible) before concluding that 11,300 dwellings is the maximum number that can be delivered. The consequence of a failure to plan for and meet anticipated local demand will lead to households and families continuing to be housed in unsuitable accommodation and will lead to an expansion of the Council’s housing register. In particular, the following options should be thoroughly reviewed:

- The allocation of suitable urban fringe sites for 100% affordable housing;
- In light of the shortfall, a review of the tall building zones should be carried out (the previous study was published in 2005) with an acceptance that locations previously found to be unacceptable may have to be reconsidered;
- A relaxation of policies which protect land for other uses. In particular, the five sites listed in Policy CP3(4) which make little contribution in terms of employment provision could be allocated for affordable housing.

Figure 2 (Housing Trajectory 2010-2030) clearly shows that a 5 year housing supply will not be delivered. Furthermore, the table in CP1 demonstrates that an additional buffer of a minimum of 5% has not been included. For these reasons, the approach fails to comply with paragraph 47 of the NPPF and there is a real possibility that the Secretary of State will conclude that the Plan is unsound.

Given the conclusions of Inspectors reviewing other Core Strategies/Local Plans (Bath and East Somerset Council, Hull City Council and Wigan Metropolitan Council) there is a real possibility that the Brighton & Hove City Plan will be rejected in its current form. It is in the interests of all parties that this does not happen and as such we propose that the housing land supply options are reviewed at this stage rather than proceeding to the submission stage.

Statement of Changes:

Any Other Comment:

Officer Response:

The housing delivery policy is in accordance with para. 14 of the NPPF which sets out the presumption in favour of sustainable development and what this means for plan making and decision-taking. In terms of plan making, the council has planned positively for housing against a context of significant physical and environmental constraints and the need to also plan positively for other development requirements. The council will demonstrate that the housing target is justified and in accordance with the NPPF when taken as a whole.

The housing target arrived takes account of opportunities for suitable taller buildings and higher density development in suitable locations; mixed use development on sites in employment/other uses and the potential for development on sites within the urban fringe. Options for the housing target were consulted upon November 2011.
Further Details:

HOUSING DELIVERY

It is noted that windfall sites will produce over 1100 units of accommodation. Those possibly are the sites that could be provided by private landlords for letting. However, the key objective "to provide decent quality housing at a cost tenants can afford" is again, in reality, "flowery talk" and cannot be supplied on this basis, other than at a significant taxpayer subsidy. What our members believe it should be saying is that such developments should be supplied at a sensible cost/return for the landlord/developer. Such statements, as mentioned above, are repeated throughout the City Plan and only demonstrate the author's lack of understanding of the real world and the costs involved in developing new housing. (Officer insert : see also respondents response to CP21 [response no. 3], CP19 [response no.6] and to CP14 [response no. 5])

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. The housing delivery policy CP1 is concerned with additional housing to be delivered over the Plan period and is considered realistic, deliverable and consistent with the strategic aims and objectives of the Plan as a whole.
Council's housing delivery policy does not follow advice in NPPF regarding the need to plan for full housing requirements to be met. Plan states that the assessed housing requirements are much higher than can realistically be accommodated. What measures have been taken by the Council to assess whether this is really the case? Has the Council assumed that all of the constraints in the local plan still apply or has it re-examined its existing policies in an attempt to meet its identified development needs? Has the Council sought to discuss this matter with its neighbouring authorities in order to see whether they could help meet the City's housing requirements? Under duty to cooperate it is essential that the Council demonstrate how it has attempted to meet any development requirements that its plan does not accommodate. It is not clear how the housing provision figure in the Plan has been derived or what efforts have been made to see what additional provision could be made to meet forecast requirements.

The council has produced no evidence to show that it has consulted with adjoining authorities and attempted to negotiate with them over accepting some of Brighton's forecast housing requirements. Not good enough to say that this will be the subject of discussions with neighbouring authorities. By admitting that neighbouring authorities have similar problems then it is tantamount to admitting that its housing requirements will not be met. Plan is open to the challenge that it is unsound. Council should look closely at those areas available for residential development and make every effort to allocate them. With part of the newly created South Downs National Park within its boundaries, the Council should not seek to prevent the allocation of other un-developed land.

Proposed housing provision is marginally less than the SE Plan. As SEP is likely to be withdrawn, Council should work comprehensively to assess its housing and other needs and work with neighbours to produce a plan that properly addresses its needs. Council should make a determined effort to meet its requirements rather than simply see them as an insoluble problem.

Given that the council is not meeting its forecast requirements, it is unacceptable that it should then look to restrict the provision of housing which is implicit in this policy. The housing trajectory in Figure 2 makes it clear that the cumulative housing requirement will not be met until 2019. There is no point looking to 'manage' housing supply when provision is less then forecast requirement so that it simply accords with the proposed rate of 565 pa. NPPF requires a 5 year supply plus 20% allowance. HBF requests Part C of policy is deleted.

Statement of Changes:

Any Other Comment:

Officer Response:

Disagree. The housing delivery policy is in accordance with para. 14 of the NPPF which sets out the presumption in favour of sustainable development and what this means for plan making and decision-taking. In terms of plan making, the council has planned positively for housing against a context of significant physical and environmental constraints and the need to also plan positively for other development requirements. The council will demonstrate that the housing target is justified and in accordance with the NPPF when taken as a whole.

A range of options for the City Plan housing target were consulted upon November 2011.

The council has been consulting with adjacent authorities throughout the preparation of the Plan and will produce a supporting Duty to Cooperate paper outlining details of all engagement.

Part C of Policy CP1 is about managing housing delivery and does not seek to restrict housing supply. The Housing Implementation Strategy sets out a range of measures to actively encourage sites to come forward particularly given the poor rate of delivery over the last 2/3 years which is a reflection of economic recession and decline in construction rather than any lack of developable sites.
The National Planning Policy Framework (NPPF) at paragraph 47 states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Paragraph 156 of the NPPF states that local planning authorities should set out the strategic priorities for the area in the Local Plan which should include strategic policies to deliver the homes and jobs needed in the area. Paragraph 182 of the NPPF advises that to be sound the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. The City housing requirements (both housing demand and housing need) have been assessed as likely to fall within a range 15,800 – 19,400 new homes over the plan period to 2030. However, the Plan provision of 11,300 new homes to be built between 2010 and 2030 is some 40% below the lower end of this range and therefore fails to comply with the National Planning Policy Framework. Paragraph 4.3 of the Plan refers to the constraints on the capacity of the city to accommodate the City housing requirements, particularly the sea to the south and the National Park to the west, north and east of the city. It is stated that with a limited legacy of derelict or vacant sites, these natural boundaries define and limit the outward expansion of the city. Paragraph 4.4 of the Plan seeks to justify the reduced housing target of 11,300 new homes on the grounds of the capacity and availability of land/sites in the city regardless of the demographic and economic implications or indeed the Plans strategic objective SO4 to address the housing needs of Brighton & Hove. Whilst the constraints presented by the sea and National Park are acknowledged there is a large amount of land between the existing built up area and the National Park boundary in urban fringe locations. Although Toads Hole Valley is identified as a strategic development area under Policy DA7, other urban fringe locations could accommodate some additional housing development and provide opportunities to meet the Plans urban fringe objectives. This is particularly the case with land south of Hangleton Lane, Hove where some limited housing development offers an opportunity to enhance the environmental quality of the site as a whole. This is explained further in our representations on Policy SA4 Urban Fringe. The Councils Urban Fringe Assessment appears to have been significantly influenced by existing Local Plan policy and all urban fringe areas should be thoroughly re-examined to identify additional development opportunities to meet the City housing requirements as far as possible. The suggestion in paragraph 4.5 of the Plan that through the duty to cooperate the Citys housing requirements could be met in neighbouring local authorities is not a realistic proposition as the Plan acknowledges that these areas face similar challenges in meeting housing requirements. The constraints applying in these area suggest that the respective authorities will experience difficulties in meeting their own housing requirements let alone those of Brighton & Hove. Whilst additional housing development areas should be identified in order to increase housing provision to help meet the Citys housing requirements, there is also a case to identify additional sites to meet the current provision of 11,300 new homes in order to provide some flexibility in supply over the Plan period. Although the housing trajectory in Figure 2 of the Plan shows the expected rate of delivery over the period to 2030 there is inevitably some uncertainty about delivery over such a long period. Such uncertainty is evident in the Plan itself. As Table 4 shows, only 2,765 houses have been built or committed and only 3,635 houses are identified in Strategic Allocations. A significant amount of housing, some 4,300 houses, is to be allocated in Part 2 of the City Plan based on the SHLAA assessment, and the balance met by a windfall allowance. With only 2,765 houses built or committed, representing 24% of provision, the development capacities assigned to the strategic allocations, broad locations and SHLAA can only be estimates and the precise amounts to be delivered are inevitably uncertain. For example, the proposal for 400 houses at Shoreham Harbour is stated in Policy DA8 is to be further tested and explored though the Joint Area Action Plan; and it is unclear how the 500 houses in Broad Locations in the Rest of City are to be identified. Furthermore, whilst the allowance for windfall sites may reflect past trends there must be significant uncertainty as to whether this level of development will occur so late in the plan period.

Statement of Changes:

In the light of our representations on Policy SA4 (Urban Fringe), Land south of Hangleton Lane, Hove should be identified for 40 dwellings. As a consequence the following changes should be made to Policy CP1: 1. At paragraph A the housing provision figure should be increased to 11,340 and the annual average rate increased to 567 dwellings. 2. At sub-paragraph c) the strategic allocations figure should increase to 3,675. 3. At paragraph B the figure for Development Across Rest of City should increase to 3,965 Table 4 should be revised to increase the Rest of City figure under Strategic Allocations to 440 dwellings. Following a re-examination of urban fringe land, if additional housing locations are identified then the level of housing provision should be increased and Policy CP1 further revised accordingly.
Officer Response:

Your objection is noted.
The housing delivery policy is in accordance with para. 14 of the NPPF which sets out the presumption in favour of sustainable development and what this means for plan making and decision-taking. In terms of plan making, the council has planned positively for housing against a context of significant physical and environmental constraints and the need to also plan positively for other citywide land use and development requirements. The council's position is that the housing target is justified and in accordance with the NPPF when taken as a whole.

A range of options for the City Plan housing target were consulted upon November 2011. The preferred housing target of 11,300 was well supported. The housing target of 11,300 is considered realistic and deliverable and is considered consistent with the other strategic aims of the Plan. This has been assessed through the Sustainability Appraisal. The target is expressed as a minimum and flexibility/contingency will be provided by development achieved through small windfall development which has not been counted in the first ten year supply.

As part of the urban fringe assessment (undertaken for Core Strategy submission version - April 2010), land south of Hangleton Lane was not considered suitable for housing as it forms part of the City's publicly accessible Open Space network and is a designated Site of Nature Conservation Importance.

Further Details:

Council housing should be looked at in a more innovative way with the council carrying out loft conversions and extensions to give more space to existing stock for larger families. New floors could be built on top of existing low level blocks of flats to create more flats. Tenants should take more responsibility for maintenance and encouraged to take pride in their property, street or estate. Problem tenants should be dealt with more swiftly particularly in new mixed developments.

Statement of Changes:

Any Other Comment:

Officer Response:

The council is looking at the potential to increase housing supply from its own assets through the Housing Revenue Account Estates Masterplan. The City Plan housing target includes a figure of 500 additional units over the plan period from this source.
Further Details:
The proposed by this Council housing target 11,300 of new homes in the city where the local land availability afford a capacity for only about 8000 homes cannot be achieved without sacrificing quality of life and healthy environment for its residents and visitors. There is not enough land between already densely populated city and the downs. Setting such high as 11,300 in very limited space will compromise other important strategic aims of the Plan as:
* Improvement of air quality
* Reduction of carbon emission to 42% by 2020
* Stopping worsening congestion and traffic noise
* Enhancing the local distinctiveness of the city built heritage
* Making the City the Europe favourite meeting place for conferences and tourist destination
* Implementing Biosphere Reserve by creating more open public spaces in the city and creation of green links between open spaces.(CP 13)
* Changing transport behaviour to improve air quality and reduce congestion.
None of these ambitious targets can be achieved with such huge amount of homes as 11,300 and associated influx of population. More houses means also more traffic, air pollution, loss of open public spaces for recreation and sport and immense burden on infrastructure. All these negative aspects of big housing developments have not been properly addressed in the proposed Plan. Acknowledges the importance of enabling sustainable economic growth, but this must be balanced with preserving the city's unique character and distinctiveness as a seaside resort.

Statement of Changes:
To avoid a negative impact on tourism the following should be taken into account:
1. Lowering the housing target to a more manageable 9,800 to take account of limited physical capacity
2. Share housing burden with neighbouring authorities
3. Bring housing density in line with national average of 43 dph. Developers to provide outdoor recreation space as standard and all developments to be well serviced by local services.
4. Contribution or levy from developers towards local infrastructure, with first priority for spending on the community affected.
5. Brownfield land a priority, e.g. Shoreham Port. Remove greenfield allocations (e.g. Toads Hole Valley) from the plan
6. Lobby central government for funding for 'green' travel and low emission schemes.

Any Other Comment:

Officer Response:
The National Planning Policy Framework requires Local Planning Authorities to plan positively to meet assessed housing requirements. Given the significant physical and environmental constraints which restrict growth and expansion of the City, the Plan has had to look positively for all realistic housing opportunities wherever possible. The housing target of 11,300 is considered realistic and deliverable and is considered consistent with the other strategic aims of the Plan. This has been assessed through the Sustainability Appraisal.
Further Details:
The proposed housing target is too high in such a physically constrained environment and is not realistic or deliverable. High housing target in SE Plan should be challenged as unachievable and be lowered to reflect limited land availability. Better distribution of housing across adjoining authorities. Better co-operation and joint working between authorities to accommodate strategic requirements such as housing and transport e.g. Shoreham Port and will remove need for encroaching on green field such as Toads Hole Valley. More emphasis on developing brownfield sites and empty town centre properties first. The Plan must provide more strict criteria and safeguards for allowing any developments on greenfield or playing fields.

Statement of Changes:

Any Other Comment:

Officer Response:
The National Planning Policy Framework requires Local Planning Authorities to plan positively to meet assessed housing requirements. Given the significant physical and environmental constraints which restrict growth and expansion of the City, the Plan has had to look positively for all realistic housing opportunities wherever possible. The housing target of 11,300 is considered realistic and deliverable and is considered consistent with the other strategic aims of the Plan. This has been assessed through the Sustainability Appraisal.
Further Details:

Unit 56 Newtown Road

Newtown Ventures Ltd owns Unit 56 Newtown Road which is located on the corner of Goldstone Lane (see enclosed Site Location Plan). The property was previously used for industrial purposes but has been vacant for a number of years despite a comprehensive marketing campaign by Flude Commercial since January 2004.

Despite planning permission for 2 x 4 storey office blocks with parking (BH2004/02582), there continues to be a lack of interest in occupying or redeveloping the property for employment purposes. Flude has confirmed that the land has a negative site value and the District Valuer has concluded that the building is unviable and will not be occupied in its current condition.

Unit 56 is clearly redundant for employment purposes and a new approach needs to be adopted in order to regenerate the site and surrounding area.

Brighton & Hove Local Plan (2005)
The Newtown Road industrial area is allocated as an EM1 employment site in the adopted Local Plan which seeks to protect the property for B1(b & c) and B2 purposes. The EM1 allocation includes Unit 56 Newtown Road, Becks Peugeot Garage and the Tecni-Form site on Goldstone Lane together with the other commercial uses on the west side of Newtown Road.

Paragraph 22 of the NPPF states the following: “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

The long term protection of Unit 56 by Policies EM1/EM3 has failed to deliver business or industrial development on the site. As such, this is exactly the type of site that the NPPF seeks to release for other uses in the interests of positive planning.

The identification of the Hove Station Development Area (DA6) for regeneration is much needed and therefore welcomed in principle. Policy CP3(4) seeks to allocate the land for employment-led (residential and employment) mixed use development on the land north of Newtown Road and stipulates that there will be no net loss of employment floorspace. Given that there is no demonstrable demand for Unit 56 either in its current form or to be redeveloped as flexible office space, the retention of the site for employment purposes (either on its own or as part of a mixed use scheme) cannot be justified and would conflict with policies set out in the NPPF. For this reason we request that reference to the site in Policy CP3(4) is removed altogether.

Proposed Uses
We understand that Signet Planning has submitted representations on behalf of Discovery Properties Ltd in relation to the Becks Peugeot Garage and the adjoining sites. These representations have promoted retail-led regeneration of the area with a new supermarket on the Becks site and the Hove Station area being designated as a district centre. Newtown Ventures Ltd fully supports these proposals.

Paragraph 4.2 of the Draft City Plan identifies a housing requirement of between 15,800 and 19,400 new dwellings over the plan period to 2030 (790-970 new homes per annum). However, Policy CP1 only makes provision for 11,300 new homes to be built (565 units per annum). This approach is inconsistent with the National Planning Policy Framework which requires Local Plans to meet the need for housing in full (Paragraph 47). Whilst the supporting text acknowledges the shortfall, the City Plan provides little explanation as to the options reviewed (for example whether limited release of protected land is possible) before concluding that 11,300 dwellings is the maximum number that can be delivered.
Figure 2 (Housing Trajectory 2010-2030) clearly shows that a 5 year housing supply will not be delivered. Furthermore, the table in CP1 demonstrates that an additional buffer of a minimum of 5% has not been included. For these reasons, the approach fails to comply with paragraph 47 of the NPPF and there is a real possibility that the Secretary of State will conclude that the Plan is unsound.

Given the conclusions of Inspectors reviewing other Core Strategies/Local Plans (Bath and East Somerset Council, Hull City Council and Wigan Metropolitan Council) there is a real possibility that the Brighton & Hove City Plan will be rejected in its current form. It is in the interests of all parties that this does not happen and as such we propose that the housing land supply options are reviewed at this stage rather than proceeding to the submission stage.

The allocation of land north of Newtown Road for residential purposes could make a significant contribution to the identified housing shortage.

Please contact planning agent if you wish to discuss the issues raised in these representations further.

(Officers insert: agent put comments forward for DA6 and CP3. Officers have also allotted these comments to CP1)

**Statement of Changes:**

The allocation of land north of Newtown Road for residential purposes could make a significant contribution to the identified housing shortage.

**Any Other Comment:**

**Officer Response:**

The housing delivery policy is in accordance with para. 14 of the NPPF which sets out the presumption in favour of sustainable development and what this means for plan making and decision-taking. In terms of plan making, the council has planned positively for housing against a context of significant physical and environmental constraints and the need to also plan positively for other citywide land use and development requirements. The council’s position is that the housing target is justified and in accordance with the NPPF when taken as a whole. The housing target of 11,300 is considered realistic and deliverable and is considered consistent with the other strategic aims of the Plan. This has been assessed through the Sustainability Appraisal. The potential for mixed use (employment/residential) on some of the city’s employment sites has been recognised in the SHLAA and this includes the employment allocation at Newtown Road.
Further Details:

Mid Sussex DC responded to the City Council's Options consultation November 2011. The concerns raised at that time remain valid. Concerns relate to planned housing provision and the fact that the city is not planning to meet its full forecast housing requirements. This could place additional pressures on other authorities. Options for development in Mid Sussex are constrained by infrastructure and environmental constraints. Mid Sussex is preparing a draft plan that accommodates locally generated housing need and whilst supporting objectives for economic growth. It is not able to accommodate additional growth generated from unmet need from other authorities. City Council should prepare a plan that fully meets its locally generated housing need.

City Council's plan target of 11,300 is below assessed need and raises duty to cooperate. Mid Sussex unable to accommodate unmet needs from neighbouring authorities but welcomes opportunity to continue to work with the City Council on cross boundary issues.

Statement of Changes:

Any Other Comment:

Officer Response:

The housing delivery policy is in accordance with para. 14 of the NPPF which sets out the presumption in favour of sustainable development and what this means for plan making and decision-taking. In terms of plan making, the council has planned positively for housing against a context of significant physical and environmental constraints and the need to also plan positively for other citywide development requirements. The council will demonstrate that the housing target is justified in this context and is in accordance with the NPPF when taken as a whole.

The council has been consulting with adjacent authorities throughout the preparation of the Plan and will produce a supporting Duty to Cooperate paper outlining details of all engagement. The council welcomes the contributions to this process by Mid Sussex DC.

Further Details:

We note that the City Council is aiming to provide a minimum of 11,300 additional dwellings over the Plan period. This assumes housing on the Toad’s Hole Valley site. We would urge that all new housing is located in the most sustainable sites, ensuring that brownfield and low landscape value sites are developed first.

Statement of Changes:

Any Other Comment:

Officer Response:

The National Planning Policy Framework requires Local Planning Authorities to plan positively to meet assessed housing requirements. Given the significant physical and environmental constraints which restrict growth and expansion of the City, the Plan has had to look positively for all realistic housing opportunities and this includes land at Toads Hole Valley which is privately owned, has no public access and is of low environmental quality. Given the city’s housing needs, inclusion of development at this location is justified.
Further Details:

It is assumed that all allocations and subsequent windfalls will be tested against a range of policies and criteria (particularly relating landscape and biodiversity) to ensure that development takes place in the right location and that the natural environment in and around the city are protected and enhanced.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments of support are welcomed. Allocations for housing development and subsequent windfall sites are assessed against the full range of planning considerations.

Further Details:

I support the approach that recognises the physical and environmental capacity of the City, but am concerned that the shortfall in housing numbers and an unclear evidence that the Council has complied with legal and policy requirements of the duty to co-operate will encourage challenges from developers.

It is unclear why urban fringe sites have not been put forward for development (and may be less vulnerable to climate change than Shoreham Harbour and the Marina).

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments of support are welcomed. The council has been consulting with adjacent authorities throughout the preparation of the Plan and will produce a supporting Duty to Cooperate paper outlining details of all engagement and how this complies with the legal and policy requirements.

Urban fringe sites have been assessed as part of the SHLAA exercises. Much of the urban fringe is in active and formal open space use (parks, allotments, playing fields etc) and is required to meet open space requirements. With the exception of Toads Hole Valley very little land has potential for housing. It is envisaged that Part 2 of the City Plan will provide an opportunity to review the built up boundary of the city and this may enable some very small sites to be re-considered through consultation.
Further Details:

2. Be Realistic about Housing Numbers whilst the economy is weak - Policy CP1
The council must be realistic about the amount of new housing development that is likely to be forthcoming whilst the economy is hovering in or close to recession, and the banks are reluctant to lend to business. Lending for development is not ‘low risk’, so only a small number of new dwellings are likely to be constructed until the country’s economic prospects improve.

Currently the Treasury is advising that austerity measures will continue beyond 2015 (when the next general election is scheduled) and there is still no solution on the horizon to the Eurozone crisis, which is strongly and adversely impacting on the UK economy. It would be unrealistic to expect more than minimal new housing to be delivered during the first quinquennium of plan period (2010-2015).

Furthermore, all the indications are that the recovery, if and when it happens, will be slow, with some forecasters currently suggesting eight years, so the targets for housing delivery in the second quinquennium (2016-2020) should also be realistic and modest.

3. Focus on sites that are more likely to be developed whilst the economy is weak - Policy CP1
The developments that are most likely to come forward during these difficult economic times are the ones where the development costs are lower and the prospects for achieving a normal profit on any investment are robust. Thus developments on smaller sites, which are already well serviced, are more likely to be progressed than proposals to redevelop large sites with large upfront preparatory costs.

Within the allocations DA1-DA6 and DA8 there are some smaller discrete housing elements that would be easier to progress than some of the larger sites. It would be helpful to identify and nurture those parts of the proposed redevelopments, ensuring they get delivered as soon as possible. Also more attention could be accorded to identifying further small redevelopment sites with lower development costs.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your comments. It is considered that the targets for housing delivery and timescales are realistic. The amounts of development ascribed to each of the Development Areas reflect a range of site sizes including some smaller and medium sized sites (although all are 6+). Development on much smaller sites (small windfall sites of 1-5 units) will also come forward and provide an element of 'contingency' should development on the larger sites not come forward as currently planned.
Support the provision of a minimum housing target of 11,300 new homes during the Plan period. (No other comments on the City Plan except those submitted relating to Policy DA7 and one planet living.)

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed.
Further Details:

1. This is an appropriate sustainable strategy to manage the interminable demand for housing in the city in the context of the city’s inexorable physical, environmental and economic constraints.

2. The attractions of the city’s townscape, the sea, and the South Downs always have drawn people to live within its finite boundaries. People always will want to live here unless unmanaged housing growth seriously destroys the city’s quality of life or its economy, perhaps by reducing the amount of land available for other uses or by destroying the city’s scale and character.

3. It will be a challenging strategy to achieve 11,300 dwellings over the plan period, without damage to the availability of open space and employment space, and without damaging the city’s sensitive townscape with inappropriately located tall buildings. A less demanding total of 11,000 might have been less risky;

4. The risk lies in the delivery of so much of the total housing on brownfield sites, where what is eventually achieved on difficult sites like Shoreham Harbour may in future deliver less than is currently expected in the Plan.

Therefore the Plan’s target of 11,300 represents the realistic maximum for sustainable housing delivery in the city during the plan period.

5. Should it transpire that it is not possible to deliver 11,300 homes in the way envisaged, it will be essential to review the total rather than damage the city by piling up or cramming in developments in the wrong places.

Statement of Changes:

Addition of wording to CP1 to emphasise that by itself contributing towards housing numbers will not be adequate justification for proposed developments unless they also comply with the overall strategy and policies of the Plan.

Any Other Comment:

Officer Response:

Your comments of support for the City Plan housing target and approach are welcomed.

Any proposed development will need to meet the provisions of all the relevant policies in the City Plan.
Further Details:

CP1 Housing delivery: we support the proposed volume of housing. We strongly urge the council to adopt minimum standards for new dwellings to ensure that private sector dwellings meet at least the standards set by the council for public sector dwellings. This is essential if we are to avoid building slums for the future. We believe that somewhere in this section there should be a reference to a commitment to include in the monitoring of housing delivery the achievement of minimum size, sustainability levels and Lifetime Homes requirements.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments of support are welcomed. In terms of sustainability and lifetime homes standards these are currently sought and monitored. Minimum size standards are not covered in Part 1 of the City Plan but this is a matter that can be considered under Part 2 of the City Plan which will deal with more detailed development policies and site allocations.
Further Details:

The latest figures from the 2011 census indicate that the population of Brighton & Hove’s grew by 10.3% to 273,400 [England & Wales average 7%]. This is more than anticipated and it will place an even greater emphasis on getting the emerging City Plan right to cope with the demands on current and future generations. Projections in the City Plan for housing need for instance may have been based on figures from 2010 that did not take account of up to 15,000 additional residents.

Even using the 2010 population projections, the shortfall in City plan housing delivery is projected to be over 7,000 homes and the Planning Inspectorate will expect this gap to be filled by working with surrounding neighbourhoods but they too may be struggling to deliver their housing targets. Also, like Brighton & Hove, they may find the 2011 Census has obliged them to review their targets upwards.

The Bath & North East Somerset Core Strategy was recently withdrawn because of concerns from the Planning Inspectorate [PINS] that the council’s methodology for assessing housing requirements did not comply with the National Planning Policy Framework [NPPF]. Specifically the council’s evidence focused on the immediate Bath area and did not consider housing needs of the wider area and whether there may be needs from further afield e.g. Bristol that should be accommodated, in part at least, within this district. The Planning Inspectorate has warned councils that they must demonstrate that they have cooperated with their neighbours to resolve cross border issues, including housing, before they submit their Core Strategies.

The Localism Bill imposes a duty to cooperate requiring councils to consult and engage with their neighbours in the preparation of Core Strategies and the Department for Communities and Local Government [DCLG] has taken a very firm view that the new duty applies to the plan-making stage. But there is very little reference in the City Plan to the city’s functional economic area and no evidence that any joint working/consultation has taken place.

A strong view expressed at the Economic Partnership workshop [03.07.12] was that, in practice the ‘duty to cooperate’ was unlikely to yield government’s desired outcomes but nevertheless the City Plan may be challenged on what meaningful collaboration has taken place prior to submission. The Inspectorate may want to see Memorandums of Understanding and Statements of Common Ground and Agreed Joint Frameworks with our neighbours but any reference to these, if they exist, if absent from the Plan.

Statement of Changes:

Any Other Comment:

Officer Response:

The housing delivery policy is in accordance with para. 14 of the NPPF which sets out the presumption in favour of sustainable development and what this means for plan making and decision-taking. In terms of plan making, the council has planned positively for housing against a context of significant physical and environmental constraints and the need to also plan positively for other development requirements, including the need of the local economy. The council will demonstrate that the housing target is justified and in accordance with the NPPF when taken as a whole.

The Housing Requirements Study (HRS) has been updated to take into account the 2011 Census population figure and the implications this has in terms of housing requirements. The update establishes that a realistic unconstrained figure for additional homes would be 16,500.

The council has been consulting with adjacent authorities throughout the preparation of the Plan and will produce a supporting Duty to Cooperate paper outlining details of all engagement.
### Further Details:

The City Wide policies within the draft document include CP1, CP14, CP19 and CP20, which specifically concern housing provision in the city. As a major employer in the city, the University supports the principle of delivering further housing to meet local needs, including affordable housing provision, which will assist with the retention and recruitment of staff.

### Statement of Changes:

Any Other Comment:

Officer Response:

Your comments of support are welcomed.

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### Further Details:

It is noted that DA8 is the only identified development area which relies on broad locations to achieve its housing delivery target. This approach for DA8 is supported as there are a number of smaller sites within DA8 that could be developed in accordance with the aims and strategies of the city plan and the more detailed area priorities set out in DA8. Taken together these sites can provide the housing delivery target set by the city plan in a manner which is sustainable, deliverable, and achievable.

Paragraph 4.13 makes it clear that 94% of new residential development is envisaged to take place on brownfield sites. A number of sites to the South of Basin Road North with a water frontage to Aldrington Basin and referred to in the Shoreham Port Master Plan as a development opportunity could be redeveloped as a brownfield site.

### Statement of Changes:

Any Other Comment:

Officer Response:

Your comments of support are welcomed. The Joint Area Action Plan for Shoreham Harbour will be considering development sites to deliver the 400 housing units set out in DA8.
Further Details:
I agree Brighton & Hove needs more homes. As long as the conservation area part are kept there are more buses with quicker transport into town, eg along A23.

Statement of Changes:
Nice homes & flats father than tower blocks.

Any Other Comment:
Your comments of support are welcomed. Policy CP19 seeks the provision of a mix of housing types, sizes and tenures.

Officer Response:
Your comments of support are welcomed. Policy CP19 seeks the provision of a mix of housing types, sizes and tenures.

Further Details:
We fully appreciate the difficulty in providing housing sufficient to meet the identified levels of housing needs established for the City, given that we are faced with a similar set of environmental constraints that impedes housing delivery in Lewes District. We therefore support the approach to base a housing delivery target on capacity and availability of land for housing development and believe that the target of 11,300 new homes between 2010 and 2030 is appropriate even though it falls short of the City’s housing needs over the plan period.

We are happy to continue engagement with the City Council to discuss strategic planning matters under the ‘duty to cooperate’ and are pleased that such a commitment is expressed in the document. However, as you will be aware, we would be unable to deliver housing in Lewes District that meets the unmet housing needs from the City, as we are unable to fully meet our own housing needs, predominantly due to environmental constraints. Therefore we will also be having a housing target that is capacity driven.

Statement of Changes:
The comments have been prepared by officers in the Planning Policy Team, in consultation with Ward Members who neighbour your authority, and are endorsed by the Lead Councillor for Planning, Cllr Jones.

Any Other Comment:
Overall, we are supportive of the approaches detailed in the DCP and generally agree that they should help address a number of the identified issues.

Officer Response:
Your comments of support are welcomed. The council recognises that Lewes District Council is in a similar position regarding its ability to meet housing requirements given significant constraints and welcomes the opportunity to work together towards a Memorandum of Understanding on this issue.
Further Details:

The latest figures from the 2011 census indicate that the population of Brighton & Hove's grew by 10.3% to 273,400 [England & Wales average 7%]. This is more than anticipated and it will place an even greater emphasis on getting the emerging City Plan right to cope with the demands on current and future generations. Projections in the City Plan for housing need for instance may have been based on figures from 2010 that did not take account of up to 15,000 additional residents.

Even using the 2010 population projections, the shortfall in City plan housing delivery is projected to be over 7,000 homes and the Planning Inspectorate will expect this gap to be filled by working with surrounding neighbourhoods but they too may be struggling to deliver their housing targets. Also, like Brighton & Hove, they may find the 2011 Census has obliged them to review their targets upwards.

The Bath & North East Somerset Core Strategy was recently withdrawn because of concerns from the Planning Inspectorate [PINS] that the council’s methodology for assessing housing requirements did not comply with the National Planning Policy Framework [NPPF].

Specifically the council’s evidence focused on the immediate Bath area and did not consider housing needs of the wider area and whether there may be needs from further afield e.g. Bristol that should be accommodated, in part at least, within this district. The Planning Inspectorate has warned councils that they must demonstrate that they have cooperated with their neighbours to resolve cross border issues, including housing, before they submit their Core Strategies.

The Localism Bill imposes a duty to cooperate requiring councils to consult and engage with their neighbours in the preparation of Core Strategies and the Department for Communities and Local Government [DCLG] has taken a very firm view that the new duty applies to the plan-making stage. But there is very little reference in the City Plan to the city’s functional economic area and no evidence that any joint working/consultation has taken place.

A strong view expressed at the Economic Partnership workshop [03.07.12] was that, in practice the ‘duty to cooperate’ was unlikely to yield government’s desired outcomes but nevertheless the City Plan may be challenged on what meaningful collaboration has taken place prior to submission. The Inspectorate may want to see Memorandums of Understanding and Statements of Common Ground and Agreed Joint Frameworks with our neighbours but any reference to these, if they exist, if absent from the Plan.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments of support are welcomed.

The Housing Requirements Study has been updated and takes account of the 2011 Census population figure. The update indicates that a revised realistic assessment of housing requirements over the plan period is 16,500.

The council has been consulting with adjacent authorities throughout the preparation of the Plan and will produce a supporting Duty to Cooperate paper outlining details of all engagement.
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<tr>
<th>Section/Supporting Doc/Annexes</th>
<th>Part Four - City Wide Policies (Sustainable City)</th>
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**Further Details:**

The Biosphere

There are a number of references to the UN Biosphere Reserve in the Plan to cover the City and parts of the South Downs National Park. Adur and Worthing Councils are currently considering the issues associated with a Biosphere designation and as such, it may be useful to have further discussions with the relevant Officers in the City Council working on this. There will certainly be a number of cross boundary issues and impacts to discuss. (Officer note: these representations allotted to Part 2 and also CP10. Please note however that references in draft City Plan to Biosphere currently occur on page 18 in a bullet and SO10, para 2.13 and within the following policies and/or their supporting text: DA2, DA3, DA6, DA7, SA1, SA4, SA5, SA6, CP10, CP13, CP16 and CP18)

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Comments noted.
The University is concerned that the policy (and CP16) appear to contradict DA3 policy that identifies the campus as a location for sustainable redevelopment and expansion. The university campus master plan also identifies major development proposals beyond the East Slope redevelopment confirmed by Policy CP21 and it considers these could be severely restricted or even prevented from proceeding by this policy if it were implemented in their current form.

**Statement of Changes:**

Urge the council to prioritise a review of these policies. A relaxation of these policies or preferably a change to the extent of land within its campus identified as a 'Natural Improvement Area' or 'Open Space' would allow these important developments schemes (not all of which will be allocated in a future development plan) to be brought forward within the campus during the life of the City Plan.

**Any Other Comment:**

**Officer Response:**

The Nature Improvement Area was designated separate to the City Plan. It is not therefore for the City Plan to amend its boundary. The identified open space reflects what is currently in existence and acts as an important benchmark in view of the city's land use challenges. As reflected in paragraph 4.165 it is not sustainable to assume a reduction in open space can meet the needs of the city's increasing population, indeed more not less is sought.

Policy CP16 acknowledges loss of open space where it results from a development allocation in a development plan (criterion 1.a.). Thus where it has been subject to consultation via the development plan process. Should the University submit a masterplan covering additional development to that already planned for this could be taken into account in the City Plan Part 2. Should development in accordance with the allocation not be necessary Policy CP16 makes it clear there should not be an assumption that alternative development would be appropriate (eg its retention as open space would be sought).

It is also important to note that the planning system includes flexibility. Regard is to be given to material considerations when applying development plan policies. It is not therefore felt policy CP10 is unduly restrictive nor that the identified open space should be amended.
### Customer No: 252  Customer Name: Mr G Card

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<th>Policy: CP10 Biodiversity</th>
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**Section/Supporting Doc/Annexes** Part Four - City Wide Policies (Sustainable City)

**Further Details:**

Representations are made in relation to land to the north of No. 40 Rosebery Avenue, Woodingdean.

The land appears to be covered by the City Plan, but lies outside both the built-up area and the countryside boundary. The land is privately owned. It is already partly developed with one house and the location of the built-up area is incorrect. The remaining land to the north should be designated as suitable for housing development.

Welcome the track known as Drove Road being included within the Nature Improvement Area but strongly object to the inclusion of land at the north of Rosebery Avenue.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The Nature Improvement Area was designated separate to the City Plan. It is not therefore for the City Plan to amend its boundary. It is also important to note that the planning system includes flexibility. Regard is to be given to material considerations when applying development plan policies and recognition of land as being within an NIA in the City Plan does not necessarily preclude development.

### Customer No: 65  Customer Name: Helmut Lusser

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**Section/Supporting Doc/Annexes**

**Further Details:**

Biodiversity / Street Trees: We believe that the role of street trees in the city ecology needs to be explicitly recognised and the need for enhancing the population of street trees should be emphasized.

CP10: Biodiversity: We believe that the importance of street trees for the local biodiversity needs to be highlighted and in this context the work the Council has carried out to retain our diverse Elm population, which is unique. We believe that there is a connection between this policy and the previous one in that improvements to roads, building next to them provide scope and opportunities to proactively improve the wildlife value and biodiversity of the street space by enhancing and maintaining our street tree population. We believe this merits a distinct policy point in policy 2 which also can be directly related to new development proposals.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

With regards to street trees, policy CPO10 is a high-level policy and deliberately non-specific. Paragraph 2 already encompasses street trees as well as all other important habitats in Brighton and Hove, therefore no change to the policy is planned.
**Customer No:** 186  **Customer Name:** Jackie Lythell

**Organisation:** Arts and Creative Industries Commission  **Support Status:** Partly Support

**Rep Number:** 15  **Page/Para:** 149  **Policy:** CP10 Biodiversity

**Section/Supporting Doc/Annexes**  Part Four - City Wide Policies (Sustainable City)

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**Further Details:**

Culture should be included in this as a means of achieving engagement

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Comments agreed. Amendment made to policy CP10 to reflect the importance of culture/community

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**Customer No:** 195  **Customer Name:** Rich Howorth

**Organisation:**  **Support Status:** Partly Support

**Rep Number:** 8  **Page/Para:** 150/4.123  **Policy:** CP10 Biodiversity

**Section/Supporting Doc/Annexes**  Part Four - City Wide Policies (Sustainable City)

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**Further Details:**

Updated content on Biosphere: can 4.123 be expanded/updated please to say “Brighton & Hove is working with local partners to achieve designation and (then) implementation of the city and surrounding area as a Biosphere Reserve. Biosphere Reserves are designated by the United Nations Educational, Scientific and Cultural Organisation as ‘centres of excellence’ to demonstrate conservation and sustainable development in practice, by bringing nature and people closer together. They aim to deliver three objectives, through an integrated management strategy and spatial zonation of the environment: ..”?

I’d be happy to discuss any of the above with you further, and please let me know what changes you decide to incorporate.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed and comments agreed. Supporting text revised to reflect Biosphere objectives.
Further Details:

Policy CP10 - Biodiversity - is particularly welcomed. It is good to see the link with the work in the South Downs Way Ahead Nature Improvement Area. The commitment to “ensuring development delivers measurable biodiversity improvements” will require clear and practical policies to seek to draw benefit from all development, in order to meet the national aim of halting the decline in biodiversity and to provide a context which clarifies the pattern of habitats across the area and the opportunities for defragmenting the network and creating new appropriate habitats.

In most developments, consideration needs to be given to the presence of European Protected and other species. There is guidance on this issue on the Natural England website that may be helpful for the development of suitable policies and local guidance (SPDs).

Policy CP10 2(b) may need to consider both the direct and indirect impacts.

The second part of the policy on Urban Design does not appear to make links to a landscape framework for the city, or seek to include planted green spaces to provide areas for relaxation that also aid urban cooling; adding to the street trees and biodiversity promised in Policy CP13 and the open spaces promised by Policy CP16.

Statement of Changes:

Any Other Comment:

Officer Response:

Comments noted.

Further Details:

The South Downs National Park Authority (SDNPA) supports the overall aims of the draft City Plan. We support the aims and objectives of the Brighton Biosphere Reserve which align with the Purposes and Duty of the South Downs National Park (SDNP) and the objectives of the Nature Improvement Area – ‘South Downs Way Ahead’.

The South Downs National Park Authority would request policy SA5 be removed from the City Plan. With regard to the important discursive text supporting the policy, especially describing the role and aspirations of the City Council as landowners, it is suggested that this text be inserted elsewhere in the document to retain this important commentary.

(Comments allotted by BHHCC officer)

Statement of Changes:

Any Other Comment:

Officer Response:

Welcome support with respect to CP10
Further Details:

Culture should be included in this biodiversity section - importance of culture in achieving that engagement and the importance of nationally significant collections cared for by RPM in supporting and understanding the natural environment.

Statement of Changes:

Any Other Comment:

Officer Response:

Comments agreed. Amendment made to policy CP10 to reflect the importance of culture/community engagement and the importance of nationally significant collections cared for by RPM in supporting and understanding the natural environment.

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Further Details:

We support work to maintain and improve biodiversity. What is missing in the overall aims in public awareness and education - gardens, where they exist, can play a big part in the biodiversity network

2. b - only light pollution is listed as an impact

We look forward to the Surface Water Management Plan, given that many of the homes in our area are basement or part basement, and that drainage, particularly at times of very heavy rain, is an issue, given the age and the nature of drains in the area, which were not designed with the density of population they now serve in mind.

Statement of Changes:

We would like to see a statement to the effect that work will continue on public awareness raising and education on the importance of biodiversity and the part it can play - eg community and private gardens, schools etc

2. b. Negative indirect effects of development - noise as well as light can impact biodiversity

Any Other Comment:

Officer Response:

Comments agreed. Amendments made to policy CP10 to reflect the importance of community engagement and education and the potentially damaging effects of noise on biodiversity.
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<td>Section/Supporting Doc/Annexes:</td>
<td>Part Four - City Wide Policies (Sustainable City)</td>
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**Further Details:**

We welcome references throughout the document to working with neighbouring authorities for beneficial effect (such as in SA5, CP5 and CP10) and thus fully support such policies insofar as they have an impact on Lewes District. With that in mind, we would like to continue the ongoing liaison with yourselves, at both an officer and Lead Member for Planning level.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Welcome support

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<tr>
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<th>Tony Mernagh</th>
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<td>Part Four - City Wide Policies (Sustainable City)</td>
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**Further Details:**

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Welcome support
Customer No: 70  Customer Name: Steve Ankers
Organisation: South Downs Society  Support Status: Support
Rep Number: 14  Page/Para: Page 150  Policy: CP10 Biodiversity
Section/Supporting Doc/Annexes Part Four - City Wide Policies (Sustainable City)

Further Details:
We welcome the commitment in the plan to implementing the South Downs Way Ahead Nature Improvement Area, in which this Society is also a partner. We also welcome the commitment to Biodiversity Action Plans, the Green Network and the Biosphere Reserve.

Statement of Changes:

Any Other Comment:

Officer Response:
Welcome support

Customer No: 100  Customer Name: Ron Crank
Organisation: Coast to Capital Local Enterprise Partnership  Support Status: Support
Rep Number: 36  Page/Para: Page 150  Policy: CP10 Biodiversity
Section/Supporting Doc/Annexes Part Four - City Wide Policies (Sustainable City)

Further Details:

Statement of Changes:

Any Other Comment:

Officer Response:
Welcome support
Further Details:

We particularly support the following aspects:
- Flood risk
- Water Efficiency in new development
- Groundwater quality
- Infrastructure, CIL and Planning Obligations

1. Flood Risk
We note that the Strategic Flood Risk Assessment and Sequential Test have both been updated this year. This provides an up to date evidence base for your plan and clearly justifies the choice of development areas in relation to flood risk.

We support the inclusion of policy CP11 which clearly sets out flood risk management requirements for new development in the city.

Flood risk issues and management options are also clearly set out in the Strategic Allocations areas of Shoreham (DA8) and the Marina, Gasworks and Black Rock (DA2).

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted.
Further Details:

Hopegar Properties Ltd own Mackleys Wharf, between the Port access road Basin Road North and in Aldrington Basin. Their total site area is approximately 5,300m² with a factory (1050m²) on the north (against the road), to the south the wharf itself (2,800m²) and between them ancillary open storage (1,080m²). Access is on the western side of the site (350m²).

Policies CP3 and CP12 could bring into statutory force provisions restricting (re-) development at Shoreham Harbour prematurely. That would tend to constrain, unhelpfully, the future provisions of the JAAP which is due to be published in 2013. The draft policies should be altered to allow the JAAP fuller scope to meet the objectives set out in DA8 and supporting text.

Tall Buildings

Shoreham Harbour (DA8) is defined in the map at page 72. The development area includes the A259 from Hove Lagoon west to Boundary Road as well as some land in south Portsllade.

Policy CP12 (page 155) then identifies Shoreham Harbour as one of the areas with 'the potential for taller developments, defined as 18 metres or more in height (approximately 6 storeys)'. (This definition is controversial and clearly depends on the context. The Tall Buildings Study, produced in 2003, says '15.6.5 The Shoreham Harbour tall building node is bounded in the west by the local authority boundary between Brighton & Hove and Adur. Further study should seek to clarify the capacity of the entire harbour area to absorb tall development and the various agreements that will need to be in place to ensure a cohesive approach to the development of the area')

The proposed Port Zed development (BH2010/03739) was on the south side of Kingsway. This was refused because, inter alia,

Reason 1:
The applicant has failed to demonstrate that the site is an appropriate location for a tall building within the context of existing development to the north and south of the site, and emerging plans for future development at Aldrington Basin. The proposal is therefore contrary to policies QD1 and QD2 of the Brighton & Hove Local Plan, and to the provisions of Supplementary Planning Guidance Note 15, Tall Buildings.

Reason 2:
The development by reason of its constant and unvarying height and massing would create a sense of bulk that would appear excessively out of scale and create a visually overbearing relationship with adjoining development to the north. The proposal is therefore contrary to policies QD1, QD2, and QD4 of the Brighton & Hove Local Plan and to the provisions of Supplementary Planning Guidance Note 15, Tall Buildings.

The definition of Shoreham Harbour already mentioned includes the above site. In my client’s view the potential for taller buildings within DA8 should be more closely studied before introducing into statute a policy as permissive and wide in scope as CP12.

My clients consider that a major distinction should be drawn between land which is effectively outwith the Port, at higher level and fronting Kingsway on the one hand: and land inside the Port with frontages onto the wharves. While the latter could indeed be very suitable for taller buildings, the former have been shown not to be.

Statement of Changes:
See above

Any Other Comment:

Officer Response:
The boundary of the Shoreham Harbour tall building area will be clarified in map form in the Urban Design Framework SPD and that document will also provide guidance on the appropriate height ranges of new development in the different parts of the tall building area. The SPD will be subject to public consultation.

**Further Details:**

We partly object. We partly support.

We subscribe to KAWHRA’s objections and support.

We live in a garden suburb of distinctive layout which as already being ruined (a) by a plethora of cars, and by the hopeless inadequate exit from Aldington Basin South into Kingsway and into Boundary Road and to the West.

The Policy contains only bland ideas for long term regeneration which couldn't be implemented unlike the road strategy agreed. Policy DA8 and Policy SA1-B. We also object to Urban Design Policy CP12 and believe that taller building between Weldock road and Boundary Road would not only be out of place but would spoil the well persevere garden city area to the South, as well as adding to the traffic queues on the main road and to parking in the garden city area.

**Statement of Changes:**

**Any Other Comment:**

Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.

**Officer Response:**

Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.
### Customer No: 17  
**Customer Name:** Martyn & Michelle Cooperman  
**Organisation:**  
**Rep Number:** 2  
**Page/Para:**  
**Policy:** CP12 Urban Design  
**Section/Supporting Doc/Annexes**  
Part Four - City Wide Policies (Healthy and Balanced Communities)  

**Support Status:** Object  
**Further Details:**  
We wish to object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. We support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.

### Customer No: 44  
**Customer Name:** Derrant and Jacqueline Savage  
**Organisation:**  
**Rep Number:** 2  
**Page/Para:**  
**Policy:** CP12 Urban Design  
**Section/Supporting Doc/Annexes**  
Part Four - City Wide Policies (An Attractive City)  

**Support Status:** Object  
**Further Details:**  
We want you to note our objection to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we wholeheartedly support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.
### Jill Sewell

**Customer No:** 140  
**Customer Name:** Jill Sewell  
**Organisation:** Kemp Town Society  
**Rep Number:** 3  
**Support Status:** Object  
**Policy:** CP12 Urban Design  
**Section/Supporting Doc/Annexes:** Part Four - City Wide Policies (An Attractive City)

**Further Details:**

In points 2 and 4 there should be a clear statement 'where these adjoin any potential development' after each point.

4.134 add to the end of the reference to Brighton Marina as a node 'and further limited by the restriction on building above the cliff height.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

The additional suggested wording is considered to be unnecessary as the policy states that the criteria apply to all new development.

Guidance on appropriate height ranges in each tall building area will be set out in the Urban Design Framework SPD. It would be inconsistent to refer to height restrictions in the supporting text in respect of only one of the areas. However, policy DA2 refers to the height restriction set by the cliffs and any development must be assessed against both policies.

### Jane & Michael Galvin

**Customer No:** 15  
**Customer Name:** Jane & Michael Galvin  
**Organisation:**  
**Rep Number:** 2  
**Support Status:** Object  
**Policy:** CP12 Urban Design  
**Section/Supporting Doc/Annexes:** Part Four - City Wide Policies (An Attractive City)

**Further Details:**

We support the detailed objection to Policy DA8 which has been submitted by the Kingsway and West Hove Residents Association (KAWHRA), and their proposed additional wording to policy DA8 subsection B ii) Aldrington Basin - Area Priorities as follows:

F) TO RESPECT AND COMPLEMENT THE DISTINCTIVE CHARACTER AND AMENITY OF THE EXISTING RESIDENTIAL AND RECREATIONAL AREAS ADJOINING THE NORTH, SOUTH AND EAST SIDES OF ALDRINGTON BASIN.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Comments acknowledged. These issues will be dealt with by other policies in the Plan particularly CP12.
<table>
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<tr>
<th>Customer No: 155</th>
<th>Customer Name: Mr and Mrs M L Holbrook</th>
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<tr>
<td>Section/Supporting Doc/Annexes: Part Four - City Wide Policies (An Attractive City)</td>
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**Further Details:**

Object to the idea of our nice neighbourhood of mainly 2 storey houses overshadowed by tall buildings on either side of the Kingsway.

Other towns and cities are normally consisting of ordinary sized houses when you drive into them.

Tall and ugly buildings don't enhance anything and spoil the landscape for those unfortunate to live in their site and shadow.

Brighton in the past has allowed some very ugly buildings (tall) to be built amongst the lovely older buildings.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

There are already a number of taller buildings (18m or higher) along Kingsway and it is considered that this area has potential to accommodate further buildings of similar height in order to provide a more coherent townscape on this major route into the city.
Further Details:
The City Council will be aware of a previous application for a mixed use redevelopment of the site for 67 residential units, storage, restaurant, retail, B1 and D1 uses (Ref BH2010/03739). Whilst this application was refused in March 2012 for reasons relating to overdevelopment and noise disturbance, a revised scheme is currently being prepared with the aim of submitting a further application later this year.

Whilst the revised scheme is yet to be considered, it is important that the draft City Plan does not introduce onerous restrictions on the site which are not currently in place.

Policy CP12 identifies nine locations within the City (including Shoreham Harbour) which are suitable for taller developments (defined as 18 metres or more in height). The Tall Building Statement submitted with the 2010 application clearly demonstrated that tall buildings in this location could be positive features in the surrounding streetscene and from mid distance views but would not be visible from long distance views.

The PortZed site (land at 9-16 Aldrington Basin/south of Kingsway, Hove) is therefore considered appropriate for inclusion within the Shoreham Harbour tall building zone. For the purposes of clarity, the Draft City Plan needs to include maps/plans which clearly show the boundaries of all the tall building zones.

Statement of Changes:

Any Other Comment:

Officer Response:
The boundaries of the tall building areas will be defined in map form in the Urban Design Framework SPD. However, the supporting text has been expanded to clarify that inclusion of a particular site within one of the tall building areas does not warrant certainty that a taller building would be acceptable on that site.

OBJECTION. I do not agree with the suggestion that there should be buildings of six or more storeys on the north side of the Kingsway in West Hove. I therefore support the detailed objections to Policy SA1 and Policy CP12’s supporting text paragraph 4.134, which have been submitted by the Kingsway and West Hove Residents Association.

Statement of Changes:
I also support KWHRA’S proposed amendments.

Any Other Comment:

Officer Response:
Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.
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<td>Part Four - City Wide Policies (An Attractive City)</td>
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**Support Status:** Object

Further Details:

We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.

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<td>Part Four - City Wide Policies (An Attractive City)</td>
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**Support Status:** Object

Further Details:

Encourage 21st century contemporary development not only for new builds but for extensions and conversions of existing buildings as a way forward that is recognised by English Heritage. In particular Hove seafront (Kingsway) is a terrible stain on the city and residents should be encouraged to redevelop and create a new and exciting seafront and not the same old tile hung dormer windows and upvc windows in a style not suited to the host building. Individual beach houses should be encouraged allowing mid 20th century houses and buildings to modernise in a contemporary form. This has started with Western Esplanade but is not being allowed for Kingsway.

Shops should have attractive frontages whether individual or in groups and not cheap signs and advertising stuck on windows etc.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

This policy is for new development rather than for extensions. Guidance on domestic extensions will be produced in the form of a Supplementary Planning Document.

Urban design policy for the western seafront (Kingsway) is specifically included in policy SA1 on The Seafront.

Policy guidance on shop front and signage is contained in adopted Supplementary Planning Documents.
Further Details:

Policy CP12 refers to Shoreham Harbour, specifically the docksides and the commercial area north of Wellington Road.

This latter area was EM1 in the 2005 plan specifically business uses and light industrial. It seems that under the Draft City Plan housing is also to be added to this list, with possible blocks up to 6 storeys high.

There may be scope for housing on the docks to the south of Wellington Road because of the difference in levels, and also on the south side of the harbour, as at Shoreham.

However the North Street Industrial area should be retained for business/light industrial. Certainly tall buildings in North Street and its side roads would be unacceptable due to the adverse effect on properties in St Andrews Road and Albion Street, especially overshadowing and loss of daylight/sunlight.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been noted and considered. Shoreham Harbour has been identified for housing as part of a mixed use development to meet the city’s identified housing need. The policy has been amended to clarify that the identification of tall buildings nodes and corridors does not necessarily mean that tall buildings will be acceptable on the site. Further guidance will give more detail on appropriate heights in the Urban Design Framework.
Further Details:

We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

I am of the view that this area of Hove was well conceived in the 1920’s-30s to provide pleasant family living. Any increase in population density will negatively impact this suburb.

It is also clear to existing residents that local resources such as schools, doctors, dentists etc are under pressure and a further increase in population would exacerbate the problems of parking and traffic volumes.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.

Proposals for an increase in residential density will need to have regard to policy CP7 Infrastructure CIL and Developer Contributions and CP9 Sustainable Transport.
**Further Details:**

CP12 Urban Design

Without at this stage being able to comment on the proposed Urban Design Framework, our comments are limited to the following points:

1. Para 1: We would like to see the phrasing of this paragraph re-defined to specifically state a presumption in favour of “low to medium rise development” except in areas where the City Plan has identified taller buildings - ie between 6 storeys (18m) and up to 15 storeys (45m), as being appropriate. (But see also our comments in para 4 and para 5(ii) below on this topic). Please state the changes you would like to see incorporated into the document.

2. Criteria on which all new development will be expected to comply

   Item 2 “Establish a strong sense of place etc” - will the Urban Design Framework specify how this will be achieved – ie through a mandatory analysis of the identified neighbourhood concerned and a design statement showing how the proposals have been influenced by that analysis?

   Item 4 : We suggest that this aim should be strengthened to read “Conserve and enhance the city’s built and archaeological heritage”.

   Item 5 : We suggest that this aim should be strengthened to read “Protect and enhance strategic views into, out of and within the city”.

4. Para 4.133 : This paragraph is designed to “enable as much certainty and clarity as possible about where the city will broadly accommodate any taller development”.

   It is quite unclear to us how this policy clarifies areas where buildings just over 18m high would be acceptable, and where buildings between that height and 45m high (approx 15 storeys), would be unacceptable. As currently defined there appears to be a danger that all new tall buildings developments will take maximum advantage of the Tall Buildings Statement – see Item 5(i) below.

5. Para 4.134 : This lists areas of the city where increased density could be achieved by permitting tall buildings as defined by the Tall Buildings Statement SPG 15. We have two major reservations over this:

   (i) We consider that the Tall Buildings Statement needs to be revised as part of the current City Plan Review. We have recently seen two proposals for tall buildings, one on London Road (No.1 Preston Park), and the other in the Hove Station Area where developers have proposed buildings which are at the maximum height (or apparently greater in the case of Hove Station), allowed under the current planning policy, leading to proposals for high buildings which are completely out of scale with their surroundings. This tendency is obviously going to be repeated in the other areas listed in para 4.134,

   (ii) We note that additional areas considered as suitable for tall buildings are now proposed under the draft.

Three areas are included which we consider are certainly not appropriate for future tall building development. These are all along or adjacent to the seafront, and are the Central Seafront, the Western Seafront / Kingsway, and the Eastern Road / Edward Street areas. We believe that the appearance of buildings all along the seafront is of vital importance to the character of Brighton and Hove, and the frontage of the city along the seafront should be of a reasonably consistent height and scale. This strategic aim should take precedence over any perceived need to increase housing or commercial densities. These should be accommodated in areas further back from the seafront. Otherwise we run the risk of creating a wall of tall buildings along the seafront which will block views of the sea from other areas of the city, and disguise and run counter to the natural topography of the land which in general rises steadily from sea level towards the north. The scale of development along the seafront should reflect this and its
height be kept relatively low. a) Central Seafront. We appreciate that this is a relatively small area which already has some tall buildings. But it is almost universally considered that the existing tall buildings there (primarily Sussex Heights and the Holiday Inn Hotel), have had a very detrimental effect on the appearance of the seafront, and are quite out of scale with the surrounding older buildings. Enough is enough. All new developments here should be in scale with and no higher than the other prominent buildings within this area of

Any other comment

b) Western Seafront / Kingsway
This area too should maintain a consistent scale and height of new development, generally in sympathy with the existing buildings, to avoid a wall of high buildings separating the city from the sea. Tall buildings here would be completely inappropriate.

c) Eastern Road / Edward Street
We appreciate that the proposals for the new buildings on the Sussex County Hospital site are taller than 18m. But we think that hospital uses should be the only exception to that in this area, and should not be used a reason to allow other forms of future development to be built higher than that.

We have commented separately on Policy DA8 - Shoreham Harbour - and our concern about the detrimental effect that tall buildings would have on views towards the sea and the effect on existing housing to the north of Kingsway in this area. 6. Para 4.135 - SPG 15 : we have already noted above our concerns that the Tall Buildings Statement should be revised as part of the Draft City Plan. It would have to be anyway to include any area considered suitable for tall buildings which is not included in the current SPG15.

7. Para 4.136 – Strategic Design criteria. Two comments – firstly, that we think it might be worth including a ‘health warning’ about the desirability of avoiding pastiche design solutions for developments in or close to historic environments and conservation areas; Secondly, that Design and Access Statements and Building for Life criteria are matters of detail not strategic design, and if they are to be mentioned at all under the category of urban design, should given a separate paragraph or included under para 4.139, and not mixed up with matters relating to the wider strategic issues of appearance, scale and townscape.

Statement of Changes:

Any Other Comment:

Officer Response:

The policy already states that “density will be raised through predominantly low-to-medium rise development” so this change is not considered necessary.

The scope and content of the Urban Design Framework will be subject to separate public consultation.

The wording in planning legislation is “preserve or enhance” so such a change would be unsound. With regard to strategic views, not all such views need to be enhanced so the current wording is considered appropriate.

Guidance on the appropriate height range for each tall building area will be set out in the Urban Design Framework SPD and the supporting text has been amended to clarify this. The supporting text has also bee amended to clarify that inclusion of a particular site within one of the tall building areas does not warrant certainty that a taller building would be acceptable on that site. In any case, as the policy itself makes clear, new development must respect the particular character and urban grain of the neighbourhood in which it is situated.

The current Tall Buildings SPG will be superseded by the Urban Design Framework SPD and the supporting text has been amended to clarify this point.

All of the tall building areas in this policy are already identified in the current Tall Buildings SPG. No new tall building areas have been proposed.

The supporting text states that innovative contemporary architecture will be encouraged so it is not considered necessary to include a ‘health warning’ about pastiche designs.

Building for Life criteria are very much strategic matters of urban design and therefore reference to this standard in the supporting text is considered to be justified.
Customer No: 21  Customer Name: H Marbach

Organisation:                                       Support Status: Object
Rep Number: 2   Page/Para: /                 Policy: CP12 Urban Design

Section/Supporting Doc/Annexes Part Four - City Wide Policies (An Attractive City)

Further Details:
I object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore I support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.

Customer No: 22  Customer Name: Mr Ken and Mrs Beverley Leonard

Organisation:                                       Support Status: Object
Rep Number: 2   Page/Para: /                 Policy: CP12 Urban Design

Section/Supporting Doc/Annexes Part Four - City Wide Policies (An Attractive City)

Further Details:
We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.
Customer No: 18  Customer Name: Mr David Flack  
Organisation:  
Support Status: Object  
Rep Number: 2  Page/Para: /  
Policy: CP12 Urban Design  
Section/Supporting Doc/Annexes: Part Four - City Wide Policies (An Attractive City)  

Further Details:  
I object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore I support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.  

Statement of Changes:  

Any Other Comment:  

Officer Response:  
Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.  

Customer No: 106  Customer Name: James Breckell  
Organisation: James Breckell Associates  
Rep Number: 7  Page/Para: 155/  
Policy: CP12 Urban Design  
Section/Supporting Doc/Annexes: Part Four - City Wide Policies (An Attractive City)  

Further Details:  
Tall buildings in Brighton and Hove can be quite alien. Buildings of 6-8 storeys in places like Brunswick, Adelaide and Sussex Square can add positively. But most of the buildings of more than 8 storeys are poor architecturally. The same density can be achieved with better architecture and space standards in lower buildings. An example is given of a poor tall building, Ashton Rise, Grove Hill.  

Statement of Changes:  

Any Other Comment:  

Officer Response:  
Thank you for your representation. Your comments are noted and considered. The policy has been amended to clarify that the identification of tall buildings nodes and corridors does not necessarily mean that tall buildings will be acceptable on the site. Further guidance will give more detail on appropriate heights in the forthcoming Urban Design Framework.
Further Details:
Design – blending old and new
The relationship between the need for sustainable buildings and conservation and design needs to be spelt out more clearly to give greater certainty to developers and residents. This is as true for new buildings in Conservation Areas as it is for extensions and improvements to listed and older buildings. It will also help people understand why change is needed and how much this change is contributing to One Planet Living.

Statement of Changes:

Any Other Comment:

Officer Response:
Policy CP12 must be read in conjunction with policy CP8 on Sustainable Buildings and the last paragraph of the supporting text makes clear the important link between these policies. With regard to existing building stock, policy CP15 on Heritage makes reference to the potential for conflict between conservation and energy conservation and detailed guidance on retrofitting will be produced to support this policy.
Summary of key comments made by Brighton & Hove Hoteliers Association:

1) New entrants have far outstripped exits in bedspace numbers, and the city has failed to generate developments to support the expansion
2) We have a crisis of overcapacity in visitor bedspaces which must be addressed
3) Businesses have become unviable both operationally and as going concern propositions, with some going into administration and others close to it
4) The ‘core area’ map is an anachronism and should be abandoned
5) Change of Use rules are exacerbating the issues and should be relaxed.

Introduction - summary of key trends outlined in full in response:
The previous 2005 Local Plan seemed very geared to encouraging growth in the accommodation sector, possibly due to the resurgence of Brighton and Hove as a tourism destination in the late 90s, early 00s. A new style of ‘boutique’ small hotels developed which were ‘very Brighton’ expanded the quality product offering to visitors. The Local Plan was keen to preserve such products, which alongside the remaining large hotels and the remaining ‘old style’ B&Bs provided the ‘wide ranging type and cost’ of accommodation headlined in the City Plan. But the plan also supported, even encouraged, growth in all those product types.

As the 00s progressed, as the products improved and leisure tourism grew again, the beginnings of a downturn in conference visitors was noted, and, vitally, some shoulder period and off peak conferences were lost. Though leisure business was (almost) year round, and Brighton was heralded as a 12 month destination, this loss of conferences had a large effect on accommodation businesses both large and small. To begin with, smaller businesses in Regency Square and Russell Square began to suffer. As east of the pier Kemp Town grew its higher quality product, the western end of the city failed to keep pace. Prevented from conversion by the Local Plan’s ‘change of use’ restriction, many of those business resorted to DSS accommodation and HMO type long term stays, some of them ‘under the wire’ e.g. run down properties in Russell Square.

Most new ventures required high bank loans, more staff, better quality products, and these high costs provoked a balancing need for higher room revenue and higher occupancy. The famous ‘two night minimum stay’ at weekends was driven by necessity rather than greed. When the conference market dipped and the shoulder/low periods softened, the ability to cover the high costs also dipped as occupancy rates fell off. By around 2005, for the first time in a while, businesses began to ‘wobble’.

However, over those years of the early 00s, planning applications for new hotels continued, and permission was granted. It seemed that every new development in the city came with a new hotel proposal - hotels being seen as easy drivers for acceptance given the employment opportunities that came with them. In 2005, concern was raised by the Hotel Association that there were already signs of over-supply, and certainly little room for growth. The commissioning by the council of the Hotel Futures Study attempted to allay our concerns by asserting that there was indeed room for the growth currently in the plan, so long as the city developed alongside the new rooms with a new Brighton Centre, the Black Rock Arena, and the i360 etc. At the time many in the Association were sceptical, but as we were being presented with a fait accompli, could do little except watch and wait.

The city has not developed in the expected way, yet the influx of new hotel rooms began as planned, with MyHotel, Jurys Inn, and Royal York leading the way, adding 365 rooms to the supply - an additional 15% more hotel rooms (+9% total serviced rooms across the city). Furthermore, as highlighted in the Draft City Plan 2012, there are an additional 372 rooms on the horizon having been agreed already. The Ibis Hotel build is underway, and will soon offer 140 of those rooms at very low rates which many businesses cannot hope to match. It is an expansion which is simply not needed given there are no new city developments. And in an ironic turn of events, whilst the Ibis build progresses, one of those more recent entrants - Royal York, has gone into administration.

The Hotel Futures Study stated:
‘Under the scenario where the current Brighton Centre continues to operate, our projected requirements for 3 star hotel development show potential for a further 107-193 3 star bedrooms by 2016. The planned Jurys Inn at the station site (234 rooms) would significantly exceed this requirement, particularly under the low and medium growth
The recession has slashed the revenues of existing businesses, as the oversupply and reduced demand has cut rates across all types of accommodation. The business plans of many of those Kemp Town refurbishments lie in tatters, with turnover now failing to cover costs in many cases. Some properties which were labelled ‘boutique’ ten years ago have not been able to keep standards up, and are now simply B&Bs, desperate to survive in a competitive market. Almost a reverse of those early 00s trends has been evident for some time. Some properties (Blanch House, Gerrards, Regency Townhouse, Royal York) went into administration, with more teetering close to it. And many businesses have been on the market for months, even years, with little hope of sale.

Policy CP12 derives from high level statements in earlier planning documents that have caused demonstrable problems in this area in recent years, and which now need clarification in the city plan in order to avoid further problems in future.

**OBJECTIONS IN PRINCIPLE**

1. We object strongly to the implications in this pair of policies that taller development could be appropriate for the north side of Kingsway anywhere between Welbeck Road and Boundary Road. Over the eight years since the Tall Buildings Study SPGBH15 was produced it has become clear through the planning application and the appeal process that tall buildings on Kingsway in West Hove would be out of place and damaging to residential amenity and the area’s domestic character. Redevelopment has been limited to four storeys. The City Plan now provides the appropriate opportunity to provide clarity and certainty by removing the strategic implication that taller development on this part of Kingsway in West Hove could be acceptable.

2. In outline our three reasons for saying this are:

   a) In this area the neighbourhood that lies between Kingsway and New Church Road overall comprises two storey houses. Such homes and gardens would be seriously overshadowed by the construction of taller buildings to their south. Hitherto the council and the Inspectorate have recognized this damage and have refused permission for several tall developments on Kingsway in this for this reason. There now can be no justification for encouraging development in future that would have such demonstrably damaging and unsustainable effects on daylight and sunlight to adjacent homes. The implications in these policies therefore would be inconsistent with the plan’s overall aims for improving the sustainability of existing development.

   b) Kingsway in West Hove is an integral part of a very pleasant 1920s Hove garden suburb. Such taller development would seriously damage the distinctive character and amenity of this well-loved neighbourhood. This has been recognised by the council and the Inspectorate. The implications in these policies in the city plan therefore would be inconsistent with the plan’s overall strategy for safeguarding the distinctive sense of place in the individual parts of the city.

   c) The policy would be undeliverable because all the large pre-war workshop/showroom sites on Kingsway have now been redeveloped. Adequate sites for taller buildings could only be created by assembling and demolishing a number of small private house sites. The quality and condition of houses in the area is such that this would be very unlikely to happen by 2030. However the existence of this undeliverable policy potentially would create concern and uncertainty for residents. Also, it would continue to misguide developers about the area’s potential.

Each of these reasons is explained further below.

**POLICY WOULD PROMOTE DAMAGING AND UNSUSTAINABLE DEVELOPMENT:**

3. To the west of Welbeck Avenue the northern side of Kingsway comprises the southern edge of an area of predominantly two storey houses built in the 1920s and 30s as part of a planned garden suburb of Hove. The maritime location, the southwards street vistas, and the overall low heights of the buildings was designed to create a very light and sunny neighbourhood which still provides a high quality of life in its streets, its homes and their gardens.

4. For many years the Council and the Inspectorate has safeguarded this by ensuring redevelopment of former several extensive pre-war garage workshop sites on the north side of Kingsway did not seriously overshadow homes to their north. Saxon Court was developed on one such site in the 1990s and is now a block of four storey flats.

5. Proposals to develop another nearby garage site, Caffyns, with a six storey block of flats were rejected by the council in 2006. An appeal was dismissed by an Inspector, also in 2006, on the grounds of the proposal being out of scale and overshadowing homes to its north. (Appeal Ref: APP/Q1445/A/06/1198243 Land at 331 Kingsway). The Inspector found that 'Even though the overshadowing would occur at times when the gardens would not normally be used for recreational purposes, they would remain in shadow for a significant part of the winter season and result in dull and gloomy areas when viewed either from within the dwellings or in terms of any limited use'. This was a factor which was considered ‘would detract from the standard of residential amenity that occupiers of these neighbouring properties can expect to enjoy in this particular
location’. A four storey block was subsequently approved by the council and is now under construction.

6. Also, in 2012 the council refused an application to build five storey blocks of flats in this area on the south side of Kingsway. One of the reasons being that for 11 weeks in winter their shadows would extend across the road and overshadow the houses on the north side.

7. Therefore the evaluation of all these past proposals has clearly demonstrated that tall buildings anywhere on this part of Kingsway would seriously damage residential amenity of domestic scale homes, gardens and streets to their north by depriving them of daylight and sunlight, especially in winter when they would be overshadowed for much of the day. Not only would this be dreary and depressing but also would reduce the high levels of natural light and heat enjoyed in existing houses for the past 80 years.

8. National planning guidance has recognised siting tall buildings south of lower houses has been recognised as unsustainable development. Siting tall development on the north side of Kingsway, west of Welbeck Avenue, therefore would not be sustainable development because it would inevitably reduce the sustainability of existing houses.

POLICY WOULD DESTROY THE DISTINCTIVE SENSE OF PLACE OF THIS PART OF THE CITY

9. The area of west Hove between Kingsway and New Church road is a distinctive neighbourhood which was developed in the 1920s and 30s as a garden suburb that linked the grander Edwardian streets in Hove to the more modest Edwardian homes east of Boundary Road. The garden suburb included building attractive two storey semi-detached houses set out along a grid of tree-lined streets leading down to the seafront/harbour’s edge at Kingsway. It was developed in conjunction with the creation of Hove Lagoon and the western esplanade, and the provision of a Kingsway neighbourhood parade of shops, a pub, and car garages/showrooms.

10. The light sunny maritime character of this area derives from its scale, layout and location. The houses on the north side of Kingsway are an integral part of these, and tall buildings there would destroy the area’s character in the southwards outlook from homes, gardens and streets in the neighbourhood. For example in the Caffyns site appeal the Inspector said that a six storey block on Kingsway would loom large and appear overbearing in neighbours’ views from the existing modest sized gardens.

11. The area’s distinctive character is highly prized by its residents, and it has been popular as a place to live since it was built 80 years ago. At the time a large part of the area was described as the ‘West Hove Garden Estate...laid out on Garden City lines to provide ample light and air’. Now, at a time when the qualities of Garden Cities are being recognized once again as a model for development, it would be inappropriate to damage the character of this garden suburb of west Hove.

12. We cannot see any rationale for taller buildings on the north side of Kingsway in this part of west Hove as a contribution to the ‘greater consistency of scale, height and roofline along the north side of Kingsway’ in policy SA1. The policy could be interpreted as promoting a wall of tall development from central Hove to Boundary Road, regardless of the context of the adjoining development, as happened in the Caffyns appeal in relation to the similar statement in SPGBH15.

13. It is our view that the scale on the seafront should reflect and respect its adjacent context. Moving westwards from the centre the scale of development in Hove south of Church Road/New Church Road reduces from urban to suburban. We believe that the scale of development on Kingsway should reflect this and any future development at it western end should in terms of City Plan policy CP12 be ‘required to establish a strong sense of place by responding to the diverse character and urban grain’ of this neighbourhood by respecting its scale’. This would preclude development of six storeys or more in this area and maintain the consistency of roofline in this neighbourhood.

POLICY WOULD BE UNDELIVERABLE AND WOULD CREATE UNCERTAINTY

14. The three large pre-war garage/workshop/car showroom sites on this part of the north side of Kingsway have been redeveloped with four storey blocks of flats (Saxon Court, the Caffyns site, and Harbour Lodge). Apart from the modern filling station/convenience store site the remainder of the property on this part of Kingsway now comprises individually owned houses on small plots.

15. The houses are sound and well maintained and by 2030 they will be barely 100 years old. Houses in the area have been popular since they were built, and there is every reason to believe that they will remain so. They are individually owned and groups of these properties would need to be acquired to assemble sites of suitable depth and width to enable a satisfactory layout for tall buildings on the north side of Kingsway. The practical and financial implications of such land assembly in this area suggest that it is not realistic to expect this to be realistically feasible.

16. The Caffyns site appeal showed that the inclusion of this end of Kingsway as corridor suitable for taller buildings in the 2004 Tall Buildings study SPGBH15 promoted damaging development proposals. Despite being realistically undeliverable in future, the continued existence of a policy supporting tall buildings on the north side of this part
of Kingsway would create uncertainty amongst residents about the risk of future development proposals that would damage their local amenity. Likewise the existence of the policy would mislead developers about the development potential of the area. As the past 8 years has shown, resisting speculative schemes for tall buildings would demand substantial time and resources from residents and the council. This could be avoided in future by clarity in the City Plan part one.

17. The SPGBH15 clearly states not all sites within a corridor will necessarily suit a tall building. It goes on to say that, in assessing whether such a scheme would be acceptable regard should be paid to: the area's existing built form, massing; the requirement to respond positively to surrounding building heights and street frontages; the need to provide a building which is of a compatible scale and building alignment with its surroundings; and to ensure that the qualities of the immediate location and setting are enhanced. Events since 2004 show that NO part of the end of the corridor, in west Hove is suitable for taller buildings.

18. Therefore in the interests of certainty for residents and for developers there should be no reference to the possibility of taller buildings being built on the north side of Kingsway, west of Welbeck Avenue. In the light of the refining of the vision of the Kingsway corridor that was contained in 2004 in SPGBH15 by the subsequent planning process we now believe that it is indefensible to retain this threat in the City Plan Part One strategy, and that these strategic policies need to be appropriately amended.

19. We therefore consider that, to remove the damaging suggestion that tall buildings might be acceptable in the westernmost part of the north side of Kingsway, both Policy SA1 and CP12’s supporting text paragraph 4.134 should be amended by addition of the words IN CAPITALS as below.

**Statement of Changes:**

Proposed amendment to Policy CP12 Urban Design’s supporting text paragraph 4.134:

4.134 Given the city’s physical constraints there is a need to increase density on existing brownfield land in a sustainable manner. Taller buildings (in the context of the city’s prevailing built form) offer one potential way of achieving this in appropriate locations. This policy seeks to ensure that such proposals are directed towards those broad areas where such potential has been identified. The areas are described in greater detail as follows:....(etc)

Western Seafront / Kingsway is THE PART OF THE a linear corridor along the stretch of Kingsway, EAST OF WELBECK AVENUE, that directly overlooks Hove’s Western Lawns.

**Any Other Comment:**

These comments and suggestions have been circulated by email to members of the Kingsway and West Hove Residents Association and have been given strong support by local residents, with no opposition.

**Officer Response:**

Thank you for your representation. Your responses have been considered and noted. Your concerns regarding taller development to the west of Welbeck Avenue have been reflected through an amendment to the policy that describes the linear corridor of tall buildings in the Western Seafront/Kingsway as reach west to Wish Road.

The policy has also been amended to clarify that the identification of tall buildings nodes and corridors does not necessarily mean that tall buildings will be acceptable on the site. Further guidance will give more detail on appropriate heights in the Urban Design Framework.
### Further Details:

Development and change prevent stagnation. There are some areas of Brighton that have been deemed Conservation Areas which really ought not to be – I am thinking specifically of the areas around Lewes Road with little architectural merit, and where housing was built over 100 years ago of low-grade bungarooosh and the buildings were presumably expected to have a 40-60 year long lifespan. The worst culprits are namely Round Hill and Hangleton.

Now would be a good time to relax these and allow developers to increase and improve the housing stock in our city in order that these areas can regenerate and emulate the regeneration successes of areas unconstrained by conservation area controls (such as Poets Corner).

### Statement of Changes:

**Any Other Comment:**

**Officer Response:**

The designation of conservation areas is a matter for policy CP15 Heritage and that policy makes clear that new conservation areas will be considered through the updated Conservation Strategy, which will be subject to public consultation.

### Further Details:

The second part of the policy on Urban Design does not appear to make links to a landscape framework for the city, or seek to include planted green spaces to provide areas for relaxation that also aid urban cooling; adding to the street trees and biodiversity promised in Policy CP13 and the open spaces promised by Policy CP16.

### Statement of Changes:

**Any Other Comment:**

**Officer Response:**

The supporting text has been amended to state that planted green spaces may provide areas for relaxation that also aid urban cooling.
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**Further Details:**

We object to tall buildings along the North side of Kingsway, West Hove. It would totally ruin the current 'open plan' of normal residential houses, mixed with one or two buildings of varying, low heights. Low being up to about 10 metres maximum. High buildings along the North side of the Kingsway will also limit sunlight/daylight to those houses immediately behind these buildings. Obviously, with the increased number of residents, car parking will be drastically affected, even though some form of parking may well be planned for within the developments. You cannot prevent people from owning cars and this will put extra pressure on the surrounding streets.

Apart from the parking problem, the increased number of residents will put strain on the local amenities. With the plans for the future for residential housing/mixed use within the Aldrington Basin, (North side), the 'new' local population will explode, as will traffic, in an area which can never support such expansion, and will certainly be to the detriment of local residents.

It would be a bonus if some of these planners/architects put themselves in the position of the people whose lives are blighted by their planning/developments!

Under the circumstances we support the detailed objections to Policy SA1 and Policy CP12's supporting text para 4.134 which have been submitted by The Kingsway and West Hove Residents Association, and their proposed amendments.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.

Proposals for an increase in residential density will need to have regard to policy CP7 Infrastructure CIL and Developer Contributions and CP9 Sustainable Transport.
Further Details:
The Hove Station area is identified by Policy CP12 as suitable to accommodate taller developments (18 metres or more in height). It is assumed (and therefore welcomed) that the Newtown Road area is part of this tall buildings node, however, the City Plan needs to clearly define the boundaries in map/plan form.

Please contact planning agent if you wish to discuss the issues raised in these representations further.

Statement of Changes:
Given the substantial housing shortfall identified in the Draft City Plan, we propose the following changes to CP12:

# Additional tall building zones need to be identified and included in subsequent versions of the City Plan;
# The wording of CP12 needs to be amended to allow tall buildings outside these zones where conditions are appropriate.

Any Other Comment:

Officer Response:
The boundaries of the tall building areas will be defined in map form in the Urban Design Framework SPD.

The tall building areas were identified following a comprehensive Tall Buildings Study (2003) and no additional potential areas have been identified. The suggested amendment would introduce uncertainty into the policy and would lack a credible evidence base, which would put the policy at risk of being found unsound.

Further Details:
We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Please see the response made to Kingsway and West Hove Resident's Association.
Further Details:
There should be an articulated commitment to art in public realm and the role of art in architecture and design in this section in addition to the mention on p 159

Statement of Changes:
Point 1: could be changed to say ‘Raise the standard of architecture, public art and design in the city’

Any Other Comment:
We should be striving to make buildings distinctive - not just high quality but landmarks
The role of art and design is key in any public realm development
The issue of accessibility is also key in any design and development

Officer Response:
The importance of public art to the public realm is recognised in policy CP13 on Public Streets and Spaces.

The supporting text states that innovative contemporary architecture, which enhances the reputation of the city, will be actively encouraged. But not every site is appropriate for a landmark building.

With regard to accessibility, the policy itself requires that new development must be inclusive, adaptable and accessible.

Further Details:
Plan should ensure design policy is flexible and guide overall scale, density, massing, height, layout etc in line with para 59 of NPPF.

Statement of Changes:

Any Other Comment:

Officer Response:
The policy does not go into unnecessary detail and is considered to be in conformity with paragraph 59 of the NPPF.
Further Details:

Keep the commitment to art in the existing planning policy i.e. public realm and percent for art -

Point 1: Raise the standard or architecture, art and design in the city

Statement of Changes:

Any Other Comment:

Officer Response:

The importance of public art to the public realm is recognised in policy CP13 on Public Streets and Spaces.

Further Details:

CP12 Urban Design

We agree generally with the expectations on “all new development”. However, we have concerns regarding the interpretation and implementation of the second expectation: There are areas of the city, typified by those alongside St James's Street, where the strong sense of place in quiet historic residential side streets in a conservation area is severely damaged, and is at risk of being destroyed, by the promotion of an excessive contrast of character in the minority of commercial streets central to such an area.

Decisions on the design of new development in areas like St James’s Street should be guided by the styles, materials and proportions of the historic architecture, conducive to quiet and polite usages and a calm "sense of place" suited to the conservation area.

To the same ends, we recommend the insertion early in this section of a cross reference to the second, third and eighth of the ten measures proposed in the policy on Public Streets and Spaces (CP13).

Statement of Changes:

Any Other Comment:

Officer Response:

The policy includes a requirement that new development must conserve or enhance the city’s built heritage and its settings. Policy CP15 on Heritage would also apply to new development in conservation areas.

New development would be assessed against all relevant policies in the City Plan, including CP13, so it is not necessary to make specific cross-reference to part of that policy. The last paragraph of the supporting text does make clear that there is an important link between these two policies however.
The South Downs National Park Authority (SDNPA) supports the overall aims of the draft City Plan. The SDNPA appreciate that the split in responsibility for planning within the administrative area of Brighton and Hove Unitary Authority can cause some confusion. However, it would be useful to make it clearer throughout the document how the division of responsibility for planning matters within the Unitary Authority operates and that all planning policy for the SDNP will be dealt with by the SDNP Local Plan.

The South Downs National Park Authority would request policy SA5 be removed from the City Plan. With regard to the important discursive text supporting the policy, especially describing the role and aspirations of the City Council as landowners, it is suggested that this text be inserted elsewhere in the document to retain this important commentary.

There is a requirement for particular care over development proposed on the urban fringe of the city. As these proposals could have a significant impact on the surrounding landscape of the South Downs National Park careful consideration must be given to the impact of any proposals on the setting of the South Downs National Park and its two Purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA supports the overall aim of the spatial distribution of development to minimise transport impacts and the continued protection of the South Downs National Park.

SDNPA support the aims and objectives of the Brighton Biosphere Reserve which align with the Purposes and Duty of the South Downs National Park (SDNP) and the objectives of the Nature Improvement Area - ‘South Downs Way Ahead’.

(Comments allotted by BHCC officer)

Statement of Changes:

Any Other Comment:

Officer Response:

Welcome support on the overall aim of the draft City Plan, aims and objectives of Brighton Biosphere Reserve and spatial distribution of developments.

It is considered that with amendments to address issue of clarity of responsibility , SA5 South Downs is an appropriate strategic and spatial policy to contain in the City Plan part 1 which sets out the council's aspirations and priorities for land within its administrative area within the National Park. Amendments to SA5 clarify that development proposals must not have any adverse impact on the setting of the National Park and its purpose.
Further Details:
Para4.133 is not clear as to how this policy clarifies areas where buildings just over 18m high would be acceptable and where buildings between 18m and 45m high would be unacceptable.

Para4.134 lists areas of the city where increased density could be achieved by permitting tall buildings. Tall buildings in all of these areas would be completely out of scale with their surroundings such as Hove Station and central seafront.

Tall buildings along the seafront would block views of the sea from other areas of the city. Examples are Sussex Heights and the Holiday Inn Hotel, which are also very ugly. No building should be higher than the Grand, for example.

Statement of Changes:
Para1: A presumption in favour of low to medium rise development (apart from those areas where the City Plan has identified taller buildings as being appropriate).

Item 4: The aim should be to conserve and enhance the city's built and archaeological heritage.

Any Other Comment:
The Tall Buildings Statement should be revised as part of the Draft City Plan.

Officer Response:
Guidance on appropriate height ranges in each tall building area will be set out in the Urban Design Framework SPD.
The tall building areas were identified following a comprehensive Tall Buildings Study (2003). The supporting text has been expanded to clarify that inclusion of a particular site within one of the tall building areas does not warrant certainty that a taller building would be acceptable on that site and particular regard must be had to any potential impact on heritage assets and their settings. The identified tall building areas are generally outside of conservation areas (with the exception of part of the Western Seafront/Kingsway corridor).

The policy already states that “density will be raised through predominantly low-to-medium rise development” so this change is not considered necessary.

The wording of the policy reflects Government policy in the NPPF, with which the City Plan must be in accordance.

The current Tall Buildings SPG will be superseded by the Urban Design Framework SPD (where it is not already superseded by this policy) and the supporting text has been amended to clarify this point.
Further Details:

The tall building areas designated by Policy CP12 are welcomed but the boundaries of the zones need to be clearly identified by the City Plan. Additional tall building areas will need to be identified if the City Council is to meet the identified housing requirements.

2.33 Hyde fully supports the council’s plans for enhancing and protecting the city’s look, and it fully chimes with Hyde’s own commitment to delivering housing of the highest quality of design and materials and which is in harmony with the character of the local area. This is why Hyde’s buildings frequently win design awards including by the Royal Institute of Chartered Surveyors, the Daily Telegraph and others. Hyde currently participates in design review meetings of the South East Regional Panel and would support the setting up of a local design panel.

Hyde fully supports the council’s plan to make new housing comply with the Building for Life standards (paragraph 4.136). All Hyde’s new developments comply with the Lifetime Homes standards, and at least ten per cent are fully accessible and adapted for wheelchair users. Design shouldn’t be too restricted by surrounding character in order to avoid stifling innovation and new design.

Statement of Changes:

Any Other Comment:

Officer Response:

The boundaries of the tall building areas will be defined in map form in the Urban Design Framework SPD.

The tall building areas were identified following a comprehensive Tall Buildings Study (2003) and no additional potential areas have been identified. The council’s approach to meeting its housing requirements is set out in policy CP1 on Housing Delivery.
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**Further Details:**

The identification of the Lewes Road Area as being suitable for taller developments by Policy CP12 is supported. The policy identifies that 'Eastern Road/Edward Street' may also have potential for taller buildings. It is unclear whether the policy is intended to refer to these streets only or the wider 'Eastern Road and Edward Street Area' identified within Policy DA5.

**Statement of Changes:**

The City Plan should utilise consistent terminology throughout to ensure clarity within the policies, and specifically, clarification should be provided in respect of Eastern Road/Edward Street area definition.

**Any Other Comment:**

**Officer Response:**

The DA5 policy area is wider than the tall building corridor for Eastern Road/Edward Street identified in CP12. The DA5 policy area is shown on the map that accompanies that policy. The extent and focus of the tall building corridor is described in the supporting text to CP12 and will be defined in map form in the Urban Design Framework SPD.

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**Further Details:**

CP12: Urban Design: We welcome the announcement of the Urban Design Framework and would suggest that the following issues are also covered in the framework: We believe that as a priority decisions need to be taken on identifying any new potential conservation areas. We are also particularly keen to refine the framework for existing conservation areas, especially in those cases where development pressures are identified in the Urban Design Framework either within, at the perimeter or adjacent to existing conservation areas. In this context we believe that we must address the question as to which conservation areas or parts of conservation areas should be completely preserved, where any new build must faithfully respect the imagery of the older parts and in which areas more modern idioms will be acceptable or indeed desirable. We believe that planning briefs for key areas of potential change should be prepared long in advance of the development process starting. This is to avoid the discussions which have been had for example in relation to the 189-191 Kingsway redevelopments. We believe that sub-policy 7 should add after 'external spaces' the words ‘adjoining roads’.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments of partial support are welcome and noted. The identification of potential conservation areas and management of development pressures on existing conservation areas will be addressed through Policy CP15 whereby a framework of future Conservation Area Management will be devised through the forthcoming Conservation Strategy.
Further Details:

Meeting the needs of older people: it is very encouraging that mention is made in the Draft City Plan (notably in CP 18 Healthy City, CP 12 Urban Design, and CP13 Public Streets and Spaces) of services and support affecting older communities, in particular regarding housing needs, health and environments, improved public spaces, and safe and accessible transport, but I suggest that it is vital that the needs of the older community are recognised and taken into account in all aspects of planning for the future. This is not simply to meet the concerns of those who are older now: ageing and the challenges of declining health, reduced economic security, impaired mobility, and loss of family and friends will affect more people in due course, and the City needs to prepare now for a different society.

Statement of Changes:

Any Other Comment:

Officer Response:

Acknowledge comments. Throughout the plan the council seeks to make provision for older people in all aspects of planning for the future. It was felt that a range of references throughout the plan, rather than a specific single policy regarding older people, would better meet this requirement. More specific references will be made in the City Plan Part II.

Further Details:

Brighton & Hove’s Tall Buildings Strategy was developed in 2004 but no tall buildings have been built in the city and there continues to be resistance to plans for tall buildings especially from residents.

Nevertheless they should form an important element of housing delivery and the boundaries of the tall building zones and nodes should be clearly marked on plans/maps in the City Plan.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments of support are welcome and noted.
Customer No: 63   Customer Name: Roger Hinton
Organisation: Regency Society   Support Status: Support
Rep Number: 13   Page/Para: /   Policy: CP12 Urban Design
Section/Supporting Doc/Annexes: Part Four - City Wide Policies (An Attractive City)

Further Details:
CP12: Urban Design - We welcome the commitment to develop an Urban Design Framework and hope that the Conservation Advisory Group and amenity societies such as the Regency Society can play a significant part in the process.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments of support are welcome and noted.

Customer No: 240   Customer Name: Graham Towers
Rep Number: 1   Page/Para: /   Policy: CP12 Urban Design
Section/Supporting Doc/Annexes: Part Four - City Wide Policies (An Attractive City)

Further Details:
We welcome the announcement of the Urban Design Framework and would suggest that the following issues are also covered in the framework:

- We believe that as a priority decisions need to be taken on identifying any new potential conservation areas.
- We are also particularly keen to refine the framework for existing conservation areas, especially in those cases where development pressures are identified in the Urban Design Framework either within, at the perimeter or adjacent to existing conservation areas.
- In this context we believe that we must address the question as to which conservation areas or parts of conservation areas should be completely preserved, where any new build must faithfully respect the imagery of the older parts and in which areas more modern idioms will be acceptable or indeed desirable.

- We believe that planning briefs for key areas of potential change should be prepared long in advance of the development process starting. This is to avoid the discussions which have been had for example in relation to the 189-191 Kingsway redevelopments.

Statement of Changes:
Point 7 should add after ‘external spaces’ the words ‘adjoining roads’.

Any Other Comment:

Officer Response:
The designation of conservation areas is a matter for policy CP15 Heritage and that policy makes clear that new conservation areas will be considered through the updated Conservation Strategy, which will be subject to public consultation. The supporting text to policy CP15 has been expanded to provide broad guidance on new design within conservation areas. Further detail will be provided in the Urban Design Framework SPD and in individual conservation area management plans.

The supporting text has been amended to refer to planning briefs.
Further Details:
Brighton & Hove’s Tall Buildings Strategy was developed in 2004 but no tall buildings have been built in the city and there continues to be resistance to plans for tall buildings especially from residents.

Nevertheless they should form an important element of housing delivery and the boundaries of the tall building zones and nodes should be clearly marked on plans/maps in the City Plan.

Statement of Changes:

Any Other Comment:

Officer Response:
The boundaries of the tall building areas will be defined in map form in the Urban Design Framework SPD.
Further Details:

CP13 Public Streets and Spaces
2. Para 4.141. This paragraph correctly states that “the purpose of this policy is to ensure that new development contributes towards the implementation of public urban realm improvements proposed by the Public Space Public Life Study (2007) where appropriate.”

We were disappointed that the recent planning application for the Ice Rink hotel was approved in spite of representations we had made that the development should include a new pedestrian link between Queen Square and St Nicholas churchyard. This proposal had in fact originated in the Conditions of Sale prepared by the City Council, but these had not been followed up in the planning brief for the hotel. As a result an opportunity to make a significant improvement to Brighton city centre by opening up a new and better route between the city centre and St Nicholas Church and to take advantage of the excellent views of the Church from the churchyard from the south-east have been lost. This is not the place to pursue this issue— but we use it to show how the current policy somehow failed to do precisely what the current proposals say should be achieved and by highlighting this, try to make the point that future opportunities such as this should not be missed in future.

Please state the changes you would like to see incorporated into the document.
1. Para 1 – Item 10 should include besides street furniture, that the appearance and visual impact of signage and advertisements should also be controlled.
2. Para 4.142

This paragraph refers to the award-winning re-design of New Road. This sets a standard to which all future public space improvements should match or better. The recent proposals for public space improvements in the Ann Street area, although welcome, did not result in any schemes of quality, and in fact were mostly gimmicky and contained little of any long term value. Something went wrong here, and we would suggest that other proposals such as Valley Gardens and the Old Town Traffic Improvements should be better managed in future.

4. Tourism
CP13 makes no reference to the importance of Tourism to Brighton. The policies set out will no doubt make the city a more attractive place for tourists, but major issues such as the West Pier and the i360, and the improvement of open spaces to cater for the many tourists and overseas students who visit the city and stay here, are not mentioned as an important factor in determining policies for public streets and spaces. Neither is there any mention of the problems caused in the streets and public spaces by large numbers of tourist buses, nor any measures proposed to resolve this problem.

5. Generally
Improvements proposed which increase the amount of public space and reduce the area of roadways, although we fully support such policies in principle, could result in significant additional traffic congestion, including potential problems for public transport. Yet the City Plan fails to recognise that there is a link between such highly welcome improvements and resolving any consequential traffic and public transport problems, or to make any realistic proposal for giving both car users and public transport passengers an alternative way of moving in and out of or around the City.

We strongly believe that the only realistic way of achieving this is to put in place a proper Park and Ride policy which addresses the real problems of how to reduce traffic volumes in the central area and yet will still allow people from outside the central city area to enter and leave the City easily and inexpensively.

We discuss this further in our response to Section CP9 Sustainable Transport.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments have been considered and noted. The issue of signage has been reflected in an amendment to point 10 in the opening paragraph. With regard to overseas students, this has been appropriately addressed in amendments to policy CP5 Culture and Tourism. Concerns regarding the impact of traffic generation are more appropriately addressed through policy CP9 Sustainable Transport.
### Further Details:

**Customer Name:** Dr Janie Thomas  
**Organisation:** The Kingscliffe Society  
**Support Status:** Partly Object  
**Rep Number:** 9  
**Page/Para:**  
**Policy:** CP13 Public Streets and Spaces

We have particular concerns regarding the past practice in the commissioning of public art in the East Cliff conservation area. The aids memorial, singled out in this section of the plan, is remarkable but provokes mixed reactions, and may have a depressing and despiring effect. The grey "desire" slogan on the Madeira Wall is intrusive, drab and tawdry in appearance, and selfish and inane in meaning - unlike, for example, the simple but subtle, and far more Brightonian "kiss" column facing East Street. We especially regret the lack of wide or local consultation conducted on much public art introduced into the city in recent years, and we look forward to reading the forthcoming planned "guidance" on the subject in the hope that well publicised consultation will be proposed in it.

### Statement of Changes:

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been considered and noted for the subsequent guidance on the implementation of Public Art.

### Further Details:

**Customer Name:** Helmut Lusser  
**Organisation:** Hove Civic Society  
**Support Status:** Partly Support  
**Rep Number:** 18  
**Page/Para:**  
**Policy:** CP13 Public Streets and Spaces

**Further Details:**

CP13: Public Streets and Spaces: we welcome this policy and the reference to New Road in the supporting text. We also support the reference to street trees and biodiversity and its linkage to policy CP10, see our comments above. We believe that the bullet point 4 should be rephrased to say: ‘reducing vehicular traffic and associated car parking’. This would bring it in line with the plans sustainable transport policies. We welcome the reference in 9 about public art. We would suggest that a reference in para 4.144 is made to identifying appropriate locations for public sculpture across the city. The general standard of new public sculpture would benefit from thorough consultation before the siting and an ambitious commissioning process aiming for public sculptures that are of highest quality and of potential international reputation.

### Statement of Changes:

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments of partial support have been noted and considered. With regard to public art, subsequent detailed planning guidance will be produced outlining measures for the implementation of public art including guidance on the extent and type of consultation.
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<tr>
<th>Customer No:</th>
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<th>Customer Name:</th>
<th>John Barry</th>
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<tr>
<td>Organisation:</td>
<td>Somerset Day Centre</td>
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<td>Part Four - City Wide Policies (An Attractive City)</td>
<td>Policy:</td>
<td>CP13 Public Streets and Spaces</td>
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**Further Details:**

Meeting the needs of older people: it is very encouraging that mention is made in the Draft City Plan (notably in CP 18 Healthy City, CP 12 Urban Design, and CP13 Public Streets and Spaces) of services and support affecting older communities, in particular regarding housing needs, health and environments, improved public spaces, and safe and accessible transport, but I suggest that it is vital that the needs of the older community are recognised and taken into account in all aspects of planning for the future. This is not simply to meet the concerns of those who are older now: ageing and the challenges of declining health, reduced economic security, impaired mobility, and loss of family and friends will affect more people in due course, and the City needs to prepare now for a different society.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments of partial support have been considered and noted. Community infrastructure and services will also be secured through the Community Infrastructure Levy (policy CP7).

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<tr>
<th>Customer No:</th>
<th>186</th>
<th>Customer Name:</th>
<th>Jackie Lythell</th>
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<tr>
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<td>Part Four - City Wide Policies (An Attractive City)</td>
<td>Policy:</td>
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**Further Details:**

We would like to see the expansion of the ‘shared space’ provision.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments of partial support are welcome and have been noted.
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<th>Customer No:</th>
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<th>Customer Name:</th>
<th>Janita Bagshawe</th>
<th>Organisation:</th>
<th>Brighton Dome Festival Ltd and the Royal Pavilion and Museums</th>
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**Further Details:**
Expand the shared space provision

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Thank you for your representation. Your comments of partial support are welcome and have been noted.

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**Further Details:**

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Thank you for your representation. Your support for this policy is welcome.
Customer No: 240  Customer Name: Graham Towers
Rep Number: 2  Page/Para:  /  Policy: CP13 Public Streets and Spaces
Section/Supporting Doc/Annexes  Part Four - City Wide Policies (An Attractive City)

Further Details:

We welcome this policy and the reference to New Road in the supporting text.

We also support the reference to street trees and biodiversity and its linkage to policy CP10.

We welcome the reference in 9 about public art.

Statement of Changes:

Bullet point 4 should be rephrased to say: ‘reducing vehicular traffic and associated car parking’. This would bring it in line with the plan’s sustainable transport policies.

We would suggest that a reference in para 4.144 is made to identifying appropriate locations for public sculpture across the city. Many of the objects of public art established in recent years have been lacklustre and have not helped Brighton’s reputation. The general standard would benefit from much more thorough consultation before the siting and an ambitious commissioning process aiming for public sculptures that are of highest quality and of potential international reputation.

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments of support are welcome and have been noted. Your comments have been considered and noted for the subsequent guidance on the implementation of Public Art.

Customer No: 100  Customer Name: Ron Crank
Organisation: Coast to Capital Local Enterprise Partnership  Support Status: Support
Rep Number: 38  Page/Para:  /  Policy: CP13 Public Streets and Spaces
Section/Supporting Doc/Annexes

Further Details:

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your support is welcomed.
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<th>Mr Andrew Whitaker</th>
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<td>Policy:</td>
<td>CP14 Housing Density</td>
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<td>Section/Supporting Doc/Annexes</td>
<td>Part Four - City Wide Policies (An Attractive City)</td>
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**Further Details:**

Policy wording reflects the problems the council is facing due to its failure to meet its forecast housing requirement. The council believes it can increase housing provision by requiring developers to increase density. This is not always appropriate, given the nature of existing housing and nature of needs. Conundrum exemplified by wording at para 2 and para 4 which requires developers to build at densities of at least 50 dph and then accepts that this may not be appropriate.

Higher densities can mean a lack of 3 or 4 bed housing being built e.g. family housing. Given that council's own aims are to provide more family housing then this policy militates against that aim and should be deleted.

Wrong for the council to focus on housing numbers rather than meeting the needs of families. Developers should not be pressurised or made to feel they are doing something wrong by proposing relatively low density development. Fourth and final paras are begrudging in this manner.

Should be a more inclusive policy, council should make it clear it will accept proposals across the whole housing market and that proposals will be considered on a site by site basis.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The supporting text to the policy makes clear that the density targets required by the policy have been regularly met and in many cases exceeded by approved schemes for a number of years. These schemes have often included a proportion of 3 and 4 bed units suitable for families and it is certainly considered to be achievable to provide family housing within higher density developments. Indeed many of the city’s traditional terraced streets where families live are high density. There is no conflict between paragraphs 2 and 4 of the policy. Paragraph 4 rightly allows for exceptions to the density targets in certain cases and the term “particular group or groups within the community” includes families.
Higher than national average density of 43 dph will worsen congestion in the city and spoil the unique architectural and social character of Brighton as a seaside resort. It will create 'ghetto' style development and increase demand on open spaces. The plan points out that there is not enough space to accommodate it. More housing means that this space will further diminish.

To avoid the disappearance of open public spaces, less houses in high density should be built. Many studies on social consequences of high density, high rise houses in London, have shown that such overcrowded environment induce antisocial behaviour, crime, feeling of deprivation and depression.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

As the supporting text to the policy makes clear, the density targets required by the policy have been regularly met and in many cases exceeded by successful schemes in the city for a number of years. Whilst the average density of new housing in England is 43 dwellings per hectare according to the most recent figures, the average density for brownfield land is 48 dph (as stated in paragraph 4.149). This figure is very close to the minimum of 50dph set out in the policy and new housing development during the Plan period is expected to be on brownfield land. The supporting text to the policy explains that, as demonstrated by the Urban Characterisation Study, many of the existing older urban areas within the city are relatively high density and these are often popular and sought-after areas in which to live. The supporting text also makes clear that successful new higher density development will depend on a ‘design-led’ approach that respects the local context.
Further Details:

HOUSING DENSITY
With the changing economic situation, home ownership is, for very young people, not achievable or, at best, a distant dream. With the changes in local housing allowance conditions not providing funding for single under-35s to occupy self-contained accommodation and many young professionals choosing to share, the need in the city for “shared accommodation” is greater than ever, but other than the provision of student accommodation has been ignored completely in the Core Strategy, when in reality it is believed that the highest demand numerically for accommodation is by single persons. How can the City Plan be taken as a serious paper when the provision for what is numerically the greatest number is just ignored in preference to larger family accommodation?

Virtually no social housing providers provide shared accommodation (it requires intensive management skills) and it is left to private landlords to meet such needs, and perhaps that is why such needs are ignored. These matters need to be taken seriously and included in the City Plan if it is to have any credence at all. (Officer insert: Comments also allotted to CP19 and CP20. See also respondents response to CP21 [response no. 3]

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcome and noted. The housing delivery policy CP1 is concerned with additional housing to be delivered over the plan period and is considered realistic, deliverable and consistent with the strategy aims and objectives of the plan as a whole.

Further Details:

The minimum density for new housing of 50 dwellings per hectare is too high and too prescriptive. The Coalition Government recently removed the previous minimum density of 30 dwellings per hectare in the expectation that councils would be more flexible over their approaches and to ensure that larger family homes get built in sufficient numbers to meet demand. We agree with this approach and believe that the minimum density is unnecessary. The minimum figure is also considerably higher than the average density of new housing in England of 43 dwellings per hectare. Therefore, a new minimum density of 50 dwellings per hectare would represent a big step change in the type of housing being built in the city and would not adequately meet the needs of families in the city.

Statement of Changes:

Any Other Comment:

Officer Response:

Government policy in the NPPF encourages local planning authorities to set out their own approach to housing density and this is part of the localism approach. As the supporting text to the policy makes clear, the density targets required by the policy have been regularly met and in many cases exceeded by approved schemes in the city for a number of years. Whilst the average density of new housing in England is 43 dwellings per hectare according to the most recent figures, the average density for brownfield land is 48 dph (as stated in paragraph 4.149). This figure is very close to the minimum of 50dph set out in the policy and, with the exception of Toad’s Hole Valley (DA7), new housing development during the Plan period is expected to be on brownfield land.
### Customer No: 174
**Customer Name:**

**Organisation:** Infinity Foods

**Support Status:** Object

**Rep Number:** 2  **Page/Para:** /  **Policy:** CP14 Housing Density

**Section/Supporting Doc/Annexes**  Part Four - City Wide Policies (An Attractive City)

**Further Details:**

Whilst the aim of CP14 to make the full, efficient and sustainable use of land is welcomed, there is a risk that the minimum recommended density of 50 dwellings per hectare is taken as a target.

**Statement of Changes:**

The wording of this policy needs to be amended in order to encourage much higher residential densities wherever possible.

**Any Other Comment:**

**Officer Response:**

Your comments are welcomed and noted. The policy has been amended to clarify that density requirements are minimum not targets.

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### Customer No: 181
**Customer Name:**

**Organisation:** Harbour View Developments (Sussex) Ltd

**Support Status:** Object

**Rep Number:** 3  **Page/Para:** /  **Policy:** CP14 Housing Density

**Section/Supporting Doc/Annexes**  Part Four - City Wide Policies (An Attractive City)

**Further Details:**

Whilst the aim of CP14 to make the full, efficient and sustainable use of land is welcomed, there is a risk that the minimum recommended density of 50 dwellings per hectare is taken as a target.

**Statement of Changes:**

The wording of this policy needs to be amended in order to encourage much higher residential densities wherever possible.

**Any Other Comment:**

**Officer Response:**

Your comments are welcomed and noted. The policy has been amended to clarify that density requirements are minimum not targets.
### Customer No: 180  Customer Name: Newtown Ventures Ltd  
**Support Status:** Partly Object  
**Rep Number:** 6  **Page/Para:** 161/  
**Policy:** CP14 Housing Density  
**Section/Supporting Doc/Annexes:** Part Four - City Wide Policies (An Attractive City)

**Further Details:**

Whilst the aim of CP14 to make the full, efficient and sustainable use of land is welcomed, there is a risk that the minimum recommended density of 50 dwellings per hectare is taken as a target. The wording of this policy needs to be amended in order to encourage much higher residential densities wherever possible. Please contact planning agent if you wish to discuss the issues raised in these representations further.

**Statement of Changes:**

See above

**Any Other Comment:**

**Officer Response:**

Your comments are welcomed and noted. The policy has been amended to clarify that density requirements are minimum not targets.

### Customer No: 106  Customer Name: James Breckell  
**Support Status:** Partly Object  
**Rep Number:** 1  **Page/Para:** 160/  
**Policy:** CP14 Housing Density  
**Section/Supporting Doc/Annexes:** Part Four - City Wide Policies (An Attractive City)

**Further Details:**

Need for higher densities in some areas around the seafront and areas around parkland can take much higher densities so long as there is ample public outdoor space planned for too. Need for higher minimum gross internal areas like in Europe. Lifetime homes standards do not go far enough in terms of space standards.

**Statement of Changes:**

See above

**Any Other Comment:**

**Officer Response:**

The importance of proximity to open space was factor in determining the Development Areas and the Tall Building Areas under CP12 and these are the areas expected to accommodate the highest densities of new development.
Further Details:

CP14: Housing Density: We support this policy and suggest one amendment. We believe there is also scope for higher densities for car free developments as space will be saved. This should be highlighted in the bullet points. It would be appropriate to have a reference here to minimum dwelling size standards.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and noted. The word 'minimum' has been inserted and the words 'at least' removed with regard to density requirements.

Further Details:

The wording of Policy CP14 needs to make it clear that a net density of 50 dwellings per hectare is a minimum requirement and not a target, otherwise there is the potential for the policy to be misinterpreted. Higher levels of density may be achievable on urban brownfield sites and the Council is therefore urged to consider individual schemes on their merits rather than addressing density in isolation. The larger number of residents associated with higher density sites provides additional support for local amenities, sustainable transport provision and new community infrastructure.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and noted. The policy has been amended to clarify that density requirements are minimum not targets.
Further Details:
The members of our Housing Network discussed the City Plan at our recent meeting and viewed it with regard to the CVSF Housing Conference report (attached) which was held in April 2012.

Given the level of housing need and constraints of available space in the city we would urge the Council to allow high density housing to be developed with the proviso that this was built with environmental impact in mind and very high design standards which consider modern lifestyles, noise, health, accessibility for those with disabilities and safety in its widest sense. We believe that it is possible to live more densely in the city providing the right designs are used.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and noted. The policy has been amended to clarify that density requirements are minimum not targets.

Further Details:
We note the policy sets density requirements; however this should be applied flexibly and each scheme considered on its own merits.

Statement of Changes:

Any Other Comment:

Officer Response:

The last paragraph of the policy, which is explained further in paragraph 4.153 of the supporting text, allows for flexibility in appropriate circumstances. Developers will have the opportunity to put forward a case for a lower density when submitting an application and the local planning authority will carefully consider all such cases against the arguments put forward.
Further Details:

In the light of the housing shortfall we would urge the City Plan to promote building at the highest sustainable densities especially on brownfield sites.

With the exception of allowing lower dph where it can be 'adequately demonstrated that the development would reflect the neighbourhood's positive characteristics etc ', the policy should make it clear that 50 dwellings per hectare is a minimum and not a target.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and noted. The policy has been amended to clarify that density requirements are minimum not targets.

Further Details:

The City Wide policies within the draft document includes CP1, CP14, CP19 and CP20 that specifically concern housing provision in the City. As a major employer in the city the University supports the principle of delivery of further housing to meet local needs including affordable housing provision as this will assist with its retention and recruitment of staff.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed
In the light of the housing shortfall we would urge the City Plan to promote building at the highest sustainable densities especially on brownfield sites.

With the exception of allowing lower dph where it can be 'adequately demonstrated that the development would reflect the neighbourhood’s positive characteristics etc ', the policy should make it clear that 50 dwellings per hectare is a minimum and not a target.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are welcomed and noted. The policy has been amended to clarify that density requirements are minimum not targets.

--

This policy should recognise that the NPPF para 133 and 134 allow for particular circumstances in which the harm or loss to heritage assets can be allowed.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are welcome and noted however it is not considered necessary to repeat the wording of national policy with the city plan.
Further Details:
Heritage is a living thing and contemporary art has a crucial role to play in presenting and reinterpreting that and making it relevant to current generations which we would like to see referenced in this document, particularly for this city.

Statement of Changes:

Any Other Comment:

Officer Response:
The importance of public art is included in policy CP13 on Public Streets and Spaces, which is a city-wide policy that applies to all areas including historic areas. It does not need to be repeated in CP15.

Further Details:
CP15: Heritage: We broadly welcome this policy. However we believe that the last sentence in policy 1 requires amplification. We believe better policy guidance should be given to developers in terms of what design idioms are acceptable in which historic settings as defined by our conservation areas. We believe that some of our conservation areas need to be carefully 'repaired' with buildings that closely resemble the original design and imagery. Others on the other hand are very capable of accepting modern designs as long as for example rhythm and fenestration of the proposed developments reflect the original buildings. We believe that this is something that the urban design framework should provide the framework for. The conservation strategy should then programme the various steps needed to achieve this. We also believe there should be a reference here to promoting access and encouraging interest in local heritage.

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments are welcome and noted. The opening paragraph to the policy has been added to stating the promotion of the city's heritage to the overall aim.
Further Details:

CP15 Part 1 - Historic areas are affected not only by development within their designated areas (usually a Conservation Area) but also by development within their setting. We would suggest amending this section to read at the end 'for new development in and within the setting of historic areas'.

Supporting Text Paragraph 4.156 The Kemp Town Estate is one of only four Grade I listed Estates recognised by English Heritage in England and the only Grade 1 listed Estate by the Sea. As such it is an almost unique feature in Brighton and should be mentioned as such in this paragraph, after the Royal Pavilion. We are disappointed that the Sussex Extensive Urban Survey failed to mention this. We also suggest the words 'up to date' with reference to this Survey be removed as it is already 5 years old.

Statement of Changes:

Any Other Comment:

While welcoming the vision and wide scope of the City Plan, the Kemp Town Society is concerned that in various places the aspirations for dense development and high buildings conflict with the aspirations for the preservation of the City's many nationally important historic buildings and set pieces.

Developers will always seize on the wording of policies that grant maximum height and density and therefore profit. They will ignore sections such as CP15 where the City has limited the scope for such developments.

There must be absolute clarity in the City Plan that where there is a conflict between policies encouraging development of a density and/or height which conflict with the conservation policies and/or exceed the capacity of the surrounding area, then the conservation and capacity policies must prevail.

We cannot see any such statement anywhere in the City Plan.

Officer Response:

Your comments are welcome and noted. Part 1 of CP15 has been amended to reflect your concerns regarding development within the setting of heritage areas.

Whilst the importance of the Kemp Town Estate is recognised, it is considered that reference to it within the text of the policy would not be appropriate.

Reference to the Sussex Extensive Urban Survey has been removed.
CP15 Heritage

We are disappointed that the plan's coverage of heritage runs to a little over one page. While we agree with the sentiment in the first "aim" set out in this section, it is articulated in very general and equivocal terms. It is not elucidated or elaborated in the supporting text, only clarified by simple references to national designations and local conservation frameworks.

The third "aim" is that the "conservation strategy will be taken forward and reviewed."

The commitment to the value of conservation is expressed in very mild terms; and this commitment is scarcely strengthened in the supporting text by the aforementioned simple references to designations, strategies and assessments.

The future of the internationally renowned architectural heritage of the city depends on a robust and confident statement championing its preservation and protection. The draft city plan is a vital context in which such a statement can and ought to be made. In our view, in the interest of the East Cliff Conservation Area and of all elements of the city's heritage, it needs to be made far more fully and forcefully.

Statement of Changes:

Any Other Comment:

Officer Response:

This a high level strategic policy which will be supported by more detailed heritage policy in Part 2 of the City Plan and in Supplementary Planning Documents. The wording of the policy reflects Government policy in the NPPF, with which the City Plan must be in accordance. Nevertheless some further detail has been added to the supporting text at paragraphs 4.156 and 4.157.


Heritage is a living thing and contemporary art has a crucial role to play in presenting and reinterpreting that and making it relevant to current generations NB note this quote:

'Heritage provides the foundation of a confident, modern country, with a distinctive identity and character. We have only just begun to realise the enormous contribution heritage can make for citizens and communities throughout the UK.' (HLF strategic Plan 2008-13)

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted.
Further Details:

We broadly welcome this policy. However we believe that the last sentence in policy 1 requires amplification. We believe better policy guidance should be given to developers in terms of what design idioms are acceptable in which historic settings as defined by our conservation areas.

We believe that some of our conservation areas need to be carefully ‘repaired’ with buildings that closely resemble the original design and imagery. Others on the other hand are very capable of accepting modern designs as long as for example rhythm and fenestration of the proposed developments reflect the original buildings. We believe that this is something that the urban design framework should provide the framework for. The conservation strategy should then programme the various steps needed to achieve this.

Statement of Changes:

Officer Response:

Further guidance on new design in historic areas has been included in the supporting text at paragraph 4.157. The Urban Design Framework SPD will expand upon this (see CP12).

Further Details:

We need to promote the heritage of the city much more to attract a different type of visitor than is attracted by the late night economy. There needs to be much more emphasis on the historic environment with information boards in Conservation Areas and permanent displays in historic building like the Dome. Why are there so little in the way of free information on the heritage of the city. There ought to be free guided walks leaflets.

Statement of Changes:

Include references to ‘promote the heritage of the city’

Any Other Comment:

Officer Response:

Your comments are welcome and noted. The text of the opening paragraph of the policy has been amended to state that ‘the council will work with partners to promote the city's heritage’.
<table>
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<tr>
<th>Customer No:</th>
<th>186</th>
<th>Customer Name:</th>
<th>Jackie Lythell</th>
</tr>
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<tbody>
<tr>
<td>Organisation:</td>
<td>Arts and Creative Industries Commission</td>
<td>Support Status:</td>
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<td>Rep Number:</td>
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<td>Part Four - City Wide Policies (An Attractive City)</td>
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</tbody>
</table>

**Further Details:**
We need to continue to seek out new models to redevelop and maintain open spaces that keep open spaces available for the public.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Your comments are welcomed and noted.
Further Details:
The required standard of provision of 4.587/thousand population is considered excessive. Brighton has two extensive recreational areas - the coastline and the National Park. Residents don’t have to travel far to access these. Criticise failure of council to meet/get close to forecast housing requirements. Desire to improve open space standards is understood but only when it can realistically be achieved and not at the expense of housing provision. Inappropriate to restrict the provision of new housing on the grounds of lack of open space when that appears not to be the case. Council should re-assess this policy with the objective of seeing how it can meet its housing and open space requirements.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. Unfortunately without the methodology and evidence applied to result in your statement that the standards are excessive it is hard to provide a detailed response.

It is important to recognise that the sea and beach are seasonal and, in respect of Brighton & Hove, are a tourist destination so can become crowded during the summer. They along with the South Downs do not address all the functions provided by the different typologies and lie at some distance from many residents.

The standards detailed in Policy CP16 and supporting text were recommended by PMP in the Open Space, Sport and Recreation Study (October 2008) following thorough analysis and assessment of needs. When devising the standards regard was given to the physical constraints of the city and future development needs, including housing. The availability of the South Downs, beach and sea were also taken into account.

In view of the challenges facing the city in respect of future housing requirements, an Open Space Study Update was commissioned to review the appropriateness of the open space standards and to devise a scoring system to help inform the 2010 Strategic Housing Land Availability Assessment. The Update Study endorsed the local open space standards and considered them appropriate.
Further Details:

Green spaces should be preserved and free, the new parking charges at Preston Park are a shame and a soft touch 4 hour limit should have prevailed. I would never have bought a bench and a tree in the park last year if I knew I was going to have to pay to see it and am considering asking the council to move them free of charge.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted. Policy CP16 seeks to preserve the city's open spaces. It also seeks to maintain and where possible improve accessibility to open space. However, due to the remit of planning this normally only relates to walking distances rather than charges. Your comments relating to Preston Park and the new parking charges therefore relate to matters outside the control/responsibility of the City Plan and have been forwarded to City Parks.
Customer Number: 92  Customer Name: John L Duffy
Organisation: University of Sussex  Support Status: Object
Rep Number: 14  Policy: CP16 Open Space
Page/Para: Section/Supporting Doc/Annexes Part Four - City Wide Policies (An Attractive City)

Further Details:

The University is concerned that the policy (and CP10) appear to contradict DA3 policy that identifies the campus as a location for sustainable redevelopment and expansion. The university campus master plan also identifies major development proposals beyond the East Slope redevelopment confirmed by Policy CP21 and it considers these could be severely restricted or even prevented from proceeding by this policy if it were implemented in their current form.

Statement of Changes:

Urged the council to prioritise a review of these policies. A relaxation of these policies or preferably a change to the extent of land within its campus identified as a 'Natural Improvement Area' or 'Open Space' would allow these important developments schemes (not all of which will be allocated in a future development plan) to be brought forward within the campus during the life of the City Plan.

Any Other Comment:

Officer Response:

Thank you for your comments. The Nature Improvement Area was designated separate to the City Plan. It is not therefore for the City Plan to amend its boundary. The identified open space reflects what is currently in existence and acts as an important benchmark in view of the city's land use challenges. As reflected in the supporting text (former paragraph 4.165) it is not sustainable to assume a reduction in open space can meet the needs of the city's increasing population, indeed more not less should be provided.

The policy acknowledges loss of open space where it results from a development allocation in a development plan (criterion 1.a). Thus where it has been subject to consultation via the development plan process. Should the University submit a masterplan covering additional development to that already planned for this could be taken into account in the City Plan Part 2. Should development in accordance with the allocation not be necessary Policy CP16 would apply, thus making it clear there should not be an assumption that alternative development would be appropriate (eg its retention as open space would be sought).

It is also important to note that the planning system includes flexibility. Regard is to be given to material considerations when applying development plan policies. It is not therefore felt policy CP16 is unduly restrictive nor that the identified open space should be amended.
Further Details:

Open Space
More emphasis needs to be given to local food production / allotment provision than is being suggested. There is significant unmet demand already and there is likely to be more in future. Given the health and other benefits, such as the reduction in food miles, arising from people growing their own food this should be prioritised. It is not enough just to ‘safeguard’ allotments as in CP18 Healthy City, when more are needed.

Statement of Changes:

Any Other Comment:

Officer Response:

The open space standards include allotments. By virtue of CP16 new will development will be expected to make provision for additional allotment/food growing space. Paragraph 4.169 makes specific reference to the provision of on-site food growing initiatives within new developments. The demand and need for allotment/food growing space was assessed along with the other types of open space categories. It is felt the balance sought between the potentially competing open space uses is appropriate. It is not therefore felt policy CP16 needs amending in respect of this issue.

Further Details:

4. I didn't understand the Accessibility Standards in the Open Space Standards table on page 166. These refer to walking distances to the open spaces but it doesn't explain 'distance from what/for whom'. The table doesn't seem to relate to anything in the text.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed. A note has been inserted after the standards to provide greater clarity over the accessibility standards. Criterion 2 in the policy seeks the provision of open space within new development in accordance with the standards detailed in the table.
Further Details:

Policy CP16 Open Space, Page 165
Southern Water fully understands the planning authority's intention to retain and enhance open space. However, it is important that policies do not unduly restrict provision of essential water supply and wastewater infrastructure should the need arise. The policy text should recognise that essential utility development will be permitted if the benefit of the development outweighs the harm, and no reasonable alternative site is available.

Statement of Changes:

We propose the following addition to policy CP16:
Planning permission resulting in the loss of open space will not be granted unless:
  a) The loss results from a development allocation..
  b) The site is not part of a playing field..
  c) The proposed development is ancillary to the use of the open space..
  d) The site is physically incapable of meeting..
  e) The proposal is for essential utility infrastructure, and the benefit of the development outweighs any harm.

Any Other Comment:

Officer Response:

It is considered the inclusion of the suggested wording could result in open space becoming a focus for utility infrastructure irrespective of the quality of the open space and accumulative impacts on the use of a space. This is not considered appropriate in view of the constraints of the city and the acknowledged inability to meet the majority of the future open space requirements. There is therefore a need to retain existing open space and to optimise their open space use and to minimise encroachment from development.

The current policy is not considered to unduly prejudice utility providers. Major utility infrastructure would normally be consider via the plan making process and form a site allocation in the City Plan Part 2 and would therefore be accepted by virtue of criterion 1a. Other utility infrastructure would be subject to the individual merits of the proposal and determined in accordance with all relevant development plan policies and material considerations which could include regard to a lack in alternative sites for such provision/overriding benefits of proposal.
Further Details:

Representations are made in relation to land to the north of No. 40 Rosebery Avenue, Woodingdean.

The land appears to be covered by the City Plan, but lies outside both the built-up area and the countryside boundary. The land is privately owned. It is already partly developed with one house and the location of the built-up area is incorrect. The remaining land to the north should be designated as suitable for housing development.

Strongly object to the land being designated as an area of open space.

Statement of Changes:

1. Adjustment of the built up area boundary to include the existing house on the site.

2. Inclusion of the remainder of the site for housing development.

Any Other Comment:

Officer Response:

In respect of this area the built up area boundary accords with that in the Local Plan. The City Plan Part 1 considers strategic allocations. Smaller site allocations and/or minor built up area boundary amendments will be considered through Part 2 of the City Plan. For this reason it is not therefore felt appropriate to amend the built up area boundary or to consider the identification of the site for housing at this stage.

The City Plan merely reflects the Nature Improvement Area which was designated separately to the development plan. An audit of open space was undertaken in 2006/7 and helps to set a benchmark by which future gains and losses can be assessed. The audit of open space included both public and private open space for the reasons detailed in paragraph 4.165 of the draft City Plan Part 1. The open space sites identified on the policies map accord with the audit. Due to the scope of the City Plan Part I it is not considered the identified open space in this area should be amended at this stage.
Policy CP16 needs to set out what types of development would be acceptable on open space sites should the criteria 1a) to 1d) be met. Hyde requests that in view of the acute level of local identified need for new affordable homes, 100% affordable housing should be the only permissible use in such circumstances.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Whilst there could be merit in this approach in respect of land values, housing may not be appropriate on respective open space due to circumstances particular to a site. In view of the constraints within the policy it is not therefore felt appropriate to constrain it further by setting out a general restriction on the types of development/use to which such space can be lost to.

Non strategic site allocations will be included within Part 2 of the City Plan. This would allow for the consideration and, where appropriate, allocation of redundant open space for 100% affordable housing on a site by site basis should any such sites be identified.

It is not therefore considered appropriate to amend policy CP16 as suggested.
Further Details:

We request that 100% affordable housing is identified as the alternative use for open space sites which no longer serve a positive function. Provision of open space should only be required for major development where appropriate.

Statement of Changes:

Any Other Comment:

Officer Response:

Whilst there could be merit in this approach in respect of land values, housing may not be appropriate on respective open space due to circumstances particular to a site. In view of the constraints within the policy it is not therefore felt appropriate to constrain it further by setting out a general restriction on the types of development/use to which such space can be lost to.

Non strategic site allocations will be included within Part 2 of the City Plan. This would allow for the consideration and, where appropriate, allocation of redundant open space for 100% affordable housing on a site by site basis should any such sites be identified.

It is not felt the Policy should only seek to secure the delivery of the open space requirements generated by major developments. The City Plan plans for the period up to 2030. In view of the city's development pressures, the number of small development sites and consequent impacts on open space it is becoming more important regard to open space provision is given. The cumulative impact of a policy that does not allow for an ability to expect the smaller developments proposals to meet the open space requirements generated would be contrary to the delivery of sustainable development. Whilst the current economic situation is having an impact on development it is not sustainable to assume the council can make up shortfalls especially in view of the current public sector austerity measures. As currently in place additional guidance can be prepared to justify waivers for smaller developments in a manner which ensures it can be altered should the cumulative impacts indicate this to be appropriate.

It is therefore not considered appropriate to amend policy CP16 as suggested.
### Further Details:

We welcome the acknowledgement of beaches in this section though one passing mention in parentheses represents a minimal degree of attention. Moreover, in a section’s supporting text of twelve paragraphs, we would have expected a paragraph setting out the need for and methods of protecting the distinctive openness of the city’s beaches. Furthermore, we would welcome a statement recognising the intrinsic geological, geometric and aesthetic interest of this expanse of shingle stones forming such a major open space between the land and the sea.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

The policy/supporting text has been amended to make clearer the regard to be given to the beach and its open space offer.

### Further Details:

The South Downs National Park Authority (SDNPA) supports the overall aims of the draft City Plan. We support the aims and objectives of the Brighton Biosphere Reserve which align with the Purposes and Duty of the South Downs National Park (SDNP) and the objectives of the Nature Improvement Area - ‘South Downs Way Ahead’.

The South Downs National Park Authority would request policy SA5 be removed from the City Plan. With regard to the important discursive text supporting the policy, especially describing the role and aspirations of the City Council as landowners, it is suggested that this text be inserted elsewhere in the document to retain this important commentary.

(Comments allotted by BHCC officer)

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Your comments are welcomed and noted.
note BHEP comments on Urban Fringe[SA4 page 21]
(ii): BHEP comments: Given the housing shortage, there is a need to reassess the housing potential of some of the urban fringe sites earmarked for protection. In May 2010 Senior Planning Inspector Roland Punshon made it clear that he did not think that the previous version of the Core Strategy would pass an Examination in Public remarking that the local authority should have ‘gone down every rabbit hole’ to find land for housing.

With 160,000 hectares of national park within a few metres of the urban fringe and a housing shortfall well in excess of 7,000 homes, the City Plan may fail to convince the Inspectorate that greenfield fringe sites are worth saving to form part of the city’s green network.

Policy SA5[3] supports the role of the wider Downs in being the de facto major contributor to the city’s green space requirements stating ‘. . . . . recognise the role of the Downs in the city’s Green Network/Nature Improvement Area/open space framework’

Statement of Changes:

Any Other Comment:

Officer Response:

An assessment of the urban fringe undertaken as part of the work on the former draft Core Strategy (Submission April 2010) and SHLAA exercises indicate very little potential for housing within the urban fringe other than at Toads Hole Valley which is included within the City Plan. Any further potential could be considered under Part 2 of the City Plan which will make smaller scale site allocations.

Much of the urban fringe contains formal open space designations such as parks, playing fields, allotments and recreation grounds which are required to meet assessed open space requirements. The NPPF recognises the value of such resources and supports their protection. The City Plan Part 1 considers strategic allocations and identifies Toads Hole Valley, a former urban fringe site, as a development area. Smaller site allocations and thus smaller urban fringe sites will be considered through the City Plan Part 2 (thus where appropriate may form allocated housing sites that fall outside the Development Areas).

Two open space studies were undertaken to inform the approach taken in the City Plan Part 1. They both demonstrate the appropriateness of the open space standards and the need to retain existing open space. As recognised in the City Plan, paragraph 4.165, it is not sustainable to assume a reduction in open space can meet the needs of the city's increasing population. Indeed in view of the open space standards an increase in open space rather than a decrease should be sought. Thus the urban fringe sites identified as open space are required to meet assessed open space requirements. The NPPF recognises the value of such resources and supports their protection.

The role of the Downs as part of the city’s open space framework is reflected within CP16 via the reference to the Nature Improvement Area and the countryside. When revising the standards the offer of the Downs and seafront were taken into account.
Further Details:

note BHEP comments on Urban Fringe[SA4 page 21]

(i.e. BHEP comments: Given the housing shortage, there is a need to reassess the housing potential of some of the urban fringe sites earmarked for protection. In May 2010 Senior Planning Inspector Roland Punshon made it clear that he did not think that the previous version of the Core Strategy would pass an Examination in Public remarking that the local authority should have ‘gone down every rabbit hole’ to find land for housing.

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Statement of Changes:

Any Other Comment:

Officer Response:

An assessment of the urban fringe undertaken as part of the work on the former draft Core Strategy (Submission April 2010) and SHLAA exercises indicate very little potential for housing within the urban fringe other than at Toads Hole Valley which is included within the City Plan. Any further potential could be considered under Part 2 of the City Plan which will make smaller scale site allocations.

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The role of the Downs as part of the city's open space framework is reflected within CP16 via the reference to the Nature Improvement Area and the countryside. When devising the standards the offer of the Downs and seafront were taken into account.
Customer No: 65  Customer Name: Helmut Lusser
Organisation: Hove Civic Society  Support Status: Support
Rep Number: 21  Page/Para: /  Policy: CP16 Open Space

Further Details:
None

Statement of Changes:

Any Other Comment:

Officer Response:
Your support is welcomed and noted.

Customer No: 171  Customer Name: Chris Sevink
Organisation: Ditchling Rise Residents Association  Support Status: Support
Rep Number: 14  Page/Para: 163/  Policy: CP16 Open Space

Further Details:
We support the aims to improve access to and quality of open space in the city and recognition of the importance of retaining access to open space in the city. We welcome the acknowledgement that quiet open spaces will be explored further in city plan part 2.

Statement of Changes:
This may not be the right section (?) - but we would like to see acknowledgement in the plan of the role that small community open space initiatives can, and are, playing in providing access to nature and local food growing and some of the well being benefits afforded by larger open space - and support for these in the city plan (eg in our area the London Road Station Garden - there are others), and the recent formation of a voluntary open spaces network. While these spaces are small, and not necessarily in the management of the city council - they can be encouraged and supported.

Any Other Comment:

Officer Response:
Your comments are noted and an amendment to paragraph 4.166 is proposed to recognise the value of community open space initiatives which help provide access to nature, local food growing and well being benefits as well as social cohesion.
Further Details:

Hollingbury Hawks Youth Football Club is a voluntary organisation operating 12 youth football teams for 7 to 16 year olds playing home games in Brighton, and are one of a number of similar clubs across the City.

# It is our experience that the availability of appropriate provision for youth football across the city, but most noticeably in the core areas in which our club is based (Preston Park, Hollingbury, Hollingdean) is either lacking or of a poor standard. This is particularly the case for small-sided youth football (currently up to and including the Under-10 age groups but see note below) which requires specifically sized pitches.
# We would therefore wish to see a higher level of, and a more detailed vision for, the provision of outdoor sports facilities including outline processes for the continued management, flexibility and upkeep of these throughout the duration of the plan.
# We play in competitions ultimately governed by the English Football Association, who have recently published mandatory changes to pitch sizes and team numbers for all age groups up to and including Under 12, to begin in September 2013. This will mean changes and differing pitch size requirements for Under 7 and 8 teams (5-a-side); Under 9 and 10 teams (7-a-side) and Under 11 and 12 teams (9-a-side). Under 13 and 14 teams will continue to play 11-a-side but require youth-sized pitches; and Under 15 and above can use full-sized pitches if required. There is therefore a myriad of pitch-size requirements that will be necessary from September 2013 onwards, which will require either more outdoor facilities to be created to accommodate them or considerably better management practices being adopted to manage the flexibility of pitch usage that will be required.
# We note the comments in the plan about opening up resource in schools etc. but believe that this in itself is already at saturation point. We are lucky to have the use of a number of local schools (without which we would not be able to operate as many teams as we do) but doubt that there is much more spare resource in our area.
# Related to the above therefore, we would welcome a commitment to maximising the provision for outdoor/all-weather pitches in any new developments across the city as a stated policy.

In summary, we would like to see a greater emphasis placed upon the provision and management of outdoor facilities in order to help achieve the Council’s stated aspiration of increasing participation in sports and physical activities - specifically in our case related to football but generally with regard to availability of outdoor facilities.

I would welcome the opportunity to discuss any of the above.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted. The city's open space and sport requirements were objectively assessed in the Open Space, Sport and Recreation Study (2008) which was endorsed by the Open Space Study Update (2011). In view of the competing need for land in respect of housing, employment, education, medical facilities, open space etc it is not felt appropriate to seek a higher standard than that recommended/endorsed in the studies.

It is considered CP17, which relates just to sports provision, helps to ensure the City Plan appropriately emphasises the need for such provision.

The 2008 study and the City Plan recognise that the quality and management of provision can affect demand. However, these elements generally fall outside the control of the planning system. The detailed consideration of these matters would therefore be more appropriately addressed through other strategies and plans, such as the Sports Facilities Plan and open space strategies, rather than the City Plan.
Customer No: 92        Customer Name: John L Duffy
Organisation: University of Sussex        Support Status: Partly Support
Rep Number: 15        Page/Para: /        Policy: CP17 Sports Provision

Further Details:
There is no recognition in the policy or supporting text of the University's contribution to the provision of sports facilities in the City through its indoor sports centre and outdoor playing fields. These are central to the range of facilities offered by the University and, through its own sports strategy, it has ambitions to continue to invest in their improvement during the life of the City Plan. This approach and commitment to maintaining and enhancing sports facilities is fully inline with Policy CP17 and should assist the overall Council strategy. Indeed, given the range of high quality sporting facilities in close proximity within the Falmer area, the University considers there is scope for identifying Falmer as a sports hub within the City Plan.

Statement of Changes:

Any Other Comment:

Officer Response:
The supporting text has been amended to give recognition to the range of sporting facilities within the Falmer area, including those provided by the University, and to note the area acts as an existing sports hub.
Further Details:

Similarly, Policy CP17 should prioritise 100% affordable housing where sports buildings become redundant. The requirement to provide financial contributions towards sports facilities should only be applied to major development proposals in order to avoid small and medium schemes becoming unviable.

Statement of Changes:

Any Other Comment:

Officer Response:

Whilst there could be merit in this approach, housing may not be appropriate on respective sports sites due to circumstances particular to a site. In view of the constraints within the policy it is not therefore felt appropriate to constrain it further by setting out a general restriction on the types of development/use to which such sites can be lost to.

Non strategic site allocations will be included within Part 2 of the City Plan. This would allow for the consideration and, where appropriate, allocation of redundant sport sites for 100% affordable housing on a site by site basis should any such sites be identified.

It is not felt the Policy should only seek to secure the delivery of the outdoor and indoor sport requirements generated by major developments. The City Plan plans for the period up to 2030. In view of the city's development pressures, the number of small development sites and consequent impacts on open space it is becoming more important regard to indoor and outdoor sport provision is given. The cumulative impact of a policy that does not allow for an ability to expect the smaller development proposals to meet the sport requirements generated would be contrary to the delivery of sustainable development. Whilst the current economic situation is having an impact on development it is not sustainable to assume the council can make up shortfalls especially in view of the current public sector austerity measures. As currently in place additional guidance can be prepared to justify waivers for smaller developments in a manner which ensures it can be altered should the cumulative impacts indicate this to be appropriate.

It is not therefore considered appropriate to amend policy CP16 as suggested.

Further Details:

3. Sport: The Plan talks about a "Healthy City" and promoting new opportunities for sport and recreation. Surely I don't need to tell you that King Alfred's is a disgrace and is far outshone by facilities in Burgess Hill and Steyning. The male showers for the Main Hall haven't worked for over a month, the ventilation system and lighting in the Main Hall are out of the Ark and booking a court on the phone can take hours. The Council can find £15 million for the i360 but not for a decent Sports Centre for the 250,000 people of the city. Aspirations are good but where is the commitment on King Alfred's?

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments have been noted.
| Customer No: | 175 | Customer Name: | Chris Todd | Support Status: | Partly Support |
| Organization: | Brighton and Hove Friends of the Earth | Rep Number: | 14 | Page/Para: | / |
| Policy: | CP17 Sports Provision |

**Further Details:**

BHFOE would like to see more emphasis on sports provision, both indoor and outdoor. Outdoor sports provision is particularly poor at 0.47 hectares per 1,000 population well below neighbouring authorities and the NPFA's recommended levels or 1.62 hectares per 1,000 population. While it is accepted that it is harder to find space in a densely populated urban area, more effort and greater ambition needs to be made in this area. It is important in encouraging people to take more exercise, keep out of trouble and to improve physical and mental well-being. Taking part in sport is also fun. The amount of additional space required by 2030 also appears to be low, just to stand still at the existing rate of provision. In the table on page 171, the additional space required is listed as approximately 16 hectares to 2030. In the Open Space, Sport and Recreation Study (2008/2009), it is listed as 19.5 hectares to 2026, which would suggest more is needed than is stated in the City Plan.

Changes to FA rules for football for under 13's is likely to mean some multi use games pitches will need reallocating. This can only add pressure on resources and could mean an increase in the additional space required for outdoor sport by 2030, on top of the apparent shortfall highlighted above. It is one reason why large development sites, particularly Toads Hole Valley, need to maximise their contributions to the provision of outdoor sports pitches.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are noted. The city's open space and sport requirements were objectively assessed in the Open Space, Sport and Recreation Study (2008) which was endorsed by the Open Space Study Update (2011). In view of the competing need for land in respect of housing, employment, education, medical facilities, open space etc it is not felt appropriate to seek a higher standard than that recommended/endorsed in the studies.

It is considered CP17, which relates just to sports provision, helps to ensure the City Plan appropriately emphasises the need for such provision. The differences between the study and the City Plan re the amount of additional space required by 2026/2030 is because the City Plan applies more up to date population predictions.

The 2008 study and the City Plan recognise that the quality and management of provision can affect demand. However, these elements generally fall outside the control of the planning system. The detailed consideration of these matters would therefore be more appropriately addressed through other strategies and plans, such as the Sports Facilities Plan and open space strategies, rather than the City Plan.
Further Details:

I would like to see more emphasis on sports provision, both indoor and outdoor. Outdoor sports provision is particularly poor at 0.47 hectares per 1,000 population well below neighbouring authorities and the NPFA’s recommended levels or 1.62 hectares per 1,000 population. While it is accepted that it is harder to find space in a densely populated urban area, more effort and greater ambition needs to be made in this area. It is important in encouraging people to take more exercise, keep out of trouble and to improve physical and mental well-being. Taking part in sport is also fun. Indoor sports facilities for e.g Badminton and other racquet sports are expensive and poor quality (recent refurbishments seemed to have paid little attention to this aspect of the King Alfred), given that people like to exercise indoors in the winter this needs to be addressed. The amount of additional space required by 2030 also appears to be low, just to stand still at the existing rate of provision. In the table on page 171, the additional space required is listed as approximately 16 hectares to 2030. In the Open Space, Sport and Recreation Study (2008/2009), it is listed as 19.5 hectares to 2026, which would suggest more is needed than is stated in the City Plan.

Statement of Changes:

More space both indoors and outdoors needs to be found for sports facilities

Any Other Comment:

Officer Response:

Your comments are noted. The city's open space and sport requirements were objectively assessed in the Open Space, Sport and Recreation Study (2008) which was endorsed by the Open Space Study Update (2011). In view of the competing need for land in respect of housing, employment, education, medical facilities, open space etc it is not felt appropriate to seek a higher standard than that recommended/endorsed in the studies.

It is considered CP17, which relates just to sports provision, helps to ensure the City Plan appropriately emphasises the need for such provision. The differences between the study and the City Plan re the amount of additional space required by 2026/2030 is because the City Plan applies more up to date population predictions.

The 2008 study and the City Plan recognise that the quality and management of provision can affect demand. However, these elements generally fall outside the control of the planning system. The detailed consideration of these matters would therefore be more appropriately addressed through other strategies and plans, such as the Sports Facilities Plan and open space strategies, rather than the City Plan.
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<td>Rep Number:</td>
<td>15</td>
<td>Page/Para:</td>
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**Further Details:**

Redundant sports buildings also present an optimum opportunity for affordable housing and where such buildings or sites are no longer suitable for sports provision the stated alternative should be 100% affordable housing. Contributions for new sports provision should be limited to major development only to ensure does not cause restrictive impact.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Whilst there could be merit in this approach, housing may not be an appropriate alternative due to circumstances particular to a site. In view of the constraints within the policy it is not therefore felt appropriate to constrain it further by setting out a general restriction on the types of development/use to which sports sites can be lost to.

Non strategic site allocations will be included within Part 2 of the City Plan. This would allow for the consideration and, where appropriate, allocation of redundant sport sites for 100% affordable housing on a site by site basis should any such sites be identified.

It is not felt the Policy should only seek to secure the delivery of the sports requirements generated by major developments. The City Plan plans for the period up to 2030. In view of the city's development pressures, the number of small development sites and consequent impacts on open space it is becoming more important regard to outdoor and indoor sport provision is given. The cumulative impact of a policy that does not allow for an ability to expect the smaller development proposals to meet the sport requirements generated would be contrary to the delivery of sustainable development. Whilst the current economic situation is having an impact on development it is not sustainable to assume the council can make up shortfalls especially in view of the current public sector austerity measures. As currently in place additional guidance can be prepared to justify waivers for smaller developments in a manner which ensures it can be altered should the cumulative impacts indicate this to be appropriate.

It is therefore considered inappropriate to amend policy CP16 as suggested.

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**Further Details:**

None

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Your support is welcomed and noted.
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<th>Tony Mernagh</th>
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<tr>
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<td>Part Four - City Wide Policies (Healthy and Balanced Communities)</td>
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Officer Response:

Your support is welcomed and noted.

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<tr>
<th>Customer No:</th>
<th>100</th>
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<th>Ron Crank</th>
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Officer Response:

Your support is welcomed and noted.
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<th>136</th>
<th>Customer Name:</th>
<th>Dr Janie Thomas</th>
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<tr>
<td>Policy:</td>
<td>CP18 Healthy Cities</td>
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**Further Details:**

CP18 Healthy City.
Linked to our comments above (SA2 & SA6) in respect of St. James’s Street we would observe that the very people living around the street whose stability, civility and custom sustain the neighbourhood are often caused ill-health and in many cases are hence driven out by the culture of noise, disorder, etc. The reasons for these adverse outcomes need attention from the council in terms of policy decisions affecting the area.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Note comment. Whilst planning policy cannot fully address these aspects of behaviour these are appropriately already addressed in broad terms under DA1 (A4) and SA2. Amending Policy in this section cannot address this issue.

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<th>Customer Name:</th>
<th>Mr Andrew Whitaker</th>
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<tr>
<td>Organisation:</td>
<td>Home Builders Federation Ltd</td>
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**Further Details:**

Objects to the costs that this policy will impose on developers. Unreasonable for the Council to require developers to demonstrate how they maximise positive impacts on health within larger developments; developers build houses they do not dictate lifestyles. Should not be burdened with the costs of carrying out health impact assessments. First three elements of policy should be deleted.

**Statement of Changes:**

First three elements of policy should be deleted.

**Any Other Comment:**

**Officer Response:**

The city council does not anticipate developers intervening in residents’ lifestyles. The policy sets out to deliver the positive aspects of development that result in heathier outcomes for residents whilst minimising any adverse impacts. Positive aspects include healthy housing options. The council considers that it has a public health responsibility to ensure that development maximises positive impacts because the long term implication for residents is so significant. It considers that it is reasonable to make provisions such as enabling active lifestyles through provision or improvement of open space.

Health Impact Assessment is only required on the largest schemes where Environmental Impact Assessment should, in any case, address health outcomes. It is a tool to try and maximise the positive aspects of development whilst minimising adverse impacts.

The policy is delivering city wide commitments and best practice.
Further Details:

Urban teenage outdoor activities should be designed for within the city

Statement of Changes:

Any Other Comment:

Officer Response:

Welcome comment. More detailed and specific policies regarding designing for an active lifestyle will come forward in the City Plan Part II
Policy CP18 Planning seeks to ‘support programmes and strategies which aim to reduce health inequalities and promote healthier lifestyles’. Our client supports this objective. Part 6 of Policy CP18 seeks to work with health providers to help deliver ‘a citywide integrated network of health facilities’.

Supporting paragraph 4.185 defines health facilities as including (so not an exclusive definition) ‘walk-in polyclinics, health centres, multipractice GPs surgeries, substance misuse clinics, ambulance facilities and critical care facilities including extension of the Royal Sussex County Hospital’. Our client supports this objective in principle, however they consider that, for the avoidance of any doubt, the definition of healthcare facilities should explicitly emphasise, most suitably under paragraph 4.185, that health facilities also includes “any other venue used wholly or mainly for the provision of any medical or health services”. This reflects a form of words that the Mayor of London has employed to define health facilities in the Mayoral Community Infrastructure Levy (2012).

The final part of Policy CP18 states that the City Plan Part 2 will identify and safeguard ‘appropriate sites for health use’. The policy as drafted does not therefore expressly provide in principle support to healthcare providers who are seeking to support the Council’s objective of a citywide network of health facilities through delivering such facilities at sites that have not been expressly designated for this purpose by the local planning authority.

Statement of Changes:

We therefore consider that a further part should be added to the policy (Part 8) to specifically advise that: ‘In principle support will be given to proposals for health facilities at all sites”.

We consider that the changes outlined should be made in the interests of good planning and so as to ensure that the City Plan Part 1 meets the tests of soundness by being consistent with the presumption in favour of sustainable development expressed in the National Planning Policy Framework and its specific objective of ‘promoting healthy communities’.

Any Other Comment:

Officer Response:

Welcome support for the policy. Note comment regarding wider definition but consider proposed definition is too broad. A revised form of wording has been incorporated. Cannot support in principle proposals for health facilities on all sites. It is important to identify appropriate sites where a priority should be given. This can best be addressed in detail in part II of the City Plan. BUPA is invited to suggest sites at that stage that might be considered appropriate.

Consider existing policy offers balanced and adequate support for health care provision incljudign private health care.
### Further Details:

Meeting the needs of older people: it is very encouraging that mention is made in the Draft City Plan (notably in CP 18 Healthy City, CP 12 Urban Design, and CP13 Public Streets and Spaces) of services and support affecting older communities, in particular regarding housing needs, health and environments, improved public spaces, and safe and accessible transport, but I suggest that it is vital that the needs of the older community are recognised and taken into account in all aspects of planning for the future. This is not simply to meet the concerns of those who are older now: ageing and the challenges of declining health, reduced economic security, impaired mobility, and loss of family and friends will affect more people in due course, and the City needs to prepare now for a different society.

### Statement of Changes:

### Any Other Comment:

### Officer Response:

Acknowledge comments. Throughout the plan the council seeks to make provision for older people in all aspects of planning for the future. It was felt that a range of references throughout the plan, rather than a specific single policy regarding older people, would better meet this requirement. More specific references will be made in the City Plan Part II.

### Further Details:

Given the huge demand for more allotments, the commitment to safeguard allotments in this policy while welcome is not enough. This policy should be seeking an increase in land for allotments for all the reasons it espouses in support of local food production.

### Statement of Changes:

### Any Other Comment:

### Officer Response:

Comments noted. This policy and policy CP16 does encourage allotment provision within developments. Whether other open space might be allocated to allotment use is a land management rather than a planning decision although any change of use could be facilitated by this and CP16.(see also CP16 para 4.169)
Customer No: 65   Customer Name: Helmut Lusser
Organisation: Hove Civic Society          Support Status: Support
Rep Number: 23   Page/Para: /          Policy: CP18 Healthy Cities
Section/Supporting Doc/Annexes

Further Details:
None

Statement of Changes:

Any Other Comment:

Officer Response:
Welcome support

Customer No: 100   Customer Name: Ron Crank
Organisation: Coast to Capital Local Enterprise Partnership          Support Status: Support
Rep Number: 41   Page/Para: /          Policy: CP18 Healthy Cities
Section/Supporting Doc/Annexes   Part Four - City Wide Policies (Healthy and Balanced Communities)

Further Details:

Statement of Changes:

Any Other Comment:

Officer Response:
Welcome support
Further Details:

We agree with the measures set out to reduce health inequalities and promote healthier lifestyles - would also like to see the importance of local environmental quality in supporting good health included in the aims for this policy - as they are acknowledged at 4.183. While the concept of care farms is an interesting one - it is not a long term solution. Improving local environmental quality is.

Statement of Changes:

Recognise that poor air quality and high noise levels can impact on health and inhibit outdoor activity and therefore improve air quality and reduce the impact of noise levels so as to promote better health.

Any Other Comment:

Officer Response:

Comments noted. The importance of local environmental quality is acknowledged in 4.183. This has also influenced references in Strategic Objective 11; open space (CP16); public streets and spaces (CP13); and CP9. Note that air quality is primarily addressed by the strategic approach to directing development areas to sustainable transport corridors and by CP9 para 4.88 and some aspects of SA6 sustainable neighbourhoods. Also in Development area policies where relevant (e.g. DA1 A7 and DA3 A2)

Welcome support
### Further Details:

Housing Standards: We reiterate our objection from the previous version of the plan: New dwellings MUST meet minimum dwelling size standards. We believe the Council having set such standards for public sector housing should apply these standards to all new housing. We recognise the built-in inertia of the planning system on this issue but believe that the localism act should allow such policies to emerge. It is simply unacceptable to produce housing year after year that fails in meeting elemental requirements for space including storage. In addition we believe that the housing mix requirements for affordable homes should also apply to all new housing as the needs are not dissimilar. This should allow a more balanced housing mix to emerge during the plan period to counteract the large amount of very small dwellings produced in recent years.

CP19: Housing Mix: As far as we can see this is a ‘non-policy’ – paras 4.197 onwards amply demonstrate the need for a balance of large and smaller dwellings with at least 50% of dwellings needed to be larger (3-4 rooms). We believe the Council should clearly set out this in policy terms as an aspiration for the plan period. It makes little sense to defer this to ‘subsequent planning documents’. If the Council is able to state a preferable housing mix for affordable housing, it should also be able to state such a mix for all housing! A cross reference to minimum dwelling standards here would be appropriate.

### Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted. Minimum dwelling size standards are a matter that can be considered by Part 2 of the City Plan: Development Policies and Site Allocations. It is not considered appropriate for the policy itself to set out a preferred unit size mix. The supporting text to the policy indicates what the likely type and size of housing required will be over the plan period. It is not considered appropriate to be prescriptive about unit size mix and this is not supported by government guidance. The City Plan does aim to ensure that a mix of housing types and sizes will be delivered and to help achieve this will need to bring forward a range of development sites across the city.

### Further Details:

If the council wishes to improve housing choice and mix then it should seek to meet its forecast requirements. Type and mix of housing can be discussed on a site by site basis. Viability is of the utmost importance; developers should not be required to change their mix in order to satisfy the local authority. Para 50 of NPPF requires local authorities to assess needs but these should not be imposed on a site by site basis by a prescriptive formula. Authority should provide for a choice of sites in a choice of locations to allow different types of dwellings to be provided.

### Statement of Changes:

Any Other Comment:

Officer Response:

The aim of the City Plan is to provide a choice of sites in a choice of locations to allow different types and sizes of dwellings to be provided. This will be achieved through the strategic site allocations in Part 1 of the City Plan and other site allocations through Part 2 of the City Plan. The housing delivery target is capacity driven due to the significant physical and environmental constraints that limit growth of the city.
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### Section/Supporting Doc/Annexes

**Further Details:**

CP19: Housing Mix: As far as we can see this is a ‘non-policy’ – paras 4.197 onwards amply demonstrate the need for a balance of large and smaller dwellings with at least 50% of dwellings needed to be larger (3-4 rooms). We believe the Council should clearly set out this in policy terms as an aspiration for the plan period. It makes little sense to defer this to ‘subsequent planning documents’. If the Council is able to state a preferable housing mix for affordable housing, it should also be able to state such a mix for all housing! A cross reference to minimum dwelling standards here would be appropriate.

### Statement of Changes:

Any Other Comment:

**Officer Response:**

Your comments are noted. Minimum dwelling size standards are a matter that can be considered by Part 2 of the City Plan: Development Policies and Site Allocations. It is not considered appropriate for the policy itself to set out a preferred unit size mix. The supporting text to the policy indicates what the likely type and size of housing required will be over the plan period. It is not considered appropriate to be prescriptive about unit size mix and this is not supported by government guidance. The City Plan does aim to ensure that a mix of housing types and sizes will be delivered and to help achieve this will need to bring forward a range of development sites across the city.
Further Details:

HOUSING DENSITY
With the changing economic situation, home ownership is, for very young people, not achievable or, at best, a distant dream. With the changes in local housing allowance conditions not providing funding for single under-35s to occupy self-contained accommodation and many young professionals choosing to share, the need in the city for “shared accommodation” is greater than ever, but other than the provision of student accommodation has been ignored completely in the Core Strategy, when in reality it is believed that the highest demand numerically for accommodation is by single persons. How can the City Plan be taken as a serious paper when the provision for what is numerically the greatest number is just ignored in preference to larger family accommodation?

Virtually no social housing providers provide shared accommodation (it requires intensive management skills) and it is left to private landlords to meet such needs, and perhaps that is why such needs are ignored. These matters need to be taken seriously and included in the City Plan if it is to have any credence at all. (Officer insert: Comments on housing density also allotted to CP14 and CP20. See also respondents response to CP21 [response no. 3]

HEALTH AND BALANCED COMMUNITIES
(Officer insert: the following comments also allotted to Part 2 and CP20)
Private landlords understand that housing contributes to a healthy life, but it is not the main factor. How a person lives is far more important. Exercise, clean living, appropriate diet, etc are just as (or even more) important. The Director of Health has stated that where a person lives is the most important factor. Our members say “how a person lives” is the most important factor. The way people use their lives, as mentioned above, in the opinion of many landlords, needs to change, and the home only forms one part of those elements.

For many years our members have provided more rented accommodation in this city than both the Local Authority and housing associations combined. Private landlords’ contribution to housing residents in this city is often ignored and their ability to provide additional accommodation has also been, in the main, ignored in this report, yet the private landlord rented sector in the city is the only sector that is really expanding. Private landlords should be considered as an individual group in the Core Strategy for providing additional homes in this city, not simply included as part of a wider process.

The City Plan makes reference to the significant number of under-occupied properties in the city. However, no recommendations or suggestions are made arising from that statement. We would like to make it absolutely clear that our members would not support any inference to the effect that such occupation is unacceptable and must point out that it is a free country for people to purchase and occupy properties as they wish, and this should not change. Our members do not accept that it is necessary to secure family housing on all suitable sites.

Statement of Changes:

Any Other Comment:

Officer Response:
Policy CP19 recognises the accommodation needs of various groups within the City including the housing needs of single person households and those people who choose to share accommodation.
CP21 is not only about student accommodation but also about Houses in Multiple Occupation which are often shared houses.
It is recognised that the private rented sector makes a valuable contribution to housing provision within the city.
**Customer No:** 116  
**Customer Name:** Conservative Group Members (c/o Jonathan Bryant)  
**Organisation:** Brighton and Hove City Council  
**Support Status:** Partly Object  
**Rep Number:** 3  
**Page/Para:** /  
**Policy:** CP19 Housing Mix

**Section/Supporting Doc/Annexes**

**Further Details:**

Whilst not wishing to be prescriptive we would like to see greater emphasis in this policy on the need for more decent sized family housing. There is no specific statement in CP19 about there being a specific shortage of family accommodation and we would like to see this addressed.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

CP19 addresses the accommodation needs of various groups within the city including family type households. The need for family accommodation is highlighted in the supporting text and the future need for family sized accommodation is highlighted in various studies referenced in the policy. The Plan seeks to address the city's various housing requirements by making provision for a choice of sites in a choice of locations. Where sites are suitable more family sized housing will be sought.

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**Customer No:** 91  
**Customer Name:** Rob Sloper  
**Organisation:** Cathedral Group plc  
**Support Status:** Partly Object  
**Rep Number:** 10  
**Page/Para:** /  
**Policy:** CP19 Housing Mix

**Section/Supporting Doc/Annexes**

**Further Details:**

Issues around housing mix are constrained by matters relating to viability, set densities and site allocation may also influence the housing mix and as such this should be recognised in policy CP19 and accounted for in determining the mix.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are noted. It is felt that the policy does sufficiently recognise the issues raised in your comments.
Further Details:
The members of our Housing Network discussed the City Plan at our recent meeting and viewed it with regard to the CVSF Housing Conference report (attached) which was held in April 2012. Equalities issues that we believe should be tackled at this level is accommodation for people with a disability (not just single people but families with a disabled child for example) and also, space for travellers to live in Brighton and Hove in line with strategies.
(Officer insert : comment also allotted to SA6)

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed. The Housing Mix policy recognises the need for accommodation for disabled people and Policy CP22 seeks to make appropriate provision for the city's travellers.

Further Details:

For affordable housing mix, this should be informed by Registered Providers to inform on site by site basis the appropriate tenure and mix.

Statement of Changes:

Any Other Comment:

Officer Response:

Government planning guidance requires LPAs to assess the need for affordable housing and this includes the type and size of affordable housing required. It is appropriate for the policy to indicate the required affordable housing mix and then to assess sites accordingly through negotiation with providers.
Further Details:
There should be more family friendly 3 and even 4 bedroom units

Statement of Changes:

Any Other Comment:

Officer Response:
The need for family accommodation is recognised within the policy and where sites are suitable for family sized accommodation this will be sought.

Further Details:
Where proposals include affordable housing provision, Registered Providers (including Hyde) should be consulted on a site by site basis in order to achieve an appropriate tenure and mix according to local need. Policy CP19 needs to be amended accordingly.

Statement of Changes:

Any Other Comment:

Officer Response:
The affordable housing mix is set out in Policy CP20 which deals specifically with affordable housing provision. Local Planning Authorities are required to assess the need for affordable housing and the need for types and sizes of affordable housing.
Further Details:
Support.

Statement of Changes:

Any Other Comment:

Officer Response:
Your support is welcomed.

---

The City Wide policies within the draft document includes CP1, CP14, CP19 and CP20 that specifically concern housing provision in the City. As a major employer in the city the University supports the principle of delivery of further housing to meet local needs including affordable housing provision as this will assist with its retention and recruitment of staff.

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments are welcomed.
Customer No: 182  Customer Name: Tony Mernagh
Organisation: Brighton and Hove Economic Partnership  Support Status: Support
Rep Number: 25  Page/Para: /  Policy: CP19 Housing Mix
Section/Supporting Doc/Annexes Part Four - City Wide Policies (Healthy and Balanced Communities)

Further Details:

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is noted.
Further Details:

The Retirement Housing Group represents a range of providers of accommodation for older people both in the private and public sectors. The Group’s remit is to promote awareness of this sector of the market and ensure planning policies are put in place so as to ensure the delivery of an adequate supply of accommodation specifically designed to meet the diverse needs of older people.

There is an increasing awareness of the issues arising from our ageing population. There are now 8.76 million people aged 65 or over in the United Kingdom which represents 11% of the total population. This is projected to increase to 11.6 million or 33% by 2025. This presents significant challenges to the nation as a whole. The 2006-based household projections show that, by 2013 32% of households in the UK will be headed by someone aged 65 or over. This has enormous cost implications as although people are living longer, many will experience a long term period of deteriorating health. Britain currently spends 12.8 billion on hospital and community health care for the over 65s. It is significant to note that it has been estimated that these older households own 1 trillion in housing equity and this will rise to 1.4 trillion by 2026. Research carried out by the Department of the Environment in 2009 revealed that over a million older people feel trapped in their own homes, lack social interaction and feel lonely and isolated. Under occupation of family housing is a significant problem. In recognition of the issues the Government has now put forward specific planning policies in the National Planning Policy Framework.

Firstly older people are identified and defined as a specific group in society. Secondly paragraph 50 requires that Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community such as the elderly. To that end paragraph requires that Strategic Housing Market Assessments should identify the mix of housing and range of tenures which addresses the need for all types of housing, including for the different groups in the community such as older people. In November 2011 the Government published its Housing Strategy for England with its stated intention of unlocking the housing market and getting Britain building again. The Government will encourage local authorities to make provision for a wide range of housing types including retirement housing, sheltered and Extra Care.

It follows from the above that it is incumbent on the Local Planning Authority to include specific policies to ensure the delivery specifically designed accommodation for older people including sheltered accommodation, extra care developments and continuing care retirement communities in appropriate and sustainable locations within its administrative area. Policies should recognise the specific characteristics of such developments including location, environment, amount, layout and design. Paragraph 1.23 notes that the City has a relatively high number of residents aged 85 or over and the population over retirement age will increase but with the largest increases affecting those people in their late 60s and late 80s. The Plan must encourage adequate and suitably designed housing and care provision for this growing sector of the population.

Any other comment
Accommodation for older people should not be looked at solely in terms of conventional housing but should embrace care and extra care.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed. The Plan recognises that there is a need for a variety of housing options for elderly people and encourages such provision (see also CP19 Healthy City and CP12 and CP13).
Further Details:
Encourage big business and high salary paying companies to invest in Brighton and Hove particularly in the Green industries.

Statement of Changes:

Any Other Comment:

Officer Response:
Objection noted. The Council has produced a City Investment Prospectus which sets out the investment offer of the city for business in the UK and overseas to encourage inward investment. The prospectus will focus on businesses in the key sectors identified as having growth potential in the city such as environmental technologies. Cross reference has been made to the City Investment Prospectus in CP2.

Further Details:
CP2 Planning for Sustainable Economic Development Supporting Test 4.22
This cross-referenced the proposed incubator business space at Toads Hole Valley (DA7). We question whether this is a sustainable location in public transport terms.

Statement of Changes:

Any Other Comment:

Officer Response:
Objections noted. A key issue for any comprehensive redevelopment of Toad's Hole Valley is to ensure that there are improved sustainable transport links to the area. Work will be undertaken with sustainable transport providers to ensure that links are improved.
### City Plan Part 1 Responses Received 27th May to 20th July 2012

<table>
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<tr>
<th>Customer No:</th>
<th>165</th>
<th>Customer Name:</th>
<th>Chris Todd</th>
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<tr>
<td>Organisation:</td>
<td>City Sustainability Partnership</td>
<td>Support Status:</td>
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<td>Rep Number:</td>
<td>9</td>
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<td>/</td>
<td>Section/Supporting Doc/Annexes:</td>
<td>Part Four - City Wide Policies (A Strong and Prosperous City)</td>
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**Further Details:**

Sustainable Economy

CP2 has a title ‘Planning for Sustainable Economic Development, yet its only reference to sustainability is around a low carbon economy. Although the policy discusses the environmental industries in the city, there is no definition of sustainable economic development. Without this, this policy could be misinterpreted to include anything that boosts economic growth regardless of whether it is sustainable or not.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Partial objection noted and comments welcomed. A definition of sustainable economic development has been added to the supporting text of CP2.

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<th>Customer No:</th>
<th>186</th>
<th>Customer Name:</th>
<th>Jackie Lythell</th>
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<tr>
<td>Organisation:</td>
<td>Arts and Creative Industries Commission</td>
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<td>113/</td>
<td>Section/Supporting Doc/Annexes:</td>
<td>Part Four - City Wide Policies (A Strong and Prosperous City)</td>
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**Further Details:**

The importance of the function of a creative hub of some kind in planning for sustainable development across the city eg circus st

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Partial support noted. The role of New England House as a creative, digital and information technology hub is acknowledged in CP2 (this will be clarified) and proposals are set out in DA4.C.2. The provision of a dance studio and affordable managed workspace suitable for creative industries is set out in DA5 Eastern Road and Edward Street.
### Customer No: 236
### Customer Name: James Brown
### Organisation: Stonebridge Brighton Ltd
### Support Status: Partly Support
### Rep Number: 8
### Policy: CP2 Sustainable Economic Development

#### Section/Supporting Doc/Annexes
Part Four - City Wide Policies (A Strong and Prosperous City)

#### Further Details:
Stonebridge Brighton Ltd are broadly supportive of the core objectives set out within this policy; in particular the approach to ‘positively and proactively’ '..support the diversification of the City’s economy to ensure its resilience and versatility.’ This key objective must, however, be reflected in the specific allocations of sites and there should be inherent flexibility built into site allocations to take account of the fact that the component parts of the local economy will undoubtedly adapt and change over the plan period.

The policy specifically supports ‘appropriate expansion’ plans for the expansion of higher and further education establishments and recognises their role as major employment generators. The policy should, however, look beyond just the modernisation and expansion of existing educational uses and embrace and support wider opportunities through the growth of educational tourism which have the potential to represent a significant positive contribution to the local economy.

#### Statement of Changes:
Sound with minor additions: The policy should specifically acknowledge the important contribution to the economy of non-traditional employment generators, including the role of educational tourism.

#### Any Other Comment:
Officer Response:

Welcome broad support for the objectives of the policy and comments noted.

It is considered that sufficient flexibility has been incorporated into the strategic allocations reflecting up to date evidence on need. Policy CP2 has focussed on key employment sectors identified with potential for growth. It is acknowledged that non-B use class employment generators do also contribute to the local economy and the Development Area proposals, SA2 Central Brighton and CP4 Retail Provision and CP6 Culture and Tourism do address the needs of retail, leisure and tourism. This will be reflected in the supporting text.

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### Customer No: 65
### Customer Name: Helmut Lusser
### Organisation: Hove Civic Society
### Support Status: Partly Support
### Rep Number: 14
### Policy: CP2 Sustainable Economic Development

#### Section/Supporting Doc/Annexes

#### Further Details:
CP2 Planning for sustainable economic development: we support this policy. In para 4.22 where a reference is made to Rampion, there should also be a reference to the enormous scope for local jobs if the city moves towards adapting its power and heat infrastructure towards more use of renewables and piped heat.

#### Statement of Changes:

#### Any Other Comment:
Officer Response:

Welcome partial support and comments. The supporting text has been amended to make reference to the potential for local jobs to be generated by a move towards decentralised and renewable energy provision in the city.
Customer No: 67  Customer Name: Mr Andrew Whitaker
Organisation: Home Builders Federation Ltd  Support Status: Partly Support
Rep Number: 3  Page/Para:  /  Policy: CP2 Sustainable Economic Development
Section/Supporting Doc/Annexes Part Four - City Wide Policies (A Strong and Prosperous City)

Further Details:
Basic aim of policy, to encourage sustainable economic growth is supported. However, Council will fail to secure inward investment and retain existing businesses if it fails to meet one of its fundamental requirements, namely to make adequate housing provision. It cannot hope to retain businesses if employees cannot obtain housing. The economy cannot function properly if there is inadequate housing provision and yet this is what the Council is proposing. In order to implement CP2, the Council must increase its housing provision so that it meets forecast requirements aligned to its economic growth aspirations.

Statement of Changes:

Any Other Comment:

Officer Response:
Welcome partial support for the broad aims of the policy. The need for adequate employment land and housing is recognised for the continued growth and prosperity of the city. Against the significant physical and environmental constraints facing the city the council has planned positively for its housing and employment land needs. In order to increase housing provision above the local housing target set out in the City Plan, further releases of employment land would be required undermining the council's economic growth aspirations and risk creating a dormitory city.

Customer No: 178  Customer Name: Tom Shaw
Organisation: Brighton and Hove Affordable Housing Partnership  Support Status: Partly Support
Rep Number: 9  Page/Para:  /  Policy: CP2 Sustainable Economic Development
Section/Supporting Doc/Annexes

Further Details:
The Partnership supports the objectives of Policy CP2 and in particular the involvement of apprenticeships and training opportunities for local residents (this is a policy for The Partnership on all of its development sites). Given this requirement to provide training schemes during the construction phase, there is no justifiable reason to require financial contributions as well (this would duplicate the requirement).

Statement of Changes:

Any Other Comment:

Officer Response:
Welcome support for CP2. The financial contribution element supports the joint partnership programme which delivers and supports the on-site provision of apprenticeship and training opportunities. This approach and methodology is set out in the council approved Developer Contributions technical guidance.
Customer No: 230  Customer Name: University of Brighton  
**Support Status:** Support

**Rep Number:** 4  **Page/Para:** Page 113  
**Policy:** CP2 Sustainable Economic Development

**Section/Supporting Doc/Annexes:** Part Four - City Wide Policies (A Strong and Prosperous City)

Further Details:
The acknowledgement of the important role the University plays as an employment generator is supported.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**
Support welcomed.

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Customer No: 232  Customer Name: Susan Moffat

**Support Status:** Support

**Rep Number:** 2  **Page/Para:** /  
**Policy:** CP2 Sustainable Economic Development

**Section/Supporting Doc/Annexes:** Part Four - City Wide Policies (A Strong and Prosperous City)

Further Details:
This policy recognises the diversity of the city’s economy and the future challenges for retaining and attracting business and employment.

**Statement of Changes:**

None

Any Other Comment:

**Officer Response:**
Support welcomed and comments noted.
This section of the City Plan places considerable emphasis on developing a low carbon economy in the city but may be a hostage to fortune without a wider definition of 'sustainable'..

One of the criticisms of the draft National Planning Policy Framework [NPPF] was the absence of a definition of sustainability particularly in relation to physical developments. Without a definition of sustainable development city stakeholders will be left guessing.

To be consistent with Policy SA2[6] [page 19] the reference to 'broadband access' should be changed to say ultrafast broadband where practicable.

The Core Strategy could give more detail in the role of skills in developing the economy and explain how it will facilitate closer links with the city's two universities and business to foster the knowledge based economy.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed and comments noted.

A definition of sustainable economic development has been included in the supporting text to CP2.

Supporting text has been amended to clarify the current initiative for ultrafast broadband roll out (as stated in SA2 part 6) however it was considered appropriate to leave reference less specific in CP2 to allow for further future upgrade in broadband technology that could come forward during the Plan period.

Additional information has been added to the supporting text with regard to the priorities for the city's labour market reflecting priorities in the City Employment and Skills Plan 2011.
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<td>The Hyde Group</td>
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<tr>
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**Further Details:**

Hyde supports the objectives of Policy CP2 and in particular the involvement of apprenticeships and training opportunities for local residents (this is a policy for Hyde on all of its development sites). Given this requirement to provide training schemes during the construction phase, there is no justifiable reason to require financial contributions as well (this would duplicate the requirement).

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Welcome support for CP2. The financial contribution element supports the joint partnership programme which delivers and supports the on-site provision of apprenticehip and training opportunities. This approach and methodology is set out in the council approved Developer Contributions technical guidance.
Further Details:
This section of the City Plan places considerable emphasis on developing a low carbon economy in the city but may be a hostage to fortune without a wider definition of 'sustainable'..

One of the criticisms of the draft National Planning Policy Framework [NPPF] was the absence of a definition of sustainability particularly in relation to physical developments. Without a definition of sustainable development city stakeholders will be left guessing.
To be consistent with Policy SA2[6] [page 19] the reference to 'broadband access' should be changed to say ultrafast broadband where practicable.

The Core Strategy could give more detail in the role of skills in developing the economy and explain how it will facilitate closer links with the city's two universities and business to foster the knowledge based economy.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted.

A definition of sustainable economic development has been included in the supporting text to CP2.

Supporting text has been amended to clarify the current initiative for ultrafast broadband roll out (as stated in SA2 part 6) however it was considered appropriate to leave reference less specific in CP2 to allow for further future upgrade in broadband technology that could come forward during the Plan period.

Additional information has been added to the supporting text with regard to the priorities for the city's labour market reflecting priorities in the City Employment and Skills Plan 2011.
Further Details:

CP20: Affordable Housing

We question the statement that "Only in exceptional circumstances will the Council accept a commuted sum or free serviced land in lieu of onsite provision." A recent news report suggests that "authorities are increasingly accepting developers’ arguments that it is not viable for them to include affordable housing in schemes in the current economic climate." (Inside Housing 15 June 2012) The report adds that the amount of cash accepted in lieu of new affordable homes has almost trebled in the past two years and that these receipts are ring fenced for affordable housing elsewhere.

This suggests that Brighton and Hove may put itself at a disadvantage in relation to other authorities if it insists on developers including a percentage of affordable homes in all but exceptional circumstances. We recognise the benefits of mixed tenure developments and support the authority’s attempts to achieve them through on-site targets. However, we feel that the Plan should allow for the possibility of a little more flexibility than the present wording suggests.

Statement of Changes:

Any Other Comment:

Officer Response:

The policy does allow for flexibility. The sliding scale indicates that commuted sums will be acceptable in lieu of onsite provision on smaller schemes. On larger schemes, the case can also be made for commuted sums where justified. In general the preference is for onsite provision because opportunities are limited in the city for alternative site provision. This accords with national policy in the NPPF.
AFFORDABLE HOUSING

Concerned with the use of the words "affordable housing". This phrase has no specific meaning but, as stated in the City Plan, appears to mean "that can be afforded by the person wishing to occupy it". Our members' interpretation of affordable is a market rent that reflects the true cost of the provision of the accommodation, with a profit margin for the landlord providing it. We are in no doubt, however, that that isn’t what Brighton and Hove City Council has in mind, but it must accept that private landlords, in providing accommodation, are entitled to make a reasonable return on their investment. The affordable housing conditions that it is proposed to apply will work against landlords developing land/properties that they own.

Private landlords believe that in providing rental accommodation in any development they undertake, they should be excluded from the affordable housing conditions as set out in the City Plan. If a private landlord is prepared to develop land / convert properties for let and is prepared to enter into an agreement with the Local Authority to do so for a reasonable period of time, that should be sufficient to allow planning permission to be granted in respect of affordable housing conditions. Again, as has been mentioned throughout the City Plan, certain concessions may be granted, but it does not give specific examples but, again, a significant number of "hoops" would have to be gone through before a successful planning application is achieved. It would have been encouraging for our members if something in the City Plan gave encouragement to them to develop surplus land, brown sites or even conversion opportunities into properties for let. The City Plan makes no favourable comments and once again it is clear that private landlords, who we must stress are the biggest provider in this city of rented accommodation, are ignored.

To give an example of the unrealistic ambitions with regard to affordable housing: is it right that if a landlord is able to build/convert ten units, two have to be affordable and, as a result, the other eight made less affordable? Landlords who specialise in letting particular types of property or to particular groups should have their specialist areas considered when an application is made for planning. Again, no such suggestion has been made in the City Plan and opportunities are being lost as a result. In this part of the City Plan, it is mentioned (paragraph 4.207) that the greatest need in the city is for one/two bedroom properties. Our members would dispute this, as we believe that the greatest demand is for shared accommodation, but we can understand the inference, as shared accommodation has been completely ignored within the City Plan.

HOUSING DENSITY.

With the changing economic situation, home ownership is, for very young people, not achievable or, at best, a distant dream. With the changes in local housing allowance conditions not providing funding for single under-35s to occupy self-contained accommodation and many young professionals choosing to share, the need in the city for "shared accommodation" is greater than ever, but other than the provision of student accommodation has been ignored completely in the Core Strategy, when in reality it is believed that the highest demand numerically for accommodation is by single persons. How can the City Plan be taken as a serious paper when the provision for what is numerically the greatest number is just ignored in preference to larger family accommodation?

Virtually no social housing providers provide shared accommodation (it requires intensive management skills) and it is left to private landlords to meet such needs, and perhaps that is why such needs are ignored. These matters need to be taken seriously and included in the City Plan if it is to have any credence at all.

HEALTH AND BALANCED COMMUNITIES

Private landlords understand that housing contributes to a healthy life, but it is not the main factor. How a person lives is far more important. Exercise, clean living, appropriate diet, etc are just as (or even more) important. The Director of Health has stated that where a person lives is the most important factor. Our members say "how a person lives" is the most important factor. The way people use their lives, in the opinion of many landlords, needs to change, and the home only forms one part of those elements.

For many years our members have provided more rented accommodation in this city than both the Local Authority and housing associations combined. Private landlords'
contribution to housing residents in this city is often ignored and their ability to provide additional accommodation has also been, in the main, ignored in this report, yet the private landlord rented sector in the city is the only sector that is really expanding. Private landlords should be considered as an individual group in the Core Strategy for providing additional homes in this city, not simply included as part of a wider process.

The City Plan makes reference to the significant number of under-occupied properties in the city. However, no recommendations or suggestions are made arising from that statement. We would like to make it absolutely clear that our members would not support any inference to the effect that such occupation is unacceptable and must point out that it is a free country for people to purchase and occupy properties as they wish, and this should not change. Our members do not accept that it is necessary to secure family housing on all suitable sites.

VICTORIAN STANDARDS ENFORCED THROUGH PLANNING POLICIES (Officer insert : the following comments also allotted to CP21)
The City Plan gives the impression that Brighton and Hove is looking to ensure that people have decent homes in which to live, with modern facilities. Our members have for many years objected to a number of policies that restrict the upgrading/modernisation of houses in multiple occupation. These properties, through planning policies, are required to remain in the same state as they were when such accommodation was first formed. It has been stated by the planners in this city that such policies are to retain cheap accommodation for vulnerable people.

Taking such views conflicts completely with the tone of the current City Plan and it is, in the opinion of our members, unacceptable that private landlords are required to continue letting properties in such a way that had they the choice they would update and self-contain. Examples of the restrictive policies that are in force with no mention of change are as follows:
(a) The Local Authority will not allow the upgrading from non self-contained to self-contained houses in multiple occupation resulting in a loss of accommodation.
(b) The current City Plan policy of inclusiveness is not part of the policy for established houses in multiple occupation let on individual tenancies. For example, all such properties have to provide within each unit of accommodation "a sink unit and cooking facilities", whereas the shared facilities will be bath, showers and toilets. In student accommodation, showers/toilets are normally provided within the individual units of accommodation and kitchens are shared. This allows inclusiveness and for tenants to get to know each other, whereas because of planning policies in the old HMOs the opposite applies, where kitchens are not shared and toilets and bathrooms are. In 2012 it is believed that a shared kitchen is more acceptable than a shared toilet/shower.

Brighton and Hove City Council needs to acknowledge that by its planning policies it is holding back the improvements needed to such properties in this city, which are, in the main, owned by private landlords, whose voice is heard but, more often than not, ignored. The City Plan, in our members’ opinion, must acknowledge those policies that force landlords to retain Victorian standards, and take steps to ensure that they are amended to allow landlords to bring their properties up to the standards expected in 2012.

Statement of Changes:

Any Other Comment:

Officer Response:
The definition of affordable housing is that set out in the government’s National Planning Policy Framework. The policy is supported by a viability study which indicates that the targets set out should be achievable but also allows for flexibility where justified. For reasons of equity all developers are treated on the same basis.
Further Details:
The 40% social housing rule has made many sites undevelopable. If the extra expense of lifetime homes and sustainable building are factored in many developments can not support the 40% social housing requirement. This should be lower or abandoned for a more flexible approach.

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments are noted. CP20 allows for flexibility and viability is specifically recognised in the policy.

Further Details:
The wording of this policy is too loose. The policy needs to address what is meant by percentages. To just say 40% of the number of dwellings is inadequate. Instead it should be say 40% of total habitable floor area of the development or '40% of the market value of the development'. The policy also needs a clause to ensure that except in specially defined situations consent will not be granted to a registered provider for the construction of any dwellings for sale or rent on the free market neither on completion or at any later date.

Statement of Changes:

Any Other Comment:

Officer Response:
The policy requirements are clear and are set out in the sliding scale of affordable housing requirements. The use of % in relation to dwelling units is a well understood policy approach and is also considered a pragmatic approach which can be easily monitored. Where registered providers propose a mix of housing to include both market and affordable housing the council must be consistent in its approach to all developments considered.
Further Details:

Whilst the sliding scale approach to affordable housing provision set out in Policy CP20 is appropriate and in line with other local planning authorities, there is the potential for the number of applications for 5-9 dwellings to decline as a result of the 20% equivalent financial contribution being introduced. Ultimately this could result in a lower number of affordable housing units being delivered. The policy also needs to make it clear how the commuted sums generated will be used in the interests of transparent government.

Please contact planning agent if you wish to discuss the issues raised in these representations further.

Statement of Changes:

See above

Any Other Comment:

Officer Response:

The evidence base indicates that sites of 5-9 units will generally be viable in terms of making a 20% affordable housing financial contribution. The policy does allow for flexibility where this can be fully justified.

Offsite affordable housing contributions in relation to larger development sites can be considered on a site by site basis as explained in the supporting text to the policy but generally, in accordance with current government policy, onsite provision will remain the priority.
Further Details:

CP20: affordable housing: Although we generally support this policy we would like to see somewhere in the plan a discussion between the need for housing mix, adequate dwelling size and affordable homes. Can it be argued that the market cannot deliver all three – or will a firm policy framework reduce land values sufficiently to make all three policy aspirations doable together? In para 4.213: a reference to dwelling size standards should be added. The database referred to in para 4.216 could be used to monitor dwelling size standards. (reference to CP1, para 4.14)

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed.
Policy CP19 addresses housing mix more generally in terms of the need for a range of housing types and sizes to meet the various accommodation needs of different groups within the City. In terms of affordable housing, CP20 also sets out the desired unit size mix and schemes are assessed against these considerations. There are dwelling size standards that Registered Providers have to meet when making affordable housing provision.

Further Details:

CP20 Affordable Housing:
• Encouragement of macro-thinking (overall affordable housing figures city wide being addressed and met, rather than scheme by scheme, as the ratio will differ per geographic site & situation.

Statement of Changes:

Any Other Comment:

Officer Response:

The sliding scale as set out in the policy is to be applied citywide; subject to the criteria set out which allow for some flexibility where justified. In this way, affordable housing will be delivered across the city. The policy is supported by a viability analysis.
Further Details:
The statement about providing homes for families needs to go further. There needs to be a commitment to building more family sized dwellings.

Statement of Changes:

Any Other Comment:

Officer Response:

There is a need in the city for affordable homes for a variety of household types which includes families. The policy does acknowledge the need for family sized affordable housing particularly by reference to the unit size breakdown. The council also uses its own affordable housing stock to meet the needs of families and encourages smaller households to take up smaller units of affordable housing.

Customer No: 67  Customer Name: Mr Andrew Whitaker
Organisation: Home Builders Federation Ltd  Support Status: Partly Support
Rep Number: 11  Page/Para: /  Policy: CP20 Affordable Housing

Further Details:
First line of policy should be re-worded in accordance with wording in explanatory text. Objects to use of wording ‘will require the provision of’. Prefer use of wording that states ‘will seek to negotiate the provision of affordable housing’.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. It is not considered that any change to the first line of the policy is necessary. The policy is clear that a process of negotiation taking account of the affordable housing targets and the listed criteria will ultimately determine the appropriate amount of affordable housing to be secured from any particular development.
### Further Details:

Paragraph 1.8 refers to the movement of households from London to Brighton which is a key feature of the housing market. It is worth noting as well that there is a not an insignificant amount of out-migration from the City westwards into Adur (approximately 750 persons per year of an age range of between 25 and 44). Whilst this helps to ensure that Adur’s population does not decline, it also impacts on Adur’s housing supply and the capacity of existing services. As such, this re-enforces the need to ensure an appropriate supply of affordable housing in the City (Policy CP20 on Affordable Housing is noted in this regard).

(Officer note: these comments also allotted to para 1.8 as detailed in the representations)

### Statement of Changes:

### Any Other Comment:

### Officer Response:

Your comments and support are welcomed. CP20 seeks to ensure an appropriate supply of affordable housing can be secured over the plan period.
Further Details:

The current wording of Policy CP20 is of concern as it potentially allows for a reduced level of affordable housing provision in developments (particularly assessment criteria iii and iv). These criteria need to be more robust otherwise the overall delivery of affordable housing could suffer, particularly if CIL levels are set too high. Hyde welcomes and supports the proposed affordable housing targets and particularly the introduction of an innovative new sliding scale approach. The policy needs to explain how the commuted sums expected to be generated will be used in the interests of transparent local government. One option would be for the sums to be returned to registered social landlords via a bidding system so that the contributions are invested into new affordable housing developments and improving existing developments. Value for money should be demonstrated to ensure that the funding is used to maximum effect to increase the supply of new affordable homes. Investing the funds into sites controlled by Registered Providers with a demonstrable track record of delivery in the City would help to ensure value for money and economies of scale, enabling new supply. CP20 should also encourage the appearance of affordable housing developments to be ‘tenure blind’ in order to ensure that they are not visibly different to market housing. Hyde notes that the Council will set a preferred target for unit size mix including 25% of three and more bedroom homes. Hyde supports this being an aspirational city-wide target to enable the Council to consider local needs on a site by site basis for different sized homes and appropriate mix of unit sizes for different development areas. Hyde notes that certain development areas may be more suitable for a higher proportion of family sized accommodation, for example DA7 (Toads Hole Valley) whereas city centre sites may be more suitable for one and two bedroom homes for single people and young couples wishing to be closer to work opportunities. Such site allocations should specify a minimum amount of family sized homes for affordable housing.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed. It is considered the criteria in CP20 are appropriate and allow for some flexibility where it can be justified.

It is envisaged that commuted sums will be pooled to enable further provision of affordable housing across the City; this is likely to involve council build and also cross subsidy to registered providers.

The preferred unit size mix for affordable housing will be used to inform appropriate size mix on specific sites in negotiation with providers.
**Customer No:** 178  
**Rep Number:** 11  
**Customer Name:** Tom Shaw  
**Organisation:** Brighton and Hove Affordable Housing Partnership  
**Support Status:** Partly Support  

**Section/Supporting Doc/Annexes**

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<tr>
<td>Partly Support</td>
<td>The current wording of Policy CP20 potentially allows for a reduced level of affordable housing provision in developments (particularly assessment criteria iii and iv). These criteria need to be more robust otherwise the overall delivery of affordable housing could suffer, particularly if CIL levels are set too high. The Partnership welcomes and supports the proposed affordable housing targets and particularly the introduction of a new sliding scale approach. The policy needs to explain how the commuted sums expected to be generated will be used in the interests of transparent local government. One option would be for the sums to be returned to The Affordable Housing Delivery Partnership via a bidding system so that the contributions are invested into new affordable housing developments and improving existing developments; value for money should be demonstrated to ensure that the funding is used to maximum effect to increase the supply of new affordable homes. Investing the funds into sites controlled by Registered Providers with a demonstrable track record of delivery in the City would help to ensure value for money and economies of scale, enabling new supply. CP20 should also encourage the appearance of affordable housing developments to be ‘tenure blind’ in order to ensure that they are not visibly different to market housing.</td>
</tr>
</tbody>
</table>

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments of support are welcomed.

It is considered that the criteria set out in the policy strike an appropriate balance between the need for some flexibility to encourage viable developments to come forward and the need to secure the provision of affordable housing.
We support the affordable housing targets set and welcome the introduction of financial contributions from smaller scale developments. Concerned that as the policy allows for flexibility, as advised by the Viability Study, that in reality the provision will be lower, particularly if CIL levels are set too high.

Concerned about criteria iv of the criteria - re. provision of affordable housing and extent to which this might prejudice the realisation of other planning objectives. There should be a balance between all objectives sought. Danger that AH will be negotiated down.

Support a mix of tenures and unit sizes. This should be informed by RPs based on their knowledge of the area, identified needs, etc.

We encourage the council to incorporate the following:

a. Prioritise AH above other planning objectives.
B. Targeting land for 100% affordable housing
C. Redundant retail or employment sites should be prioritised for affordable housing
D. Where there is a loss of another type of residential use, AH should be priority alternative use.
E. Illustrate rate of expected rate of housing delivery for both market and affordable housing through housing trajectory in accordance with para. 47.

Additional Details:

The City Wide policies within the draft document includes CP1, CP14, CP19 and CP20 that specifically concern housing provision in the City. As a major employer in the city the University supports the principle of delivery of further housing to meet local needs including affordable housing provision as this will assist with its retention and recruitment of staff.

Additional Details:

Your support is welcomed. Some flexibility is required in order to ensure sites come forward for development and housing is delivered in the City. The council gives high priority to affordable housing but also has to balance other key priorities including employment provision and the provision of other key services and facilities.
Further Details:

The Economic Partnership commends the local authority for responding to requests from developers to introduce a sliding scale for affordable housing provision and introducing a degree of flexibility into the policy. However, the introduction of a requirement to provide a financial contribution for developments of between 5-9 dwellings may affect viability or lead to a reduction in applications coming forward. In the interests of transparency, the policy should make it clear how the financial contributions will be used.

With Housing Association funding now dependent upon selling property and increasing rents there seems little doubt that the provision of affordable housing will be more difficult to achieve. This is an area of great concern to the Economic Partnership.

It may be preferable to adopt a macro strategy for affordable housing, using an overall target for delivery rather than site specific targets. This would afford a greater chance at maximising value and capital receipts especially on local authority land.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed.

The evidence base indicates that financial contributions towards affordable housing provision from smaller sites of 5-9 units will generally be viable. The policy allows for some flexibility where there are viability considerations.

The sliding scale approach is considered appropriate and more equitable in comparison to using an overall target. The sliding scale considers viability against site size. Financial contributions towards affordable housing can be pooled to help deliver / cross subsidise affordable housing provision elsewhere in the City.
### Further Details:

The Economic Partnership commends the local authority for responding to requests from developers to introduce a sliding scale for affordable housing provision and introducing a degree of flexibility into the policy. However, the introduction of a requirement to provide a financial contribution for developments of between 5-9 dwellings may affect viability or lead to a reduction in applications coming forward. In the interests of transparency, the policy should make it clear how the financial contributions will be used.

With Housing Association funding now dependent upon selling property and increasing rents there seems little doubt that the provision of affordable housing will be more difficult to achieve. This is an area of great concern to the Economic Partnership.

It may be preferable to adopt a macro strategy for affordable housing, using an overall target for delivery rather than site specific targets. This would afford a greater chance at maximising value and capital receipts especially on local authority land.

### Statement of Changes:

### Any Other Comment:

### Officer Response:

Your support is welcomed. An up to date viability study supports the lower end of the sliding scale and the criteria set out in the policy allow for flexibility where justified.
Watkin Jones Group delivers and manages student housing schemes. They are working with the Co-operative Group on the former Co-op site on London Road to develop student housing and retail. There is an agreement with the University of Sussex to use the accommodation primarily for postgraduate students. A previous application was refused but not on the principle of student housing. No concerns about student housing have since been raised by officers. In the absence of any objections, it must be suitable and justifies a site specific allocation for purpose built student accommodation.

The Student Housing Options Paper sought to address HMO issues and ensure provision of high quality purpose built student accommodation. Four sites were specifically identified and no reason given for excluding the Co-op site. Watkin Jones and the University of Sussex both recommended that the site should be included for student accommodation. The officer response was that the site was included in the SHLAA and had potential to help meet the City's housing targets. Watkin Jones state that the Preston Barracks site is allocated for student accommodation but also listed in the SHLAA. Inclusion in a SHLAA does not commit to residential use as a SHLAA does not allocate sites.

Watkin Jones object to the exclusion of the Co-op site from the list of identified sites for student accommodation in policy CP21. Seven reasons are given. The site is the only one in the city linked to the University of Sussex and is an important part of its housing strategy. There is no objection in principle to student accommodation and it seems perverse to ignore it as an allocated site. The Preston Barracks site is allocated for student accommodation but also included within the SHLAA. Inclusion in a SHLAA, which does not allocate sites, does not preclude allocation of the site for student housing. The supply identified in the SHLAA exceeds the housing requirement. Given the surplus of housing sites, the Co-op is not needed for open market housing anyway. Student use of the Co-op site will help to free up existing family housing currently used as an HMO. The location of the Co-op is suitable for student accommodation. It is accessible to the campus by cycle and bus. Student use is the only viable use of the Co-op site and would contribute to the regeneration of London Road.

**Statement of Changes:**

Part B of policy CP21 should be amended to include the former Co-op Department Store, London Road as an allocation for "purpose built student accommodation for up to 400 beds as part of a mixed use scheme including retail.

Criterion 7 of part A of the policy should be deleted. An extant residential consent or identification in a SHLAA is no reason to prevent development for purpose built student accommodation. The term "other educational establishments" requires clarification.

The seven criteria should be applied flexibly to ensure delivery of sufficient student housing through the City Plan.

**Any Other Comment:**

**Officer Response:**

Watkin Jones’ comments on the recent planning history of the Co-op site on London Road are noted. However, the absence on the most recent decision of a reason for refusal relating specifically to student accommodation use does not justify allocation for purpose built student accommodation. Rather, this reflects the current lack of an adopted planning policy covering the site or setting out criteria for student housing provision. The council considers the site to be wholly suitable for general housing and it would not be appropriate to preclude such use through a policy allocation for an alternative use.

Policy CP21 identifies five sites for purpose built student accommodation. In total, they will provide a minimum of 2,200 student bedspaces. These additional bedspaces will be of significant help in meeting the accommodation requirements arising from the growth in student numbers. However, the council also faces very challenging housing targets and, in order to address housing needs robustly, adequate availability of housing sites must be maintained. Criterion 7 of policy CP 21, which seeks to avoid the use of sites within the SHLAA, allocated by City Plan policies or with extant permission, is considered justified given the tight physical constraints on the city and its significant housing needs. The Co-op site is considered suitable for housing development and, in these circumstances, it would not be appropriate to allocate the site for student
Watkins Jones appears to have misunderstood the Preston Barracks proposals. Mixed use development is sought on the site. Contrary to your comments, there is no conflict between the Preston Barracks allocation and the site's inclusion within the SHLAA. A 300 dwelling figure for Preston Barracks is contained within both the SHLAA and policy DA3. This figure for housing is in addition to, rather than instead of, the separate student accommodation provision and other uses also sought.

The term "other educational establishments" is explained more fully in paragraph 4.208 of the supporting text and includes City College, the city's language schools and Brighton Institute of Modern Music.

In conclusion, the council does not accept that the Co-op site on London Road should be specifically allocated for student housing, as general housing use would be an acceptable use and one that would help to meet the city's challenging housing targets.
The provision of a specific policy for student accommodation is welcomed, and the emerging policy context recognises in broad terms the significant contribution of education use to the local economy. The emerging policy basis is, however, focused on meeting the needs of the universities and tackling current problems relating to Houses in Multiple Occupation (HMO’s).

The Policy is unsound. There is, however, also a growing number of international language schools in Brighton which have their own specific accommodation requirements (This is evident by the significant local presence of Study Group, as well as the large number of language schools and private colleges throughout the City). Currently there is a deficiency in bespoke accommodation for this form of education use which places strain on the wider housing stock and traditional leisure and business hotel bed spaces. In particular SBL understand from discussions with operators that there is a specific need for bespoke facilities to cater specifically for short and medium term study visits. Accommodation for these education establishments is most appropriately located within town centre locations close to where there is existing and future demand.

Managed accommodation such as bespoke study hotel accommodation can also help to address some of the problems with traditional or unregulated student accommodation by providing an alternative form of accommodation to traditional hotels, B and B’s and HMO’s.

The emerging policy position needs to recognise the wider contribution of the student market to the local economy and both ensure that draft policies are sufficiently flexible and that there is direct encouragement and support within the policy framework to satisfy all requirements of the diverse and expanding student market.

Unless addressed the lack of recognition for student housing proposals outside of the university campuses is likely to lead to; a shortfall in supply of suitable accommodation, un-controlled pressure to release sites (including sites which may be better suited to other uses) and continued pressure on other housing stock and hotel bed spaces.

A specific opportunity has been identified on the Blackman Street Site (land adjacent to Britannia House) –Site (e) within the New England Quarter and London Road Area (Policy DA4) to create an innovative form of ‘study hotel’ accommodation which would provide both living and teaching space to cater specifically for the study/educational tourism market. Further information on this innovative use is enclosed with these representations.

The current approach in the City Plan is too focused on university and College supply and the need to control unregulated student accommodation. There is a need for a more positive approach encompassing the wider educational needs of the City during the Plan period and the economic benefits these can support.

Statement of Changes:

Although Stonebridge Brighton Ltd recognise the general support in the City Plan for the economic function of educational uses there needs to also be a specific recognition of the role of ‘study/educational tourism’. The wider needs of the educational sector also need to be considered to both positively encourage and where appropriate make specific provision for existing and future needs of private educational establishments, international business and language schools.

Any Other Comment:

Officer Response:

Your support for a student accommodation policy is welcomed. Policy CP21 does not deal exclusively with the two universities. Part i) A 6 of the policy refers specifically to other education providers and the council would welcome the provision of additional purpose built accommodation to meet their students’ needs. Paragraph 4.208 also makes clear reference to the range of education providers within the city, including "the language schools." The policy applies equally to the purpose built student accommodation of all the city’s education providers.
Your comments propose use of the Blackman Street site for a study hotel. The Blackman Street site is allocated for 2,000 sq m of B1 office/research and development floorspace in policy DA4 of the City Plan. The city has a demonstrable need for new and high quality employment floorspace in central locations such as Blackman Street as shown by the Employment Land Study. Consequently, no change to the allocation of the site is proposed.

Customer No: 136  Customer Name: Dr Janie Thomas
Organisation: The Kingscliffe Society  Support Status: Object
Rep Number: 6  Page/Para:  
Policy: CP21 Student Housing and Housing in Multiple Organisation:

Further Details:

Houses in Multiple Occupation
We welcome the proposal re Article 4 directions and it is helpful to have a clear policy to guide assessment of planning applications for new HMO's. In the Draft Plan it is indicated that if within a radius of 50 metres from the centre point of an application site's highway frontage more than 10% of properties are HMO's then planning change of use to HMO would not be allowed.

However, the draft options paper put out for consultation gave a distance of 100 metres, not 50. We have not detected any responses asking for that original distance to be made smaller and we are concerned that the reduction could impact adversely on neighbourhoods already containing large numbers of HMO's. We would ask that the 100 metres yardstick be used.

Further, in our response to the draft options paper we opined that the 'more than' 10% of properties in HMO use should be amended to a straight 10%. That has not been taken up in the draft City Plan, although (at paragraph 4.218) there is reference to a '10% threshold'. In the light of that straightforward 10% we consider that the 'more than' should be deleted.

Statement of Changes:

Any Other Comment:

Officer Response:
The Kingscliffe Society's support for the proposed policy to control the location of new houses in multiple occupation is welcomed.

The 50 metre radius proposed reflects further work on the likely level of impact of an HMO. The 100 metre distance shown in the Student Housing Options Paper was considered excessive as, in parts of the city, it would include properties up to three streets away from an application site. The 50 metre radius is also consistent with the methodology adopted in other cities, such as Portsmouth and Milton Keynes.

The radius itself, of course, has no impact upon the actual concentration of HMOs in the area. The policy clearly sets 10% as the threshold, above which changes of uses will not be permitted.
New build student housing appears to be one area of housing where institutions are prepared to invest. To build student accommodation in the city is attractive because such developments are able to be built at high density on small sites. No parking is required and there are no onerous provisions for social housing, neither are there "off-development" costs.

In the City Plan, student housing is regarded as sustainable housing. However, it is only sustainable if there are students prepared to pay the costs of occupying it in an ever increasing expensive environment for such students. There is nothing within the City Plan to indicate how this accommodation could be used if it was under-occupied or if there was no need for it in the future. In view of this, how can it be described as sustainable accommodation, when it is not sustainable. There is nothing within the City Plan to indicate how this accommodation could be used if it was under-occupied or if there was no need for it in the future. In view of this, how can it be described as sustainable accommodation, when it is not sustainable?

The cost of renting purpose built student accommodation is high compared with student housing within other areas of the city. With the introduction of student fees and the reduction in applicants for places (as has already been experienced) the cost of accommodation will be a significant consideration for any student attending university.

Although not specifically mentioned in the City Plan, it is assumed that by allowing a significant increase in student accommodation it will release privately rented student houses back into family occupation. Neither ourselves nor our association's members have been consulted on this aspect, but the Local Authority planners need to be under no illusion that houses converted into accommodation for students are usually converted into 4/5/6 bed accommodation, not suitable for family occupation, nor, for that matter, affordable to a family, and landlords (like any other businesses) will, if necessary, reduce rents to encourage students to occupy their properties, rather than the expensive purpose built student blocks and, if necessary, let to professional sharers or unemployed single under-35s, who are now forced to live in shared accommodation.

It appears that the City Plan has ignored the changes in circumstances of both young professionals, the unemployed and, for that matter, students, which account probably together for the largest single category of persons needing accommodation within the city.

STUDENT HOUSES / HOUSES IN MULTIPLE OCCUPATION

On behalf of our members, we have made suggestions/comments regarding the implementation of Article 4 in five wards in the city. We would not wish to go over the matters we have already written about but we wish it to be made very clear that in ignoring completely the need for shared accommodation within the city, the use of Article 4 will only exacerbate the situation. To bring in an arbitrary 10% for shared accommodation is, in the opinion of landlords, unacceptable. It will be very difficult for the Local Authority to establish the 10% required within a 50 metre radius. It has already brought challenges in other cities and, unsurprisingly, planning inspectors are allowing planning permissions where the council, based on the 10% rule, is refusing planning. The Local Authority did consult with us prior to implementation but, again, our suggestions were ignored and we believe that such a policy is unsustainable, will be challenged and will cost the Local Authority significant sums through having to pay for the appeals that are subsequently accepted for planning.

VICTORIAN STANDARDS ENFORCED THROUGH PLANNING POLICIES (Officer insert : the following comments also allotted to CP20)

The City Plan gives the impression that Brighton and Hove is looking to ensure that people have decent homes in which to live, with modern facilities. Our members have for many years objected to a number of policies that restrict the upgrading/modernisation of houses in multiple occupation. These properties, through planning policies, are required to remain in the same state as they were when such accommodation was first formed. It has been stated by the planners in this city that such policies are to retain cheap accommodation for vulnerable people.

Taking such views conflicts completely with the tone of the current City Plan and it is, in the opinion of our members, unacceptable that private landlords are required to continue letting properties in such a way that had they the choice they would update and self-contain. Examples of the restrictive policies that are in force with no mention of...
change are as follows:
(a) The Local Authority will not allow the upgrading from non self-contained to self-contained houses in multiple occupation resulting in a loss of accommodation.
(b) The current City Plan policy of inclusiveness is not part of the policy for established houses in multiple occupation let on individual tenancies. For example, all such properties have to provide within each unit of accommodation "a sink unit and cooking facilities", whereas the shared facilities will be bath, showers and toilets. In student accommodation, showers/toilets are normally provided within the individual units of accommodation and kitchens are shared. This allows inclusiveness and for tenants to get to know each other, whereas because of planning policies in the old HMOs the opposite applies, where kitchens are not shared and toilets and bathrooms are. In 2012 it is believed that a shared kitchen is more acceptable than a shared toilet/shower.

Brighton and Hove City Council needs to acknowledge that by its planning policies it is holding back the improvements needed to such properties in this city, which are, in the main, owned by private landlords, whose voice is heard but, more often than not, ignored. The City Plan, in our members' opinion, must acknowledge those policies that force landlords to retain Victorian standards, and take steps to ensure that they are amended to allow landlords to bring their properties up to the standards expected in 2012.

Statement of Changes:

Any Other Comment:

Officer Response:

The council fully recognises and supports the important role played by private landlords and the rented sector in housing the city's residents. We also recognise the housing needs of single people, including students, within the city.

Policy CP21 forms part of a balanced and comprehensive approach by the council to HMOs and student housing issues. It forms a key part of the council's Student Housing Strategy.

The further provision of purpose built accommodation for students will help to house increasing numbers of students, allow the universities to accommodate a higher percentage of their first year students and enhance housing options for students. These are all very clearly positive benefits. Contrary to the Association's comments, proposals for purpose built student accommodation will be required to address related issues, such as car and cycle parking, sustainable transport and refuse/recycling storage, in the same way as other developments. Also as with many other uses, if student accommodation were later to become redundant, alternative proposed uses would be considered under relevant planning policies in force at that time and this may include an affordable housing requirement.

Providing purpose built student accommodation may not lead to the conversion of existing houses in multiple occupation back to family homes. However, in addition to the above benefits, it should help to relieve pressure for further conversions.

The Association's objections to the proposed article 4 direction are noted. The decision on whether to confirm the direction will be taken separately. However, if confirmed, the criteria for assessing resulting applications are clearly set out in policy CP21. The council has already gathered significant evidence to enable an assessment of the proportion of HMOs within a set radius of an application site to be made. Other councils with article 4 directions and an adopted planning policy are successful in planning appeals and there is no reason why this would not be the case in Brighton and Hove.

The Association's comments about upgrading existing HMO accommodation are noted. This issue is not covered by policy CP21, which does not protect HMO accommodation or require particular standards to be met.

Overall, the council is satisfied that its approach to student housing is well balanced and one that will offer increased accommodation choice for students living in the city.
Customer No: 170  Customer Name: Anne Johnson & Louis Blache

Support Status: Object

Further Details:

We live in the North Laine and are very unhappy about the proposal to build dormitory accommodation for the University of Brighton on the City College carpark/site. From the point of view of these students, they should have their accommodation sited closer to the university, minimising both their expense and their travelling time. They should certainly not be located in an inner city residential area, where it is likely to create a lot of noise and disturbance, especially late at night and at weekends. We base these comments on the existing level of disturbance caused by people travelling through the North Laine late at night. This could only make matters worse. We therefore urge you to reconsider your plans.

Statement of Changes:

Any Other Comment:

Officer Response:

Your concerns about noise and other disturbance in North Laine are noted. These issues are clearly relevant to the success of any scheme at City College, but can be successfully dealt with through the planning application process or a more detailed policy in City Plan Part Two. The City Plan encourages the use of sustainable transport. The proposed sites for purpose built student accommodation are all close to Old Steine and Lewes Road and benefit from good bus, cycle and pedestrian links between the two universities and the city centre.

Customer No: 129  Customer Name: Michael Johnson

Support Status: Object

Further Details:

Scrap the ridiculous new policy introducing licensing and article 4 that restricts students and professionals living together in smaller house shares. This policy will not stop anti-social behaviour or where young people wish to live. It will push up house prices for properties with licences and increase rents. It will not drum out rogue landlords but will penalise good landlords financially and restrict other improvements. The council, police and university must play their part in anti-social behaviour, unless more power is given to landlords their hands are tied by law.

Statement of Changes:

Any Other Comment:

Officer Response:

Policy CP21 forms one part of the council's Student Housing Strategy. The Strategy is being implemented in conjunction with the universities and the council's Environmental Health and Private Sector Housing teams. The policy alone will not address anti-social behaviour, but the comprehensive and co-ordinated approach of which policy CP21 forms a part should both provide additional accommodation choices for students and address potential impact upon other residents.
<table>
<thead>
<tr>
<th>Customer No:</th>
<th>3</th>
<th>Customer Name:</th>
<th>Mr Jonathan Bromberg</th>
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<td>Section/Supporting Doc/Annexes</td>
<td>Policy:</td>
<td>CP21 Student Housing and Housing in Multiple Organisations</td>
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**Further Details:**

I object to paragraph 4.211 page 187 of the plan.

In that paragraph you state City College Pelham Street Campus has planning permission for 300 student bedspaces (and in of the annex document, draft infrastructure delivery plan page 50-51 you say 600 spaces - so which is it?)

I live adjacent to the Pelham Street campus and the following points are extant:

- know nothing about them having permission for this.

- I already suffer from late night noise and am woken every night. Anabel Carrington and Peter Wileman who work for the Council have taken the attached noise diary very seriously as have the Police whom I am regularly in contact.

- 300-600 additional students living here (I am told first years from the Uni of Brighton) will only add to the noise issues, currently caused mainly by alcohol and licensed premises. At least now many of the people who wake residents up actually leave the area afterwards.

- The area is already a densely populated inner city area where matters such as car parking are at a premium. Building on the City College car park and adding 300-600 new residents will only add to these problems.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your comments on policy CP21.

The policy allocates the City College site for 300 student bedspaces and the Infrastructure Delivery Plan has been amended to reflect this. You are correct that the City College site has no planning permission for student accommodation. This was a drafting error. The supporting text (paragraph 4.211) has been amended to state that the council has previously resolved to grant planning consent, but that the development did not proceed. Your concerns about noise disturbance, alcohol related anti-social behaviour and parking problems are noted. These issues are clearly relevant to the success of any scheme, but can be dealt with through the planning application process or a more detailed policy in City Plan Part Two.
<table>
<thead>
<tr>
<th>Customer No:</th>
<th>249</th>
<th>Customer Name:</th>
<th>Cllrs Ian Davey, Pete West and Lizzie Dean</th>
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<td>Part Four - City Wide Policies (Healthy and Balanced Communities)</td>
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**Further Details:**

As ward councillors for the North Laine, we are concerned that a large building on the current City College site or car park may be over-development and highly inappropriate. We totally support local residents' concerns and those of the NLCA (North Laine Community Association) regarding the impact that proposals for an overly large development would have with its immediate proximity to a conservation area. Pelham Tower, as it currently stands, is an imposing structure that dominates the northern skyline from the North Laine, in particular from this historic, Regency period Pelham Square. Should proposals be put forward to build on the car park, we are also very concerned at its proximity to and impact on the surrounding area, particularly Trafalgar Street and Whitecross Buildings, both during construction works and thereafter.

It is stated within the City Plan that City College has planning permission for 300 students. This is not the case. Like the NLCA, we believe that this site is an entirely inappropriate location for a large number of students. The site is immediately adjacent to the North Laine where residents already suffer from the negative impact of Brighton's late night economy. Late night noise and anti social behaviour continue to have a detrimental impact on residents' quality of life, particularly at weekends. Most of this behaviour is from drinkers walking through the area to get home or to go to another venue in or near to North Laine. It is inevitable that putting a larger number of students just north of North Laine would further adversely affect their quality of life.

While we appreciate there is a need to find or create student accommodation away from residential streets such as Hanover, we do not believe the solution lies in student accommodation blocks in such a central location with its proximity to the narrow residential streets of the North Laine conservation area, and we are concerned that no management plan that might be promised could alleviate the situation.

We note that the application for the former Co-op Building on nearby London Road was refused on the grounds of over-development and the unsuitability of the area for large student numbers, and believe the situation with regard to City College is much the same.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your concerns about the potential height and visual impact of redevelopment at City College are recognised. Policy CP21 does not address such issues in detail, but they will clearly be important in assessing any scheme. The visual impact of the replacement buildings was carefully considered as part of the previous planning permission.

The policy allocates the City College site for 300 student bedspaces and the Infrastructure Delivery Plan has been amended to reflect this. You are correct that the City College site has no planning permission for student accommodation. This was a drafting error. The supporting text (paragraph 4.211) has been amended to state that the council has previously resolved to grant planning consent, but that the development did not proceed.

You have raised concerns about late night noise disturbance, anti-social behaviour and proximity to North Laine's narrow residential streets. These issues are very relevant to the success of any scheme, but can be dealt with through the planning application process or a more detailed policy in City Plan Part Two and appropriate management measures. With regard to the Co-op building, your comments are also noted. However, whilst the previous application was refused was refused on the grounds of overdevelopment, the reasons for refusal did not state that the area was unsuitable for large student numbers.
Further Details:

Strongly object to the inclusion of criterion 7 in CP21. It threatens the deliverability of strategic objectives of the City Plan, is not justified and is not consistent with national policy. Criterion should be removed.

It infers that any proposal for student accommodation for sites considered to be potentially suitable for housing (e.g. because they are included in SHLAA) should be resisted, even if that site is neither allocated for housing or does not have planning permission for housing and this is not justified. This appears due to the fact that Brighton & Hove cannot demonstrate a 5 year supply of housing.

Government's own guidance on SHLAA's makes clear that inclusion of a site for consideration in a SHLAA does not mean that the site should be allocated or developed for housing;

In many instances, sites that are considered potentially available, suitable and developable for housing does not mean that a housing development is either viable or deliverable. Co-Op has been marketed since 2007 but a residential scheme has not come forward despite being in the SHLAA. Resistance to an alternative development proposal, such as student housing, on the basis of the SHLAA would result in it remaining vacant for the foreseeable future.

Including this criterion would also cause a contradiction with wording of draft CP21. E.g. Preston Barracks is included within CP21 as a strategic allocation for student accommodation. However, if it came forward as a planning application, the criterion (7) in the same policy would contradict this allocation because the site is identified in the SHLAA for housing.

Co-Op site should be included as a site allocation for student housing for approx 350 bed spaces with ground floor A uses. The site is clearly deliverable, viable and acceptable in planning policy terms and could have a number of social and economic benefits for the city. Could also help support regeneration of DA4 area.

Statement of Changes:

Any Other Comment:

Officer Response:

The Co-operative Group's general support for the regeneration of key sites within the city and for the City Plan's encouragement of investment in educational facilities and student accommodation is welcomed.

Policy CP21 identifies five sites for purpose built student accommodation. In total, they will provide a minimum of 2,200 student bedspaces. These additional bedspaces will be of significant help in meeting the accommodation requirements arising from the growth in student numbers. However, the council also faces very challenging housing targets and, in order to address housing needs robustly, adequate availability of housing sites must be maintained. Criterion 7 of policy CP 21, which seeks to avoid the use of sites within the SHLAA, allocated by City Plan policies or with extant permission, is considered justified given the tight physical constraints on the city and its significant housing needs. The Co-op site is considered suitable for housing development and, in these circumstances, it would not be appropriate to allocate the site for student accommodation.

Contrary to your comments, there is no conflict between the Preston Barracks allocation and the site's inclusion within the SHLAA. A 300 dwelling figure for Preston Barracks is contained within both the SHLAA and policy DA3. This figure for housing is in addition to, rather than instead of, the separate student accommodation provision also sought.
Further Details:
The sites identified in Policy CP21 do not have the capacity to meet the significant shortfall in student accommodation. Furthermore, the development of these properties is unlikely to occur in the short term.

Additional sites should be allocated in the next version of the City Plan in order to meet this need and also to reduce pressure on the main housing stock where the over concentration of student housing is currently causing conflict in areas such as Hanover, Moulescoomb and Bevendean.

Statement of Changes:
Richmond House in D’Aubigny Road/Hughes Road should be included on the list of allocations for student accommodation and the capacity of the property discussed with the landowner and planning agent.

Any Other Comment:

Officer Response:
The City Plan identifies specific sites for more than 2,200 student bedspaces within purpose built accommodation. In addition, policy CP21 also sets out a clear criteria based approach to assessing applications for student accommodation on other unidentified sites. Together with the private rented sector, this purpose built accommodation will help to cater for increasing student numbers and represents a considerable improvement in housing options for students over coming years.

Richmond House is an established employment site. Should the site become redundant for employment uses, appropriate tests and alternative uses are set out in policy CP3 on employment land. Given the existing protection of the Richmond House site for employment purposes and the identified need for such floorspace shown by the Employment Land Study, allocation for student housing would be wholly inappropriate.

Further Details:
Policy CP21 needs to ensure that student accommodation is tightly restricted for students; proposals should be designed to meet the needs of local universities and education providers (who should be consulted on a site by site basis) and should be tied to a long term lease agreement with a suitable educational institution to ensure long term viability. Where this is not the case, then a requirement for the provision of affordable housing should be applied in a similar approach to the London Plan (paragraphs 3.52 and 3.53). If land or buildings used for student housing is no longer required then the only permissible alternative use should be for affordable housing.

Statement of Changes:

Any Other Comment:

Officer Response:
Hyde Group's comments are noted. Policy CP21 already seeks to robustly secure such schemes for occupation solely by students. It also seeks the support of an existing educational establishment and effective management arrangements. It is not proposed to amend the policy to seek affordable housing as part of applications for purpose built student accommodation. The likely size of each scheme means that, if the student accommodation is later proposed for conversion to residential, it would trigger a planning policy requirement for affordable housing at that time.
Further Details:

Student accommodation should be subject to the requirements of affordable housing policy, particularly where the accommodation is not robustly secured for students. A similar approach is applied elsewhere in SE including the London Plan 2011.

Statement of Changes:

Any Other Comment:

Officer Response:

The Guinness Partnership's comments are noted. It is not proposed to amend the policy to seek affordable housing as part of planning applications for purpose built student accommodation. Policy CP21 does seek to robustly secure such schemes for occupation solely by students. To some extent, these purpose built student housing schemes will help to relieve pressure on the city's existing housing stock. In addition, the likely size of each scheme means that, if the student accommodation is later proposed for conversion to residential, it would be likely to trigger a planning policy requirement for affordable housing at that time.
City Plan Part 1 Responses Received 27th May to 20th July 2012

Customer No: 158   Customer Name: Peter Crowhurst

Support Status: Partly Support

Rep Number: 8   Page/Para: /   Policy: CP21 Student Housing and Housing in Multiple Organisation:

Section/Supporting Doc/Annexes: Part Four - City Wide Policies (Healthy and Balanced Communities)

Further Details:
B3. Pelham Street (p.186) states 300 bedspaces. Annexe 2 states 600 bedspaces.

Statement of Changes:
Reword 600 spaces to 300 spaces in Annexe 2.

4.211 states six sites are specifically allocated for new purpose built student accommodation. We understand this should be five.

4.211 also states that ‘City College's Pelham Street campus has planning permission for a mixed use development incorporating 300 bedspaces for students. This sentence should be reworded as the planning application was withdrawn.

Any Other Comment:
We have mentioned our concerns (D4) about the detrimental affect on North Laine residents if 300 first-year undergraduate students were accommodated at City College.

Please note that there were discrepancies in the plan with reference to the number of students planned for Pelham St. In DA4 it says 300 students, in an annex it says 600 students. Moreover it says in 4.211 that planning permission has been granted for 300 bedspaces. This is not the case as the planning application by City College was withdrawn once funding from the LSC was no longer available.

Officer Response:
The errors in paragraph 4.211 and Annexe 2 have been corrected. Paragraph 4.211 now refers to five sites and Annexe 2 contains a figure of 300 bedspaces. We also note your comments about the status of the previously withdrawn planning application at City College and paragraph 4.211 has been amended to reflect this.

Your concerns about the possible impact on North Laine of student accommodation are noted. Policy CP21 sets out criteria that will need to be addressed by proposals and will ensure that issues such as noise disturbance, anti social behaviour and management are addressed through the planning application process.
Customer No: 196  Customer Name: David Dalton  
Organisation: Zise Ltd  
Support Status: Partly Support  
Rep Number: 2  Page/Para: /  
Policy: CP21 Student Housing and Housing in Multiple Organisation:

Section/Supporting Doc/Annexes  Part Four - City Wide Policies (Healthy and Balanced Communities)

Further Details:
Support the proposed City Plan but reaffirm the belief previously expressed in response to the Student Housing Options Paper that the former Buxtons site (on the junction of Ditchling Road and Oxford Place) should be added to the list of strategic development sites as it could potentially deliver around 100 student residences.

Statement of Changes:
Inclusion of Buxtons site as strategic allocation for student housing.

Any Other Comment:

Officer Response:
Policy CP21 identifies five sites for purpose built student accommodation. In total, they will provide a minimum of 2,200 student bedspaces. These additional bedspaces will be of significant help in meeting the accommodation requirements arising from the growth in student numbers.

However, the council also faces very challenging general housing targets and, in order to address housing needs robustly, adequate availability of housing sites must be maintained. Criterion 7 of policy CP 21 specifically seeks to avoid the use of sites with extant permission. This is justified given the tight physical constraints on the city and its significant housing needs. The Buxton's site, as shown by the extant planning permission for 28 apartments, is suitable for housing development and it would not therefore be appropriate to allocate the site for student accommodation.
### Further Details:

The NLCA is concerned that there is a contradiction between the City Plan and supporting Annex 2. The City Plan, p186 states 300 bedspaces for City College. Annex 2, p51 states up to 600 students. (Officer insert : comments also allotted to Annex 2)

The NLCA do not consider that City College is an appropriate area for the development of student accommodation. The NLCA is concerned about the proximity to the adjoining residential area and the potential of disruption and late night disturbance.

### Statement of Changes:

4.211 states and City College’s Pelham Street campus has planning permission for a mixed use development incorporating 300 bedspaces for students. This should be deleted as the plan was withdrawn. We understand the proposal was discussed, and minded to grant, but was withdrawn to the conditions of Section 106 not being complied with and the loss of LSC funding.

### Any Other Comment:

### Officer Response:

The policy allocates the City College site for 300 student bedspaces and the Infrastructure Delivery Plan has been amended to reflect this. You are correct that the City College site has no planning permission for student accommodation. This was a drafting error. The supporting text (paragraph 4.211) has been amended to state that the council has previously resolved to grant planning consent, but that the development did not proceed. Your concerns about the impact of late night disturbance upon the adjoining residential area are noted. These issues are clearly relevant to the success of any scheme, but can be dealt with through the planning application process or a more detailed policy in City Plan Part Two.
Further Details:
The principle of the introduction of a policy concerning and supporting the delivery of student accommodation in the city is supported by the University although the University
has concerns that the strict application of the 7 listed criteria within the policy will serve to severely limit the delivery of new developments during the life of the City Plan.
Clearly that would be at odds with other policies within the document that support the delivery of new student accommodation.

CP21 part i (b) - the university welcomes and supports the identification of its East Slope redevelopment project as this is a crucial development to support the future growth and enhancement of its campus. The University also supports the supporting text in the bullet point under the identification of the site although it considers that the development should be at a greater density than previous residential developments on the campus to reflect the need for further on-campus accommodation but also to reflect opinion which highlights the social and friendly nature of the current East Slope development and the fostering of a University spirit through the ease of interaction between residents.

The Council should be aware that the University is continuing to work with specialist student accommodation provider Watkin Jones with respect to its proposals for the development of the former Co-op site in London Road for student accommodation. In the absence of any alternative credible options, the University's ambitions for further growth during the Plan period means that it will need accommodation provided by the Co-op site as well as the East Slope redevelopment project and other new off-campus developments if it is to reduce pressure on the private sector rental market in the city.

CP21 ii - the University acknowledges and supports the concerns raised by students in response to the draft City Plan that the introduction of these controls will have an impact on the cost and availability of housing and community relations. However it is prepared to support this element of the policy, but only on the basis that:
1) proposals for University managed HMOs are exempt;
2) part i of the policy is adopted in line with the University's requirements identified in the points raised above as it is only through a more supportive and proactive policy on new built student accommodation that the problems of HMOs identified in the draft plan can be properly addressed.

The University considers the initiatives identified in Policy CP21 should also be supported by improvements to local transport infrastructure serving the University campuses as this will reduce the demand on private rented housing in those locations with optimum access to the campus at present.

Statement of Changes:
A degree of flexibility be introduced into the policy through the following changes:

A. The Council will encourage the provision of purpose built accommodation to help meet the housing needs of the City's students. IN THE ASSESSMENT OF PROPOSALS FOR NEW PURPOSE BUILT STUDENT ACCOMMODATION THE COUNCIL WILL, WHERE APPROPRIATE, HAVE REGARD TO THE FOLLOWING CRITERIA:..'

In addition and to ensure proposals have the legitimate backing of existing education establishments in the city, criterion 6 should be strengthened to read:

6. Schemes should have the support of one of the Universities or other educational establishments WITH EXISTING FIRM FOUNDATIONS IN THE CITY.'

Fully supportive of the identification of the Co-op site as sixth strategic allocation for purpose built student housing within a revised CP21 B i - in this respect it supports the separate representations submitted to the Council in response to the City Plan on behalf of Watkins Jones that provide the more detailed case seeking this allocation.

Any Other Comment:
Officer Response:
The University's general support for the City Plan's approach to the Lewes Road and student accommodation is welcomed.
The University's comments about the density of the proposed East Slope development are noted. The policy does not preclude development at a higher density and requires a net increase in numbers above the existing East Slope Residences. The council would be supportive of efforts to maximise use of the site but, given that no details of a proposed scheme have been received, that the University's masterplan is under review and the proximity of the South Downs National Park, it is not felt appropriate to amend the policy to require a higher density at this stage.

The policy has been strengthened to reflect your comments that proposals for purpose built accommodation should have the support of an existing educational establishment within the city. The criteria are considered appropriate to all development proposals for purpose built student accommodation and no other changes have been made. The policy aims to balance new accommodation provision against potential impact upon neighbours and other key policy goals, such as housing and employment provision.

The council is aware of the University's work with Watkin Jones to secure redevelopment of the former Co-op store on London Road for student accommodation. However, the absence on the most recent decision of a reason for refusal relating specifically to student accommodation use does not justify allocation for purpose built student accommodation. Rather, this reflects the current lack of an adopted planning policy covering the site or setting out criteria for student housing provision. The council considers the site to be wholly suitable for general housing and it would not be appropriate to preclude such use through a policy allocation for an alternative use. In conclusion, the council does not accept that the Co-op site on London Road should be specifically allocated for student housing, as general housing use would be an acceptable use and one that would help to meet the city's challenging housing targets.

The views of the University on proposals affecting houses in multiple occupation are noted. The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010 and the provisions of the Housing Act 2004 set out exemptions from house in multiple occupation designation relating to specified educational establishments including the University of Sussex.

Other City Plan policies will seek improvements to sustainable transport infrastructure which, as the University states, should help to relieve housing pressures in certain areas.

The council would welcome ongoing communication with the university about its development plans and, in particular, the review of the masterplan.

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<th>Ann Montgomery</th>
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<td>Part Four - City Wide Policies (Healthy and Balanced Communities)</td>
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<td>Further Details:</td>
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<td>HMOs need to be tightly controlled for residents as we are infested with rubbish, parties and noise if houses are not monitored. It pulls areas down.</td>
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<td>New student accommodation also needs to be monitored as students need space/grass and are very restricted in urban areas. Residents feel the impact of noise.</td>
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<td>Statement of Changes:</td>
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<td>Officer Response:</td>
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<td>Your support for the proposed controls over locations of houses in multiple occupation is welcomed. Your views on new purpose built accommodation are noted and the council will seek to ensure a high standard of design, appropriate levels of open space and management controls in such schemes.</td>
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<td>Customer Name:</td>
<td>Molly Thew</td>
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**Further Details:**
Students should be housed on campus and not in residential areas as they are loud, messy and have no respect for neighbours.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Policy CP21 proposes a significant number of new bedspaces for students on university campuses and in self contained accommodation. Your comments about anti-social behaviour are noted. The planning system has limited control over the behaviour of individuals. However, the council's Student Housing Strategy contains a range of measures to address such problems. The proposed planning controls over the location of new houses in multiple occupation will help to avoid further excessive concentrations.
City Plan Part 1 Responses Received 27th May to 20th July 2012

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<th>Ron Crank</th>
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**Further Details:**

Students are a paramount importance to Brighton & Hove and their contribution to the success of the city economy cannot be overstated. Increasingly they will look for a higher education 'package' that includes not just excellent tuition but also excellent accommodation.

The Council needs to be flexible on sites other than those listed if the need for student accommodation is to be met. Additional sites coming forward will help to free up some of the accommodation proved in traditional housing stock where social problems can be caused by overconcentration [studentification] in residential areas.

We would also question CP21 [A6 which proposes that approved schemes should be occupied solely as student accommodation. With smaller schemes there is scope to have employment use on the ground floor with accommodation above. Indeed many students already live in this type of accommodation in the North Laine and London Road. As with many aspect of the Plan there is a need for greater flexibility with each site considered on its own merits.

Given the pressing need for student accommodation and the fact that, even after delivery of the four purpose built sites there will still be a significant shortfall we would urge higher densities to be employed where practicable. This is particularly the case at the City College Pelham Street campus which could accommodate 500 units, Circus Street which should not be capped at 400 spaces and Preston Barracks which could probably accommodate over 800 spaces.

Increasing the units at the Circus Street site would compensate for the loss of employment space [which the Economic Partnership does not oppose] by delivering considerable indirect benefit to the local economy in the long term

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The Economic Partnership's support for the broad aims of this policy is welcomed. The importance of students and education to the local economy are recognised.

The council would welcome additional sites coming forward for purpose built accommodation, subject to their acceptability under other planning policies. Policy CP21 sets out clear criteria against which such proposals would be addressed.

Higher densities on some of the allocated sites may be possible and policy CP21 allows for this. However, no drawings and/or planning permissions on any of the sites are in place to demonstrate that a higher density is possible and it is not therefore appropriate to increase the number of bedspaces in the policy at this stage. The council can be flexible if further development of the proposals shows that increased numbers can be satisfactorily accommodated.

The reference to occupation solely as student accommodation in criterion i) A. 6. refers to the accommodation element of the overall development alone. It would, as the Partnership states, be possible for separate, self contained uses, such as retail or offices, to take place on lower floors within a mixed use development.
Support proposal for new purpose built accommodation to reduce burden on residential areas provided they are located at Falmer only. Universities expand and do not deal with anti-social behaviour and noise by a minority of students. Halls need to be better planned in terms of materials, structure and architecture than Phoenix Halls on Southover Street. It has taken years of negotiation to achieve small changes to lower disturbance, such as taxis picking up inside the grounds rather than in adjoining streets.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support for the policy's approach to student accommodation is noted and welcomed.

Policy CP21 contains criteria that will be used in considering planning applications for purpose built accommodation. These address many of your concerns, including measures to deal with potential noise and disturbance, management controls and design. In addition, the allocated sites are in locations that will avoid the kind of impact upon neighbours that you raise in respect of Phoenix Halls. The issues that you raise would also be considered at planning application stage and local residents would be consulted on any planning applications for new student accommodation.

I support the City Plan approach of purpose built student accommodation.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support for policy CP21 and the approach to student accommodation is welcomed.
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**Further Details:**
Support the City Plan approach of purpose built student accommodation.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Your support for the policy is welcomed.

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<th>Robert Young</th>
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**Further Details:**
I support the City Plan approach of purpose built student accommodation.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Your support for Policy CP21 and its approach to purpose built student accommodation is welcomed.
Customer No: 55  Customer Name: Fiona M Hall

Support Status: Support

Rep Number: 1  Page/Para: /  Policy: CP21 Student Housing and Housing in Multiple Organisation:

Section/Supporting Doc/Annexes Part Four - City Wide Policies (Healthy and Balanced Communities)

Further Details:
I support the City Plan approach of purpose built student accommodation

Statement of Changes:

Any Other Comment:

Officer Response:
Your support for policy CP21 and its approach to purpose built student accommodation is noted and welcomed.

Customer No: 200  Customer Name: Mr Richard Poulson

Support Status: Support

Rep Number: 1  Page/Para: /  Policy: CP21 Student Housing and Housing in Multiple Organisation:

Section/Supporting Doc/Annexes Part Four - City Wide Policies (Healthy and Balanced Communities)

Further Details:
I support the policy: “To meet increasing accommodation demands from students and to create mixed, healthy and inclusive communities, the Council will support the provision of additional purpose built accommodation and actively manage the location of new Houses in Multiple Occupation. The Council will continue to work closely with the two universities and other education providers to achieve these goals.”

Statement of Changes:

Any Other Comment:

Officer Response:
Your support for the policy is welcomed.
Further Details:
The university welcomes the recognition of student accommodation needs and policies to meet them.

Statement of Changes:

Any Other Comment:

Officer Response:
The University's support for policy CP21 is welcomed.
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<th>Anna Louise Hunter</th>
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**Further Details:**

I support this proposal for new purpose built student accommodation to reduce the burden on residential areas PROVIDING Brighton University does not use the extra accommodation to increase the intake of students.

There is an established Hall of Residence on Southover Street - the Phoenix. With proposals to build accommodation at Pelham Street and Circus Street it out mean that there are three Halls within a quarter of a mile triangle. Since the building of the Phoenix Halls in 1977 a good number of local residents have either moved, or not been able to sell their properties, mostly due to the architecture of the building, noise and constant disturbance at night from taxis and partying students, fire engines: during the day, building maintenance, service vehicles likens the site to an industrial zone. The building acts as an echo chamber, amplifying noise. There needs to be greenery around these new Halls, something to "baffle" echoes.

Kitchens need to be sited away from any residential area. Ideally situated overlooking a courtyard. A main entrance to the Halls through which people pass to access their flats. This would give more security to the students.

I suggest local long term residents, who have suffered greatly (and continue to suffer from "the un thought through "architecture of Phoenix Halls) are consulted on specific needs of the locality, that is to say this could prevent local house owners from suffering as greatly as this community.

Once built, there needs to be strong, form management that is willing to liaise with surrounding communities.

Will the architectural plans be available for residents to see before building commences? Brighton University often state that they have learned lessons from the Phoenix Halls, but will the new Halls be as "Gerry" built as the Phoenix with all its’ known problems.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments about the impact that student accommodation can have upon neighbours are noted. However, planning policies cannot be used to control overall student numbers at the University of Brighton.

Policy CP21 does contain criteria that will be used in considering planning applications for purpose built accommodation. These address many of your concerns, including measures to deal with potential noise and disturbance, management controls and design. The issues that you raise would be considered at planning application stage and local residents would be consulted on any planning applications for new student accommodation.
Further Details:

I am writing in response to the above problem. Out of the five houses on either side of our 4 out of the 10 are houses in multiple occupation, 3 by students groups and 1 by private tenants. None of the houses has an agent’s identification.

At the rear of us there are two houses occupied by students - one of the houses has a full width loft extension and a conservatory with wide doors onto their patio 2 metre from the end of our garden. The whole of our road has about 30 student houses and about 2/3 days a week there will be above average noise from these houses. Also the amount of rubbish from them is excessive and ends up overflowing the bins and over the pavements.

I am very much in favour of new purpose built student accommodation particularly for first year students in suitable locations and also in limiting student lets in established residential neighbourhoods. The five sites listed are a very good idea. Implementing Article 4 and requiring planning permission would help to limit student concentrations and landlord owned properties, especially as Hanover Terrace and probably other roads in the area have more than 10% HMOs. The house in this areas could then become available again to young families.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support for the development of purpose built student accommodation and for the article 4 direction on houses in multiple occupation is welcomed.
Further Details:

Students are a paramount importance to Brighton & Hove and their contribution to the success of the city economy cannot be overstated. Increasingly they will look for a higher education ‘package’ that includes not just excellent tuition but also excellent accommodation.

The Council needs to be flexible on sites other than those listed if the need for student accommodation is to be met. Additional sites coming forward will help to free up some of the accommodation proved in traditional housing stock where social problems can be caused by overconcentration [studentification] in residential areas.

We would also question CP21 [i]A6 which proposes that approved schemes should be occupied solely as student accommodation. With smaller schemes there is scope to have employment use on the ground floor with accommodation above. Indeed many students already live in this type of accommodation in the North Laine and London Road. As with many aspect of the Plan there is a need for greater flexibility with each site considered on its own merits.

Given the pressing need for student accommodation and the fact that, even after delivery of the four purpose built sites there will still be a significant shortfall we would urge higher densities to be employed where practicable. This is particularly the case at the City College Pelham Street campus which could accommodate 500 units, Circus Street which should not be capped at 400 spaces and Preston Barracks which could probably accommodate over 800 spaces.

Increasing the units at the Circus Street site would compensate for the loss of employment space [which the Economic Partnership does not oppose] by delivering considerable indirect benefit to the local economy in the long term

Statement of Changes:

Any Other Comment:

Officer Response:

The Economic Partnership's support for the broad aims of this policy is welcomed. The importance of students and education to the local economy are recognised.

The council would welcome additional sites coming forward for purpose built accommodation, subject to their acceptability under other planning policies. Policy CP21 sets out clear criteria against which such proposals would be addressed.

Higher densities on some of the allocated sites may be possible and policy CP21 allows for this. However, no drawings and/or planning permissions on any of the sites are in place to demonstrate that a higher density is possible and it is not therefore appropriate to increase the number of bedspaces in the policy at this stage. The council can be flexible if further development of the proposals shows that increased numbers can be satisfactorily accommodated.

The reference to occupation solely as student accommodation in criterion i) A. 6. refers to the accommodation element of the overall development alone. It would, as the Partnership states, be possible for separate, self contained uses, such as retail or offices, to take place on lower floors within a mixed use development.
### Customer No: 229  Customer Name: Mr Stuart Derwent

**Organisation:** CPRE B&H  
**Rep Number:** 5  
**Page/Para:** /  
**Policy:** CP21 Student Housing and Housing in Multiple  
**Section/Supporting Doc/Annexes:** Part Four - City Wide Policies (Healthy and Balanced Communities)  
**Support Status:** Support

**Further Details:**
Gave support to the options paper last autumn. Allowance must be made for the infrastructure needs associated with additional student population, which effectively increases the housing numbers, with added pressure on land and infrastructure in this constrained city. Adequate provision of infrastructure throughout the plan period must be made.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
CPRE's comments on infrastructure requirements are noted and supported. Policy CP21 requires sites to have good sustainable transport links and will require developers to contribute towards these where necessary. Infrastructure requirements will also be picked up by other policies within the City Plan, such as CP7 (Infrastructure CIL and Developer Contributions) and CP9 (Sustainable Transport).

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### Customer No: 171  Customer Name: Chris Sevink

**Organisation:** Ditchling Rise Residents Association  
**Rep Number:** 16  
**Page/Para:** 185-186/  
**Policy:** CP21 Student Housing and Housing in Multiple  
**Section/Supporting Doc/Annexes:** Part Four - City Wide Policies (Healthy and Balanced Communities)  
**Support Status:** Support

**Further Details:**
We support proposals to manage the development of student accommodation to minimise impacts on neighbourhoods, and, where appropriate, encourage integration into neighbourhoods.

4.213 we support the aim to support and enhance the quality and management of housing and in HMO dominated neighbourhoods (such as parts of ours) - much of this housing is very poorly managed and of poor quality - both in terms of physical space and layout and building condition.

**Statement of Changes:**
We would like to see higher profile/priority given to supporting better quality housing as poor housing standard leads to lack of care for the wider neighbourhood by occupants.

**Any Other Comment:**

**Officer Response:**
Your support for the City Plan's approach to managing the location of houses in multiple occupation and encouraging integration into the local community is welcomed. Policy CP21 sets out one element of the council's efforts to improve HMO accommodation. The planning system can have limited impact upon the quality of the housing, but other initiatives such as extended HMO licensing will help to address this issue.
### Customer No: 116  
**Customer Name:** Conservative Group Members (c/o Jonathan Bryant)  
**Organisation:** Brighton and Hove City Council  
**Support Status:** Support  
**Rep Number:** 5  
**Policy:** CP21 Student Housing and Housing in Multiple Organisation  
**Section/Supporting Doc/Annexes**

**Further Details:**

We agree with the approach to planning for student housing (i.e. more purpose built accommodation and more active management of the location of HMOs). We would also like to see the city’s two universities making better use of the land that they own to house their students.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your support for the City Plan's approach to providing more purpose built student accommodation and managing the location of houses in multiple occupation is welcomed. The council is working closely with the two universities to address student housing requirements. This includes specifically allocating land that they own, such as East Slope at the University of Sussex's Falmer campus, for student accommodation.

### Customer No: 78  
**Customer Name:** Miss Navdeep Bains  
**Organisation:**  
**Support Status:** Support  
**Rep Number:** 1  
**Policy:** CP21 Student Housing and Housing in Multiple Organisation  
**Section/Supporting Doc/Annexes** Part Four - City Wide Policies (Healthy and Balanced Communities)

**Further Details:**

Anti-social behaviour by students needs to be taken more seriously by the council and university. Those who are vulnerable / elderly/ with children or work feel threatened or scared and don’t want to be abused when asking people to be quiet. We pay council tax and work and it is difficult to work when being woken up 3 or 4 times a week.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments about anti-social behaviour are noted. The planning system has limited control over the behaviour of individuals. However, the council's Student Housing Strategy contains a range of measures to address such problems. The proposed controls over the location of new houses in multiple occupation will help to avoid further excessive concentrations.
Conservative Group Members (c/o Jonathan Bryant)

Further Details:
New traveller sites should not be located in the South Downs National Park. Segregating various groups of travellers into one location does not in our view foster strong community cohesion. There is no mention of private traveller accommodation in this policy. We would, therefore, like to see more encouragement, support and advice for travellers to buy their own plots of land.

Statement of Changes:

Officer Response:
Some new Traveller sites will need to be located in the National Park if there are no suitable alternatives. The need for traveller accommodation is a housing need and the National Park Authority will itself need to identify traveller sites within the Park where there is a need demonstrated.
Community cohesion is fostered through good access to local facilities such as schools, health facilities, work and other local services.
The criteria set out in the policy to guide site location is also relevant to any sites brought forward by travellers themselves.

Maureen Holt

Further Details:
In meeting travellers needs by providing extra pitches there is also a need to protect the rights of the settled community by making sure the parks and open spaces around the city are not equally available by becoming sites for 'illegal encampments.'

Statement of Changes:

Officer Response:
Your comments are noted. The council takes prompt enforcement action where there are illegal encampments within city parks and open spaces and acknowledges that the rights of the settled community are important in this respect.
Further Details:
The traveller policy sets out a positive criteria for assessing the suitability of any future sites. It highlights that there is an existing need for permanent residential pitches within Brighton and Hove and that they have identified a site. And that any additional requirements will be facilitated through Part Two of the City Plan. The reference to the planning application in paragraph 4.221 is noted as is the criteria based policy. In light of the listed criteria, the SDNPA would not expect any further applications for the provision in the National Park.

There is a requirement for particular care over development proposed on the urban fringe of the city. As these proposals could have a significant impact on the surrounding landscape of the South Downs National Park careful consideration must be given to the impact of any proposals on the setting of the South Downs National Park and its two Purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA supports the overall aim of the spatial distribution of development to minimise transport impacts and the continued protection of the South Downs National Park.

Statement of Changes:

Any Other Comment:

Officer Response:
Support for criteria listed in the policy is welcomed. Any further applications for sites within the National Park would need to be justified by a lack of suitable alternative sites. Comments regarding landscape impact considerations are noted and it is acknowledged that this is a key issue.
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<td>Policy:</td>
<td>CP3 Employment Land</td>
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**Further Details:**

CP3 Employment Land

1. We question whether DA7 Toads Hole Valley is a sustainable location for B1 employment floorspace.

Supporting Text

4.29

Exclude DA7.

Table 5 City Plan Employment Floorspace

We question whether Toads Hole Valley is a suitable location for 25,000 sq m of B1 employment floorspace.

**Statement of Changes:**

Any Other Comment:

Officer Response:

Objection and comments noted.

The City Council's updated Employment Land Study indicates that there will be a shortfall of office and industrial floorspace in the city to 2030. There is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively. Whilst the majority of the new office accommodation identified is on the fringe of the city centre (DA4, DA5), significant land capacity constraints the city face mean there are limited opportunities to accommodate all of the forecast requirements in centre. The proposals for DA7 Toads Hole Valley seek the creation of a sustainable mixed use communities and the provision of employment floorspace will ensure that the site is used efficiently and effectively to meet the development needs of the city.
Further Details:

This Policy is inflexible and will constrain redevelopment, investment and new job creation. As such it does not accord with the NPPF particularly paragraphs 20 and 21, and the overarching aim of the Government which is to support economic development.

Furthermore, the policy, as currently worded, will conflict with the overarching aspirations of the Plan.

Bullet 5 in particular, by preventing redevelopment unless existing sites and premises are redundant, will stifle new investment and regeneration.

The Plan focuses on the need to redevelop land, which has previously been used, to meet its future requirements for all forms of land use. It also recognises that opportunities are at a premium, because the City is tightly constrained and because demand pressures are high. Within this context it is unlikely that large areas of vacant premises will be available for redevelopment. Rather, redevelopment sites will emerge where it becomes economic to redevelop lower value, lower density areas, which although in use, present opportunities for development.

Such development opportunities are vital to the success of the Plan and must be actively encouraged. The Policies of the Plan, as currently worded, constrain future investment and will make it impossible for the Plan to be delivered.

The policy should acknowledge that comprehensive redevelopment, even where existing buildings are in use, can bring forward wider benefits in terms of job creation, investments, public realm, sustainability etc, which will far outweigh the loss of an existing unit(s).

Paragraph 4.31 recognises the current market difficulties and the needs for a flexible and positive approach. This is strongly welcomed. However this acknowledgement is then ignored in the policy itself. The Policy should, in accordance with comments set out here and elsewhere, be adjusted to specifically acknowledge the need for flexibility.

Paragraph 4.36 is welcomed and should be recognised in Policy CP3 and elsewhere in the DA policies.

Paragraph 4.40 is supported and again should be reflected elsewhere in the Plan.

Statement of Changes:

Policy CP3 should be amended to acknowledge the need for flexibility as set out in paragraphs 4.31 and 4.36 and the overarching importance of employment generating uses rather than simply B-Class uses.

Any Other Comment:

Officer Response:

Objection and comments noted.

CP2 sets out the council’s approach to supporting sustainable economic development, an overarching aspiration of the City Plan and council. One of the consistent barriers cited with regards to business needs and future economic growth is the lack of supply of B use class employment space.

CP3 has been updated to reflect the findings of the Employment Land Study Review 2012 with regards to the updated forecast requirement for office and industrial floorspace over the plan period and the updated potential supply of site to meet the quantitative and qualitative requirements. The Study found that there was a quantitative and qualitative need for 112,240 sq m of B1 office floorspace to 2030 and a modest requirements for 43,430 sq m B1b, c, B2 and floorspace over the plan period. The Study concluded that the Council’s approach to employment land should aim to at least fully meet Brighton & Hove’s employment space needs over the plan period so that the City’s
However in re-assessing the existing portfolio of employment sites and the potential identified supply of employment land likely to come forward during the Plan period the study identified a potential shortfall, whereby the City Plan Part One is unable to fully meet the identified needs of B class sectors in quantitative and qualitative terms. It is therefore considered that the approach to B use class employment land provides the appropriate level of flexibility.

The City Plan proactively identifies through strategic allocations within the Development Areas opportunities for comprehensive redevelopment to secure new investment and regeneration (including non B use class employment generating uses).

CP3 also safeguards offices within SA2 Central brighton and key industrial estates and premises across the city and encourages the refurbishment and upgrade of existing industrial estate. This is supported by the Employment Land Study Review 2012.

The study also concluded that in the context of the tight industrial and office market and quantitative shortfall of supply a test of redundancy is still required for unallocated sites. CP3.5 allows for a balanced assessment to be made on a case by case assessment.

Further Details:
Policy CP3 allocates 4000 sq m of employment floor space to Brighton Marina, specifically the Gas Works site. Request removal of this specific reference and allocate the 4000 sq m of employment floor space across all three strategic allocations in DA2: Inner Harbour, Black Rock and Gas Works.

Reason: Significant costs in decommissioning and decontaminating the site. Taking these costs into account, the site will not be viable with predominantly employment uses.

Supporting text (para 4.31) identifies the importance of allowing for 'reasonable flexibility to promote successful regeneration and enable viable schemes to be delivered.' Supportive of this flexibility.

Statement of Changes:
Request that specific changes (on page 118) allocating 4000 sq m of B1-B2 employment land to the Gas Works site be taken out. Unless the council are confident that they can provide 4000 sq m of employment space elsewhere within the Marina, the reference to the quantity of floor space should be removed altogether. If not, the City Plan will not pass the test of soundness as it will not be deliverable.

Any Other Comment:
Officer Response:
Objection and comments noted. An Employment Land Study Review 2012 has been undertaken to inform the final version of the City Plan. This had indicated through updated forecasts, a quantitative requirement of 43,430 sq m for industrial floorspace to 2030 as well as a qualitative need. Therefore strategic allocations where opportunities for new industrial floorspace to be accommodated to meet this need continue to be required.

In response to the issues regarding the potential high remediation and decommissioning costs and in light of the findings of the Employment Land Study Review 2012 it is considered appropriate that a reduced amount of new industrial floorspace be identified for this site. It is considered that 2,000 sq m of industrial floorspace could effectively form an extension to the Bell Tower estate comprising smaller scale units at the north of the Gas Work site alongside potential improvements to the local road access/junction arrangements. DA2 has been amended to reflect the proposed change.
Hopegar Properties Ltd own Mackleys Wharf, between the Port access road Basin Road North and in Aldrington Basin. Their total site area is approximately 5,300m² with a factory (1050m²) on the north (against the road), to the south the wharf itself (2,800m²) and between them ancillary open storage (1,080m²). Access is on the western side of the site (350m²).

CP3 and CP12 could bring into statutory force provisions restricting (re-)development at Shoreham Harbour prematurely. That would tend to constrain, unhelpfully, the future provisions of the JAAP which is due to be published in 2013. The draft policies should be altered to allow the JAAP fuller scope to meet the objectives set out in DA8 and supporting text.

Policy CP3 includes allocations for B1 employment use in DA8 Shoreham Harbour. Overall it says ‘employment sites and premises will be safeguarded..’ It does not mention the JAAP.

It then introduces into policy at part 5 restrictions on release of unallocated sites in employment use, and at 4.93 gives a list (a-k) of criteria which will be considered in relation to redundancy of sites in employment use (Use Classes B1-B8).

Part 5 of the policy also seeks to establish a preference on re-use for employment generating uses or affordable housing and refers to CP20. That sets a target of 40% affordable housing, (while recognising at CP20 iv. that this might be offset where it would prejudice the realisation of other planning objectives).

It is not appropriate to impose these policies now, on what could become a major area of change within the period of the Plan, without explicit modification.

I also refer you to the 2005 City Plan (Local Plan). Mackleys Wharf enjoys waterfront access with great functional and amenity value and it would be contrary to the aims of Policy EM12 to allow the long term development potential of this site to be restricted.

CP3 part 1 should be amended. It should refer to the forthcoming JAAP for Shoreham Harbour and state that, if considered appropriate after further study, provisions of CP3 may be modified or dis-applied in the area covered by the JAAP.

**Statement of Changes:**

See above

**Any Other Comment:**

**Officer Response:**

Objection and comments noted.

The strategic principles for Shoreham Harbour are set out within DA8 of the City Plan which refers to the preparation of a JAAP which will be concerned with detailed implementation.

CP3 sets out the overall approach to Employment Land and cross references DA8 which sets out detailed priorities for employment sites within Aldrington Basin and South Portslade Industrial Estate and clarifies that this will be in accordance with a future brief that will form part of the JAAP. It is not considered that there is anything in CP3 that would constrain the JAAP unduly. No changes to policy proposed.
Stonebridge Brighton Ltd (SBL) consider that the general approach to employment policy needs to be revisited and amendments undertaken to the policy position to ensure that it is sufficiently flexible. In this regard we wish to make the following comments on the draft policy position.

Employment targets
The policy approach seeks to specifically safeguard new allocations and commitments on sites to provide new B1 employment floorspace totalling 130,407 sqm. This would be in addition to the renewal and refurbishment of vacant floorspace on sites such as New England House.

This targeted level of B1 growth is, however, significantly greater than even the upper level of the 2006 B1 growth estimates (see comments on Part 2 and CP2). Paragraph 4.30 of the Draft Local Plan advises that 'A review of the Employment Land Study will be undertaken to review the floorspace requirements to 2030 and the findings will inform the final version of the City Plan. SBL consider that it is essential that a comprehensive review is undertaken of the existing employment land evidence base. Until this is completed it is considered premature for the Council to reach any conclusions on the appropriate overall level of B1 floorspace and distribution of B1 space across specific sites.

The 2006 data is now significantly out of date and no longer provides a credible and justifiable base-line position; particularly given that the evidence and analysis predates the recession and current depressed international economic conditions. In this context it is very likely that the upper level of estimated B1 employment demand which has been utilised to determine B1 growth targets no longer represents a reasonable yardstick. Furthermore, the apportioned B1 figures should be appropriately re-calculated to take account of interim supply and changes since 2006. Consideration should also be given to the impact on the level of supply resulting from the current economic downturn and the recognition in both the subtext to the plan (para. 4.31) and accompanying Viability Assessment work that B1 space is very unlikely to be delivered over the next five years and in some instances (including DA4- New England Quarter and London Road) B1 space may not be delivered until later in the plan period.

Flexibility of the Policy Approach
The sub-text at para 2.11 asserts that: ‘further releases [of employment land and premises beyond sites identified to meet employment land targets] will harm the ability of the city to create new jobs for the growing population. ’ This is considered to be a very restrictive approach to employment and the Council should consider a more flexible approach which recognises the broader base of jobs and alternative employment options outside traditional B1a or B1b uses.

The specific policy text as currently drafted only allows some flexibility to release ‘ unallocated sites or premises in employment use’ (Part 5 of the Policy). There is, however, clear recognition at paragraph 4.31 that there is a need to allow for ‘reasonable flexibility to promote successful regeneration and enable viable schemes to be delivered, particularly if over the short to medium term economic growth takes a different profile’ The sub-text to the policy proposes a number of specific policy tests. Whilst these in themselves should be appropriately re-visited in line with the more positive approach advocated in the NPPF it is considered imperative that a flexible approach to the application of this policy is explicitly written into the policy itself either through a criteria approach or other suitable mechanism.

To reflect the wider objectives of the Plan the policy should make clearer references to the role of alternative employment generating uses. At present these are only mentioned in passing, however, these should be a key part of the economic diversification advocated by the Plan. The Policy sub-text also makes passing reference to a more flexible approach to ensure the delivery of regeneration, however, this should be a central part of this policy to ensure that the plan is sufficiently future proof in order to allow the benefits of new innovative employment generating uses to be realised.

Whilst economic development and the delivery of an appropriate level of office space are important issues SBL are concerned that as currently drafted the Plan is not appropriately balanced in terms of the different demands on brownfield sites. Specifically SBL are concerned that the upfront allocation of protected employment sites is likely
Unsound: The City Plan as currently drafted would not represent a sufficiently flexible approach to employment land provision.

The levels of targeted employment should be revisited as part of a comprehensive review of the employment land evidence base position and to ensure that a robust position is presented which reflects changing market conditions. Greater recognition should be given to the role of other non-traditional sources of economic growth.

Statement of Changes:

A thorough review of the employment evidence base and in particular the justification for and likely levels of B1 growth need to be reassessed.

The policy approach should be amended to recognise that there will need to be greater flexibility in order to encourage regeneration of sites.

Any Other Comment:

Officer Response:

Objection and comments noted.

CP2 sets out the council’s approach to supporting sustainable economic development, an overarching aspiration of the City Plan and council. One of the consistent barriers cited with regards to business needs and future economic growth is the lack of supply of B use class employment space.

CP3 has been updated to reflect the findings of the Employment Land Study Review 2012 with regards to the updated forecast requirement for office and industrial floorspace over the plan period and the updated potential supply of site to meet the quantitative and qualitative requirements. The Study found that there was a quantitative and qualitative need for 112,240 sq m of B1 office floorspace to 2030 and a modest requirements for 43,430 sq m B1b, c, B2 and floorspace over the plan period. The Study concluded that the Council’s approach to employment land should aim to at least fully meet Brighton & Hove’s employment space needs over the plan period so that the City’s economy is not constrained.

However in re-assessing the existing portfolio of employment sites and the potential identified supply of employment land likely to come forward during the Plan period the study identified a potential shortfall, whereby the City Plan Part One is unable to fully meet the identified needs of B class sectors in quantitative and qualitative terms. It is therefore considered that the approach to B use class employment land provides the appropriate level of flexibility.

The City Plan proactively identifies through strategic allocations within the Development Areas opportunities for comprehensive redevelopment to secure new investment and regeneration (including non B use class employment generating uses).

CP3 also safeguards offices within SA2 Central brighton and key industrial estates and premises across the city and encourages the refurbishment and upgrade of existing industrial estate. This is supported by the Employment Land Study Review 2012

The study also concluded that in the context of the tight industrial and office market and quantitative shortfall of supply a test of redundancy is still required for unallocated sites. CP3.5 allows for a balanced assessment to be made on a case by case assessment.
Further Details:

Infinity Foods’ wholesale and packing operations are currently carried out at 67 Norway Street, Portslade (Use Class B8 with ancillary offices). These premises no longer meet modern employment requirements for the following reasons:

1. The buildings are in poor condition (particularly the 1930s warehouse at the southern end of the site) and are nearing the end of their working life. Furthermore, the layout of the buildings which includes a number of columns in the middle of the floor space do not lend themselves to modern warehouse requirements;

2. The site doesn’t have turning space for larger vehicles and results in the need to reverse onto the highway, thereby creating safety hazards. In addition, the surrounding streets are narrow and unsuitable for commercial vehicles;

3. The property only has 10 parking spaces and as a result, significant on-street parking in a residential area can occur;

4. The vehicle access is located immediately adjacent to residential properties on Norway Street, St Aubyn’s Road and Franklin Road and has been the subject of noise complaints from surrounding residents;

5. It is understood that the land has been subject to subsidence and contamination in the past. These issues represent abnormal remediation costs for the future redevelopment of the site and have had a negative effect on the marketability of the property. The site has been marketed by Graves Son & Pilcher since September 2011 and to date has attracted no serious interest for B1, B2 or B8 purposes (either as existing or as part of a redevelopment scheme).

In addition to the restrictions listed above, Infinity Foods will shortly be relocating from the premises so that the Co-operative can expand. To that end, Infinity has recently achieved planning consent for more appropriate accommodation in Dolphin Road, Shoreham-by-Sea.


Paragraph 22 of the NPPF states the following:

‘Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.’

Policy CP3(4) seeks to allocate the Franklin Road Industrial Estate for employment-led (residential and employment) mixed use development and stipulates that there will be no net loss of employment floorspace. Infinity Foods have held discussions with the City Council over the last 12 months and officers have been supportive of a mixed use scheme on the site.

Given that the site is no longer suitable for modern business purposes and there is no demonstrable market demand for such uses, this is exactly the type of site that the NPPF seeks to release for other uses in the interests of positive planning.

Paragraph 4.2 of the Draft City Plan identifies a housing requirement of between 15,800 and 19,400 new dwellings over the plan period to 2030 (790-970 new homes per annum). However, Policy CP1 only makes provision for 11,300 new homes to be built (565 units per annum). This approach is inconsistent with the National Planning Policy Framework which requires Local Plans to meet the need for housing in full (Paragraph 47).

Statement of Changes:
Given that there is no demonstrable market demand to retain the site for employment purposes (either on its own or as part of a mixed use scheme) the inclusion of the Franklin Road Industrial Estate in Policy CP3 cannot be justified and would conflict with policies set out in the NPPF.

We therefore request that any reference to the site is removed from this policy.

The allocation of the Infinity Foods site solely for residential purposes in the City Plan could make a significant contribution towards reducing the identified housing shortage. We therefore request a residential allocation either in Part 1 or Part 2 of the Plan.

Any Other Comment:

Officer Response:

Objections and comments noted. The council is aware of the constraints Infinity Foods' have faced with their current site and have worked with Infinity Foods to find alternative suitable sites within the city/city region. It is not clear from the representations that market demand was tested for mixed use residential and employment uses to conclude that there is no demonstrable demand for employment use on this site as part of a mixed used scheme.

The approach set out in CP3 for this site is to allow for mixed use redevelopment of a previously safeguarded employment site to bring forward modern business floorspace and additional housing units. The starting position in the policy is that there is no net loss of employment floorspace in light in the tight constraints in the existing supply of industrial sites within the city. Indeed an Employment Land Study Review undertaken to inform the final version of the City Plan highlights both the quantitative and qualitative need for industrial floorspace over the plan period. Paragraph 4.36 provides the factors that will be taken into consideration if a net loss of employment floorspace is being proposed and provides the flexibility to address the specific constraints to this site outlined in the representation.

The performance of this site currently, and the opportunities for the employment role of the site to be enhanced through mixed use employment and residential development was considered as part of the Employment Land Study Review 2012. The assessment did not conclude that the site should be removed from the policy. In conclusion, the council does not accept that the site should be removed from the policy.
Further Details:
While paragraphs 4.37 to 4.40 of the supporting text outlines reasons why the Council might want to retain existing employment sites, it is noteworthy that no evidence is referred to to suggest that not specifically protecting existing B1a office uses (in the Central Brighton area) and unallocated sites or premises in all B Class uses) would prevent the Council achieving its overall strategic objective of job creation, meeting modern business needs and supporting the attractiveness of the city as a business location.

Moreover, Paragraph 4.39 sets out tests against which proposals for a change of use from a B Class use might be subjected. These are unusually detailed for a strategic planning policy and, without justification, set disproportionate expectations in terms of information that existing and prospective landlords and tenants would be expected to provide to the Council.

Statement of Changes:
Draft Policy CP3 does not currently meet the tests of soundness as it is not justified. It is also not consistent with national policy as the National Planning Policy Framework (NPPF) states under paragraph 22 that ‘where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities’.

The NPPF does not therefore support blanket protection for employment uses, as Draft Policy CP3 does. We therefore recommend Parts 2 and 5 of this policy and supporting paragraphs 4.37 to 4.40 are revisited.

Any Other Comment:
Officer Response:
Objection and comments noted.

CP2 sets out the council’s approach to supporting sustainable economic development, an overarching aspiration of the City Plan and council. One of the consistent barriers cited with regards to business needs and future economic growth is the lack of supply of B use class employment space.

CP3 has been updated to reflect the findings of the Employment Land Study Review 2012 with regards to the updated forecast requirement for office and industrial floorspace over the plan period and the updated potential supply of site to meet the quantitative and qualitative requirements. The Study found that there was a quantitative and qualitative need for 112,240 sq m of B1 a office floorspace to 2030 and a modest requirements for 43,430 sq m B1b, c, B2 and floorspace over the plan period. The Study concluded that the Council’s approach to employment land should aim to at least fully meet Brighton & Hove’s employment space needs over the plan period so that the City’s economy is not constrained.

However in re-assessing the existing portfolio of employment sites and the potential identified supply of employment land likely to come forward during the Plan period the study identified a potential shortfall, whereby the City Plan Part One is unable to fully meet the identified needs of B class sectors in quantitative and qualitative terms. It is therefore considered that the approach to B use class employment land provides the appropriate level of flexibility.

The City Plan proactively identifies through strategic allocations within the Development Areas opportunities for comprehensive redevelopment to secure new investment and regeneration (including non B use class employment generating uses).

CP3 also safeguards offices within SA2 Central brighton and key industrial estates and premises across the city and encourages the refurbishment and upgrade of existing industrial estate. This is supported by the Employment Land Study Review 2012.
The study also concluded that in the context of the tight industrial and office market and quantitative shortfall of supply a test of redundancy is still required for unallocated sites. CP3.5 allows for a balanced assessment to be made on a case by case assessment.

Further Details:

Suggest a relaxation of policies which protect land for other uses. In particular, the five sites listed in Policy CP3(4) which make little contribution in terms of employment provision could be allocated for affordable housing. In addition to the changes to Policy CP3 referred to above, Hyde would strongly recommend that the release of unallocated employment sites be reserved solely for affordable housing, rather than as a preference. A minor amendment to the wording of this policy such as this could result in a substantial increase in the supply of affordable housing in the city. Flexibility of the type proposed has been deployed effectively elsewhere enabling poor quality employment floorspace unsuitable for modern employment needs to be released generating a significant supply of new affordable homes.

Statement of Changes:

Any Other Comment:

Officer Response:

An Employment Land Review 2012 has been undertaken to inform the final version of the City Plan.

The study concluded that the approach to these sites was reasonable given the context of the competing demands on the City’s limited supply of land and the need to make more productive use of sites. The criteria based approach set out in the supporting text to CP.3 allows a flexible approach to be taken to these 5 sites.

The study concluded that in the context of the tight industrial and office market and quantitative shortfall of supply a test of redundancy is still required. The CP3.5 allows for a balanced assessment to be made on a case by case assessment. The limited amount of land available for new development means that the best use is made of all sites and premises and the role that some of these site can play in meeting non B use class employment generating uses such as medical/health centres and language schools has to be considered alongside the importance of delivering affordable housing. However it is not considered reasonable to reserve these sites solely for affordable housing.
Further Details:

Unit 56 Newtown Road
Newtown Ventures Ltd owns Unit 56 Newtown Road which is located on the corner of Goldstone Lane (see enclosed Site Location Plan). The property was previously used for industrial purposes but has been vacant for a number of years despite a comprehensive marketing campaign by Flude Commercial since January 2004.

Despite planning permission for 2 x 4 storey office blocks with parking (BH2004/02582), there continues to be a lack of interest in occupying or redeveloping the property for employment purposes. Flude has confirmed that the land has a negative site value and the District Valuer has concluded that the building is unviable and will not be occupied in its current condition.

Unit 56 is clearly redundant for employment purposes and a new approach needs to be adopted in order to regenerate the site and surrounding area.

Brighton & Hove Local Plan (2005)
The Newtown Road industrial area is allocated as an EM1 employment site in the adopted Local Plan which seeks to protect the property for B1(b & c) and B2 purposes. The EM1 allocation includes Unit 56 Newtown Road, Becks Peugeot Garage and the Tecni-Form site on Goldstone Lane together with the other commercial uses on the west side of Newtown Road.

Paragraph 22 of the NPPF states the following:
“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

The long term protection of Unit 56 by Policies EM1/EM3 has failed to deliver business or industrial development on the site. As such, this is exactly the type of site that the NPPF seeks to release for other uses in the interests of positive planning.

The identification of the Hove Station Development Area (DA6) for regeneration is much needed and therefore welcomed in principle. Policy CP3(4) seeks to allocate the land for employment-led (residential and employment) mixed use development on the land north of Newtown Road and stipulates that there will be no net loss of employment floorspace. Given that there is no demonstrable demand for Unit 56 either in its current form or to be redeveloped as flexible office space, the retention of the site for employment purposes (either on its own or as part of a mixed use scheme) cannot be justified and would conflict with policies set out in the NPPF. For this reason we request that reference to the site in Policy CP3(4) is removed altogether.

Proposed Uses
We understand that Signet Planning has submitted representations on behalf of Discovery Properties Ltd in relation to the Becks Peugeot Garage and the adjoining sites. These representations have promoted retail-led regeneration of the area with a new supermarket on the Becks site and the Hove Station area being designated as a district centre. Newtown Ventures Ltd fully supports these proposals.

Paragraph 4.2 of the Draft City Plan identifies a housing requirement of between 15,800 and 19,400 new dwellings over the plan period to 2030 (790-970 new homes per annum). However, Policy CP1 only makes provision for 11,300 new homes to be built (565 units per annum). This approach is inconsistent with the National Planning Policy Framework which requires Local Plans to meet the need for housing in full (Paragraph 47). Whilst the supporting text acknowledges the shortfall, the City Plan provides little explanation as to the options reviewed (for example whether limited release of protected land is possible) before concluding that 11,300 dwellings is the maximum number that can be delivered.
Figure 2 (Housing Trajectory 2010-2030) clearly shows that a 5 year housing supply will not be delivered. Furthermore, the table in CP1 demonstrates that an additional buffer of a minimum of 5% has not been included. For these reasons, the approach fails to comply with paragraph 47 of the NPPF and there is a real possibility that the Secretary of State will conclude that the Plan is unsound.

Given the conclusions of Inspectors reviewing other Core Strategies/Local Plans (Bath and East Somerset Council, Hull City Council and Wigan Metropolitan Council) there is a real possibility that the Brighton & Hove City Plan will be rejected in its current form. It is in the interests of all parties that this does not happen and as such we propose that the housing land supply options are reviewed at this stage rather than proceeding to the submission stage.

The allocation of land north of Newtown Road for residential purposes could make a significant contribution to the identified housing shortage.

Please contact planning agent if you wish to discuss the issues raised in these representations further.

Statement of Changes:
Reference to the site (officer insert : eg land north of Newtown Road) in Policy CP3(4) is removed altogether.

Any Other Comment:

Officer Response:
The approach set out in CP3 for this site is to allow for mixed use redevelopment of a previously safeguarded employment site to bring forward modern business floorspace and additional housing units. This is a more flexible approach to the site than the current adopted Local Plan.

The Study found that there was a quantitative and qualitative need for 112,240 sq m of B1 a office floorspace to 2030 and a modest requirements for 43,430 sq m B1b, c, B2 and floorspace over the plan period. The Study concluded that the Council’s approach to employment land should aim to at least fully meet Brighton & Hove’s employment space needs over the plan period so that the City’s economy is not constrained.

However in re-assessing the existing portfolio of employment sites and the potential identified supply of employment land likely to come forward during the Plan period the study identified a potential shortfall, whereby the City Plan Part One is unable to fully meet the identified needs of B class sectors in quantitative and qualitative terms.

Paragraph 4.36 of CP3 provides the factors that will be taken into consideration if a net loss of employment floorspace is being proposed and provides the flexibility to assess sites on a case by case basis.

The performance of this site currently and the opportunities for the employment role of the site to be enhanced through mixed use employment and residential development was considered as part of the Employment Land Study Review 2012. The assessment indicated that the site is currently underperforming and effectively provides no employment space. However it did not conclude that the site should be removed from the policy. The assessment noted the performance of the industrial estate to the south of the site and saw potential role of this site for an extension to the existing industrial estate to the south of Unit 56 Newtown Road. In conclusion, the council does not accept that the site should be removed from the policy.
Further Details:

It is considered that Section 5 of CP3 does not sufficiently allow for the encouragement of mixed use development or the release of employment use to other uses in appropriate locations where this would help to achieve the aims and objectives of the remainder of the draft city plan.

In particular in order to achieve the housing delivery targets set out in DA8 Shoreham Harbour it is anticipated that the city council should encourage the release of employment land to at least mixed use or wholly residential use.

Statement of Changes:

CP3 Paragraph 5 should be amended as follows: After (B1-B8) Insert: "Or it can be established that the release of the site to other uses contributes to the delivery of housing targets set out in Part 2 of the city plan

Any Other Comment:

Officer Response:

Objection and comments noted.

The strategic principles for Shoreham Harbour are set out in the City Plan within DA8 Shoreham Harbour which references the production of a Joint Area Action Plan which will be concerned with detailed implementation.

CP3 sets out the overall approach to Employment Land and cross references DA8 which sets out detailed priorities for Aldrington Basin and South Portslade Industrial Estate and clarifies that that redevelopment in these areas will be in accordance with a future brief that will form part of the JAAP. It is not considered that CP3 would constrain the JAAP unduly. No changes to policy proposed
Further Details:
Council's intention of meeting forecast employment needs over the Plan period is welcomed. Federation also accepts that such a strategy may involve safeguarding existing sites and premises. However, in doing this Council will need to be sure that it is protecting sites that genuinely meet the needs of industry in all its forms. It should not simply protect sites where it is unwilling to contemplate change. Council is requested to examine the sites identified in the policy and consider whether it is necessary to retain each and every one. It may be appropriate to release some for housing. Federation welcomes the fact that some green field land has been identified for both residential, employment and other uses in the Plan and suggests that more such allocations be considered.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial support and comments noted.

An Employment Land Review 2012 has been undertaken to inform the final version of the City Plan. This included an assessment of the sites listed in CP3. The study found that these established areas remain popular, as demonstrated by high occupancy and low vacancy levels. The Study found limited spare capacity in existing industrial floorspace and an identified shortfall in industrial floorspace supply against a forecast modest requirement for new industrial floorspace over the plan period. Therefore it is considered important to continue to protect these employment sites whilst encouraging new business investment and opportunities in order to facilitate renewal and growth.

Further Details:
Support direction of point 5 which identifies affordable housing as preferred alternative use where land is released from employment use. Policy should be strengthened to include affordable housing as only acceptable alternative use as opposed to another employment use. This would provide an important source of supply to deliver much needed affordable housing.

Statement of Changes:

Any Other Comment:

Officer Response:
An Employment Land Review 2012 has been undertaken to inform the final version of the City Plan.

The study concluded that in the context of the tight industrial and office market and quantitative shortfall of supply a test of redundancy is still required. The CP3.5 allows for a balanced assessment to be made on a case by case assessment. The limited amount of land available for new development means that the best use is made of all sites and premises and the role that some of these site can play in meeting non B use class employment generating uses such as medical/health centres and language schools has to be considered alongside the importance of delivering affordable housing. However it is not considered reasonable to reserve these sites solely for affordable housing.
These representations relate to the proposed regeneration of the Hove Station area and its designation for mixed use employment and housing, in particular the identification of Becks Peugeot Garage site as a protected employment-led (residential and employment) mixed use site.

On behalf of Discovery Properties LTD (who is an experienced developer of retail and commercial schemes throughout the Country eg Kenilworth, Chichester, Wells, Bristol, Tavistock) we support the principles in the Draft City Plan in relation to the designation of the Hove Station area for regeneration. The principle of the need to regenerate, with the station as a focus for new development, can be supported. However, these proposals in their current form are, in our view, contrary to the policy set out within the NPPF relating to ensuring the delivery of economic growth. The continuation with the employment proposals on the Station area site despite the non-implementation of the proposals in the Local Plan represents a lack of realism. Given that the opportunity has existed for employment-led regeneration to come forward for at least five years, this would in the context of the technical guidance notes to PPS4 (which are still extant) be outside the normally expected ‘reasonable timeframe’ for retail and other town centre uses to become available.

The proposed development areas location due to its accessibility would potentially make suitable forms of development within the area sustainable in the context of the policies of the National Planning Policy Framework (NNPF). However, Discovery Properties LTD doubts the Council's strategy, in particular regarding the potential delivery of the mix of uses that is being put forward. In this regard, one of the key sections of the NPPF relates to ‘delivering sustainable development’. In NPPF, section 1 (paras 18 to 22) the Government’s commitment to securing economic growth to create jobs and prosperity and to ensure the planning system can support sustainable economic growth should be important pillars of how the Council prepares and adopts this City Plan. The various objectives for how the planning system can help achieve economic growth are set out in para 21 of the NPPF. One of the objectives for Councils it ‘to identify priority areas for economic regeneration, infrastructure provision and environmental enhancement’. The fact that the Council has identified the Hove area for regeneration would accord with this objective.

However, para 22 of the NPPF is an important consideration and states: 'Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.’ The Council has maintained the policy intention in the Brighton & Hove Local Plan 2005 for the Hove Station area (including the Becks Peugeot site) eg ‘protected’ for employment purposes. The fact that the protection of the Becks Peugeot site and the intention for some form of employment-led regeneration (B2) is being maintained despite the lack of success that has been achieved through the Local Plan proposals for the site in our view suggests the Council is seeking to rely on an employment-led regeneration where there is no reasonable prospect of that use coming forward to lead regeneration as the Council intends.

Given the history of the Hove area in general, the Council should review the intention for the regeneration of the Hove Station area to be employment-led. Discovery Properties LTD and its team consider that the strategy for the regeneration of the Hove Station area should be reconsidered with particular regard to allowing the principle of retail use to provide the catalyst for the regeneration of the Hove Station area. In this regard, the Council’s policy DA6 for the Hove Station area and related policy CP3 (Employment Land) should be re-worded to include particularly convenience goods retailing (a supermarket) in the permitted mix of uses. It is also considered that the Becks Peugeot site given its accessibility and position within the Hove Station regeneration area would be the best site for a supermarket to come forward, potentially along with other uses. Given this possibility, it is also suggested that the Hove Station area could be identified in retail terms as a district centre which could potentially allow other smaller scale retail uses to come forward that would help regeneration of the area. In this regard a mixture of retail, employment and residential would be more realistic and also viable.

There have been a number of studies carried out under the auspices of Central Government (albeit under the previous Government) that recognise the benefits that food retailing could bring in terms of acting as a pump primer to the regeneration of what have historically been difficult areas to develop. A report produced by DTZ has been acknowledged by Planning Inspectors as confirming the importance of retailing to generate returns to cross-subsidise the regeneration of wider areas. Signet Planning has recently been involved in a number of such cases including a larger regeneration site at Derby where the Council had longstanding intentions to develop an eight hectare site in the middle of the city for solely residential use as part of its regeneration strategy. With the collapse of the housing market and little interest in significant employment
development the Council accepted the principle of a food supermarket to bring forward the regeneration process. There are other similar examples across the country.

Officer insert : comments also allotted to DA6 and CP4)

Statement of Changes:
Accordingly, Discovery Properties Ltd requests that policy DA6 (Hove Station Area) be re-worded to secure the following:
1. Recognise that retail (particularly a supermarket) should be an appropriate use within the Hove Station area.
2. Allocate the Becks Peugeot Garage site to be the location for a supermarket.
3. Consider (in conjunction with Discovery Properties Ltd and other landowners) a Masterplan for the wider area with a supermarket on the Becks Peugeot Garage site.
4. Designate the Hove Station area in retail terms as a district centre to promote other forms of use that will overall provide a viable mixed use scheme and the regeneration of the area.

An appropriate change to accord with the above should also be made to draft Policy CP3 (Employment Land). (Officer insert : and also CP4 retails Provision)

Any Other Comment:

Officer Response:
The approach set out in CP3 for this site is to allow for mixed use redevelopment of a previously safeguarded employment site to bring forward modern business floorspace and additional housing units. This is a more flexible approach to the site than the current adopted Local Plan.

The starting position in the policy is that there is no net loss of employment floorspace in light of the tight constraints in the existing supply of industrial sites within the city. Indeed an Employment Land Study Review 2012 undertaken to inform the final version of the City Plan highlights both the quantitative and qualitative need for industrial floorspace over the plan period.

The Study found that there was a quantitative and qualitative need for 112,240 sq m of B1 a office floorspace to 2030 and a modest requirements for 43,430 sq m B1b, c, B2 and floorspace over the plan period. The Study concluded that the Council’s approach to employment land should aim to at least fully meet Brighton & Hove’s employment space needs over the plan period so that the City’s economy is not constrained.

However in re-assessing the existing portfolio of employment sites and the potential identified supply of employment land likely to come forward during the Plan period the study identified a potential shortfall, whereby the City Plan Part One is unable to fully meet the identified needs of B class sectors in quantitative and qualitative terms

Paragraph 4.36 of CP3 provides the factors that will be taken into consideration if a net loss of employment floorspace is being proposed and provides the flexibility to assess sites on a case by case basis.

The performance of this site currently and the opportunities for the employment role of the site to be enhanced through mixed use employment and residential development was considered as part of the Employment Land Study Review 2012. The assessment indicated that the site is currently underperforming and effectively provides no employment space. However it did not conclude that the site should be removed from the policy. The assessment noted the performance of the industrial estate to the south of the site and saw potential role of this site for an extension to the existing industrial estate to the south of this site.

The Retail Study did not recommend that BHCC should seek to designate any additional shopping centres in the city.

In terms of convenience floorspace there was no identified capacity for additional convenience goods floorspace identified in the short to medium term up to 2020. In terms of comparison floorspace it was stated that there was an oversupply of comparison floorspace in the immediate term due to new commitments and that we should plan for the capacity identified below through the redevelopment of the Brighton Centre and extension to Churchill Square which strengthens the role of the Regional Centre.

In conclusion, the council does not accept that the site should be removed from the policy.
Further Details:

Whilst Royal Mail recognises the need to protect existing unallocated sites or premises in employment uses, we are of the opinion that Part 5 of Policy CP3 should allow further flexibility for employment sites to come forward for redevelopment for alternative uses, where appropriate.

The Policy as currently drafted may prevent employment sites that have reached the end of their economic life; be unfit for modern occupation; and uneconomic to be developed for alternative employment uses, to be brought forward for redevelopment. This Policy should enable sites that are surplus to requirements to come forward for mixed use or residential led developments where it is demonstrated they are no longer commercially suitable for employment use.

Statement of Changes:

We therefore request more flexibility is incorporated into the Policy and supporting text, providing for the circumstances described above.

Any Other Comment:

Our requests as detailed in representations on DA6, DA8, SA2 and CP3 accord with the Government’s National Planning Policy Framework (NPPF) (published March 2012) which 'provides a presumption in favour of sustainable development' and from which we consider paragraphs 14, 19-20, 21,35,47, 50, 161 to be of particular relevance.

Further, Royal Mail would welcome the opportunity to meet with the Council to discuss the inclusion of their sites in the emerging Brighton & Hove Draft City Plan Part 2 which we understand will include the Council’s Site Allocations and Detailed Policies:

Hove Delivery Office (DO), 88 Denmark Villas, Hove, BN3 3UG;
Portslade Delivery Office (DO), 39-41 Boundary Road, Brighton, BN41 1AA;
Rottingdean Delivery Office (DO), Nevill Road, Brighton, BN2 7JQ; and
Brighton Delivery Office (DO), Office (OFF) / Industrial (IND), 62 North Road, Brighton, BN1 1AA.
- all of which are strategically important to Royal Mail

Officer Response:

Royal Mail has full control of there portfolio of sites within Brighton & Hove as landowner. The sites will only come forward for redevelopment with the agreement of the landowner. Whilst the council accepts the need for the Royal Mail to continue to provide its services, these issues can be fully addressed by the landowner and it is not considered necessary to amend the policy.
Further Details:

1. This is a realistic and strong policy which is essential to meet the challenge of maintaining and growing the city’s economy in the future. Experience of past economic cycles shows that as the housing market becomes more buoyant, the pressure to use employment land for house building increases. Without such a policy, over the plan period there could be incremental whittling away of the space to do business, provide services, and employ people in the city, which could seriously weaken the city’s economy and services.

2. The policy’s identification of specific sites in this strategic policy is important. Indeed the short length of the sites listed illustrates the need to retain the limited resources of employment land remaining in the city. In addition the policy’s recognition of the need to protect unallocated sites or premises in employment use is clearly important for maximizing the options available for businesses in the city.

3. The recognition of the contribution of “sui generis” uses to the city in 4.34 is a welcome acknowledgement of the real world diversity of activities which need to happen in the city.

Statement of Changes:

It would be worth emphasizing in the text that these policies are intended to ensure the maintenance of adequate land for business and employment in the city until 2030 and beyond, and that short term fluctuations in the economic and housing markets will not in themselves be justification for reducing the supply of employment land.

Any Other Comment:

Officer Response:

Support welcomed and comments noted.

Further Details:

We particularly welcome the support for the upgrade and refurbishment of the listed industrial estates and business parks and would like to see a reference to similar support for the refurbishment of all existing office stock where appropriate.

Statement of Changes:

Any Other Comment:

Officer Response:

Support and comments noted. Part 2 of the policy has been amended as requested. The Employment Land Study 2012 noted that the upgrading and renewal of the City's existing office stock will also be important to ensure that this space is better utilised, remains competitive and attractive to the market.
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Section/Supporting Doc/Annexes: Part Four - City Wide Policies (A Strong and Prosperous City)

**Further Details:**

We particularly welcome the support for the upgrade and refurbishment of the listed industrial estates and business parks and would like to see a reference to similar support for the refurbishment of all existing office stock where appropriate.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support and comments noted. Part 2 of the policy has been amended as requested. The Employment Land Study 2012 noted that the upgrading and renewal of the City’s existing office stock will also be important to ensure that this space is better utilised, remains competitive and attractive to the market.

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**Further Details:**

CP4 Retail Provision - Paragraph commencing “Brighton Regional Shopping Centre” Given the special character of The Lanes and North Laine, which are characterised by smaller shop units, in order to ensure that there is a balance between smaller and larger units in the regional centre, the DA1 site should not be required to provide a mix of small and large units as smaller independent traders would not be able to afford new floorspace which would be provided in the DA1 site and also it would not serve the balance of retailing across the City to relocate smaller businesses within the DA1 sites. Therefore we propose the following wording: "... and SA2). With the exception of land subject to Policy DA1, consistent with the “Character Areas” defined “

4.47

It should be required that the market share (and this comparison floorspace retail need) might increase with the addition of a new anchor store. There should be clarification that as a key site allocation (DA1), this is no requirement to undertake an impact or sequential site assessment, or otherwise the Council would inadvertently bring treating part of the site of edge of centre rather than as an allocation. The final sentence of this paragraph is consistent with it being treated as an allocation and is welcomed.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

A mix of unit sizes is appropriate. No specific sizes are mentioned in the policy and can be dealt with through the application or City Plan Part Two. Paragraphs 24-26 of the National Planning Policy Framework make it clear that assessment is not needed where in accordance with the adopted plan.
Further Details:
Policy CP4 identifies a hierarchy of shopping centres in Brighton and classifies Brighton Marina as a District Centre. City Plan does not define the boundary of the Marina District Centre in proposals map.

Council is preferring to retain Marina District Centre status despite recommendations from 2006 Retail Study and 2011 update to Retail Study.

Statement of Changes:
In circumstances where Brighton Marina's principle use is for leisure purposes and where the only retail feature is the existing Asda store (which is effectively functioning as an out of centre store) we request that Brighton Marina is de-designated as a District Centre and that separate site specific policies (including the Gas Works and Black Rock areas) determine the future development of this area instead.

Without the removal of the classification of Brighton Marina as a District Centre, the City Plan will not pass the test of soundness. This is because the existing designation is unjustified and not based on proportionate evidence (i.e. the recommendations from the retail studies.)

Any Other Comment:

Officer Response:
The City Plan includes major development at the Marina and strengthening the District Centre forms a key element of planning sustainable communities for the future.
Further Details:

We write on behalf of our client, Sainsbury’s Supermarkets Ltd, in relation to the Draft City Plan Part 1. Sainsbury’s, as a key retailer in Brighton and Hove, support the overall aims and objectives of the Draft City Plan Part 1. Please see below for comments relating to specifically Policy CP4 - Retail.

Policy CP4 states the following: ‘Applications for all new edge and out of centre retail development will be required to address the tests set out in national policy. Applications will be required to complete an impact assessment at a locally set threshold of 1,000 sqm (gross) floorspace or more’. This is explained further in the supporting text under paragraph 4.46: The Retail Study identifies capacity for new food and non-food retail floorspace to the period 2030. In accordance with Government policy the council will prefer to direct retail applications to the town centre in the first instance and then edge of centre locations. Only if suitable sites are not available will out of centre sites be considered. Impact assessments will be required as a locally set threshold for proposals of 1,000 sqm net or more not within the town centre.

Whilst the adopted National Planning Policy Framework supports Local Authorities to use locally set thresholds, these must be ‘proportionate’ to the default threshold of 2,500 sq m. Given the lack of evidence published by the Council in support of the locally set threshold for retail impact assessments, it is unclear as to how a figure of 1,000 sq was derived. When fully supported by a robust evidence base, locally set thresholds are likely to be useful as they are more relevant to localised need and areas which are in decline.

However for Regional centres such as Brighton, such a low threshold may impact on the viability of future developments coming forward given the substantial difference between the national ‘default’ and the localised threshold. It is our view that this threshold is arbitrary and without justification or evidence, particularly as it is significantly lower than the national default. It is for this reason that we formally request that the Council utilises the default threshold of 2,500 sq m unless a robust evidence base to support this threshold before the City Plan Part 1 is submitted to the Secretary of State for examination.

Statement of Changes:

Should there be no evidence to suggest that a ‘proportionate’ locally set threshold is required in Brighton and Hove, then the default threshold contained within national planning policy guidance should be used to guide the need for retail impact assessments. We therefore suggest the following policy wording:

‘Applications for all new edge and out of centre retail development will be required to address the tests set out in national policy. Applications will be required to complete an impact assessment in accordance with national planning policy guidance’.

It is also proposed to reword paragraph 4.46 to remove the reference to the local threshold.

The suggesting wording is as follows: ‘The Retail Study identifies capacity for new food and non-food retail floorspace to the period 2030. In accordance with Government policy the council will prefer to direct retail applications to the town centre in the first instance and then edge of centre locations. Only if suitable sites are not available will out of centre sites be considered. Impact assessments will be required in accordance with national planning policy guidance’.

Any Other Comment:

Officer Response:

The council will be preparing a background paper to support the inclusion of a locally set threshold in time for the Examination of the City Plan in 2013. A figure of 1,000 sqm has been proposed in the policy as it ties in with the trigger for a major development application. The city has had minimal applications for developments over 2,500 sqm in the last 10 years so it is felt to appropriate to lower the threshold to a more appropriate figure to trigger the requirement for an impact assessment.
Further Details:

These representations relate to the proposed regeneration of the Hove Station area and its designation for mixed use employment and housing, in particular the identification of Becks Peugeot Garage site as a protected employment-led (residential and employment) mixed use site.

On behalf of Discovery Properties LTD (who is an experienced developer of retail and commercial schemes throughout the Country eg Kenilworth, Chichester, Wells, Bristol, Tavistock) we support the principles in the Draft City Plan in relation to the designation of the Hove Station area for regeneration. The principle of the need to regenerate, with the station as a focus for new development, can be supported. However, these proposals in their current form are, in our view, contrary to the policy set out within the NPPF relating to ensuring the delivery of economic growth. The continuation with the employment proposals on the Station area site despite the non-implementation of the proposals in the Local Plan represents a lack of realism. Given that the opportunity has existed for employment-led regeneration to come forward for at least five years, this would in the context of the technical guidance notes to PPS4 (which are still extant) be outside the normally expected ‘reasonable timeframe’ for retail and other town centre uses to become available.

The proposed development areas location due to its accessibility would potentially make suitable forms of development within the area sustainable in the context of the policies of the National Planning Policy Framework (NNPF). However, Discovery Properties LTD doubts the Council’s strategy, in particular regarding the potential delivery of the mix of uses that is being put forward. In this regard, one of the key sections of the NPPF relates to ‘delivering sustainable development’. In NPPF, section 1 (paras 18 to 22) the Government’s commitment to securing economic growth to create jobs and prosperity and to ensure the planning system can support sustainable economic growth should be important pillars of how the Council prepares and adopts this City Plan. The various objectives for how the planning system can help achieve economic growth are set out in para 21 of the NPPF. One of the objectives for Councils is ‘to identify priority areas for economic regeneration, infrastructure provision and environmental enhancement’. The fact that the Council has identified the Hove area for regeneration would accord with this objective.

However, para 22 of the NPPF is an important consideration and states: ‘Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.’ The Council has maintained the policy intention in the Brighton & Hove Local Plan 2005 for the Hove Station area (including the Becks Peugeot site) eg ‘protected’ for employment purposes. The fact that the protection of the Becks Peugeot site and the intention for some form of employment-led regeneration (B2) is being maintained despite the lack of success that has been achieved through the Local Plan proposals for the site in our view suggests the Council is seeking to rely on an employment-led regeneration where there is no reasonable prospect of that use coming forward to lead regeneration as the Council intends.

Given the history of the Hove area in general, the Council should review the intention for the regeneration of the Hove Station area to be employment-led. Discovery Properties LTD and its team consider that the strategy for the regeneration of the Hove Station area should be reconsidered with particular regard to allowing the principle of retail use to provide the catalyst for the regeneration of the Hove Station area. In this regard, the Council’s policy DA6 for the Hove Station area and related policy CP3 (Employment Land) should be re-worded to include particularly convenience goods retailing (a supermarket) in the permitted mix of uses. It is also considered that the Becks Peugeot site given its accessibility and position within the Hove Station regeneration area would be the best site for a supermarket to come forward, potentially along with other uses. Given this possibility, it is also suggested that the Hove Station area could be identified in retail terms as a district centre which could potentially allow other smaller scale retail uses to come forward that would help regeneration of the area. In this regard a mixture of retail, employment and residential would be more realistic and also viable.

There have been a number of studies carried out under the auspices of Central Government (albeit under the previous Government) that recognise the benefits that food retailing could bring in terms of acting as a pump primer to the regeneration of what have historically been difficult areas to develop. A report produced by DTZ has been acknowledged by Planning Inspectors as confirming the importance of retailing to generate returns to cross-subsidise the regeneration of wider areas. Signet Planning has recently been involved in a number of such cases including a larger regeneration site at Derby where the Council had longstanding intentions to develop an eight hectare site in the middle of the city for solely residential use as part of its regeneration strategy. With the collapse of the housing market and little interest in significant employment
development the Council accepted the principle of a food supermarket to bring forward the regeneration process. There are other similar examples across the country.

**Statement of Changes:**

Accordingly, Discovery Properties Ltd requests that policy DA6 (Hove Station Area) be re-worded to secure the following:

1. Recognise that retail (particularly a supermarket) should be an appropriate use within the Hove Station area.
2. Allocate the Becks Peugeot Garage site to be the location for a supermarket.
3. Consider (in conjunction with Discovery Properties Ltd and other landowners) a Masterplan for the wider area with a supermarket on the Becks Peugeot Garage site.
4. Designate the Hove Station area in retail terms as a district centre to promote other forms of use that will overall provide a viable mixed use scheme and the regeneration of the area.

An appropriate change to accord with the above should also be made to draft Policy CP3 (Employment Land). (Officer insert : and also CP4)

We are willing to discuss this further to demonstrate the deliverability of what is being put forward.

**Any Other Comment:**

**Officer Response:**

The Retail Study did not recommend that BHCC should seek to designate any additional shopping centres in the city.

In terms of convenience floorspace there was no identified capacity for additional convenience goods floorspace identified in the short to medium term up to 2020. In terms of comparison floorspace it was stated that there was an oversupply of comparison floorspace in the immediate term due to new commitments and that we should plan for the capacity identified below through the redevelopment of the Brighton Centre and extension to Churchill Square which strengthens the role of the Regional Centre.

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<td>Part Four - City Wide Policies (A Strong and Prosperous City)</td>
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**Further Details:**

Compared to towns and cities of similar profile Brighton city centre is very well supplied with shops, especially small shops. There is a school of thought that suggests it is over-supplied. Many new, small scale developments frequently include retail on the ground floor even in locations where there is little footfall e.g. the proposals for the Hargreaves site at the junction of Portland Street and Church Street or where there is already high vacancy rates e.g. Lewes Road petrol station site.

While we understand the desire to create active frontages that can add to the street scene and provide an element of security, too often these retail units will remain empty or have a succession of tenants that fail to achieve commercial success.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Small / independent shops are recognised in the retail study as characteristic of Brighton & Hove. Vacancy rates in all centres are below the national average. We recognise the importance of location, but there is no current reason to change the policy.
Further Details:

Compared to towns and cities of similar profile Brighton city centre is very well supplied with shops, especially small shops. There is a school of thought that suggests it is over-supplied. Many new, small scale developments frequently include retail on the ground floor even in locations where there is little footfall e.g. the proposals for the Hargreaves site at the junction of Portland Street and Church Street or where there is already high vacancy rates e.g. Lewes Road petrol station site.

While we understand the desire to create active frontages that can add to the street scene and provide an element of security, too often these retail units will remain empty or have a succession of tenants that fail to achieve commercial success.

Statement of Changes:

Any Other Comment:

Officer Response:

Small/independent shops are recognised in the retail study as characteristic of Brighton & Hove. Vacancy rates in all centres are below the national average. We recognise the importance of location, but there is no current reason to change the policy.

Further Details:

We support that Brighton regional shopping centre should be the focus for future significant retail development. We also support the council being committed to ensuring that the existing shopping centres remain the focus for new retail development (para 4.43). We agree that major retail developments in Brighton regional centre should provide for a mix of small and large retail floorspace to cater for both national retail occupiers and the demands of smaller independent and local traders.

Statement of Changes:

The boundary of the regional shopping centre should be extended southwards to include Ship Street into the primary shopping frontage (PSF); this would assist the PSF in providing a mixture of small and large units.

Any Other Comment:

Officer Response:

Your comments are duly noted and support for the approach welcome. The Retail Study makes no reference to the need to alter the shopping centre frontage. Any future changes will be considered in preparation of the Site Allocations and Detailed Policies DPD.
Further Details:
The role of Brighton Dome Festival Ltd & Royal Pavilion and Museum in this is critical as the major providers. The importance of improvements to the Royal Pavilion Estate as cited earlier.
New opportunities eg Strong opportunities through RPM to create new experiences drawing on natural history and archaeological collections to interpret the national park environment and communicate messages about the relationship of city to the Downs.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments have been considered. Point 2 of policy CP5 already recognises the role of the South Downs as a visitor, educational and recreational asset. The policy has been amended to acknowledge agencies such as the RPM in facilitating understanding of the South Downs.

Further Details:
Need to recognise role of culture within the city as activating force in the city – engagement with arts eg the role that culture is playing in engaging the public with different policy and thematic areas. Culture can promote both communication and engagement for other areas. Need to restate here the statement about strong and expanded base to the cultural infrastructure and make it match the requirement outlined for sport. This is for the benefit of the economy and the city's national and international status as a cultural destination.

Statement of Changes:

Any Other Comment:
We are disappointed that the language around planning gain for sport is so much stronger than for culture and arts. The language around sports provision is in terms of a 'requirement'. Cultural provision and participation is every bit as important in this city in particular where over 50% of the population regularly engage in the arts and creative and cultural industries account for 10% of employment.

Officer Response:
Your comments are noted and welcomed.

The importance of the arts and cultural activities in Brighton & Hove are considered to be fully recognised and encouraged within the policy. Requirements for contributions towards public art and culture are outlined in the supporting text of policy CP7 Infrastructure and Developer Contributions.
APEC is keen to preserve the level of affordable workspace for artists and artists groups across the city and, more specifically, in the Hove Station (DA6) area. Pleased to see numerous statements through the Plan to the importance of the arts to the character of the city and supporting the provision of affordable workspace and generally welcomes the policy.

APEC is concerned though that the Plan uses the term “affordable” in a number of places in relation to rents for artists workspace without being clear about what constitutes “affordable.” Queries the “average” rent paid for artist workspace set out in the Creative Industries Workspace Study 2008. The “average” figures given in that study are higher than those generally affordable by arts practitioners and makers and cover the wider creative industries sector. APEC itself would not be viable at the higher rents mentioned in the study and other similar artist workspaces offer similar rents to APEC. APEC is also concerned about the proposed shift in the Hove Station area into high quality flexible office/business (B1) floorspace, which is likely to further increase rents. Clarity on the definition of “affordable” will be critical to the success of the policy. Stresses the contribution made by this sector to society and to the health of their communities. Hope that these comments will help to plug a small but vital gap in an otherwise impressive policy.

**Statement of Changes:**

Clearer definition of the word "affordable" in relation to workspace provision particularly for artists/makers workspaces.

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your partial support and comments are noted regarding that affordability of workspace will vary depending on the nature and type of creative industries businesses and organisation and this will be reflected in a footnote to the supporting text in DA4 and CP5.
The South Downs National Park Authority (SDNPA) supports the overall aims of the draft City Plan. The SDNPA appreciate that the split in responsibility for planning within the administrative area of Brighton and Hove Unitary Authority can cause some confusion. However, it would be useful to make it clearer throughout the document how the division of responsibility for planning matters within the Unitary Authority operates and that all planning policy for the SDNP will be dealt with by the SDNP Local Plan.

The South Downs National Park Authority would request policy SA5 be removed from the City Plan. With regard to the important discursive text supporting the policy, especially describing the role and aspirations of the City Council as landowners, it is suggested that this text be inserted elsewhere in the document to retain this important commentary.

There is a requirement for particular care over development proposed on the urban fringe of the city. As these proposals could have a significant impact on the surrounding landscape of the South Downs National Park careful consideration must be given to the impact of any proposals on the setting of the South Downs National Park and its two Purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA supports the overall aim of the spatial distribution of development to minimise transport impacts and the continued protection of the South Downs National Park.

SDNPA support the aims and objectives of the Brighton Biosphere Reserve which align with the Purposes and Duty of the South Downs National Park (SDNP) and the objectives of the Nature Improvement Area – ‘South Downs Way Ahead’.

(Comments allotted by BHCC officer)

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Please see the response in respect of policy SA5.
Further Details:

Whilst the principle of the approach of the Policy is supported by the University there is no specific mention of the University's contribution to culture and tourism within the City e.g its Attenborough Centre for Creative Arts, its specialist archives (such as the renowned Mass Observation Archive) its summer schools and language programmes that widen the overall cultural offer and bring additional visitors and spending to the City.

Statement of Changes:

Officer Response:

Thank you for your representation. Your comments have been considered and noted. The University's contribution to the arts and cultural facilities is recognised and has been addressed through amendments to the policy. The 2008 Tourism Strategy recognises the city's success in attracting English language students, through the opening of purpose built English language centres and schools. Policy CP5 has been amended to reflect this.

Further Details:

CP5 is supported with the following provisos: CP5, point 3: add support for the promotion of spaces for public art in regeneration / new developments in para 4.54 add references to new public art works.

Statement of Changes:

Officer Response:

Thank you for your representation. Your comments have been considered. Policy CP13 Public Streets and Spaces addresses the need for public art as part of regeneration schemes. This is considered sufficient to avoid repetition in the plan. Opportunities for public art to be incorporated into development and regeneration proposals in Part 2 of the City Plan.
Most great city destinations have a world class art gallery. Either use an existing building or design a new gallery. Valley Gardens was identified during the meeting as an underused space - this could become a subterranean gallery such as the Louvre pyramid.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been considered. The 2008 Tourism Strategy (version 3) identifies that visitors are drawn to the city by the diversity of cultural and tourism attractions and to 'experience the atmosphere'. The city has a wide variety of attractions and their cumulative total make Brighton an attractive place to visit. The city does not have an art gallery comparable to the Louvre. However, it does not have a number of other attractions, including art galleries, that other cities do not have.

Stonebridge Brighton Ltd support the recognition of the importance of tourism in Brighton and the significant contribution which this makes to the local economy. The policy approach is currently focused on the City’s traditional leisure tourism role, however, to meet some of the core objectives of helping to reduce seasonality and promoting diversity it is important that the policy recognises the role of other emerging sectors such as study/education tourism and the positive contribution that these can provide in terms of both economic benefit and facilitating year round tourism.

Statement of Changes:

Sound with minor additions:
The specific role of 'study/education tourism' and its role in delivering economic benefits and facilitating year round tourism should be acknowledged.

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been considered. The 2008 Tourism Strategy recognises the city’s success in attracting English language students, through the opening of purpose built English language centres and schools. Policy CP5 has been amended to reflect this.
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<td>Part Four - City Wide Policies (A Strong and Prosperous City)</td>
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**Further Details:**
We support the policy which will retain, upgrade, protect and enhance existing performance venues.

**Statement of Changes:**

Any Other Comment:

Officer Response:
Support noted and welcomed.

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<td>Part Four - City Wide Policies (A Strong and Prosperous City)</td>
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**Further Details:**
We welcome references throughout the document to working with neighbouring authorities for beneficial effect (such as in SA5, CP5 and CP10) and thus fully support such policies insofar as they have an impact on Lewes District. With that in mind, we would like to continue the ongoing liaison with yourselves, at both an officer and Lead Member for planning level.

**Statement of Changes:**

Any Other Comment:

Officer Response:
Your comments of support are welcome and noted.
Further Details:

The city's cultural offer is of paramount importance to its sense of place and its attractiveness as a place to do business.

Its events programme generally benefits the resident population and the tourism sector but a key criterion is missing from the list at CP5[1]. They should derive a direct net benefit to the local economy or be of such benefit to the reputation of the city that they derive a considerable indirect benefit e.g. by raising the media profile of the city.

The Economic Partnership welcomes the promotion of the South Downs National Park to enhance our visitor economy and the intention to work with the Park Authority and neighbouring councils to promote eco-tourism but it would be wary of specifically naming other agencies in the City Plan which may appear exclusive.

The Partnership also welcomes the creation of affordable workspace for the creative industries and would suggest an update of the Creative Industries Workspace Study [March 2008].

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been considered. The criteria in point 1 of policy CP5 are comprehensive requirements intended to deliver direct net social, cultural, environmental and economic benefits to the city. The criteria in point 1 inherently support the local economy.

The reference to specific agencies promoting tourism has been amended in the policy.

Your comments regarding an update to Creative Industries Workspace Study has been noted.
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**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been considered. The criteria in point 1 of policy CP5 are comprehensive requirements intended to deliver direct net social, cultural, environmental and economic benefits to the city. The criteria in point 1 inherently support the local economy.

The reference to specific agencies promoting tourism has been amended in the policy.

Your comments regarding an update to Creative Industries Workspace Study has been noted.
Throughout the past five years, the Hotel Association has met with Visit Brighton and the Planning Department regularly to ensure that these trends are noted and taken seriously. It has been important that the city is made aware that new hotel rooms did not create or serve additional demand, they simply expanded the supply, resulting in lower occupancies for all, lower room rates (ie lower turnover), and ultimately less viable businesses. It has been gratifying that as a result of such meetings, the draft City Plan 2012 has been amended to reflect some concerns.

However, as we stand now in June 2012, the state of things is of such gravity that the Hotel Association must lend its weight and experience to challenging the Draft City Plan still further, as there is a danger that the tourism offering in the city could be on the path to extended unsustainability. The Draft City Plan should, we feel, be seen as providing a barrier to that, rather than expediting it.

Statement of Changes:

CP6 Headline statement
It is no longer the case that any City Plan needs to correlate cost with a particular product type or star rating. The product has homogenised as customers book (online) more and more on price alone. They don’t care what the place looks like or where it is, so long as they get the right price. So we have the Royal Albion Hotel offering double rooms at £38, whilst Hotel Una (a boutique B&B) offers a double at £250. It is accepted that the spectrum of ‘type’ of accommodation will still apply as market conditions dictate, and indeed can grow further. We would remove ‘and cost’ from the aspiration.

Part 2
Whilst this does reflect the conversations we have held over the past 5-6 years, it is too late to impact our current scenario, as the additional hotel rooms are already causing significant problems. Furthermore, as we have previously discussed, a large number of smaller properties have changed their use TO visitor accommodation ‘under the wire’ to offer new supply of cheaper end bedspaces to compete with existing Guest Accommodation. Notably self catering studios (eg 8 Upper Rock Gardens), group accommodation for Hens and Stags (eg 1 Atlingworth Court), ‘resurrected’ full service B&Bs previously private houses or long stay accommodation (eg Grand Pier, Madeira Place) and rooms above pubs. These establishments are able to have their own websites and to offer themselves on ‘compare the market’ type sites to compete with everyone else. The growth in these bedspaces is often unchecked and unknown, but we know it is substantial.

Part 8
The suggestion that the council will ‘safeguard’ existing accommodation at the same time as granting permission to a 17% increase in bedrooms, and at the same time as there is unchecked growth in smaller businesses as described above, is a recipe for disaster and threatens business success.

In response to paragraph 6.3 of the Hotel Futures Study of the situation where there would be an impact of new hotels on existing hotels, the BHHA consider the situation is now of negative growth; VisitBrighton is not as successful as it hopes to be in attracting new association conferences to the city (we do not have a new Centre and any Association conferences are small and of limited occupancy value) and an oversupply of new hotels ahead in growth in the market. Major projects have not happened and the pressure on existing hotels has indeed materialised, even for weekends, outside of peak summer). Further hotel development over and above that already proposed will put even more pressure on existing hotels and guest accommodation establishments.

Hotel Core Zone
The core zone is an anachronism, and should be abandoned. Query why 5 star B&B in Hove is excluded and why boundary excludes eastern side of Upper Rock Gardens.
The clusters of activity are there because of the style and size of building, closeness to the seafront, ease of access to the city etc, and as has been proved in recent years, will always be areas where new growth is targeted. The old Local Plan and those before it were drawn up in an age when tourists shuffled from hotel to hotel, and clusters made it easier to do so. In this internet age, bookings are made well in advance by and large, with maps of the accommodation freely available and clear descriptions of where you will stay and how close you will be to everything. Clusters are not a generator of choice any more. Intervention from the council is not required. BHAA response quotes the discussion in the Hotel Futures Study of the ongoing validity of zone in present format.

Section 4.62
Any ‘clusters’ of accommodation will be driven by type of building, closeness to attractions and hotspots, ease of access to the centre etc... there is no need for a council driven map to define any zone at all.

Suggest a more relevant approach might be to talk about preserving an overall number of bedspaces to satisfy general demand without oversupply, allowing fluidity in both directions which achieves the end result. If deemed important, there could be a ‘large hotel’ number of bedspaces and a ‘small business’ number of bedspaces adding up to the ideal number, but in this age of internet-driven homogeneity, that also may be an old fashioned notion.

Change of Use
Applications for change of use for any accommodation businesses, across the city, should be taken very seriously and are unlikely to be undertaken lightly. In times of economic boom, these businesses are often worth far more as Visitor Accommodation than the bricks and mortar of the building, but it is a fact that in more difficult times and when there is overcapacity, many businesses do become unviable as going concerns very quickly. Turnover needs to cover a bank loan repayment, VAT and other taxes, rates, staff and other costs. If turnover suffers, the accounts soon reflect profits which fail to convince lenders of viability. In those circumstances, particularly as a freeholder, it is perverse to expect to continue with an unsaleable business for a prolonged period or until bankruptcy, when an alternative use for the building is feasible and would allow a solvent exit.

A change of use permission allows a live-in freeholder to remain in their home in the event of retirement, or ill health for example - it would seem harsh to force the property owner to leave their home, possibly even leave the city, because the building needs to be sold as a going concern. Also it is well known that Brighton and Hove is desperate for office space, high quality apartments and private houses. Visitor accommodation could provide some of the desperately needed stock, and council fears of a ‘run’ are almost certainly unfounded. As we have seen above, there will always be conversion ‘the other way’, and there will inevitably be new hotel applications to consider.

Full response provides examples by BHHA to support their concerns.

Our proposal is that the core zone concept is removed. Change of Use should be facilitated for individual applicants without any need for periods below a poverty line or ‘proof’ of a long-failing business before it is granted. If such evidence is requested, it should be swift to gather and readily judged, recognising that individual accommodation businesses do not need to be protected when the overall bedspace offering in the city provides for a sufficient and sustainable industry. Our view is that a decision should fall on the side of permission rather than rejection as a default, so long as the conversion is to a quality alternative and not to HMO (reference is made to the HFS where the impact of HMOs adjacent to hotels was raised).

Supporting Text

Paragraph 4.57
The city’s hotel stock has patently not ‘kept pace’ with customer expectations. As Brighton has become seasonal for the first time in decades, a better word is ‘outstripped’. The City Plan should be more about addressing that, and not pretend that supply and demand are any longer in harmony.

Paragraph 4.58
This section should recognise the further additions to stock highlighted above, particularly the smaller businesses. Unchecked and unknown (except to established businesses trying to compete), there could be over 200 additional rooms, even more (using the Rock Gardens example as a guide). With a redevelopment of the Brighton Centre many years away, the study would suggest that current and future growth will see a significant
The tone of the section is correct, but we are possibly too late. The oversupply has already had a negative impact, with boutique hotels on the wane, losses of stars in established hotels, many businesses eschewing star ratings and accreditation altogether, a narrower spectrum of offering and product becoming cheaper and more homogeneous. The Grand, no longer 5 star, sells its bedrooms on the internet for the same price as an unrated B&B in New Steine, and to a visitor, they are even the ‘same’ product.

Our view is that if supply/demand balance is rectified to protect turnover potential in those that remain, then upgrades and refurbishments, and sales of businesses, will expand the spectrum again in the future and allow more differentiation. Let the stock balance itself by recognising and counting the new entrants and allowing others to exit more easily. Market forces will preserve and restore the breadth of product.

Again, it is too late, and the City Plan should acknowledge that. ‘Potential for oversupply’ has become ‘oversupply’. There is already a ‘significant impact’ on existing businesses. The City Plan should rethink its approach to exiting businesses as well as new applications to allow a more viable balance. HFS: ‘there is little evidence of loss of tourist accommodation and a lot of new (hotel) development either delivered or likely to come on stream in the next 12-18 months, to the point where the city finds itself in a position of net increase in hotel rooms. In such a situation it is questionable whether a retention policy is really needed, or indeed whether it is entirely fair to make it very difficult for businesses to exit, particularly as some of them are poorly located in relation to the main generators of demand and may have limited potential to re-position themselves viably in the market.’

National occupancy levels would have no bearing on any analysis of viability of a Brighton and Hove business. The loan to value, cost to turnover, and profit/loss equations for this city are not representative of other cities, let alone a national average. This is a more than usually expensive environment in which to run an accommodation business - success will always be fragile, and if a business starts to suffer, national occupancy level data will have little to offer. You could be doing 10% better on occupancy and still be making a loss.

Requiring that business to gather data over 18 months or longer is an unnecessary cruelty, as is any suggestion that the sale should be less than market value. The conditions in this section are too stringent, given that the business owner could be in danger of losing both job and home. If the business is up for sale as a going concern and the accounts do not meet estate agent professionals’ expectations, the business should be allowed to apply for a change of use to facilitate a sale, wherever in the city the business is situated. The granting of change of use could be the difference between solvency or bankruptcy, and the council should not have the power over a freeholder to that extent. The loss of bedspaces would not, as this response has made clear, be a threat to the tourism economy, and indeed will go some way to redressing the oversupply.

Quotes letter for Chief Planning Officer at CLG regarding use of Local Development Orders - ‘I would encourage you to consider whether there are circumstances where you and your communities could use these orders to relax planning constraints locally to target particular issues, encourage development, support local economic strategies and make best use of existing properties.’

Of course the market will recover eventually, and with that will come new conversions INTO visitor accommodation, some reversions, and new already planned hotels coming on stream) But some existing businesses may not be able to see out the downturn before things turn around.)The solution needs to lie in finding a balance between new development and managed loss. Whilst we recognise that adopting these changes would be a significant move away from past procedures, we believe it is vital that change is considered.
Any Other Comment:

Officer Response:

Objection noted and comments welcomed.

Policy CP6 has been amended to reflect the need for a period of consolidation and recovery to help demand and supply get back into balance, and restore confidence in the market place and amongst investors.

Part 2 of the policy has been amended to require an impact assessment.

Part 6 of the policy has been amended and sets out a more flexible approach to allow those premises that have become poorly located in relation to the main generators of demand and with limited potential to re-position themselves viably in the market to exit the market is required. However the Hotel Core Zone boundary (as amended by the Hotel Future Study recommendations) has been retained as it is considered appropriate to focus the application of the policy to the main accommodation clusters rather than city wide. The supporting text does acknowledge that over the life time of the plan new drivers of accommodation could emerge impacting on the attractiveness of certain areas of the Hotel Core Zone.
Further Details:

It is clear that the Hotel Futures Study [which is now 5 years old and was written pre-recession] was predicated on growth scenarios that have failed to materialise. Indeed, in 2007 very few people predicted a double dip recession, the loss of 6% of national GDP [which will never be regained] and flat or negative growth for a 5 year period since. These are national figures but Brighton is not immune from the national economic landscape. Given the weak global economy, the Governor of the Bank of England has suggested that the UK may experience another 10 years of ultra low [or no] growth.

This places the City Plan in a difficult position since it may need to prepare for the first half of its proposed term offering a completely different scenario to the second half. This disparity will be strongly felt in the provision of visitor accommodation.

To an extent a number of unofficial bed-spaces in addition to those officially counted undermines the validity of the Hotel Futures Study [although we accept it is difficult to count the 'unofficial' spaces]. Nevertheless, there is doubt from some quarters about the robustness of the accommodation occupancy statistics that inform council policy and planning applications. We would suggest that a slowing economy and recent additions to bed space volume have already delivered the 'potential for oversupply' outlined in paragraph 4.60 of the supporting text and the City Plan should do more to address this situation.

The Economic Partnership would like to see strengthened criteria [within the boundaries of national policy] for assessing the impact on existing provision and especially the merit of any edge-of-town hotel applications.

The wording of CP6[2] 'Proposals for new hotel accommodation are encouraged to be accompanied by an impact assessment' is insufficient to safeguard the viability of existing supply. An impact assessment should be mandatory and the City plan should make it clear that planning consent for new build or conversion will be measured against current supply and prevailing economic conditions.

The policy regarding a change of use to non-hotel/guest house could also be reviewed. It seems that it is easy to generate more bed-spaces [whether they are needed or not] but difficult to reduce them once established.

City College Brighton & Hove should be named and included in any proposals for the development of apprenticeships in this sector.

Statement of Changes:

Any Other Comment:

Officer Response:

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Reference has been made in the supporting text to the role of City College in apprenticeship/ training schemes in the visitor accommodation sector.
Further Details:

It is clear that the Hotel Futures Study [which is now 5 years old and was written pre-recession] was predicated on growth scenarios that have failed to materialise. Indeed, in 2007 very few people predicted a double dip recession, the loss of 6% of national GDP [which will never be regained] and flat or negative growth for a 5 year period since. These are national figures but Brighton is not immune from the national economic landscape. Given the weak global economy, the Governor of the Bank of England has suggested that the UK may experience another 10 years of ultra low [or no] growth.

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Statement of Changes:

Any Other Comment:

Officer Response:

Objection noted and comments welcomed. Policy CP6 has been amended to reflect the need for a period of consolidation and recovery to help demand and supply get back into balance, and restore confidence in the market place and amongst investors.

Part 2 of the policy has been amended to require an impact assessment.

Part 6 of the policy has been amended and sets out a more flexible approach to allow those premises that have become poorly located in relation to the main generators of demand and with limited potential to re-position themselves viably in the market to exit the market is required.

Reference has been made in the supporting text to the role of City College in apprenticeship/ training schemes in the visitor accommodation sector.
Policy CP6 provides support for visitor accommodation and seeks to avoid the loss of hotel and guest house accommodation within the defined Hotel Core Zone. There is an opportunity with CP6 to require alternative uses on such sites to be restricted to affordable housing as with Policy CP3.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Amendments to CP6 require that new uses proposed with any change of use application be compatible with the character and uses in the area. CP20 Affordable Housing would be applied if residential use were put forward.
Further Details:
The general approach to hotel development within Brighton is to consolidate the current position which reflects the current supply of traditional leisure and business tourism accommodation; including a number of new sites and recent commitments.

The policy position, however, should allow flexibility to encourage new forms of tourist accommodation. Our client is working with the landowner of the Blackmen Street in conjunction with student accommodation providers to develop an innovative ‘study hotel’ concept which seeks to provide bespoke accommodation to cater for short to medium stay study visits. This use would not compete with traditional or business accommodation and can help release pressure on existing hotel accommodation and private residential stock.

The popularity of Brighton as a location for short and medium term study breaks is reflected by the large number of international and language schools and Stonebridge Brighton Ltd understand that there is a high demand for additional teaching space and accommodation. Accordingly it is considered appropriate that the City Plan makes appropriate provision and encourages new and innovative forms of accommodation such as study hotels.

Further information regarding the Study Hotel concept was submitted with representation.

Statement of Changes:
The policy is sound with minor additions. The Policy should provide specific encouragement for new forms of tourist accommodation

Any Other Comment:

Officer Response:
Partial support noted.

Part 2 of the policy does provide sufficient flexibility to allow for new forms of tourist accommodation where it can be demonstrated that it has the ability to create new demand and how it might meet needs currently unsatisfied in the city.
### Further Details:

There is no indication in the policy or supporting text whether the CIL will be applied to future University development project.

In the Council's forthcoming preparation of the CIL it must remember that the University is a public service provider and is structured as a not for profit institution which is required by its statutes to reinvest any surpluses in the pursuit of education and research objectives. In this context, requirements to divert funds from these purposes to a CIL on each of its projects would not be in the public interest and would, indeed, undermine other planning policies in the Plan that promote economic and social progress within the City. These and other potentially similar circumstances must be given the weight they deserve in future decision making based on the CIL.

### Statement of Changes:

#### Any Other Comment:

**Officer Response:**

The objection is noted. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development.

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### Further Details:

CP7 Infrastructure, Community Infrastructure Levy (CIL) and Planning Obligations

4.68

SLI considers that the provision of park and ride facilities is essential to ensuring that Brighton regional centre has a sustainable transport strategy. This is reflected not only in those but previous representations. We welcome the move towards informal park and ride but consider that there is an urgent need for a separate explicit park and ride policy which will cove the identification of both information and permanent park and ride sites. Work clearly needs to be undertaken to indentify and agree appropriate site(s), so it is essential that this is added to the list of bullet points.

There also should be a recognition that in setting CIL, there has to be a recognition that certain sites will:

- a) need to be fully exempted; or
- b) need to be potentially exempted.

from CIL because of challenges of viability. Therefore there needs to be text to state:

"in setting the CIL tariff, certain site allocations will need to be tested to establish whether it is appropriate or viable for them to be fully CIL chargeable.”

### Statement of Changes:

#### Any Other Comment:

**Officer Response:**

The objection is noted. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development.
Further Details:
The pressure of more housing and budgetary constrains on the Council planners puts them in danger of allowing the large developments in return for multi-millions levy which could contribute to lessen the cost of many infrastructure projects. In principle developers contribution to improve the community infrastructure is very valuable benefit, provided it is not the only factor swaying the approval in favour of big developer. The Plan must provide safeguards against such temptation in Council decision making.

Statement of Changes:

Any Other Comment:

Officer Response:
The objection is noted. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development.

Further Details:
Waste Water Treatment
As you are aware, the capacity of the current waste water treatments works at Shoreham Harbour is limited and any enhancement/extension needs will need to be addressed in the joint Area Action Plan for this site. The works serve Shoreham as well as the western parts of the City. The approximate limit is for a further 4000 dwellings and there is also a biological limit in terms of future population. This is an infrastructure constraint which needs to be taken into account and may impact on the timing of delivery of key developments not only in Shoreham but also in the western parts of the City. This may impact on the proposed development area of Toads Hole Valley if this is within the catchment area.

Statement of Changes:

Any Other Comment:

Officer Response:
The partial objection is noted. The policy indicates the requirement for utility infrastructure including water provision and wastewater treatment and drainage. The Infrastructure Delivery Plan (IDP) Annex document to the City Plan has been amended to include requirement for timely provision of new or improved water and wastewater infrastructure to be co-ordinated to meet needs generated by new development. The IDP has been further amended to include further reference for any necessary expansion for Shoreham Wastewater Treatment Works to be identified in a future Joint Area Action Plan (JAAP).
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**Further Details:**

Infrastructure: The national 80% CO2 reduction target by 2050 poses an extraordinary challenge and we believe that the draft plan seriously underplays the changes needed to de-carbonise the city. We believe that much more emphasis needs to be given to the scope for renewables in the city and that piped heat needs to be recognised as the major potential contributor to reducing the city carbon footprint. We believe that the spatial implications of more renewables need to be recognised and identified rather than just referred to and that the infrastructure ambitions of the plan need to raise the profile of renewable energy and decarbonisation measures, piped heat in particular. We have made a number of proposals for changes to a number of paragraphs accordingly. We believe this aspect requires considerable imagination and vision.

CP7 Infrastructure etc: we believe that the infrastructure delivery plan must be underpinned by policy – especially we refer to our various comments above on renewables infrastructure. This can not be left to a subsequent document. In para 4.68 the task of adapting the city’s power and heat infrastructure to a more carbon efficient way must be highlighted. In the same para we welcome the reference to public art.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The partial objection is noted. The policy includes specific requirements for ensuring sustainable development and efficiency measures including renewable energy. The Infrastructure Delivery Plan Annex document to the City Plan has been amended to further reference ‘energy savings’ under District Heating / CHP technologies and reference to DA8 Shoreham to investigate future possibilities in the Joint Area Action Plan (JAAP)
Southern Water is the statutory water and sewerage undertaker in Brighton & Hove City. New and improved water and wastewater infrastructure will be needed to serve the development proposed in the draft City Plan.

Delivery of the required infrastructure is dependent on a supportive planning policy framework at all levels – regional, county and local.

Furthermore, new development must be co-ordinated with provision of new and improved infrastructure. This will help to ensure that a high level of service can be maintained to both new and existing customers, and that unsatisfactory levels of service such as sewer flooding or poor water pressure are prevented.

We recognise that Policy CP7 attempts to deal with infrastructure provision, and the phasing of development with this infrastructure. However, none of the mechanisms identified, alone or in combination, sufficiently support provision of water and wastewater infrastructure. Neither the CIL nor planning obligations apply to water and wastewater infrastructure. Furthermore, the Infrastructure Delivery Plan is not sufficiently flexible.

As a result, we have not identified a strategic policy in the draft City Plan that adequately supports provision of water and wastewater infrastructure, and coordinates development with its provision. This could have a detrimental impact on the Plan’s ability to deliver sustainable development that is adequately served by water and wastewater infrastructure in a timely manner.

**Statement of Changes:**
We propose insertion of the following policy:

**Strategic Policy: Provision of new utility infrastructure**

Proposals by service providers for the delivery of utility infrastructure to meet the needs generated by new development and by existing communities will be encouraged and/or permitted, subject to other relevant policies.

New residential and commercial development will be permitted only if sufficient water and wastewater capacity is either available, or can be provided in time to serve it.

**Any Other Comment:**

**Officer Response:**
The partial objection is noted. The policy indicates the requirement for utility infrastructure including water provision and wastewater treatment and drainage. The Infrastructure Delivery Plan Annex document to the City Plan has been amended to further reference requirement for timely provision of new or improved water and wastewater infrastructure to be co-ordinated to meet needs generated by new development.
The members of our Housing Network discussed the City Plan at our recent meeting and viewed it with regard to the CVSF Housing Conference report (attached) which was held in April 2012. We believe that the Infrastructure Levy should be used to fund community development work - successful developments and communities require adequate engagement and consultation work and the ability to network people moving into new developments to work together to build homes and neighbourhoods rather than just buildings. Consideration should be given to community space which is safe to use and provides the opportunity to come together to do things.

Statement of Changes:

Any Other Comment:

Officer Response:

The partial support is noted and welcomed. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development and this will include community facilities where appropriate.

It is crucial that charging levels for CIL are realistic so that there is not a harmful impact on viability and reduced provision of affordable housing. There is a real threat that in viability assessments affordable housing will be the only item that can be reduced. A statement in the plan that prioritises affordable housing above other community benefits is justified.

Statement of Changes:

Any Other Comment:

Officer Response:

The partial support is noted and welcomed. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development.
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**Further Details:**

Policy CP7 seeks to facilitate financial contributions towards infrastructure and neighbourhood needs through a locally adopted Community Infrastructure Levy (CIL). The Council needs to ensure that the charging levels strike an appropriate balance between delivering the infrastructure required and creating viable planning consents which are not implemented. Policies CP7 and CP20 need to confirm that affordable housing is the key priority and the requirement for which will not be reduced in advance of other community benefits. Reduced or zero-tariff charging rates should be applied where necessary to developments with high percentages of affordable homes if this makes delivery of such homes viable.

Where development proposals do not have the financial capacity to meet the full requirements for CIL contributions, planning applications should be reviewed by a Council approved Panel of local Chartered Surveyors rather than a District Valuer in order to avoid unnecessary delays to the planning system.

**Statement of Changes:**

Any Other Comment:

Officer Response:
The partial support is noted and welcomed. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development.

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**Further Details:**

CP7 Infrastructure, Community Infrastructure Levy (CIL) and Planning Obligations:

• The council must initiate early consultation with the development industry in relation to CIL, to ensure it isn't a prohibitive addition to the City Plan.

**Statement of Changes:**

Any Other Comment:

Officer Response:
The partial support is noted and welcomed. The policy has been amended indicating that CIL may be implemented following further investigation.
Further Details:
Policy CP7 should ensure that the level of developer contribution requested should be weighed up against the wider public benefits generated by a development like Circus Street that will help to deliver regeneration, better economic performance of the city, sustainable economic growth, a well trained and skilled workforce, improved transport links and new housing to help meet housing demand and needs.

Statement of Changes:

Any Other Comment:

Officer Response:
The partial support is noted and welcomed. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development.

Further Details:
We particularly support the following aspects:
- Flood risk
- Water Efficiency in new development
- Groundwater quality
- Infrastructure, CIL and Planning Obligations

4. Infrastructure, CIL and Planning Obligations
We support policy CP7 and its supporting text as it includes biodiversity, water provision, wastewater treatment and flood risk infrastructure in the range where contributions may be sought.

We would welcome the opportunity to work with you on developing your proposed Planning Obligations Supplementary Planning Document (SPD), to help secure funding for environmental infrastructure.

Statement of Changes:

Any Other Comment:

Officer Response:
The support is noted and welcomed.
Further Details:

With the intention to introduce CIL in 2013, and with few other local authorities having done so already, CIL is clearly untried and untested. Although perhaps not appropriate for inclusion in the City Plan at this stage two contentious issues will sooner or later have to be addressed:

- the extent to which developers could be fully or partially exempted from CIL on the basis that CIL payment would make the development unviable [despite the requirement for a viability assessment];

- the extent to which payment in kind could be taken into account and credited against CIL liability [notwithstanding possible problems with EU procurement regulations]

Also, without specific restrictions on the types of infrastructure that could be included within planning obligations, there may well be disputes as to whether certain infrastructure should be paid for through CIL or by planning obligation.

Keep the CIL simple and easy to use for developers, officers and elected members while complying with the rigorous legal tests applied to it may prove to be a challenge. Brighton & Hove City Council must initiate consultation at an early stage with the development community and other interested parties.

Statement of Changes:

Any Other Comment:

Officer Response:

The support is noted and welcomed. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development.
Further Details:

With the intention to introduce CIL in 2013, and with few other local authorities having done so already, CIL is clearly untried and untested. Although perhaps not appropriate for inclusion in the City Plan at this stage two contentious issues will sooner or later have to be addressed:

the extent to which developers could be fully or partially exempted from CIL on the basis that CIL payment would make the development unviable [despite the requirement for a viability assessment];

the extent to which payment in kind could be taken into account and credited against CIL liability [notwithstanding possible problems with EU procurement regulations]

Also, without specific restrictions on the types of infrastructure that could be included within planning obligations, there may well be disputes as to whether certain infrastructure should be paid for through CIL or by planning obligation.

Keep the CIL simple and easy to use for developers, officers and elected members while complying with the rigorous legal tests applied to it may prove to be a challenge. Brighton & Hove City Council must initiate consultation at an early stage with the development community and other interested parties.

Statement of Changes:

Any Other Comment:

Officer Response:

The support is noted. The policy has been amended indicating that CIL may be implemented following further investigation. The requirement for developer contributions through Planning Obligations will remain for infrastructure requirements to directly mitigate impacts of development.
Further Details:
The assumption that ‘Greenfield’ residential buildings will be built at the Code for Sustainable Homes Level 6 would mean that each unit would be significantly more expensive to construct than the norm, probably about £50K, and thus seriously undermine the City Plan.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted.
The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing. In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.

This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008.

To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach.

To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
Further Details:

It is unrealistic to set a requirement for Code for Sustainable Homes Level 6 for Greenfield sites particularly if there is also a requirement for affordable housing. If this is implemented then it will prejudice the deliver of Brighton's housing targets.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted.
The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings.
The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing.
In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.
This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008.
To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach.
To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
Further Details:

We note that draft Policy CP8 ‘Sustainable Buildings’ sets out the Council’s Code for Sustainable Homes and BREEAM requirements.

WM Morrisons accepts that BREEAM ratings are an appropriate measure of a buildings performance in terms of sustainability.

However, they are concerned that setting stringent requirements for all major commercial developments to achieve BREEAM ‘Outstanding’ from 2013 could represent an unreasonable burden on companies. This, in turn, could jeopardise investment, regeneration and employment creation in the borough. This is particularly relevant in light of the current economic climate and the government’s current emphasis on promoting economic growth (as set out in the NPPF). A flexible and pragmatic approach needs to be adopted.

In light of this we would suggest that the Policy includes some flexibility, i.e. that the BREEAM requirements will be subject to the tests of suitability and viability.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted.

The NPPF also sets out that ‘economic, social and environmental gains [be sought] …jointly and simultaneously’ (Paragraph 8) whilst taking ‘local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas (Paragraph 10). It also urges local planning authorities to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. (Paragraph 93). The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings. The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing. In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.

This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008. To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach. To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
### Policy CP8 Sustainable Buildings

**Support Status:** Partly Object

Policy CP8 sets out ambitious requirements for both new build and conversions for residential development in terms of Code for Sustainable Homes. Whilst this approach is commendable in principle, the requirement to meet Code Levels 5 and 6 in particular represent substantial additional costs which could result in developments becoming unviable (and at the expense of affordable housing delivery). Hyde’s own approach to delivery of sustainable housing and delivering at least Code for Sustainable Homes Code level 3 and 4 homes is to reduce energy and heating demands of homes (a ‘fabric first’ approach) while introducing renewable energy (zero-carbon) elements via the use of solar panels and solar thermal technology where there is a demonstrable and direct benefit for the end user through the reduction of heating or fuel bills, (ahead of less efficient and more expensive technology for energy generation such as combined heat and power technology). Such technologies, in Hyde’s experience from its own development programme, often can make affordable housing far less ‘affordable’ to deliver, maintain and live in (through service charges for tenants and shared owners, for example).

Hyde would urge the council to work with developers to reduce the overall energy and heating demand of new housing and adopt a flexible approach on the use of on-site energy generation technologies. Hyde is concerned that a need for ‘bolt-on’ sustainable features rather than integral green construction methods which can be used to reach Code for Sustainable Homes Level 3 and 4 will potentially become a barrier to the delivery of affordable housing because of the additional upfront capital costs; ongoing lifecycle costs of maintenance and management; and critically in terms of the cost per unit of heat and power paid for by residents of the completed dwellings plus associated abnormal service charges and costs. There is a requirement to strike a balance between priorities and whilst Hyde supports the Council’s aspiration for environmentally sustainable new development, Hyde believes that in relevant circumstances, the balance should be in favour of the supply of new affordable housing rather than insisting on the highest standards in all situations. The policy should have the flexibility to respond to local needs and circumstances to ensure that it does not harm the viability of the development and supply of both market and affordable homes. We propose that affordable housing proposed by Registered Providers should meet the high standards and requirements set by the national Homes and Communities Agency (Code for Sustainable Homes Level 3 as part of the Design and Quality Standards 2007) rather than those currently set out in CP8. The wording of CP8 should be amended to ensure that the delivery of affordable housing is not restricted by the requirement to reach the higher Code Levels suggested in CP8(1).

### Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted. The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings. The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing. In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard. This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008. To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach. To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
Further Details:
The objective of the policy to achieve sustainable development is supported. However the requirements that the policy places on developments is very restrictive. At present there are high costs associated with reaching the Code for Sustainable Homes and BREEAM levels which are being sought by the Council within the policy. Very few buildings have been built out to BREEAM level ‘Outstanding’ due to the technological and financial constraints of achieving this. Criterion 2 places a long list of requirements on all developments, including conversions extensions and changes of use. It is considered that the provision of this level of information on small scale schemes is overly onerous and unnecessary.

Statement of Changes:
It is considered that a more acceptable and achievable level to be included within the policy would be ‘Code for Sustainable Homes - at least Level 4’ and ‘BREEAM - at least Excellent.’ It is suggested that the policy is amended to reflect this. It is suggested that Criterion 2 is amended to state ‘All development proposals including conversions, extensions and changes of use are require to demonstrate, where appropriate, how the development.’

Any Other Comment:

Officer Response:
Your comments are noted.
The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings.
The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing. In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.
This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008.
To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach.
To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
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Further Details:

We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert due to potential relevance to Policy CP8)

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted.

Reference to delivery of ‘the principles of the One Planet approach.’ has been added to opening paragraph of Policy CP8.
Further Details:

1. Policy CP8 and its supporting text set out a good strategy for securing the development of sustainable new buildings. However, recent experience with several proposed developments in the city has shown that developers may propose new buildings with sustainable attributes in themselves, but which would adversely affect the sustainability of existing buildings adjacent to the proposed development. In particular, this problem occurs when proposed new buildings would overshadow existing properties, as this can seriously affect the availability of levels of passive solar heating and lighting previously enjoyed in the existing building. Furthermore, overshadowing is likely to preclude retrofitting of PVs that would contribute to the reduction of the ecological impact of the existing building stock.

2. This section of the Plan recognises the need to reduce the ecological footprint of the city by retrofitting existing buildings (4.79). Therefore, we consider that it is important to recognise also that new buildings cannot be truly sustainable if they adversely affect the current level of sustainability of existing properties, or preclude its improvement. One sustainable new building should not be allowed to adversely affect existing levels of sustainability in the present building stock, or preclude its future improvement.

Statement of Changes:

(o) does not adversely affect the existing standard of sustainability of adjacent buildings or preclude retrofitting to improve their sustainability.

and add the following after paragraph 4.79:

'New buildings should not affect the existing level of sustainability of adjacent buildings which can be expected to have a reasonable future lifespan of at least 10 years, and should not adversely affect the reasonable prospects for future retrofitting those buildings to improve their carbon footprint.'

Any Other Comment:

The issue of proposed buildings depriving existing homes of passive heat and light levels currently enjoyed, and potential productivity for retrofitted PVs, has been an issue for residents in our area since 2006. Very many residents are now looking for recognition that the issue of the sustainability of new buildings needs to include consideration of their impact on the sustainability of existing buildings which form their context.

Officer Response:

Partial Objection and comments noted.

Planning Applications are carefully considered with respect to impact on the amenity of neighbouring properties such as loss of daylight or sunlight and privacy and the council will aim to ensure that high quality is maintained through the rigorous enforcement of planning permissions.

CP14 Housing Density states that proposals must demonstrate that they would ‘respect, reinforce or repair the character of the neighbourhood’. The supporting text goes on to say that ‘successful higher density developments will depend upon a ‘design-led’ approach that respects its local context and minimises impacts on its surroundings’. 
Financial viability
Financial viability is a key element of the National Planning Policy Framework and that it is important to make a robust case in the supporting evidence for policy CP8 that matches the ambitions set by the city in terms of One Planet Living and reduction in resource use. The concern is that Code 6 is an ambitious target and developers may be reluctant to deliver this, particularly if experience is limited and there are concerns around costs.

Food waste
There is concern that food waste is not being properly recognised as an issue in new and existing development and that the Plan needs to change this. For example, anaerobic digestion could be addressed in the context of planning policy such as CP8.

Sustainable materials/waste
A link with waste and opportunities for re-use of materials needs to be made clearer. Waste management systems for construction waste are currently inadequate. More infrastructure to support waste reuse is needed, especially construction waste. Small local depots as well as bigger urban fringe sites are required.

Green infrastructure/Heat island mitigation
The City Plan needs to take a lead in both mitigation of and adaptation to climate change. Some measures can help resolve both these aspects and consequently need to be given a high priority within the Plan. One such measure is tree planting which not only helps to lock up carbon but also provides shade and helps reduce the street level temperature, predominantly in the summer. This helps reduce heat stress particularly for more vulnerable residents. Another measure which could have a double impact is encouraging the use of lighter coloured building materials where possible, particularly road surfaces, to increase the Earth’s albedo and help reflect heat from the sun. This measure, like tree planting helps reduce the urban heat island effect, lowering citywide temperatures and helping to reduce demand for air conditioning. Other measures include promoting green roofs and walls which can absorb the sun’s radiation without causing the surroundings to heat up. They also have the benefit of helping to improve air quality and supporting wildlife.

Water
There is a need to consider off-site compensation measures to secure implementation of water neutral developments. An example of off-site measures could be retro-fitting low flush toilets in existing homes and businesses, or paying for the installation of water meters in surrounding properties. More also needs to be done both in the urban area, as well as on our downland, to help improve ground water quality from its ‘poor’ status.

Air Quality
The language used in the City Plan around air quality is rather strange and needs to be reviewed. It should insist that new development should be contributing to improving air quality, rather than the often stated requirement that new “developments do not increase the number of people exposed to poor air quality.” This will be difficult to assess and might only be possible to achieve in ways which could be quite counterproductive to delivering many other objectives in the plan. Greater emphasis needs to be given to tackling air quality given the recent ruling on EU air quality limits and the need to meet these or face potentially large fines.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted.
The policy has been amended to address some of the strategic issues raised. A number of other issues would be more properly addressed via the production of guidance to support policy implementation. To that effect, the following text has been added to the policy text: “Technical guidance and clarification will be produced to help planning
Financial viability
With regards to instances when standards set out in the policy cannot be achieved, paragraph 4.78 refers to the need for ‘developers to make a case’ for exceptions. Criteria for assessment of such cases are set in this policy (financial viability, technical feasibility, site constraints, and delivery of additional benefits).

The East Sussex, South Downs and Brighton & Hove Waste & Minerals Plan, due to be adopted in early 2013, provides strong policy support for more sustainable management of construction, demolition and excavation wastes. This includes the encouragement of developments that involve the preparation of materials for reuse. The Waste & Minerals Plan also supports the provision of new facilities to support sustainable waste management including anaerobic digestion.

Green infrastructure/Heat island mitigation
In Policy CP8 these issues are covered by a combination of headings ‘a’ (climate change mitigation and adaptation), ‘f’ (reduction heat island effect) and ‘h’ (biodiversity). An additional comment will be added in the footnote to ‘F’ (note 159) on greening of buildings. This is likely to be elaborated in any guidance in support of the policy.

Water
The penultimate paragraph of the main policy text refers to options for mitigation measures which include water. In order to highlight further the role of ‘Allowable Solutions’, which in the context of the Code for Sustainable Homes may include provisions for off-site water compensation measures, reference to ‘Allowable Solutions’ were added to this paragraph.

Air quality:
The wording used regarding improving air and reducing exposure to air pollution is consistent with the council’s Air Quality Management Plan and Action Plan.
Further Details:

The Federation is supportive of the objective of building in a sustainable and energy efficient manner; many members have been involved in research with government and others regarding how to achieve this objective. However, there are limits to what can be achieved within certain costs and timescales. Council should be aware of costs and impacts upon viability. Federation encourages members to work in accordance with government's requirements on these matters. Question the need for developers to demonstrate how they would address issues listed in Part 2 of policy. It is for a developer to decide what materials he uses - has cost implications and should not be imposed by the council. Council can produce advisory notes on how best to achieve these objectives but should not be set in policy. Paragraph 173 of NPPF emphasises the need for local plans to ensure viability - the council's policy does not do this. Part 2 should be deleted.

Statement of Changes:

Re-word first sentence of policy to state that 'The council will encourage..' rather than 'require all development'. Part 1 of policy should be re-worded to say 'All development should accord with government standards'. Delete Part 2 of policy.

Any Other Comment:

Officer Response:

Your comments are noted. The NPPF also sets out that ‘economic, social and environmental gains [be sought] …jointly and simultaneously’ (Paragraph 8) whilst taking ‘local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas (Paragraph 10). It also urges local planning authorities to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. (Paragraph 93). The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings. The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing. In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard. This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008. Currently there is no evidence that this approach has adversely impacted on level of development in the city. To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach. To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
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<td>Sustainable development should be properly defined in terms of development and planning applications within this policy. It needs to be much more detailed and an explanation given of exactly how BHCC interns to interpret and to apply this term in its determination of applications for planning consent.</td>
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<td>Officer Response:</td>
<td>Thank you for your comments. Amendments have been made under the Spatial Strategy section to define sustainable development and to accord with National Planning Policy Framework a new policy has been included on the presumption in favour of sustainable development.</td>
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Further Details:
The requirements of Policy CP8 to achieve higher than Code for Sustainable Homes Level 3 exceeds national targets and can have significant implications on development costs (particularly with Levels 5 and 6). These additional costs can represent the marginal difference between a development being viable or otherwise, particularly in the current financial climate. The wording of Policy CP8 should therefore be amended to reflect the aspirations of the Council whilst allowing greater choice and flexibility for applicants. Please contact planning agent if you wish to discuss the issues raised in these representations further.

Statement of Changes:
See above

Any Other Comment:

Officer Response:
Your comments are noted.
The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings.
The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing.
In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.
This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008.
To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach.
To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
Further Details:

Policy CP8 sets out ambitious requirements for both new build and conversions for residential development in terms of Code for Sustainable Homes. Whilst this approach is commendable in principle, the requirement to meet Code Levels 5 and 6 in particular represent substantial additional costs which could result in developments becoming unviable (and at the expense of affordable housing delivery). The Partnership’s own approach to delivery of sustainable housing and delivering at least Code for Sustainable Homes Code level 3 and 4 homes is to reduce energy and heating demands of homes (a ‘fabric first’ approach) while introducing renewable energy (zero-carbon) elements via the use of solar panels and solar thermal technology where there is a demonstrable and direct benefit for the end user through the reduction of heating or fuel bills, (ahead of less efficient and more expensive technology for energy generation such as combined heat and power technology). Such technologies often can make affordable housing far less ‘affordable’ to deliver, maintain and live in (through service charges for tenants and shared owners, for example).

The Partnership would urge the council to work with developers to reduce the overall energy and heating demand of new housing and adopt a flexible approach on the use of on-site energy generation technologies. The Partnership is concerned that a need for ‘bolt-on’ sustainable features rather than integral green construction methods which can be used to reach Code for Sustainable Homes Level 3 and 4 will potentially become a barrier to the delivery of affordable housing. There is a requirement to strike a balance between priorities and whilst The Partnership supports the Council’s aspiration for environmentally sustainable new development The Partnership believes that in relevant circumstances the balance should be in favour of the supply of new affordable housing rather than insisting on the highest standards in all situations. The policy should have the flexibility to respond to local needs and circumstances to ensure that it does not harm the viability of the development and supply of both market and affordable homes.

The Partnership fully supports the council’s plans for enhancing and protecting the city’s look, and it fully chimes with The Partnership’s own commitment to delivering housing of the highest quality of design and materials and which is in harmony with the character of the local area. This is why The Partnership’s buildings frequently win design awards including by the Royal Institute of Chartered Surveyors, the Daily Telegraph and others. The Partnership currently participates in design review meetings of the South East Regional Panel and would support the setting up of a local design panel.

The Partnership supports the council’s plan to make new housing comply with the Building for Life standards (paragraph 4.136). The Partnership’s new developments comply with the Lifetime Homes standards, and at least ten per cent are fully accessible or adaptable. Design shouldn’t be too restricted by surrounding character in order to avoid stifling new design.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted.

The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings.

The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing.

In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.

This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008.

To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach.

To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical
Supports thrust of policy and RPs governed by high standards set by the HCA. In relation to affordable housing, the policy should provide that affordable housing provided by RPs should match HCA standards. Achieving higher standards should not be at the expense of delivering affordable housing. Balance should be in favour of more affordable homes rather than insisting on higher standards in every case. Policy should not jeopardise delivery of both market and affordable housing.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are welcomed and concerns noted.

The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings.

The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing. In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.

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To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
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<td>CP8 Sustainable Buildings</td>
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### Further Details:

Whilst we support improved environmental standards in new buildings we would seek reassurances that the measures set out in this policy don’t add significant extra costs to developers. Developers already complain about the excessive number of hoops they have to jump through when trying to build in Brighton & Hove and in these tough economic times it would not be sensible to make things even more difficult for them.

### Statement of Changes:

Your comments are welcomed and concerns noted.

The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings.

The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing.

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To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
Further Details:
The Cathedral Group strongly supports the need for an affordable housing target but it needs to be applied more flexibly based upon viability and where the council deems this to be justified through the undertaking of a formal assessment.

Statement of Changes:

Officer Response:
Support for affordable housing provision is welcomed. The policy specifically states that the targets may be applied more flexibly where the council considers this justified and sets out a range of criteria which will impact upon this including viability considerations.

Further Details:
Policy CP8 needs to be flexible in terms of standards that should be subject to technical feasibility and viability in order to assist delivery.

Statement of Changes:

Officer Response:
Your comments are welcomed and concerns noted. The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing. In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.
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To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
Further Details:

CP8 Sustainable buildings. Policies 1 and 2 – we welcome these policies. In point 2e there should be a reference to achieving at least minimum dwelling size standards. We consider adequate space in dwellings as an essential sustainability consideration. We also believe that there should be reference to new buildings being prepared for the receipt of piped heat and that this applies especially in the 8 development areas. We challenge the Council to properly formulate its vision for energy, water and waste neutral, high-standard, cost effective, resource efficient future and the development of a low carbon economy for the city. As far as we can see this has not been done for the city as a whole but only for new developments. Para 4.73 entirely misses the importance of piped heat. We do wonder if all the requirements set out here for new developments will really be necessary and whether we are not overloading the development industry. Perhaps a more hardnosed approach to what will actually help decarbonise the city is needed.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and concerns noted

We recognise your concerns on minimum dwelling size standards. However introducing a minimum dwellings sizes would require further background evidence to support a particular minimum standard and therefore will be investigated under City Plan Part 2.

Further Details:

Making heritage buildings sustainable & future proofing for minimising environmental impact.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed.

The main policy text heading 2e (former d) has been amended to express more clearly the importance of improving energy performance of existing buildings.
Further Details:

Code 6 is an ambitious target that exceeds national guidelines and developers may be reluctant to deliver this. Indeed there are few developers that have experience of delivering to this standard of sustainability and, in the current economic climate there will be valid concerns around costs although we accept that when supply chains reach a critical size and depth of skills costs will decline. However, this may take a long time and if it transpires that insistence on higher sustainability codes limits development, the City Plan may need greater flexibility in the wording of this policy to allow for consideration on a case-by-case basis. For instance is it realistic to expect Code 5 to be delivered on the Gasworks site on top of the substantial cost of decontamination of the land [see DA2[2] page 3].

Notwithstanding this, we accept that there may be indirect advantages to demanding higher standards: they could aid the development of the environmental industries in the city. The report Low carbon jobs for cities: What cities can do to encourage jobs growth in the low carbon economy published by think-tank the Work Foundation suggests that tougher environmental requirements for new developments and increasing the demands for on-site renewable energy generation could encourage growth in low carbon jobs.

However, the Economic Partnership has consistently counselled caution when encouraging the development of new environmental industries; we must be realistic about which types of low carbon jobs might be created or attracted to the city building on our strengths and prioritise accordingly.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and concerns noted.  
The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings.  
The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites that can benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing. In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.  
This flexible yet robust approach to standards is based on a well established practice in Brighton & Hove which followed the adoption of SPD08 Sustainable Building Design in 2008.  
To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to: ‘Allowable Solutions ‘ or a local offset mechanism using this approach.  
To help planning applicants identify opportunities to make successful applications, the following text has been added to the main policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.”
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**Further Details:**

The University supports the principle of Policy CP8 (standards for sustainable building design) and Policy CP9 (sustainable transport provision) and the council should be aware that it takes sustainable development of its campus very seriously. The University's senior management had initiated and gives full support to its Environmental Management System, EcoCampus that sets a robust framework to manage and improve the University's environmental performance in a sustainable manner through challenging targets for reductions in carbon emissions, water use, transport, construction and refurbishment. Amongst these measures is its successful campus wide travel plan that encourages access to the campus by staff, students and visitors through more sustainable modes of travel.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments and your organisation's commitment to delivering high standards of sustainable building design are welcomed.
Further Details:

Code 6 is an ambitious target that exceeds national guidelines and developers may be reluctant to deliver this. Indeed there are few developers that have experience of delivering to this standard of sustainability and, in the current economic climate there will be valid concerns around costs although we accept that when supply chains reach a critical size and depth of skills costs will decline. However, this may take a long time and if it transpires that insistence on higher sustainability codes limits development, the City Plan may need greater flexibility in the wording of this policy to allow for consideration on a case-by-case basis. For instance is it realistic to expect Code 5 to be delivered on the Gasworks site on top of the substantial cost of decontamination of the land [see DA2[2] page 3].

Notwithstanding this, we accept that there may be indirect advantages to demanding higher standards: they could aid the development of the environmental industries in the city. The report Low carbon jobs for cities: What cities can do to encourage jobs growth in the low carbon economy published by think-tank the Work Foundation suggests that tougher environmental requirements for new developments and increasing the demands for on-site renewable energy generation could encourage growth in low carbon jobs.

However, the Economic Partnership has consistently counselled caution when encouraging the development of new environmental industries; we must be realistic about which types of low carbon jobs might be created or attracted to the city building on our strengths and prioritise accordingly.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and concerns noted.

The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings. The standards set in Policy CP8 vary by development type and size with more being asked of larger developments that can benefit from economies of scale, and Greenfield sites benefit from the absence of site clearance/preparation costs normally associated with Brownfield development. The council recognises however that there may be instances when meeting policy standards may not be possible. The policy and its supporting text outline mitigation mechanisms available and criteria for assessing such circumstances due to financial viability, technical feasibility, site constraints, and delivery of additional benefits such as the provision of affordable housing.

In such instances, planning applicants are urged to engage as early as possible with the Local Planning Authority by providing sufficient evidence and negotiating a reduced standard.

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To help planning applicants identify opportunities to make successful applications, the following text has been added to the last paragraph of the policy text: ‘Technical guidance and clarification will be produced to help planning applicants meet the requirements of this policy.’
Further Details:

2. Proposals for improved recycling facilities are welcome. Waste food collection would be advantageous, not everyone can find room for a compost heap, especially flat dwellers.

The Germans seem to recycle all plastics, supermarket cartons, yoghurt pots, plastic film etc. Could we not do the same? Even melting it down into a solid block would take less landfill space than the current situation. Nine tenths of the rubbish in my dustbin comprises such bulky items.

Statement of Changes:

4. There have been a number of Parking consultations recently involving meetings between local residents and council representatives. Why was the same approach not taken with the City Plan which seems a much more important matter? The Plan document is large complicated and scattered with technical jargon. Meetings with residents to explain how proposals would affect their area would have produced a much better informed community.

Officer Response:

Comments noted and support welcomed. Plastic bottles are the only plastics that Brighton & Hove and the majority of local authorities currently recycle. Plastic bottles are mainly made from PET (soft drinks and water bottles) and HDPE (milk and detergent bottles). There are already markets for plastic bottles as these can be recycled back into bottles or even fleeces.

There are several reasons why other plastics are not currently being recycled. These include:

There are not well developed and secure markets for all plastics. This means we may not be able to sell them on.

Even though some items such as food trays might be made from PET they actually have different properties than the PET used to make bottles. This means we may not be able to process the material.

Plastics are used to make food trays and there is a concern that residents will place recycling still contaminating food. If too much recycling becomes contaminated it cannot be processed.

Food waste represents 35% of the average household bin in Brighton & Hove and the council encourages residents, alongside recycling of glass, can, paper, cardboard and plastic bottles, to try to reduce unnecessary food waste.

Your comments regarding consultation on the City Plan are noted and we appreciate your concerns. There have been a number of previous consultations on the City Plan (formerly called the Core Strategy) and there will be a final consultation on the City Plan in February-March 2013. As with previous consultation we publicised details of the City Plan consultation through various means including press releases and made the document available at local libraries and council customer service centres as well as online. It would not be possible to notify all residents in the city on the City Plan but we did contact over 700 consultees including amenity and residents groups on our consultation database. We do try to ensure that technical jargon is kept to a minimum and where used explain this and provide a glossary of terms. A quick guide to the City Plan was produced as we appreciated it is a large document.
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**Further Details:**

I strongly support this policy. It is visionary and progressive. The only comments I have are that: - It can be technically difficult, expensive and sometimes carbon intensive to reach Code level 6 for water consumption. In aspiring for water neutrality, the Council could investigate the possibility of developers paying for retro-fitting off site to offset water used in the new development, similar to an ‘allowable solution’ for carbon.

**Statement of Changes:**

Officer Response:

Your comments are welcomed. 
The penultimate paragraph of the main policy text refers to options for mitigation measures which include water. In order to highlight further the role of a policy approach incorporating mitigation, text was added referring to: ‘Allowable Solutions’ or a local offset mechanism using this approach, which may include provisions for off-site water compensation measures, reference to these were added to this paragraph.

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<td>Ditchling Rise Residents Association</td>
<td>Policy: CP8 Sustainable Buildings</td>
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<tr>
<td>Rep Number: 11</td>
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**Further Details:**

We support the proposals for sustainable buildings and would like to see the protection to health and amenity of neighbours to any new buildings included

**Statement of Changes:**

2. e. Protects occupant health, the health of any neighbours and the wider environment by making the best use of site orientation, building form, layout, landscaping and materials to maximise natural light and heat etc

**Any Other Comment:**

Officer Response:

Your comments are welcomed and concerns noted.

It would not be appropriate however to change the text in Policy CP8 as occupant health is embedded in the Code for Sustainable Homes and BREEAM assessments.
We particularly support the following aspects:
- Flood risk
- Water Efficiency in new development
- Groundwater quality
- Infrastructure, CIL and Planning Obligations

2. Water Efficiency in new development
Policy CP8 on Sustainable buildings sets out design standards for new development in the form of Code for Sustainable Homes and BREEAM requirements.

We support the inclusion of this policy in that it meets our own recommendations on water efficiency for new development.

Our current position is that as a minimum requirement, homes built before 2016 should achieve internal water use of 105 litres/head/day (as required by Code for Sustainable Homes (CSH) level 3) moving to 80 litres/head/day (CSH level 5) after 2016 (as a minimum requirement).

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed.
The target for delivering Code Level 6 and BREEAM Outstanding standards have been deferred until after 2016 and 2019 respectively in line with the progression of Building Regulations towards zero carbon buildings.
To provide flexibility for planning applicants and highlight further the role of a policy approach incorporating mitigation, text was added referring to ‘Allowable Solutions’ or a local offset mechanism using this approach.
The Plan does not show how the new developments will improve public transport, reduce carbon emission and improve air quality.

**Statement of Changes:**

More radical and innovative ideas to reduce pollution and boost "green driving and transport" such as:

* Investment in fuel efficient, green technology buses
* Introduction of network of charge points for electric car and buses
* Erecting of "GREEN BARRIERS" of trees and plants on most traffic congested roads and the sea front. Such barriers aim to reduce level of PM10, trap pollution, dust and noise and also to create pleasing, green environment in the streets. They can be financed, as it was the case with Marylebone Road in London, by Government multi-million project "Clean Air Fund".
* INTRODUCTION OF TRAMWAY SYSTEM AS THE MAIN "GREEN MODE" of transport around the city. Brighton main traffic corridors form Whitehawk via Eastern Road up to Western Road, together with another route for the Pier to Preston, are suitable routes for developing modern, clean tramways system.

Good model to see how this was done on the Continent are Nice and Montpellier. Both of those coastal cities are of similar to Brighton size and character, being business and cultural centres of the region and attracting large numbers of business people, students and tourists. In their drive to reduce carbon emission and make the city centre more attractive and healthy for its citizens they created vast pedestrian areas. The cars and buses are diverted into outskirts of the city and the main mode of transport around the centre is modern, energy efficient tramway network. This "green approach" has brought cleaner air and also encouraged people to walk and enjoy shopping and leisure in quieter and pleasant environment.

Similar measures, including banning, as much as possible, of cars and coaches along the seafront (except for dropping off and parking for disabled people) and planting of trees for "Green Barriers, could be put in place in Brighton and thus achieve the Council objective of improving the streets and public open spaces attractiveness and Biosphere reserve as stated in CP13, CP14, SP6 and SP 11.

**Any Other Comment:**

In planning for the future economic growth it is important to remember that people are coming to Brighton not only to work and live here but also to benefit from the fresh sea air and clean beaches. Protecting our seaside resort status is essential to maintaining the City attractiveness for long term tourism and economic growth in general!

**Officer Response:**

Your objection to the policy is noted.

It is considered that the detail in transport policy sufficiently outlines how the city will facilitate a modal shift from the private car to sustainable modes of travel, improve air quality, make street safer and encourage active travel.

Under the statement of changes it can be confirmed that reference to providing a network of electric vehicle charging points has been added to the policy. The greening of key corridors into the city is already addressed through the development areas policies and the Valley Gardens policy (SA3).

In terms of introducing a tramway in the centre of the city, the policy will not prevent this happening in the future however this is very costly infrastructure and there is currently no funding available or identified to implement this. It would therefore be inappropriate and unsound to include this within the policy.
Further Details:

I would like to see included the following:
Road surfaces to be replaced and not continually patched, paving treatments to be consistent and not part tarmac part red or grey concrete slabs etc. more street planting and low level attractive lighting, minimal street furniture and signage.

A policy for education on keeping Brighton and Hove tidy and free from litter, education for pedestrian road safety in schools. An end to complicated road crossings that appear to cause more accidents due to confusion. Introduce more roundabouts and zebra crossings as in other European cities.

A sensible approach to cars, they are here to stay and are more eco friendly by the year, therefore consistent and reasonable parking charges enabling them to get from a to b and park as quickly as possible. Allow cars to use bus lanes off peak and introduce more intelligent traffic lights and shared space schemes. A flashing amber system of traffic lights for night time. Allow cars that would qualify for free congestion charge i.e eco cars to have a free permit allowing them to park in the city for free in order to get old bangers and gas guzzlers off the road. Introduce parking permits in areas of high density such as the Lewes Rd and Hanover area to get old bangers used by students off the road. CPZ should be soft touch where possible with a restriction just 1 or 2 hours a day to encourage local visitors. Parking restrictions should stop earlier than 8pm to encourage people to use the nighttime economy for all and less restriction on Sundays too.

An attractive and fit for purpose state of the art coach station at Poole valley, a state of the art sports centre and art gallery. A rapid transport system from Hove lagoon to the Marina and Brighton station to the seafront etc.

Better flow of traffic from the north of the city to the seafront and back out, with more parking and ride options.

Statement of Changes:

Any Other Comment:

Officer Response:

Your points are noted.

A lot of points you raise relate to detailed transport and highways matters and will be addressed through the Local Transport Plan.

In terms of making best use of road infrastructure, this is addressed under the Cars and Freight section of the policy (B3).

Your ambitions for a coach station at Poole Valley and better north-south movement and support for Park and Ride are noted.
Further Details:

There is inadequate recognition in the City Plan of highways network issues. It is vital for the city to establish an overriding principle of the vital need for the A27 to connect the A27 to the A259 on the east and western sides of the city. Suggestions to the west is to extend the Hangleton Link Road southwards to the A259 by tunnelling under BHCC land using a culvert or cut and cover. To the east a number of options are suggested including redesigning the A27/Lewes Road junction to provide a spur towards Wilson Avenue including tunnelling and a multi-level A259 interchange at Brighton Marina. Or upgrade the Falmer Road to improve capacity for cars (double decker road at Woodingdean proposed) with a single bore tunnel down to the A259 at Woodingdean/Ovingdean) to join the A259 at Saltdean Lido. A number of benefits to the west will be growth of residential areas, better access to east to the city including the hospital and relief for Rottingdean.

These proposals should be in City Plan as they are major highways improvements.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted and welcome.

You propose significant new road infrastructure for the city. These proposals are contrary to the transport strategy for the city (to achieve a modal shift); they are not deliverable in terms of great cost at a time of public spending restraint; and they are likely to cause significant disruption and loss of amenity to residents of Brighton & Hove.
Concerns relate to Part 6 on Parking. Availability of parking is an important consideration for many when buying a house or flat. Council should therefore be reasonable when preparing guidance and is urged to work with developers on this issue.

Second para of policy is a statement of intent rather than policy and should be deleted. Council should consider how CIL could be an appropriate mechanism whereby funds could be used to meet plan objectives otherwise viability of some proposals could be adversely affected through cumulative impact of plan's policies on viability of development.

Statement of Changes:

Officer Response:

Your objections are noted.

It is agreed that parking is an important issue for the city. This will be addressed through supplementary planning guidance on parking and accessibility which will be subject to public consultation.

Paragraph 2 will be retained as it outlines the main aims of the transport policy.

Careful consideration is being given to taking CIL forward in the current economic climate to address the issue of viability and deliverability of development in the city. Policy CP7 Infrastructure and Developer Contributions has been amended accordingly.
Further Details:

CPRE's comments on the options paper stated that more detail on transport was needed. That remains the case. The proposal to use large peripheral car parks as Park and Ride does not make sense. These car parks have an existing use and use is less busy periods would be difficult to promote and cause uncertainty and lack of use. Park and Ride needs ot guarantee parking and fast onward travel. Park and Ride can also increase local traffic. CPRE has concerns locally and nationally about Park and Ride.

Behavioural change is needed, both within and outside the city. Existing traffic levels in the city are unacceptable and we cannot just intercept cars on the boundary. Thecouncil must work with other agencies to create behavioural change and more use of public transport. The bus system needs to be developed further.

Statement of Changes:

Any Other Comment:

Officer Response:

Your concerns are noted.

The proposal for informal park and ride is one of two main proposals to intercept car journeys entering the city. A supporting background paper on informal park and ride will be published in April 2013 when the City Plan is submitted to the Secretary of State. This will scope potential sites, report on meetings with landowners, public transport providers and potential investors and consider scenarios for informal P+R. The policy also outlines measures to intercept journeys by promoting travel by rail (use of station car parks at weekends) and improving bus services beyond the city boundaries.
Further Details:

The Brighton Society commented on the City Plan Park and Ride Transport Options Paper in December 2011, expressing our disappointment at the lack of strategic thinking behind the proposal to abandon plans for Park and Ride and to adopt alternative measures to reduce city centre traffic. We can only reiterate this view and emphasise our strong concerns that a formal Park and Ride Policy is not included in the Draft City Plan. We consider that past public policies of constructing multi-storey car parks in the central area, in particular the huge car parks associated with the developments around Churchill Square, have been a major cause of the congestion problems currently being experienced in the City.

These problems are only going to get worse in the next 18 year period for which the City Plan is to be the blueprint. Yet there is no realistic alternative being proposed which would provide the majority of residents and visitors to the City any alternative way of moving around easily and inexpensively. Included in the Draft City Plan are improvements to the city streets and open spaces.

These, though highly desirable in order to create a better and more attractive environment for pedestrians and cyclists, will inevitably reduce the capacity of the road network to accommodate traffic and could also compromise public transport, leading to even more congestion. So the lack of a coherent and sustainable transport policy could also threaten the viability of future townscape improvements.

There comes a point where the problems of congestion and pollution have to be tackled and the emphasis placed on improving and increasing the capability of the public transport system to provide a more effective and cheaper alternative to the private car. Park and Ride would play an important part in achieving this aim. There are highly successful precedents for Park and Ride and several cities of similar size to Brighton have introduced successful Park and Ride schemes - Winchester, Cheltenham, Oxford, Cambridge and Canterbury to name but a few.

Statement of Changes:

In order to achieve a successful Park and Ride scheme a number of things have to happen – and the sooner the better. The City cannot wait 18 years before they are tackled. Brighton already has many of the components of a successful Park and Ride scheme.
- It has an excellent Bus Company and an established network of routes and connections to all parts of the City and the surrounding areas;
- the road system has several routes with dedicated bus lanes and the potential for these to be extended and improved further;
- it has a relatively high density of population, and together with the surrounding areas of East and West Sussex District Councils a fairly continuous urban area distributed along the south coastal area;
- it attracts a high number of tourists – like Oxford and Cambridge. In these cities, visitors form a high proportion of the users of Park and Ride. It would certainly make Brighton more attractive as a tourist destination.

Any Other Comment:

There are two main problems. The first is the shortage of potential sites, because of the city’s restricted location between the sea and the South Downs National Park. That makes it all the more important and urgent that any possible sites are identified and secured before they become unavailable. Why for example has part of Toad’s Hole Valley not been suggested as a potential site? It has good links to the A27 and into the City via Dyke Road. A large parking area could be created at the top of King George VI Avenue in the area of Court Farm which could be screened by trees to reduce the visual impact.

Other potential sites in under-utilised areas to the east and west to cater for commuter traffic into Brighton, as well as sites to the north of the City should also be explored. Nor should sites within the National Park be discounted as long as they were well designed and heavily landscaped and planted with trees. Has any approach along these lines been made to the South Downs National Park?

Cambridge for example has sited some of its Park and Ride facilities within the Green Belt outside the City boundary, and these are not unattractive, being very well designed...
and landscaped. If travellers sites are acceptable to the Council within the National Park, why not well designed car parks? Other potential sites could also be explored – why not encourage parking at railway stations with large commuter car parks north of Brighton particularly at weekends, with either rail or bus services from there into Brighton?

The second main problem is that there are too many City Centre car parks. A policy to reduce these year by year should be included in the City Plan starting with North Road. The public accept steady incremental change more readily than the shock of radical change. Such a policy was in fact actually carried out in Cambridge – the largest central car park in the City was demolished as part of a major retail development which included a new John Lewis store. The omission of Park and Ride from the City Plan is a serious error of policy. An eminent planner once described one of the main roles of planning as “to avoid the significance of irreversible mistakes”. Park and Ride should be reinstated as an essential part of a Sustainable Transport Policy.

Officer Response:

Your concern that removing formal Park and Ride from the Sustainable Transport policy represents a gap in the transport strategy for the city are noted.

Policy CP9 has been amended to address the need to intercept car journeys before they reach the city centre. There are two main strands to the policy: the first is facilitating informal P+R (better use of existing car parks on the periphery of the city) and the second is to make better use of station car parks at weekends and enable and promote longer distance bus services.

It is not considered that improving cycling and walking infrastructure will conflict with bus services. The supporting text of the policy has been amended in response to comments to strengthen to the importance of buses and bus infrastructure.

It is agreed that one of the key problems in delivering formal P+Ride in the city is the lack of deliverable or appropriate sites. Toad's Hole Valley is not considered to be an option for park and ride as the site is required to meet essential development and infrastructure needs of the city. The National Park is not considered an appropriate location for a Park and Ride site and the South Downs National Park Authority has confirmed this and it's support to remove Park and Ride from the strategy.
Further Details:

CP9 Sustainable Transport

1b. SLI welcomes the objective to promote and facilitate the better use of existing large car parks on the periphery of the City and transfer journey with existing and improved bus and rail services. This is step towards park ride which SLI supports. However SLI considers that the Plan should define how this would be implemented as well as, in parallel, identify specific park and ride sites (such as DA7 Toads Hole Valley).

2c. Major development schemes such as the redevelopment of the Brighton Centre and extension of Churchill Square (DA1) will be improving the attraction of the regional centre. While continued use of travel plans will ensure sustainable transport choices, the successful implementation of DA1 will require park and ride to reflect that public transport choices are reduced at peak weekend periods. SLI is concerned that the CP9 Sustainable Transport strategy places too much emphasis on local travel and does not adequately address the City’s regional role – and regional visitors.

B.6. Parking

The sole focus is on parking management and public control on the provision of additional public parking spaces in central areas. There needs to be a strategy for park and ride (both formal and informal) to intercept people travelling by car at the periphery of the urban area – an expansion of the ideas in 1b. There is no justification to why this option has been discounted.

The opportunity for ‘informal’ weekend park and ride is referred to under the DA7: Toad’s Hole Valley policy (para 3.80) and we consider that there are other sites around Brighton’s periphery which could be suitable (such as the American Express Stadium).

We consider that there should be an explicit policy for park and ride, appropriately a new CP policy. We suggest wording in the form of:

“CP… Park & Ride

The Council will work with partners, stakeholder and communities to provide:

A. Informal weekend park and ride
B. Permanent park and ride

In determining appropriate sites for informal park and ride, the Council shall take into account the following criteria:

- A minimum existing parking provision for 200 spaces.
- Accessibility to bus services and rail services.
- The use of the existing parking spaces at weekends and on public holidays.
- The opportunity to provide additional parking neighbourly residential amenity.

There shall be a presumption in favour of this use.

The priority for the provision of a permanent park and ride site shall either be accessibility to the A27 or A23.

In other representations we have suggested that part of DA7: Toad’s Hole Valley shall be used for a permanent park and ride facility. This would be cross reference and expanded in the second part of the policy identified above.

4.90

SLI welcomes the Plan’s commitment to work with landowners and businesses with car parks with over 200 spaces on the periphery of the City with good road links to promote their use for informal park and ride. There should be an identification of specific sites where expansion of parking shall be allowed to facilitate this informal park and ride. SLI would be pleased to work with the Council to identify such sites but in the meantime recommends that there should be an additional explicit park and ride policy.

4.91

Toad’s Hole Valley (DA7) should be investigated specifically for a new park and ride facility.

Statement of Changes:

Any Other Comment:

Officer Response:
Your objection to the policy is noted.

Your concerns regarding the implementation of informal Park and Ride are noted. A technical background paper is currently being prepared that will scope potential sites, assess scenarios and report on meetings with partners and stakeholders. This will be published in April 2013 and submitted to the Secretary of State with the City Plan.

Your concerns about managing journeys into the city are noted however it is considered that sufficient measures are proposed in the City Plan to address sub-regional journeys.

Your support for retaining formal Park and Ride is noted. This was considered as part of a policy options consultation undertaken in the autumn 2011. It was resolved that formal Park and Ride is no longer deliverable in terms of sites and costs. However the city council will work with public transport providers, landowners and businesses in the city to facilitate informal park and ride. Toad's Hole Valley may provide opportunities for informal P+R linked to office parking, however, this valuable land is required to meet important city priorities for homes, jobs and schools.
Punitive measures, such as disproportionate increases in parking charges, are not justified as a means of achieving a ‘modal shift’ in people’s transport choices.

- Residents living on the outskirts of the city, where there is not a good bus service and people who are unable to walk or cycle any distance will be unfairly penalised by these policies.
- In principle, we support ‘formal’ park and ride but recognise that, particularly in the current economic climate, the practical difficulties of delivering this are probably insurmountable.
- We recognise that there is already a significant amount of ‘informal’ park and ride taking place in the city at the moment but the arrangements discussed in the CP 9 supporting text about expanding this, particularly around using supermarket car parks, are ill-thought through and are not practical.
- However, we do believe that there may be benefit in looking in more detail at utilising the new Brighton & Hove Albion FC car park on the Falmer released land and the car parking facilities at the universities as potential park and ride sites, albeit that their use would probably have to be restricted (to non-match days and university holidays respectively).
- Car-free developments have been counter-productive and have led to greater pressure on the city’s on-street parking spaces. We believe that this policy should be removed from the Plan.
- Investigate the possibility of a seafront monorail connecting Shoreham Harbour in the west to the Marina in the east linking into the new i360 and the Palace Pier and, in the longer term, with links to other key areas in the City such as Brighton Station.

Statement of Changes:

Any Other Comment:

Officer Response:

Your objections to the policy are noted.

Your concerns about parking charges and the unfair impact on residents on the outskirts of the city are noted.

Your recognition of the challenges around delivering formal park and ride are noted. In terms of informal park and ride, work is underway on a technical background paper that will scope possible sites, mechanisms for delivery and work with partners and stakeholder to deliver the proposal. This will be published in April when the Plan is submitted to the Secretary of State.

Your concerns regarding car free housing are noted, however this will be retained as an option for new housing development. In terms of minimising off-street parking this has been amended in response to the Transport Assessment findings to ‘minimising off-street parking in accessible locations’.

The policy will not prevent proposals for monorail coming forward in the future, however, there is currently no funding secured for such significant infrastructure and consequently it would be considered unsound to refer to this within the policy.
**Further Details:**

CP9 Sustainable Transport

At 4.90 there is reference to ‘informal’ park and ride. Our response to the consultation on the four policy options paper was to keep Park and Ride (in the medium to long term) in the form of a revised criteria-based policy incorporated into the sustainable transport policy.

In rejecting that we note the council’s aim to come to arrangements with owners of large car parks (200 places plus) situated on the edge of the city. We wonder about feasibility in terms of sufficient availability, what the cost would be to motorists and how much control the city would have over charging. Until such things are settled satisfactorily efforts to retain Park and Ride should be maintained.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your concerns about removing formal Park and Ride from the policy are noted.

It is essential that proposals in the City Plan are deliverable. It is considered that Park and Ride cannot be delivered in terms of sites and costs. One of the alternatives proposed in the policy is to facilitate informal Park and Ride. This will be the subject of a supporting background paper that will cover the scoping of possible sites, the outcomes of meetings with public transport providers and landowners and scenario testing. This will be published in April when the City Plan is submitted to the Secretary of State.
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<th>Miss G A Funnell</th>
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### Further Details:

3. Improved public transport facilities are to be welcomed. I suggested that part of the land used in the Shoreham harbour project should be set aside for a park and ride area, with a ground level bus station and car-park built above it. The route could perhaps link Portslade, Hove and Brighton stations, with extra stops in Western and London Roads during shop hours, and finish at the existing park and ride at Withdean. Why not allow the bus drivers to select from a number of agreed routes, depending on traffic? Shopping centre stops could be flexible. For example, if London Road is suffering from congestion, the bus could travel from Brighton station via New England Hill and drop passengers at Preston Circus, rather than Baker Street.

### Statement of Changes:

4. There have been a number of Parking consultations recently involving meetings between local residents and council representatives. Why was the same approach not taken with the City Plan which seems a much more important matter? The Plan document is large complicated and scattered with technical jargon. Meetings with residents to explain how proposals would affect their area would have produced a much better informed community.

### Officer Response:

Your comments are noted and welcomed. The option to proceed with Park and Ride was considered during the options consultation stage in the autumn 2011. Having weighed up the advantages and disadvantages of park and ride that included the lack of availability of sites following the designation of the National Park. The decision was taken to remove it from the City Plan. Shoreham Harbour, which is almost full occupied by activities linked to the Port or by businesses, is poorly accessed and has never been considered as an appropriate location for park and ride. Instead the city plan is taking forward a proposal for informal park and ride to make best use of existing car parks on the outskirts of the city.

In terms of consultation, there have been large number of rounds of consultation on the City Plan. It is unfortunately not possible to go to every neighbourhood to talk about the Plan however we consult over 750 residents and stakeholders on our database that include residents and neighbourhood groups. During this consultation we ran two stakeholder events inviting local groups to attend a presentation and discussion. There were a number of press releases on the Plan and copies of the documents were available for viewing at all local libraries.
**Further Details:**

Para. 4.90 – As a group we support the principle of Park & Ride to discourage motorists from driving through residential areas and the City Centre. We recognise that many do so because they live in areas not well connected by public transport.

Outlying villages and even some small towns cannot support commercially viable bus services so these people have no choice - if they want to come to Brighton they have to drive. Longer distance visitors are different as they can often be directed towards rail stations or frequent bus services. Eastbourne, Worthing and Lewes for example all enjoy 10 minute frequency bus services into Brighton and these should be promoted much more, so they become a realistic alternative to Park & Ride on the outskirts of the city. The City Council could work with neighbouring local authorities to promote this and perhaps consider jointly funded Park & Ride sites outside the City Council area that could be used to serve more than one destination.

We share the concerns expressed by the Brighton & Hove Bus company about shared use ‘informal Park & Ride’ sites on the outskirts of the city. While such arrangements can work (e.g. Brighton Marina car parks could potentially be used as an ‘overflow car park’ for employees of the Royal Sussex County Hospital on weekdays, linked by frequent existing bus services), other sites are more difficult to imagine being practical as peak times are more likely to coincide. Therefore it would be difficult to reach agreements with land owners to release sufficient spaces at the desired times.

Paras 4.98/99 We fully support the proposal for better integration with rail and calls for improved rail services at weekends. There is no doubt that many people are put off travelling to Brighton by train at weekends by engineering works and by less frequent and slower services. However most engineering works on the Brighton Main Line are carried out during the winter months and the improved ‘trouble free’ summer services are not well promoted. There is certainly scope to encourage visitors from London area to make use of existing rail services. Improved late night services from Brighton would also help as there are hardly any departures after midnight on any night of the week yet the city is buzzing through the early hours. There are some southbound services into Brighton so northbound tracks should be used too. Integration with buses at rail stations is essential to provide seamless journeys. Brighton Station is a fair walk from some attractions, especially for the less mobile so good bus links to and from rail stations are essential. The Brighton Station Gateway project has highlighted the issues around this station and we hope these can be resolved without having a detrimental impact on buses.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your concerns are noted.

You note the importance of journeys into and out of Brighton & Hove by bus. This is addressed through part A1 of the policy however paragraph 4.95 of the supporting text has been amended to emphasise the importance of cross authority journeys.

Your concerns regarding the deliverability of informal Park and Ride are noted. A technical background paper is currently being prepared that will scope potential sites, assess scenarios and report on meetings with partners and stakeholders. This will be published in April 2013 and submitted to the Secretary of State with the City Plan.

Your support for securing improvements to rail services at weekends is noted. In terms of the Station Gateway, this is a public transport hub and the need to maintain good bus links to the area will shape the scheme.
**Further Details:**

We need to move on from park & ride ? there are no sites and using existing car parks is unlikely to work except for one-off events

**Statement of Changes:**

Please give more thought to how people can move around the city with a reduced dependency on the car by placing more emphasis on improving public transport ? e.g. more bus prioritisation, better bus shelters, improving links to the National Park (particularly by train)

**Officer Response:**

Your support to remove Park and Ride from the policy is welcome.

Your concerns about informal Park and Ride proposals are noted. Further work will be undertaken on this through a supporting background paper that will be published in April 2013. The city council will work as a facilitator for informal P+R but it will need to be business-led. Encouraging a modal shift remains central to the transport strategy for the city including improving bus services and bus infrastructure and working with rail providers to improve and promote train services. This will include improving sustainable transport links to the National Park.
City Plan Part 1 Responses Received 27th May to 20th July 2012

Customer No: 165  Customer Name: Chris Todd
Organisation: City Sustainability Partnership
Rep Number: 10  Page/Para: /
Section/Supporting Doc/Annexes Part Four - City Wide Policies (Sustainable City)

Support Status: Partly Support
Policy: CP9 Sustainable Transport

Further Details:

Transport
This was an area which was previously felt to be rather weak and lacking in both content and ambition. Therefore, the improvements to the sustainable transport policy CP9 in particular are welcome, but the CSP still believes that there is the need for further improvements. Without a more radical approach it is felt that the modal shift that is needed to reduce carbon emissions and achieve the One Planet Living aims won't happen.

Park & ride
The CSP previously supported the dropping of the policy on park & ride and is concerned that the new policy which suggests using existing large car parks on the periphery of the city is unrealistic and a distraction from tackling travel behaviour. It also ignores the wider impacts that park & ride can have such as increasing carbon emissions and for those in rural areas without access to a car can leave them more isolated when marginal bus services are undermined through abstraction onto the park & ride service. These wider sustainability and equality issues are not considered here but need to be. If park & ride is to be successful, it needs to be consistently promoted, it needs to be reliable and it needs to be predictable. Using existing car parks which are heavily used at various times of the week and year and so not available for park & ride for substantial periods will not build that certainty and reliability for park & ride to be successful. The CSP is also concerned that continuing with a park & ride policy, albeit amended, could lead to developments being given an excuse to hold onto large car parks rather than developing and implementing effective travel plans. In new build, such as on Toads Hole Valley this could lead to developments being given permission for larger car parks than necessary to possibly service a part-time park and ride. This would be a waste of scarce land which would be better used providing homes for people and scarce community facilities such as sports pitches than more car parking.

Non-car travel needs to be marketed at the point of the journey (e.g. "Don't drive into Southend, catch a train instead" adverts by the Highways Agency) rather than in the city centre. While the Plan talks of encouraging greater train use it could be stronger on intercepting people as close to home as possible.

Trains, National Park & Tourism
Railway links to the city are vitally important to the city for both tourism and business. However, the services are not reliable enough, particularly at weekends and are discouraging people from using public transport to access the city. For example, Network Rail planned engineering works on the bank holiday weekend at the start of the Brighton Festival, potentially one of the busiest of the year. This is not only undermining the local economy but impacting on air quality and congestion too. Integration between trains and other transport (buses, pedestrians, cyclists, etc.) needs to be better. In particular, railway operators could be doing much more to encourage access to the South Downs National Park to support aspirations to expand the local economy through eco-tourism, particularly with so many stations in and very close to the National Park, e.g. Moulscoomb and Falmer within the city and many more outside of it. However, this means that train operators need to run more flexible rolling stock to cater for larger numbers of cyclists and people with pushchairs, buggies or in wheelchairs.

With an ageing population there is likely to be an increase in demand for space for electric buggies / wheelchairs and as more easy access trails are implemented, there will be greater opportunities for people with mobility impairments to access the countryside.

Cycle hire at railway stations and other places, such as at Stanmer Park, will also be important in any tourism offer. If combined with better access for bikes on trains, it starts to create quite a wide range of opportunities for people to use Brighton & Hove as a base for visiting the National Park and other places of interest. Buses also have a capacity problem as only two cycles can be carried on the services to Devil's Dyke and Ditchling Beacon, not enough for a family to travel out together. Again, if this could be improved, opportunities would start to open up.

20mph Zones
The CSP supports 20mph zones as these increase safety and independence as they help give people a greater transport choice particularly those less confident walking or cycling. The young and old can also find it harder to judge speeds and distances, so having slower moving vehicles give more time and a greater margin of error. This is before the severity of any impact is considered. Just like anyone else in society, children’s lives are not just confined to one space in the community such as the area around a
school. Having 20mph zones helps create larger areas of town where it is safer to access services such as local shops, parks, etc. or to interact socially.

Bus Travel & Traffic Control
The CSP would like to see a more ambitious approach to public transport with clear goals to increase bus passenger numbers or a proportion of all journeys. To do this, more radical measures such as speeding up bus services needs to be prioritised to reduce journey times, increase service frequencies and improve the attractiveness of public transport to those who currently drive. This could also help drive down operator costs which would help create a downward pressure on fares. Better facilities, particularly bus shelters also need to be prioritised. Bus shelters in Churchill Square, North St and London Road to name but a few are totally inadequate for the number of passengers using them. In new developments there is little or no analysis of demand and the allocation of shelter provision seems to be a rather crude process. This was observed with the redevelopment of the Royal Sussex County Hospital where proposed provision did not match existing demand, let alone an increase as suggested by the plans.

Public & Private Car Parking
The CSP also feels that the City Plan needs to be clearer on the control of privately owned but publicly used car parks. If the intention is to limit this, then that needs to be made explicit, particularly with the proposals to redevelop Churchill Square and the Brighton Centre. There is a concern that the cumulative impacts of increasing car parking in and around the central area will create more congestion and air pollution while compromising pedestrians, cyclists and public transport users. In particular, this places greater pressure on junctions, such as the Aquarium roundabout which already struggle to cope at times. Beyond a certain point, it just isn’t physically possible to accommodate more motor vehicles, however efficient the signalling is without making the pedestrian experience untenable which would have a severe negative impact on the city’s tourism appeal.

In addition any reference to parking in the City Plan needs to be clear whether it is talking about car parking or cycle parking. While there is a need to minimise car parking provision, the opposite is true for cycle parking. The CSP would like to see a far stronger policy steer around key air quality areas and public transport corridors where car parking will not be allowed to increase and potentially will be the focus for removal (allowing for disabled parking). For example, air quality and congestion is a problem in the North St area. A key element of reducing congestion and pollution in this important bus corridor should be to remove as many private vehicles from the area as possible. As in York’s central pedestrian area, there should be a car-free development zone around these important or problematic areas. It would also like to see the potential for existing car parks to be redeveloped for other more productive uses as an impetus for economic regeneration.

Travel Demand Management and Travel Planning
The sections in the City Plan on travel demand management and travel planning are weak and vague. It needs to be made clearer that transport assessments are not the same thing as travel plans, and the latter ought to be expected of developers. These issues may be covered in the details of the City Plan, but ought to be in the headlines.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support for the revised policy is welcome and concerns noted. Your concerns about the proposal for informal Park and Ride are noted. It is considered important that there is a measure in the City Plan to address the interception of cars into the city centre. The City Council will act as a facilitator only and it should be taken forward by the private sector. A supporting background paper will be undertaken on informal Park and Ride that will be published with the City Plan in April 2012. The other strand of the policy relating to journeys into the city is to promote and work with public transport providers to encourage more journeys into the city by bus and train.

Your comments relating to improved train access and services to the National Park are noted. The city council is committed to working with rail providers to improve train services.

Your support for 20mph zones is noted and welcomed.
It is recognised that bus services in the city are key to modal shift. In response to comments references to buses and bus infrastructure have been strengthened in the supporting text to reflect the importance of bus services to the city and the funding secured to improve infrastructure. Your comments on bus shelters will be passed to the relevant Team.

Your concerns about private and public car parks are noted. The intention of allowing no expansion of public car parks is to include all car parks used by the public.

Your ambitions around greater pedestrianisation in the city centre are noted. The City Plan will not prevent such initiatives from being taken forward.

References to travel plans have strengthened in the supporting text in response to comments made.
Further Details:

Transport and Public transport: We welcome much of these policies but suggest that they only scratch the surface in terms of achieving sustainable transport policies. We make a number of proposals for improving this section.

CP9: Sustainable transport: we broadly support this policy although we believe it only starts to scratch the surface of what a sustainable transport policy would need to do and could be substantially improved. We support in particular A1 B (better use of car parks), B1 (rapid/express services) and B2. However we do not see a strategy here for reducing car based travel and a position as to how to handle growth in car ownership and use.

Growing car ownership places the most demanding requirement on space, for which there is strong competition. We miss any reference to car free developments or zones where car use will be discouraged. Although car clubs are referred to in the supporting text they are not highlighted in the policy. Generally the policy is only taking a small step towards sustainable transport as long as the Council cannot bring itself to firmly reduce car based travel within at least the older parts of the city. This would help make the city much more attractive and generate the spaces needed for walking, cycling, shared road surfaces, and major planting improvements. We do recognise that there are references to all these matters (with the exception of shared street space) in the supporting text – but this doesn’t elevate it to policy. We do urge the council to make an explicit policy reference to shared surface roads and substantial improvements to a number of our major roads such as Church Road / Western road to improve the pedestrian environment and encourage planting to achieve boulevard effects. In point 4 a consideration of a cycling scheme similar to ‘Boris bikes’ could be added.

Statement of Changes:

Any Other Comment:

Officer Response:

Your concerns are noted.

The strategy to manage car-based travel is addressed under part A1 of the policy through intercepting of journeys into the city at train stations and through informal park and ride and reducing the need to travel by car within the city by providing improved public transport and cycling and walking facilities. In addition the overarching strategy for the city is to locate new development in accessible locations.

Reference to car free housing can be found under part B6 Parking in relation to the need for guidance.

Car Clubs are addressed under part B3 Cars and Freight bullet 3.

Shared street space is covered in the text under B2b and d relating to safer streets and improved public realm.

Your comments regarding a cycle scheme are noted. This initiative cannot be mentioned in the policy as funding has not been identified however the policy will not prevent such an initiative coming forward in the future.
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<td>Part Four - City Wide Policies (Sustainable City)</td>
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**Further Details:**

The inclusion of a requirement to submit transport assessments as part of development schemes is welcomed. The inclusion of a separate travel plans section to the policy is also appreciated as this should help to increase the number of travel plans submitted and could have a positive impact on the SRN.

The increase in quantums of housing and office in the Development Areas is noted as well as the inclusion of a new site at THV. There needs to be an update of the transport evidence supporting the City Plan to assess the updated development proposals as well as the extended plan period.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are welcomed and noted.

In terms of a the need for additional transport evidence, a full transport assessment of the City Plan will be undertaken in consultation with the Highways Agency.
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Further Details:

We support the policy of encouraging greater use of public transport throughout Brighton & Hove. Much has been achieved over recent years and it is essential that this trend continues with annual increases in bus and rail usage and less car dependency.

However in the light of the council seeking to reduce car usage by 10% to 20% (which could be equivalent a 30% net reduction in traffic, when the population growth is taken into consideration); is not clear how the council aims to achieve this policy.

We strongly support the comments made at the Transport Partnership meeting that a bolder approach is necessary to achieve these aims.

Bus reliability is of crucial importance to bus users. If a bus service cannot be trusted, then people will use other transport modes (mainly the car) regardless of the cost and inconvenience. To this end, it is important that existing bus lanes are maintained (or close equivalents provided); and that when other council infrastructure schemes are being created, the real affect on bus service reliability is carefully considered.

Bus infrastructure improvements should be considered wherever they are needed, and not just being tied to sustainable transport corridors. This means bus lanes, bus gates, real-time information, bus stop improvements (etc.), could be located anywhere in the city. Bus priority at traffic signals should be strongly considered at the right locations; and the provision of more bus shelters, should be given a far higher priority (no one likes getting wet while waiting for the bus, it just discourages usage).

CP9 refers to the identifying priorities for Transport Infrastructure Improvements, under the Sustainable Communities strategy (CP6). It is important that consultation on these local infrastructure issues are not just limited to just local community group; and that the input of city wide organisations such as Brighton area Buswatch are also involved; to avoid the risk of less successful schemes being introduced. Brighton Area Buswatch welcomes recent invitations to become more involved in this process.

CP9 also refers to the Community Infrastructure Levy (CIL); presumably to replace, or partly replace, section 106 agreements. In recent years, section 106 agreements have contributed significantly to the provision of bus infrastructure, such as real-time information signs, accessible kerbs etc.

As future implementation of this policy is contained in the “Infrastructure Delivery Plan” (detailed in CP7, item 3), and we trust that Brighton Area Buswatch will be involved in any discussions on this plan.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support and concerns are noted.

Your request for a bolder approach to reducing car use are noted.

Support for bus lanes and infrastructure is noted. The supporting text of the policy paragraph 4.95 has been amended to strengthen references to emphasise the importance of bus services and bus infrastructure in the city. The policy does not prevent the introduction of matters such as bus priority at traffic lights which can be introduced through detailed transport policies.

Your request to be involved in and consulted on detailed transport measures are noted and will be passed to the relevant team.
## Further Details:

Following comments made in Autumn 2011 to the options paper that the paper was vague the detailed measures set out in the policy are welcome, in particular:

- bus priority lanes on key routes;
- ensuring sustainable transport infrastructure is in place for rapid/express bus services.

But the transport strategy for the city needs to be more ambitious to achieve a level of modal shift that is essential if P+R is to be abandoned and congestion avoided. A shared commitment is sought with BHCC to increase the number of bus journeys made in the city by 50% by 2030. This is realistic and has been achieved over the last 18 years through successful joint working.

The focus on cycling and walking will not achieve this modal shift - there is no logic in allocating 10% of LTP funds to this in relation to the modal shift that can be achieved. Both can conflict with bus services (traffic signals, road and pavement layouts etc).

Para 4.108 - thought that the funding for Edward Street was secured for bus improvements not cycling and walking.

- Queries the robustness of proposals in 4.90 to make better use of existing peripheral car parks. The supermarket car parks are often full, the bus journey times from the supermarket to Churchill square are too long (30mins from Holmbush; 26 mins from West Hove and 31mins from Hollingbury). There would be inconsistent provision.
- Universities - unlikely to agree as reducing car use.
- Stadium - car park use based upon careful management so proposal in conflict and inconsistent availability.
- Marina - not possible following the completion of redevelopment works.

4.93 - Western Road is not a local shopping centre and reference to Brunswick makes no sense.

4.95 - Upgrading to bus information real time systems is too detailed for a 20 year plan and most will be completed by time of adoption. Final sentence does not make sense and is unclear.

4.96 - Improving N-S routes for a rapid bus-based service is important to link to the station. If so it is important that bus space at the station is not reduced as a result of the Station Gateway proposals.

4.98 Replace reference to NRA with Network Rail.

## Statement of Changes:

**Any Other Comment:**

**Officer Response:**

Your comments are noted and welcomed.

The city council recognises the importance of bus services in achieving the modal shift needed in the city. In response to your comments the supporting text (para4.95) has been rebalanced and amended to reflect this and the funding that has been secured for bus infrastructure improvements in the city. This work will continue along with partnership working with Brighton & Hove Buses.

Paragraph 4.108 has been amended to remove reference to Edward Street.

Your comments on informal park and ride are noted. It is considered that the proposal will be business-driven with the council acting as facilitator. Work is underway on scoping potential sites and how this will be taken forward. A paper will be prepared for submission of the City Plan to the Secretary of State.

Amendments have been made to paragraphs 4.93, 4.95, 4.96 and 4.98 of the supporting text of the policy in response to your comments.
Further Details:

By and large the City Plan is accompanied by excellent supporting documents that offer a high degree of analysis and evidence based commentary. But the Transport section of the Plan is lacking in a robust evidence base apart from the 2009 Transport Assessment which sets out the transport impacts of developments outlined in the [previous] Core Strategy. The number and nature of development areas has changed since this time e.g. Toads Hole Valley.

The city’s transport problems fall into two categories:
Intercity [access and egress to the city from other places]
Intra-city [movement within the city limits]

We have considerable concern about the credibility of one of the solutions for the former i.e. alternative small-scale satellite sites serviced essentially by normal bus services [CP9 A2, page 140]. With a heavy heart, the Economic Partnership accepts that, with the foundation of the South Downs National Park, the opportunity for a meaningful Park & Ride [P&R] facility close to the city has passed.

In the absence of political will to consider Patcham Court Farm and the adjacent allotments there is no obvious site. In any event it is questionable whether a P&R facility would be a good strategic use of the land in question.

While the satellite proposal is worth exploring many of the suggested sites seem unlikely to deliver the certainty and predictability of provision that would be essential to guarantee repeated use. In addition the journey times into the city centre from some sites would be well in excess of the 20 minute maximum that appears to be acceptable to the public using P&R facilities in other towns and cities.

The proposals to work with Network Rail to reduce week-end disruption to services are welcomed but we note that this has been an aspiration for decades without success.

The draft City Plan proposes increasing the number of walking and cycling journeys which is to be welcomed on a number of levels but it is unrealistic to expect this to make a significant impact in modal shift and reduce car journeys effectively enough to reduce congestion. Indeed there is a school of thought that, without dedicated cycle lanes, more bicycles sharing narrow roads with buses will only serve to increase congestion because the buses cannot overtake them. Anything that actively deters bus use e.g. slower journey times, should be avoided.

A variety of ground-breaking advances over the past two decades have had a dramatic effect on bus patronage which has more than doubled and it seems compelling to conclude that buses will largely provide the sustainable transport solutions to intra-city travel. But the section of the Plan that deals with bus travel is thin in the extreme both in terms of policies and supporting text. More detail is needed on working in partnership with bus operators to introduce specific measures to increase bus patronage to a set target over a set period of time with the Plan term. More frequent services have encouraged many car owners to use buses but the often poor and inadequate provision of shelter while waiting for them is still a barrier.

The Economic Partnership welcomes the proposal to prepare a Freight Strategy and a Coach Strategy for the city and would suggest that an indicative, realistic timetable for implementation be included in the Plan.

The use of variable charging to manage demand and utilisation of parking facilities makes sound economic sense but the implications should be modelled beforehand to determine the effect on the local economy and avoid unintended consequences.

In the supporting text paragraph 4.93 [page 144] causes confusion over the definition of ‘local shopping centres’ by including Western Road [a City Centre location] and London Road [a Town Centre location] in the list of local shopping centres to be made more accessible.
Lewes Road improvements are welcomed, but they must not present practical implications for the development of the Preston Barracks.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your support for the policy is welcomed and your concerns noted.

You raise concerns about the level of evidence to support the transport policy. A Transport Assessment of the current proposals in the City Plan has been undertaken and will be published for publication consultation as part of the City Plan evidence base.

Your concerns about informal Park and Ride are noted. Work is currently underway on a technical background paper that will investigate in more detail the sites available, look at mechanisms and models for informal P+R and involve discussions with partners and stakeholders. This will be published in April on submission of the plan to the Secretary of State.

Your concerns that cycling and walking will not be able to deliver the modal shift required are noted. Paragraph 3.95 of the policy has been amended to provide greater emphasis on the importance of buses in achieving a modal shift and the investment secured now and in the future on bus infrastructure.

The need for timetables for the coach and freight strategies and to model the economic impact of parking charges are noted and will be referred to the Transport Strategy Team.

Paragraph 4.93 of the supporting text has been amended in response to comments regarding local centres.

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**Further Details:**

Sustainable transport – park and ride is an important element as a way of improving accessibility to venues and events.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your concern regarding removal of Park and Ride from the policy are noted. It is considered that Park and Ride is no longer deliverable and that it will be satisfactorily replaced through the alternative measures outlined in the policy.
Further Details:

The general principles of this policy are supported.

However, there are concerns over the potential impact of the proposals for park and ride within the strategy. Whilst the rationale for wanting to reduce car use within the town centre through a package of measures including park and ride is acknowledged, we would not want this to be to the detriment of neighbouring authorities. Where park and ride proposals are likely to have a detrimental impact on the East Sussex road network or where proposed park and ride facilities are situated in East Sussex their acceptability would need to be considered on a case-by-case basis to ensure that they will be of nil detriment on our local communities.

Statement of Changes:

In B.2 (page 141), Rail, suggested that the following text be added:
"BHCC residents should be encouraged to commute (for work, social and educational purposes) by rail, as those commuting into Brighton and Hove for work, social and educational purposes."

In paragraph 4.98
* The National Rail Authority should be Network Rail.
* East-West rail services should also be improved (not just north-south)
* Encourage existing car users to travel sustainably where possible. Car use should be minimised and car sharing should be promoted, as well as other sustainable means to get to the train station.

Suggest including a generic paragraph about the need to continue on-going engagement with stakeholders, including the County Council, in respect of schemes coming forward which affect or adjoin the boundaries of local planning or local transport authorities.

Suggest the document references the upgrade to the real time passenger information system on the A259 corridor in Peacehaven, Newhaven and Eastbourne and that this will be extended to Lewes. These improvements will be funded using the Local Sustainable Transport Fund secured towards improvements in Lewes, Newhaven and Eastbourne and its delivery will require partnership working with BHCC to ensure its successful integration with their own RTPI project.

Any Other Comment:

Officer Response:

Your comments are noted and welcomed

Your concerns regarding informal Park + Ride are noted and the city council will work with East Sussex CC and the other adjoining authorities on any proposals that effect adjoining authorities.

Amendments have been made to policy CP9 and the supporting text in response to the all of the remaining comments made.
### Customer No: 66  Customer Name: Zoe Freeman

**Support Status:** Partly Support  
**Organisation:**  
**Rep Number:** 1  
**Page/Para:** /  
**Policy:** CP9 Sustainable Transport  
**Section/Supporting Doc/Annexes** Part Four - City Wide Policies (Sustainable City)

**Further Details:**
I am writing as member of Friends Of The Earth and feel particularly strongly about Moving on from park and ride as there are no sites Continued and more investment in public transport particularly trains to the national park and more shelters and real time info at bus stops .To ensure that the community is involved in the development of Toads Hall valley and that the national park is fully respected.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Your comments are noted and welcomed.

Your support for removing Park and Ride is noted.

You emphasise the importance of investment in public transport - the supporting text of the policy has been strengthened to set out more clearly the important role buses and bus infrastructure have in reducing the number of car journeys in the city.

You can be reassured that residents will be engaged during the preparation of the Planning Brief for Toads Hole Valley. In addition the importance of protecting the setting of the National Park is set out in the THV policy and reference to this has been added to the Urban Design policy.

### Customer No: 106  Customer Name: James Breckell

**Support Status:** Partly Support  
**Organisation:** James Breckell Associates  
**Rep Number:** 5  
**Page/Para:** 139/  
**Policy:** CP9 Sustainable Transport  
**Section/Supporting Doc/Annexes** Part Four - City Wide Policies (Sustainable City)

**Further Details:**
Cycle lanes should be less complicated and jogging routes around the city that avoid traffic. I would like to be able to cycle along the seafront Brighton to Worthing on a dedicated cycle lane without traffic interference.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Your comments regarding cycle lanes are noted and will be passed to the relevant Transport Team.
Customer No: 70  Customer Name: Steve Ankers  
Organisation: South Downs Society  
Rep Number: 13  Page/Para: Page 140  
Policy: CP9 Sustainable Transport  
Section/Supporting Doc/Annexes: Part Four - City Wide Policies (Sustainable City)  
Support Status: Partly Support  

Further Details:

To meet the overall vision for the expanding development of the city, there will be huge pressure on the transport network. As stated earlier, this is a particular concern to the Society given the traffic and traffic congestion via the gateways in and out of the City and through the National Park.

We agree that much must be done by informing and influencing journey patterns, promoting and encouraging the use of more sustainable transport options, and providing measures that increase people’s travel options. We recognise that this lies at the heart of the changes required. We look forward to receiving details of the measures proposed to tackle this which, we feel, should be balanced in favour of incentives and not penalties.

We also recognise that significant pressure results from car journeys entering the city at peak times during the week and from shoppers and visitors at weekends, especially during the summer months. For example, these can be seen as long traffic queues out of the City along the A23. However, it is important to recognise that main car-borne commuter demand is from East and West and not from the North.

We note that the Council has abandoned formal Park & Ride options. We understand that this is due to funding not being made available. To replace this, informal Park + Ride is favoured, the main purpose being to intercept car journeys into the city and transfer workers and visitors onto existing and improved bus or rail routes.

In order to achieve this we note that the Council is proposing to advise and work with landowners and businesses with existing large car parks (over 200 spaces) on the periphery of the city, where there are good road links, to promote their use. In principle, we would support such a proposal. However, we believe that there is insufficient detail in this draft City Plan to suggest where these sites are and whether there is indeed the capacity. As such emphasis has been put on this we believe it is crucial that evidence in support of this be made available as a priority. If informal Park & Ride is to be workable, an attractive pricing strategy will need to be implemented.

With the above in mind, it will be vital that the Council reach agreements with the Train Operating Companies significantly to improve passenger capacity and overall efficiency of rail services, particularly at weekends. We support the transfer of journeys from car to rail by encouraging visitors to use station parking facilities and travel into the city by train. However, many of the station car parks are limited in capacity (especially during the week) and the current pricing is often prohibitive. We look forward to hearing more details of how the Council will address this.

We are pleased to note that funding has been secured to improve in particular the Lewes Road corridor in terms of bus priority as well as walking and cycling, and are encouraged that the Council is committed to improving Rights of Way and access to open spaces and the National Park.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support and comment on the policy are welcome.

You raise concerns that there is a lack of detail on informal Park and Ride. Your concerns are noted. Work is currently underway to scope possible sites, to develop possible mechanisms for delivering informal Park and Ride and to work with partners on taking the proposal forward. A technical supporting paper will be published when the City Plan is submitted to the Secretary of State.
BHFOE welcomes the fact that more detail has been provided in this policy although needs to go further, particularly with the park & ride part of the policy. Transport is responsible for nearly 20% of all carbon emissions, air quality is poor in many areas and obesity is a serious and rising problem for the NHS. Quite radical measures and changes will be required if these problems are to be seriously addressed.

Park & ride could undermine longer distance bus services, particularly if they are subsidised. This could isolate those in rural communities creating further inequalities.

Park & ride may only work for one off events such as the London to Brighton cycle ride. However, as a permanent proposition it is not viable given that most car parks will only be available some of the time. For park & ride to work properly, it needs to be reliable, consistent, frequent, permanent and with adequate capacity. Given the disjointed nature of existing car parks, even if these were available all the time, it would be harder to create a successful park & ride service.

The only credible permanent park & ride that could be developed would be utilising the rail network, intercepting journeys far closer to home. However, there are problems around reliability and credibility of the network to overcome first. More work could be done to promote access by train, but inflexible rolling stock is a barrier to carrying large number of cyclists.

BHFOE would like to see greater emphasis given to improving the overall bus network by speeding up services, improving frequencies and reliability and driving down costs. The provision of bus shelters also needs to be taken more seriously as current provision in busy areas such as Churchill Square and London Road is totally inadequate for the numbers of bus users.

Travel plans should be a requirement within the policy, not just a suggestion as in part B.5. Promote measures to prioritise pedestrians to encourage more sustainable modes, particularly at busy junctions. Need improvements at the Clock Tower junction. Should promote public realm improvements in West Street and remove private car movements north-south along this route.

More focus on removing city centre parking and traffic movements to improve air quality. Should be done slowly to encourage a shift in sustainable modes.

The policy is not clear. While not expanding public car parking, the policy leaves it open for more private car parking to be built. No more car parking unless disabled parking and car-free development zones in areas of high public transport frequency.

Distinction needs to be made between cycle parking and car parking. Cycle parking needs to be promoted to cope with existing and latent demand.

Links to health need to be made more explicit not just around air pollution but about the health benefits of choosing sustainable modes of transport such as cycling and walking.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcome and your concerns noted.

Your concerns about the proposal for informal Park and Ride are noted. It is considered important that there is a measure in the City Plan to address the interception of cars
into the city centre. The City Council will act as a facilitator only and it should be taken forward by the private sector. A supporting background paper will be undertaken on informal Park and Ride that will be published with the City Plan in April 2012. The other strand of the policy relating to journeys into the city is to promote and work with public transport providers to encourage more journeys into the city by bus and train.

Your comments relating to improved train access and services to the National Park are noted. The city council is committed to working with rail providers to improve train services.

It is recognised that bus services in the city are key to modal shift. In response to comments references to buses and bus infrastructure have been strengthened in the supporting text to reflect the importance of bus services to the city and the funding secured to improve infrastructure. Your comments on bus shelters will be passed to the relevant Team,

It is considered the Travel Plan section of the policy is sufficient to promote this measures actively.

In terms of improving pedestrianisation in the city centre, this is promoted through a number of policies (Public Streets and Spaces, area policies) and the City Plan will not prevent these initiatives coming forward.

Your concerns about private and public car parks are noted. The intention of allowing no expansion of public car parks is to include all car parks used by the public. Your comments regarding removing central car parks is noted and can be considered in Part 2 of the City Plan.

Separate reference has been made to cycle parking in the policy.

In terms of the health benefits of cycling and walking this is addressed in the supporting text of the policy.
Further Details:

By and large the City Plan is accompanied by excellent supporting documents that offer a high degree of analysis and evidence based commentary. But the Transport section of the Plan is lacking in a robust evidence base apart from the 2009 Transport Assessment which sets out the transport impacts of developments outlined in the [previous] Core Strategy. The number and nature of development areas has changed since this time e.g. Toads Hole Valley.

The city’s transport problems fall into two categories:
- Intercity [access and egress to the city from other places]
- Intra-city [movement within the city limits]

We have considerable concern about the credibility of one of the solutions for the former i.e. alternative small-scale satellite sites serviced essentially by normal bus services [CP9 A2, page 140]. With a heavy heart, the Economic Partnership accepts that, with the foundation of the South Downs National Park, the opportunity for a meaningful Park & Ride [P&R] facility close to the city has passed.

In the absence of political will to consider Patcham Court Farm and the adjacent allotments there is no obvious site. In any event it is questionable whether a P&R facility would be a good strategic use of the land in question.

While the satellite proposal is worth exploring many of the suggested sites seem unlikely to deliver the certainty and predictability of provision that would be essential to guarantee repeated use. In addition the journey times into the city centre from some sites would be well in excess of the 20 minute maximum that appears to be acceptable to the public using P&R facilities in other towns and cities.

The proposals to work with Network Rail to reduce week-end disruption to services are welcomed but we note that this has been an aspiration for decades without success.

The draft City Plan proposes increasing the number of walking and cycling journeys which is to be welcomed on a number of levels but it is unrealistic to expect this to make a significant impact in modal shift and reduce car journeys effectively enough to reduce congestion. Indeed there is a school of thought that, without dedicated cycle lanes, more bicycles sharing narrow roads with buses will only serve to increase congestion because the buses cannot overtake them. Anything that actively deters bus use e.g. slower journey times, should be avoided.

A variety of ground-breaking advances over the past two decades have had a dramatic effect on bus patronage which has more than doubled and it seems compelling to conclude that buses will largely provide the sustainable transport solutions to intra-city travel. But the section of the Plan that deals with bus travel is thin in the extreme both in terms of policies and supporting text. More detail is needed on working in partnership with bus operators to introduce specific measures to increase bus patronage to a set target over a set period of time with the Plan term. More frequent services have encouraged many car owners to use buses but the often poor and inadequate provision of shelter while waiting for them is still a barrier.

The Economic Partnership welcomes the proposal to prepare a Freight Strategy and a Coach Strategy for the city and would suggest that an indicative, realistic timetable for implementation be included in the Plan.

The use of variable charging to manage demand and utilisation of parking facilities makes sound economic sense but the implications should be modelled beforehand to determine the effect on the local economy and avoid unintended consequences.

In the supporting text paragraph 4.93 [page 144] causes confusion over the definition of ‘local shopping centres’ by including Western Road [a City Centre location] and London Road [a Town Centre location] in the list of local shopping centres to be made more accessible.
Lewes Road improvements are welcomed, but they must not present practical implications for the development of the Preston Barracks.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your support for the policy is welcomed and your concerns noted.

You raise concerns about the level of evidence to support the transport policy. A Transport Assessment of the current proposals in the City Plan has been undertaken and will be published for publication consultation as part of the City Plan evidence base.

Your concerns about informal Park and Ride are noted. Work is currently underway on a technical background paper that will investigate in more detail the sites available, look at mechanisms and models for informal P+R and involve discussions with partners and stakeholders. This will be published in April on submission of the plan to the Secretary of State.

Your concerns that cycling and walking will not be able to deliver the modal shift required are noted. Paragraph 3.95 of the policy has been amended to provide greater emphasis on the importance of buses in achieving a modal shift and the investment secured now and in the future on bus infrastructure.

The need for timetables for the coach and freight strategies and to model the economic impact of parking charges are noted and will be referred to the Transport Strategy Team.

Paragraph 4.93 of the supporting text has been amended in response to comments regarding local centres.

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**Customer No:** 231  **Support Status:** Partly Support  
**Customer Name:** Miss Alison Walters  **Policy:** CP9 Sustainable Transport  
**Organisation:**  
**Rep Number:** 7  **Page/Para:** /  
**Section/Supporting Doc/Annexes** Part Four - City Wide Policies (Sustainable City)

**Further Details:**

I welcome that there is much more detail on sustainable transport but more needs to be done as transport plays such a big role in carbon and poor air quality. Of particular concern is the impact on commercial transport - e.g. the transport of waste out of the city which not only has an impact on a congested and poor air quality area of the city (Vogue Gyratory) but also means the city is exporting its transport impacts out of the city to other areas of the county and country.

**Statement of Changes:**

I would welcome changes to the document to consider the impacts of commercial transportation and how these can be reduced (both within the city and further a field).

**Any Other Comment:**

**Officer Response:**

Your comments are noted and welcome.

Your concerns regarding the growth of commercial transport are noted but are very much a national issue. The spatial strategy in the City Plan aims to reduce the need to travel. In addition, the waste strategy also aims to maximise recycling and to reduce the need to transport waste. In terms of pollution, these matters are addressed through development area and special area policies and through work on air quality management.
Further Details:
Please take this golden opportunity to do more to strengthen public transport links (particularly rail) to our wonderful national park and making the public transport experience a whole lot better e.g. more bus prioritisation and better bus shelters

Statement of Changes:
As above

Officer Response:
Your comments on improving public transport access to the National Park are noted and welcomed. Improving links to the National Park are outlined under section B4 of the policy (Walking and Cycling) and under part 6 of policy SA6 South Downs.

Further Details:
The University supports the principle of Policy CP8 (standards for sustainable building design) and Policy CP9 (sustainable transport provision) and the council should be aware that it takes sustainable development of its campus very seriously. The University's senior management had initiated and gives full support to its Environmental Management System, EcoCampus that sets a robust framework to manage and improve the University's environmental performance in a sustainable manner through challenging targets for reductions in carbon emissions, water use, transport, construction and refurbishment. Amongst these measures is its successful campus wide travel plan that encourages access to the campus by staff, students and visitors through more sustainable modes of travel.

Statement of Changes:

Officer Response:
Your approach to environmental management of the University of Sussex campus is supported by the city council and your comments are welcomed.
Further Details:
From a cyclist's perspective I find it extremely difficult to get from my home in the Preston Park/Fiveways area to the seafront by bicycle. In particular navigating the Level and Valley Gardens, and where they adjoin Lewes and London Road. The cycle lanes aren't continuous, and are punctuated by too many pelican crossings and barriers. Where the cycle lanes meet Edward St they run out entirely. I am put off taking my kids to the seafront by bike as the whole area is a vast dangerous and confusing traffic interchange/contraflow. I can easily imagine a dedicated cycle lane through this area if the proposal to close the West side of Valley Gardens is accepted.

Statement of Changes:
Looking at the city cycle network map, there is a red and white line running along the sea front which is fantastic, but it isn't unified with the rest of the city. What I'd like to see is cycle lanes connecting up with the seafront route, running into the heart of the neighbourhoods and communities in Brighton. I understand the physical difficulty of this but do think it would make cycling a possibility for so many more than at present. The best incentive of all to get people cycling would be by offering a safe, direct, and pleasant to use cycle lane to the sea front, central shopping area, the Lanes etc.

Any Other Comment:
All the recent developments such as the Old Shoreham Road cycle lanes and the upcoming Lewes Road cycle lane are great and a positive changes. It does seem the more challenging tasks are being left aside though. I can easily see Brighton and Hove becoming a major cycling city if the outer fringes had a free path into the centre and the sea front. The appetite certainly is there.

Officer Response:
Your comments are noted and welcome.

Your concerns regarding uncontinuous bus lanes are noted. One of the aims of the policy is to provide a comprehensive and joined up cycle network within the life of the Plan (by 2030) that will address the issue you have raised. Your detailed concerns regarding crossings etc will be passed to the relevant Team.
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<td>Hyde is fully supportive of the council's ambition to increase the use of sustainable modes of transport (as set out in Policy CP9), and feels strongly that housing and wider development can play a key role in helping the council achieve this goal. The Supplementary Planning Document referred to in paragraph 4.116 should take a pragmatic approach to parking provision which could achieve car-free or higher density housing in the right locations. Providers of housing can play a role in supporting existing residents in transferring to more sustainable forms of transport. At new development Ebenezer Chapel, Hyde held workshops with residents on car-sharing and creating personalised travel plans which avoided the use of the car.</td>
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<td>Your support is noted and welcomed.</td>
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<th>Your comments regarding the Parking and Accessibility supplementary planning document are noted.</th>
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| Your promotion of sustainable travel is very welcome and the city council looks forward to working with you in the future. |
Further Details:
1. We support the promotion of integrated sustainable transport system for improvement of health etc.
2. Improvement in east-west bus services from the London Road area
3. Better integrate rail with other modes

Statement of Changes:
1. This aim should also include the reduction of air and noise pollution
2. Improvement in east-west bus services from the London Road area
3. Promotion of transfer of journeys from car to rail should also include work with rail companies towards better provision for visitors travelling by train - eg capacity to carry luggage, children's buggies, wheelchairs, and, given work to promote Biosphere status and provide no car access to the South Downs National Park and given aim at
4. To provide an integrated cycle network, to carry bicycles.

Any Other Comment:

Officer Response:

Your support for the policy is welcomed.

In terms of your concerns, the aim to reduce air and noise pollution are addressed as part of the introductory policy strategy and the overarching aim of the policy to promote a modal shift. Individual development and special areas address pollution where an issue has been identified.

Your other comments are noted.
Further Details:

In general, we agree with the suite of measures detailed in the policy and believe that the encouragement of sustainable transport modes will have a positive impact on the City and the wider region, including in Lewes District. For the same reason we are supportive of the approach, given in SA1, to improve sustainable transport options on the A259.

In principle, we think it is logical to make better use of large car parks on the periphery of Brighton to encourage journeys to be transferred from the private car to trains and buses.

Where such car parks exist either within, or on the boundaries of Lewes District, we do though ask that the District Council has the opportunity to input into the detailed proposals for any such schemes and can consider the impact on local amenities and residents.

Statement of Changes:

Any Other Comment:

The comments have been prepared by officers in the Planning Policy Team, in consultation with Ward Members who neighbour your authority, and are endorsed by the Lead Councillor for Planning, Cllr Jones.

Overall, we are supportive of the approaches detailed in the DCP and generally agree that they should help address a number of the identified issues.

Officer Response:

Your support for the policy is noted and welcomed.

The city council will work with Lewes District Council to take forward cross boundary transport and travel initiatives.

Further Details:

Sustainable transport - vital for culture to survive and be a key economic business in the city.

Statement of Changes:

Any Other Comment:

Officer Response:

Your point is noted.

The City Plan aims to promote and encourage sustainable travel.
**Further Details:**

DA1: Brighton Centre and Churchill Square Area

The development aims for this important part of Brighton are consistent with the strategy for a prosperous city, if they can be achieved.

Our main concern is that similar aims have been around for some time, but have not been achieved. While a single all-encompassing development project may be the most desirable outcome, we are concerned that continued failure to achieve it could blight the area.

Paragraph 3.3 states that a “priority will be to ensure that redevelopment of the Brighton Centre delivers new retail floor space as an extension of Churchill Square. This linking of two separate development objectives increases the risk of blight. The Plan should allow for the possibility of a more piecemeal approach to development.

The visual impact of the existing Churchill Square buildings in Cannon Place and Russell Road is the very opposite of good urban design. We hope that whatever new developments are approved in the area will significantly improve on this precedent.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The Society's concerns about the likelihood of bringing forward an all-encompassing development are noted. The policy does not preclude a flexible approach to development in terms of phasing, and this is a relatively common issue. Flexibility, if required, can be satisfactorily addressed at a later stage.

The policy is clear that a high standard of design for both buildings and the public realm is required. This should ensure a significant enhancement to the appearance of this area and improvements in the relationship to the surrounding historic city centre areas.

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**Further Details:**

We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Paragraph 3.149 has been amended to add references to how the policy will help to deliver the One Planet Living principles.
Further Details:

Standard Life Investments (SLI) supports the Plan’s objective of directing the provision of new retail floorspace to the City’s existing retail centres, in particular Brighton regional centre where Churchill Square is located and where the most significant opportunity for its expansion lies.

The retail needs study has identified capacity for 58,313sqm of comparison floorspace and 2967sqm convenience floorspace.

SLI supports the allocation of Churchill Square as the preferred location for additional floorspace however 20,000sqm is too low and is not viable and does not relate to the findings of the Retail Study. This reflects that a major anchor store would account for 12-15,000 sq m alone which would leave insufficient floorspace (5-8,000 sq m) to accommodate shop units and MSUs. This balance of department store and other retail floorspace is unsustainable and unviable as there needs to be a significantly higher quantum of MSU and unit space. Therefore the 20,000 sq m figure should be amended to 40,000 to 50,000 sq m. This figure is not only consistent with the identified need but also consistent with reinforcing Brighton's role as regional centre after no major retail development for a significant period of time despite expenditure growth.

DA1 Brighton Centre and Churchill Square Area

The introduction does not recognise DA1 as being the main retail floorspace allocation in the City. We suggest the addition of the following wording: extension of the Churchill Square Shopping Centre which will be the primary retail allocation over the plan period

SLI supports the identification of additional new comparison goods retail floorspace. However;

(a) The quantum of floorspace identified (20,000 sq m) is insufficient to either meet demand or create a viable development. This should be replaced by 40,000 – 50,000 sq m.

(b) This part of the allocation should be amended to reflect the opportunity for convenience goods floorspace as well as A2/A3 and A4. This reflects that there is an opportunity to incorporate high quality bars, to reflect the quality and management of the existing centre.

A.5. The reference to high quality and sustainable transport facilities is imprecise and should be explained.

A.6. The redevelopment of the Brighton Centre and the extension of Churchill Square Shopping Centre will be based on a seamless extension from Western Road southwards. It should be clarified that cycle access will be primarily north-south rather than east-west in this urban block.

1. New Brighton Centre and Expansion of Churchill Square

Amend to:

“... (and A2, A3 and A4 use classes). The site is also suitable to accommodate additional convenience goods floorspace. New...”

b) If this site is a retail allocation, there is no need to undertake a Retail Impact Assessment. The site is identified (at present) to accommodate 20,000 sq m of additional A1 comparison goods floorspace and is thus the principal means by which the Council will be able to accommodate that need. Furthermore in paragraph 4.47, which considers proposals for new retail floorspace in edge or out of centre locations, the impact on the delivery of the Brighton Centre and Churchill Square redevelopment is a key consideration. That can only be a consideration if that site (Brighton Centre/Churchill Square extension) is allocated and not being treated inadvertently as edge of centre. The Council is adhering to the good practice guidance in 4.9:

“A key component of a pro-active approach to meeting town centre needs is the identification of appropriate sites together with policies to bring forward new development. Where local authorities have identified quantitative and/or qualitative needs for retail and other main town centre uses, they should actively examine existing and potential sites within centres, or on the edge of defined town centres. Also they should consider the scope to expand existing centres and promote new ones.”

The DA1 allocation is consistent in that it is seeking to expand the centre within a defined area. It would not be expected that such an allocation would be required to follow the tests applied to a non-allocated edge of centre site. Therefore the sentence beginning “Edge of centre...” is contrary to the NPPF and the retained Practice guidance on need, impact and the sequential approach (December 2009) and should be deleted.

Statement of Changes:
Your comments are welcome and duly noted. The Retail Study Update 2011 does identify capacity for 58,313 sqm comparison floorspace and these figures are derived by increasing the market share at 60% to 70% in order to secure the position of the regional centre. In calculating the increase in market share Table C1.7 of the Retail Study reflects the future redevelopment of the Brighton Centre which will increase the net additional retail floorspace by at least 20,000 sq m. Policy DA1 is clear that 20,000 sqm is a minimum amount to be delivered and does not preclude any additional amount of comparison retail to come forward. It remains important that any increase in floorspace is consulted upon and tested through the planning application process. In addition it would be inappropriate to increase the amount of development so significantly without further consultation.

It is felt that the policy as a whole recognises that the DA1 is the primary focus for new retail development and therefore no changes to the text of the policy will be made. Additionally, policy CP4 identifies that the Regional Centre should be the focus for future significant retail development.

The retail study states that there is no identified capacity for additional convenience floorspace in the short to medium term. In the light of this there is not any need to plan for additional convenience retail and therefore allow for it at Churchill Square.

The SPD for the Brighton Centre will provide more precise detail on cycle access.

The Retail Study is clear that it recommends that the Council should continue to support the delivery of a scheme at the Brighton Centre and that this capacity should be directed into the redevelopment of this area through the city plan. To ensure the future development of the Brighton Centre and possible extension to the prime retail frontage boundary to include this area, we consider that any application for additional comparison retail that would impact on the delivery of this development should not be permitted.

The Retail Study also states that on completion of the re-development of the Brighton Centre the Regional Shopping Centre boundary and prime retail frontage designation should be extended to include the retail elements of this scheme.

In relation to part 1b) of the policy the text of the policy has been amended to state that applications for edge of centre proposals will be determined in accordance with policy CP4.
Further Details:
The Brighton Society recognises the need for a new conference centre to compete with facilities elsewhere in the country, and we welcome the Plan’s commitment to "high quality building design and townscape."
We would also welcome a pedestrian link between the Churchill Square shopping mall and the seafront; however such a link has failed to work in the past so plans for a new one would need to be convincing.
We strongly question the need for additional shopping floor space. High street retailers are struggling to hold their own against online competitors and there are empty shops in the existing mall and nearby. It is true that there is currently a recession, but we believe that the proposed extension to the Mall would result in the permanent loss of shops in nearby streets.
We are also strongly opposed to the creation of any further closed off areas in the city centre, that is areas which cease to be public spaces once the shops close in the evening.

We welcome the commitment to improved public safety in and around West Street.

Statement of Changes:
We consider that a policy should be specifically included in section DA1 to improve the appearance and visual quality of the urban environment and townscape in Cannon Place and Russell Road as part of any redevelopment proposals in this area. Both streets are urban disaster areas.

We do not think any more tall buildings are appropriate in this area. Refer to our response to Section CP12 Urban Design.

Any Other Comment:
Finally, we are concerned that the planned development of the area seems to rely on an agreement between a number of different landowners. Such agreement has not been achieved in the past and there is a risk that continuing failure will result in ongoing blight for the area. For this reason we believe that the Plan should be drafted to allow clear flexibility for the independent development of different parts of the Seafront and Churchill Square sites, if necessary.

Officer Response:
The Society's support for a new conference centre and high quality design is welcomed.

The policy seeks to improve pedestrian and cycle access through the area and to reduce the barrier created by the A259. This issue is also picked up in the adopted supplementary planning guidance for the site. Your comments that such links have previously failed are noted. However, this issue will be fully explored and improvements incorporated within the scheme.

Your comments on the need for retail floorspace and changing shopping patterns are noted. The retail floorspace figures are based on the council's 2011 Retail Study Update, which identified some additional need over the plan period up to 2030. This need is reflected in the policy.

The views of Brighton Society on lack of public access to certain parts of the city centre outside normal opening hours are noted. The council recognises this issue and the policy specifically seeks improved "permeability and connectivity" with regard to the Churchill Square and Brighton Centre redevelopments. Similar wording has been added to Part A of the policy to reflect the wider city centre.

The DA1 area is identified as a 'tall buildings node' in the council's adopted Supplementary Planning Guidance Note 15 on Tall Buildings. Reference to a possible tall building is also made in the Brighton Centre Supplementary Planning Document. The supporting text to policy DA1 refers to exploring "opportunities for a tall building" and it is not proposed to alter this text. However, the earlier historic townscape in this area has clearly been significantly harmed by Churchill Square and the Brighton Centre. We note your comments about Russell Road and Cannon Place in particular. The council will be working to ensure that any redevelopment in this area achieves a very high standard.
of urban design, respects adjoining conservation areas and enhances the surrounding townscape.

The support for public safety improvements around West Street is welcomed. Policy SA2 gives more clarification on how this will be achieved.

The concerns about bringing forward development involving a range of landowners are noted. However, the policy does not preclude a flexible approach to development in terms of phasing, and this is a relatively common issue. Flexibility, if required, can be satisfactorily addressed at a later stage.

Customer No: 175  Customer Name: Chris Todd
Organisation: Brighton and Hove Friends of the Earth

Support Status: Partly Support
Policy: DA1 - Brighton Centre and Churchill Square Area

Further Details:
Include Russell Square car park to enable regeneration proposals.

Local Priorities should recognise need for better cycle parking provision. Bus shelters in Churchill Square not fit for purpose given the large numbers of people that use them.

More ambition to tackle air quality problems on North Street and Western Road. Remove north-south travelling traffic through clock tower to allow better flow of buses, better air quality and improved pedestrian environment.

Changes at the Clock Tower could also be linked to creating a New Road style approach in West Street, north of the entrances to the Churchill Square car parks, which would help create a stronger linkage between The Lanes and Churchill Square and boost the area economically.

Statement of Changes:

Any Other Comment:

Officer Response:
An error on the map on page 28 showing Churchill Square (Area D) has been corrected. The earlier inaccurate boundary has been extended to include the whole of the shopping centre and the car park. However, the strategic allocation boundary already included Russell Square car park and this is likely to form part of any redevelopment scheme for Churchill Square and Brighton Centre.

As you state, sustainable transport improvements will need to be addressed in developing proposals for Churchill Square and Brighton Centre. Detailed plans for the redevelopment have yet to be drawn up and it is therefore not possible at this stage to be more specific. It should be noted though that the policy specifically requires "high quality public and sustainable transport facilities" and that policy CP9 contains further guidance on provision of sustainable transport.

The Friends of the Earth suggested improvements to West Street and the Clock Tower area are welcomed. Wider issues, such as traffic management, pedestrian flows and air quality will be addressed through policies, including DA1, City Plan Part 2 and the Local Transport Plan.
City Plan Part 1 Responses Received 27th May to 20th July 2012

Customer No: 192    Customer Name:

Organisation: Tesco Stores Ltd    Support Status: Partly Support

Rep Number: 1    Page/Para: /    Policy: DA1 - Brighton Centre and Churchill Square Are

Section/Supporting Doc/Annexes

Further Details:
The range of uses identified should include (or maintain) support for appropriate provision of new retail floorspace to meet local needs and encourage sustainable shopping patterns.

Statement of Changes:

Any Other Comment:

Officer Response:
Policy DA1 seeks the extension of Churchill Square shopping centre to help deliver the additional comparison goods floorspace identified in the council’s recent Retail Study and to enhance the role of the Regional Shopping Centre. Whilst the shopping centre has a regional catchment, it also clearly serves local shopping needs and, given its city centre location and easy accessibility by a variety of means of transport, it encourages sustainable shopping patterns.
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Further Details:

I've looked at City Plan Part 1 at the Jubilee Library. Also at the Implementation Summary.

My comments are:

1. I'm very impressed with the thoroughness of Part 1. Also with how well and clearly it's written. I'm delighted to be given the opportunity to look at and comment on it, but I do wonder how practical it is for most people to read through a plan that's 200 pages in overview alone. I was a bit confused by the Implementation Summary, though. There doesn't seem to be any logic to the order of the activities and I wondered if some section headings are missing.

2. The Brighton Centre/Churchill Square Development Area section refers to 'strategic allocation', and I didn't understand what this means. The glossary doesn't provide a definition of 'strategic allocation' and it doesn't seem to be explained anywhere else in the text. I assume that 'strategic allocation' just means 'the bit affected by the plan' but it isn't clear. (My home borders the Brighton Centre/Churchill square Development Area - the boundary of this area literally goes through my back yard. Hence it's important to me to understand the significance of 'Development Area' and 'Strategic Allocation'.)

3. Regarding DA1 and SA2, there seems to be no acknowledgement that these areas are also (or are immediately bounded by) residential areas. Apart from my obvious self-interest as a city centre resident, thriving and characterful city centres are not solely focused on commercial activity.

There is lots of reference to the importance of 'mixed use' in relation to new development, but retaining and respecting the mixed character of existing areas is also important.

Statement of Changes:

Any Other Comment:

You might need to know that I tried to send my comments via the website but seemed to keep reaching dead ends. In the process of trying to find how to send comments via the website, I came across the 'Consultation Portal' and saw a download called 'Reviewing a Research Proposal'. I looked at this because I'm a research professional (buyer and supplier) myself. In case you're not aware, the version you have published relates only to academic research proposals. It doesn't relate to proposals that a client receives in response to an Invitation To Tender. An academic proposal is one where the researcher has an idea for research and submits a proposal to a potential sponsor. A proposal received in response to an ITT is one where the client needs to commission research and is looking for a suitable supplier. The review processes and proposal contents are substantially different. I've published a short guide to assessing commissioned research proposals and you're very welcome to a (free) copy of it. It's been peer reviewed and published as a free download on an independent research association's website.

Officer Response:

Thank you for your comments about the length and legibility of the City Plan. We recognise that it is a substantial document. Although we have carried out consultations on the whole plan, it is not though a document that will be read in its entirety by many people. For most, reference to a few key policies that affect a specific proposal will be sufficient. Your comment about a definition of "Strategic Allocation" is noted and this will be added to the Glossary.

Residential and mixed use schemes play a key role in developments within city centres. References to residential uses have been added to policy SA2 in response to your comments. However, the focus of policy DA1 is on the redevelopment of Brighton Centre and Churchill Square and, although there are residential uses within strategic allocation boundary, further housing is not specifically proposed by this policy.
Further Details:

We accept the need for redevelopment in this area to address poor environmental quality and to introduce a broader mix of land uses providing greater benefit for the city’s residents. Any redevelopment needs to be justified on economic and environmental grounds and meet the tests of sustainability. It should also be carried out on a selective phased basis so that the area is not blighted by large-scale construction over a long period. A large comprehensive development in this area would cause extensive disruption and degradation of the city centre over several years.

The presumption in favour of redevelopment of the Brighton Centre and the Kingswest block would need to be justified by economic and environmental analysis. These buildings currently provide valuable facilities for the city. The Brighton Centre is a well-used large venue and the Kingswest block provides the only multiplex cinema in the city centre. Both buildings are well maintained, fully functional and clearly have a considerable useful life. Neither block has architectural merit but both have potential for extension, remodelling and refurbishment.

We are particularly concerned about the concept of including a hotel in a redevelopment. Any hotel development in this area could well be a tall and massive building. Our Conservation area is enhanced by long views down to the sea. These have already been damaged by developments such as the West Pier Hilton and Chartwell Court. We would be opposed to the construction of tall buildings which would further impede views from our area.

It is our view that the most pressing need is for intervention to put right the damage caused by the development of Brighton Centre during the 1970s. This destroyed the east side of Russell Square, replacing a valuable historic street façade with a multi-storey car park, a housing tower block and an over sized access road serving only as access to car parking. At the same time Russell Road has been made a hostile environment for pedestrians by the predominance of service areas and car park frontages.

To remedy this environmental damage selective and sensitive developments are needed to -
# restore the east side of Russell Square with a new building of sympathetic scale and design.
# use constructively the underused and unsightly land on the east side of Cannon Place
# change the use of the multi-storey car parking on the north side of Russell Road to commercial and/or residential. This would restore normal activity to the street and improve its safety and attractiveness.

Statement of Changes:

Any Other Comment:

Officer Response:

Your broad support for redevelopment in this area to improve environmental quality and variety of land use is welcomed. High quality environmental design is specifically sought in the policy and economic reasons are clearly also key to the policy allocation.

The Association's recognition of the ongoing importance of Brighton Centre and the Kingswest Centre to residents and visitors is noted. Any redevelopment would cause temporary disruption over the construction period. However, as policy DA1 states, the longer term benefits in securing the city's position as a conference destination in future are highly significant.

We recognise your concerns about a tall building and the harm caused by Chartwell Court and the West Pier Hilton. However, the DA1 area is identified as a 'tall buildings node' in the council's adopted Supplementary Planning Guidance Note 15 on Tall Buildings. Reference to a possible tall building is also made in the Brighton Centre Supplementary Planning Document. The supporting text to policy DA1 refers to exploring "opportunities for a tall building" and it is not proposed to alter this text. Key views and the impact upon the surrounding conservation areas will be prime considerations in developing the proposals.
City Plan Part 1 Responses Received 27th May to 20th July 2012

The earlier historic townscape in this area has been significantly harmed by Churchill Square and the Brighton Centre. We note your comments about Russell Road and Russell Square in particular. The council will be working to ensure that any redevelopment in this area achieves a very high standard of urban design, respects adjoining conservation areas and enhances the surrounding townscape.

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Further Details:

I received a leaflet through the door regarding Toads Hole Valley development, and have read your guide to City Plan Policies.

I am in agreement for some commercial new development at:
1. New England Quarter and London road
2. Brighton Centre and Churchill Square
3. Brighton Marina and Black Rock

Statement of Changes:

Any Other Comment:

Officer Response:

Support for new commercial development at Brighton Centre and Churchill Square welcomed.
DA1 Brighton Centre and Churchill Square Area
This area should include Russell Square car park in the strategic allocation as it would provide more opportunities for expanding the retail offer at Churchill Square or other facilities associated with the new conference centre. No extra car parking should be allowed. Substantial cycle parking and better bus interchange facilities (shelters and information) need to be provided for this area and need explicit recognition in the policy. More ambition also needs to be shown around the Clock Tower to remove or minimise north-south private vehicle movements so as to improve bus flows and air quality and the pedestrian environment in the area. This could be done by making West St a pedestrian priority area like New Road north of the Churchill Square car parks which could also lift the area economically.

Statement of Changes:

Any Other Comment:

Officer Response:

An error on the map on page 28 showing Churchill Square (Area D) has been corrected. The earlier inaccurate boundary has been extended to include the whole of the shopping centre and the car park. However, the strategic allocation boundary already included Russell Square car park and this is likely to form part of any redevelopment scheme for Churchill Square and Brighton Centre.

Sustainable transport and parking will be key issues to be addressed in developing proposals for Churchill Square, Brighton Centre and the surrounding area. Detailed plans for the redevelopment have yet to be drawn up and many factors will feed into an assessment of appropriate sustainable transport arrangements and car parking levels for the scheme. It is therefore not possible at this stage to be more specific. It should be noted though that the policy specifically requires "high quality public and sustainable transport facilities" and that policy CP9 contains further guidance on provision of sustainable transport. The Partnership's suggested improvements to West Street and the Clock Tower area are welcomed. Wider issues, such as traffic management, pedestrian flows and air quality will be addressed through policies, including DA1, City Plan Part 2 and the Local Transport Plan.
Further Details:

Strategic allocations in DA1 and DA2 should be phased. Black Rock should be developed before the Brighton Centre. DA1 and DA2 should not be planned in isolation. The proposals contain some fine aspirations, but the current Brighton and Hove ‘offering’ is a set of wide-ranging music/conference venues that are able to cater for audiences from almost zero to around 7,000 (Brighton Centre). This places us on ‘The Circuit’ for most music acts: this is a big draw, bringing in many extra ‘Economic Agents’ into the city. Using the Amex is an alternative, but limits have been imposed. We do continue to attract some ‘Major’ acts, but this has a lot to do with our ‘Image’. If the Brighton Centre is redeveloped under the assumption that Black Rock will provide us with a 10,000-seat venue, and the Black Rock development does not proceed, this will reduce the economic prosperity. The Black Rock development should be completed before the Brighton Centre is considered for re-development.

Statement of Changes:

Your comments about the importance of a variety of sizes of venue to the city and the potential problems that the loss of the Brighton Centre during redevelopment could cause for live music are noted. Clearly this concern equally applies to conferences and other current uses of Brighton Centre too. Whilst this is a significant concern, it would be for a temporary period only to allow significantly improved facilities to be provided. This is an unavoidable problem in redevelopment. It would not be practicable to secure alternative temporary facilities during this period and it is also not considered reasonable for the policy to require Black Rock development to be completed before the Brighton Centre redevelopment commences.

Officer Response:

Your comments about the importance of a variety of sizes of venue to the city and the potential problems that the loss of the Brighton Centre during redevelopment could cause for live music are noted. Clearly this concern equally applies to conferences and other current uses of Brighton Centre too. Whilst this is a significant concern, it would be for a temporary period only to allow significantly improved facilities to be provided. This is an unavoidable problem in redevelopment. It would not be practicable to secure alternative temporary facilities during this period and it is also not considered reasonable for the policy to require Black Rock development to be completed before the Brighton Centre redevelopment commences.

Further Details:

Role of art & design in creating an attractive public realm; the role of cultural provision in providing a vibrant and diverse night time economy- also links here with health to provide alternatives to drinking culture.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted. Art clearly has a role to play in creating the "state of the art convention facility incorporating the highest standard of environmental design" sought by the policy. References to "legibility" and "permeability" have been added to part A.2 of the policy. Part A.4 has also been amended to refer to actions to diversify the evening economy.
Further Details:
We question the need for additional shopping floor space as the high street is struggling and not likely to recover. This is not only due to recession but due to people buying more online. Any extension to the shopping mall in Churchill Square would result in a loss of shops in nearby streets.

We would not support a tall building on the seafront (replacing the Brighton Centre) leading from Churchill Square. The townscape here is important and much of it has been spoilt by tall buildings.

A pedestrian link from Churchill Square to the seafront would open up the area.

We welcome improved public safety in and around West Street but it is not clear how a more ‘diverse evening economy’ will be achieved.

Statement of Changes:

Any Other Comment:
P28: remove the word ‘landmark. This is a term often used by developers to justify tall buildings. I heard this term frequently expressed by those speaking on behalf of the developers of the proposed Beetham Tower to justify a building which would have towered over Brighton.

How will a more diverse evening economy be achieved?

Officer Response:
Your comments on the need for retail floorspace and changing shopping patterns are noted. The retail floorspace figures are based on the council's 2011 Retail Study Update, which identified some additional need over the plan period up to 2030. This need is reflected in the policy.

The DA1 area is identified as a ‘tall buildings node’ in the council's adopted Supplementary Planning Guidance Note 15 on Tall Buildings. Reference to a possible tall building is also made in the Brighton Centre Supplementary Planning Document. The supporting text to policy DA1 refers to exploring “opportunities for a tall building” and it is not proposed to alter this text. However, the earlier historic townscape in this area has clearly been significantly harmed by Churchill Square and the Brighton Centre. The council will be working to ensure that any redevelopment in this area achieves a very high standard of urban design, respects adjoining conservation areas and enhances the surrounding townscape.

The support for public safety improvements around West Street and a link from Churchill Square to the seafront is welcomed. Policy SA2 gives more clarification on how public safety will be improved and further detail will be developed over time and through partnership working.
Further Details:
Section A point 1 - add something about role of art in that point - legibility and public realm and the importance of those
Section A point 4: add role of cultural provision in diversifying the evening economy as part of the offer
Section B 3.2 or 3.3 - add point about role of art in any development or design - need to ensure a unique and distinctive conference centre for the city

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted. Art clearly has a role to play in creating the "state of the art convention facility incorporating the highest standard of environmental design" sought by the policy. References to "legibility" and "permeability" have been added to part A.2 of the policy. Part A.4 has also been amended to refer to actions to diversify the evening economy.
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<td>Section/Supporting Doc/Annexes: Part Three: Development and Special Area policies</td>
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### Further Details:

THE COMMITTEE WELCOMES THE PROPOSALS FOR IMPROVING THE ENVIRONMENT IN THIS AREA, SPECIFICALLY:

- The replacement of the Brighton Centre with a new convention facility
- The commitment to high quality building design
- The creation of a balanced night time economy
- The creation of a gateway link between Churchill Square and the Seafront
- The creation of a high quality landmark building in the area

### Statement of Changes:

We feel that the aim of using the redevelopment of the area as a way to enhance and consolidate Brighton’s role as a primary Regional Shopping Centre within the South East is mistaken as:

* With only 500,000 sq ft of retail space Churchill Square is only number ten in the region for size
* All regional competitors are situated near motorway or near-motorway junctions - unlike Churchill Square

The plan should then acknowledge that Churchill Square is a shopping centre that primarily serves existing residents and visitors - in which case the way ahead would be improvements in quality and value added per square foot of retail space

However we would underline the importance of efficient traffic management in order to mitigate chronic congestion in the area. These could include better flow of traffic to and from car parks, better information on entering Brighton of availability and non-availability of parking space, and separation of traffic flows into and out of the city.

We would point out the importance of ensuring that new building design is of a sufficiently high quality and uses imagery that respects and enhances the character of the seafront area as it is.

### Any Other Comment:

### Officer Response:

The Society's support for the redevelopment of Brighton Centre, for a scheme of high quality design and for the formation of a link between Churchill Square and the seafront is welcomed. Your positive comments about the creation of a more balanced night time economy are also gratefully received.

The Society's comments on the size of Churchill Square are noted. However, the Regional Shopping Centre designation covers the whole city centre retail area, rather than just Churchill Square itself. This location offers more sustainable transport options than a shopping centre located on or close to a motorway junction. The city centre retail area, including Churchill Square, serves both local shopping needs and those of visitors to Brighton and Hove. The proposed extension would help to meet the needs of both residents and visitors.

The policy does seek high quality public and sustainable transport facilities, improved pedestrian and cycle access and to address the barrier formed by the A259. Other policies within the City Plan, particularly CP9, also seek improvements to sustainable transport and traffic management. Whilst policy DA1 is considered sufficient to tackle this issue in relation to Brighton Centre and Churchill Square, the Society's comments are noted and will inform the redevelopment proposals.
The redevelopment of any shopping mall on the scale proposed for Churchill Square would usually be accompanied by an increase in parking provision.

The plan should make clear whether this is acceptable in the face of the city’s ambition to reduce its carbon footprint and, if so, what quantum of increase would be allowed.

Three years after Make Architects were appointed to design a new Centre it seems obvious that it will not be delivered in the medium term. In the interim communication about the redevelopment needs to be very carefully managed in terms of the message to market; announcements made in 2009 had a detrimental effect on enquiries and bookings.

Although largely due to the efforts of VisitBrighton and the recent physical improvements, the Centre has enjoyed a measure of success in attracting conferences, it will not be able to sustain this against competition from other national venues e.g. London, Liverpool, Manchester, Belfast etc.

Statement of Changes:

Any Other Comment:

Officer Response:

Parking will be one of the issues to be addressed in developing proposals for Churchill Square and Brighton Centre. Detailed plans for the redevelopment have yet to be drawn up and many factors will feed into an assessment of appropriate car parking levels, including proposed floorspace and sustainable transport access. It is therefore not possible at this stage to be specific about car parking requirements. It should be noted though that the policy specifically requires “high quality public and sustainable transport facilities” and that policy CP9 contains further guidance on provision of sustainable transport.

Your valid point about managing the redevelopment of Brighton Centre to avoid an adverse impact upon bookings is noted and this has been addressed in amendments to the supporting text.
Further Details:

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Statement of Changes:

Any Other Comment:

Officer Response:

Parking will be one of many issues to be addressed in developing proposals for Churchill Square and Brighton Centre. Detailed plans for the redevelopment have yet to be drawn up. Many factors will feed into an assessment of appropriate car parking levels, including proposed floorspace and sustainable transport access. It is therefore not possible at this stage to be specific about car parking requirements. It should be noted though that the policy specifically requires “high quality public and sustainable transport facilities” and that policy CP9 contains further guidance on provision of sustainable transport.

Your valid point about managing the redevelopment of Brighton Centre to avoid an adverse impact upon bookings is noted and amendments have been made to the supporting text.
Further Details:

The City Plan should recognise that the purpose of the Marina was to be a Marina. This is in the Brighton Marina Act and the Lease between the council and the head lessee. The current draft does not put sufficient emphasis on the fundamental purpose of the Marina and why it was constructed.

The Marina is in a special location is in not purely part of the city's urban area. Marina should be a leisure destination, primarily focussing on yachting and maritime activities.

The Marina has remained a sympathetic development ahead of its time and does not have an adverse impact on its surroundings. This is due to the success of keeping development below cliff height. The Widdicombe public inquiry (1975) imposed a height restriction of 49m to protect visual amenity. These original concepts should be integral to the City Plan. These material planning considerations should be just as valid today.

'Do no breach cliff height' is insufficient. Further restriction to protect views and the character of Marina is necessary.

Inaccurate to say that Marina is characterised by piecemeal development and poor public realm. This only applies to the western end of the Marina.

Brighton Marina Act restricts development above cliff height and represents a legitimate expectation upon which residents can rely.

SPG15 and Taller Buildings – this merely allows for taller buildings for Brighton Marina. It does not mandate Tall buildings. This is a crucial and fundamental difference and it hugely important.

Future development should respect, reflect and enhance the Maritime environment of the Brighton Marina and its environs.

Future development should make provision for amenity space, education and medical facilities on site. Financial contribution for areas outside the Marina should be refused.

Affordable Housing: Location of future affordable housing within the Marina should not lead to ‘ghettos’ in the least attractive areas of the Marina in future development.

Brighton Marina needs a public realm strategy, called for by PAN04. This is long overdue and has been outstanding for almost five years now.

The aspiration that the Marina is one of the main contributors to the Housing needs of Brighton is fundamentally flawed. 1,940 additional units is unacceptably high in terms of density and no evidence that this can be accommodated below cliff height. 2,000 Flats identified is an arbitrary and wholly excessive level of additional number of extra units. This would mean an overdevelopment of a restricted site with ‘cramming’.

1940 additional units is inconsistent with keeping development below cliff height and cannot be achieved without harming the local character, environs and strategic views.

Statement of Changes:

Housing Mix : There should be more emphasis on family and 3 bed apartments. There is a preponderance of one and two bedroom apartments already. A continuation of the existing emphasis on one and two bedroom apartments will not lead to a sustainable or cohesive development. This will be contrary to Healthy and Balanced Communities.

Affordable Housing should be required to be at least to the BHCC min size requirements. (No more ‘hobbit homes’). Nor should they be of inferior quality, specification and be poor in air light and space.

South Downs National Park – full account of this Area of Outstanding Natural
Beauty and the impact of Brighton Marina on this now and for any future development should be a high priority. No development at Brighton Marina should have a negative impact on this AONB both from within and without the South Downs National Park.

It should be clearly stated that:
1. the distinct nature and character of the Marina as a marina will be protected and this is paramount
2. Development at the Marina should in general be no denser or higher than the existing development at the eastern end
3. no building above cliff height will be permitted and the protection of views, local character and environs will be regarded as mandatory and nonnegotiable
4. further that taller building in the Marina (circa 18 metres) is unlikely to comply with the above and thus not permitted
5. a target for residential units (ie considerably fewer than the 2,000 specified) needs to be established which can be reconciled with keeping the Marina as a Marina, which does not impinge on the local character, its environs or harms visual amenity or important strategic views.

[In addition such a target needs to be established in a rational, well considered, demonstrably robust manner which is not arbitrary nor at the behest of political whim or dogma.]

**Any Other Comment:**

**Officer Response:**

Your comments are noted and welcomed.

The city council is required to identify sites for housing development to meet challenging targets to meet housing the city's full housing needs. Brighton Marina has been identified as having significant potential for housing development whilst required to respect the character of the area, be of a high standard of design and improve public realm and community facilities in the area. It is considered that the restriction on development above the cliff height is sufficiently clear and concise. However this restriction will not apply to the extant planning permission for development on the outer harbour.

Capacity assessments indicate that the number of residential units sought through policy DA2 can be built below cliff height.

In terms of the National Park, this status has now superseded the AONB designation. Any developments near to the National Park will be required to meet the criteria set out in policy SA5 South Downs.
### Further Details:

**SFRA**

Issues with BH SFRA bought to the council's attention on 17th Feb 2012, which was enclosed with representation. The Brighton Marina Company Limited have commissioned Peter Brett Associated to conduct a FRA and would like these taken into account.

**Regeneration**

We welcome and share the council's aim to ensure comprehensive regeneration of the Marina. You note that you plan to work in partnership with the different landowning interests and update the current masterplan and we welcome this.

**Tall buildings**

Constraints of site levels and restrictions of land ownership should be taken into account. There is a danger that regeneration proposals, whilst ambitious, are financially unviable and thus practically unachievable. In order to prevent this we suggest that the restriction on building above cliff height is removed.

Additional reasons for this are as follows:

* The right to build above cliff height is enshrined in the Brighton Marina Act
* B&HCC own tall buildings strategy identifies the Marina as a suitable location for tall buildings.
* B&HCC own Marina Master Plan (PAN04), identifies the site as suitable for tall buildings
* B&HCC have already granted permission for 11 buildings above cliff height
* B&HCC have already given permissions, as landlords, for the cliff height to be breached

**Public realm strategy**

We support the aim for a public realm strategy for the Marina and agree the need for comprehensive design guidance for developers, focussing particularly on pedestrian routes and connections is of benefit to Brighton Marina.

In conclusion we would like to thank you for the comprehensive City Plan and share with you the desire to play our part in the regeneration of Brighton & Hove.

### Statement of Changes:

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been noted and considered. No amendments to the policy are required. The role of the SFRA is to advise the local planning authority on locating development in the areas at lowest risk of flooding. The City Council has an interest in ensuring the SFRA is accurate as it is allocating the Marina for new development. Detailed flood risk assessments are required for individual development proposals in areas of higher flood risk which might show different findings from the SFRA at the time a planning application is made.

Proposals for development that breach the cliff height will need to demonstrate that this is required to deliver the regenerative benefits outlined in policy DA2 in order to justify a departure from the policy as currently worded.

Policy DA2 commits to an updated master plan in the form of a Supplementary Planning Document (SPD). Further information regarding a public realm strategy will be detailed in the SPD.
I am NOT in agreement for major housing development at Toads Hole Valley, Brighton Marina, the Seafront and New England Quarter.

I gather you hope to plan for over 11,300 new homes over the next few years.

1. How are you going to supply water for all these homes. We already do not have enough water to supply the area with the present population.We will have continual drought restrictions if you go ahead with these proposals.

2. The city is congested at the moment. With another say 25,000 population and additional cars, the city will become even more congested.

3. I know a number of people from surrounding areas are not shopping or visiting Brighton any more because of high parking charges and congestion on the roads.

4. People like and come to Brighton because it is not overcrowded at the moment, but will be if you plan to build another 11,000 homes.

5. Why do you have to plan to increase in size all the time. Big is not always beautiful, as we have seen with the banks. Stand up to the government and say you only want limited new housing development. Do not let them dictate how many new homes should be built. We are already one of the most densely populated countries in Europe. Enough is enough.

6. Why are you not planning for a park and ride facility on the outskirts of brighton. What about the football stadium with existing car parking spaces unused in the week, and most Saturdays and Sundays.

7. If Brighton becomes to large it will loose a lot of its appeal, and become another urban sprawl.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been analysed and considered. Please see the response in relation to policy DA7.
The previous draft Core Strategy policy DA2 on Brighton Marina, Gas Works and Black Rock Area was amended significantly in response to two rounds of thorough public consultation. This amended policy included a requirement that future development does not breach the height of the cliff.

We are pleased that this remains in policy DA2. However, we do not believe that this statement on cliff height is consistent with the increase in the target number of additional residential units within the development area from 1,650 to 2,000. This higher number will produce a density of development that will not be in keeping with the existing development in the Marina and will have a negative impact on the character of the area. We would like to see the allocation in DA2 restored to 1,650.

We believe that Brighton Marina and Black Rock are two separate development areas and should both have a separate dedicated policy.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been analysed and considered. The number of residential units proposed assists in meeting the city's housing delivery strategy (see policy CP1). Capacity assessments show that the number of residential units sought through policy DA2 can be built below cliff height.
Further Details:

A feasibility study/capacity study and a design document accompany the representations made by NLP on behalf of X-Leisure. These documents serve to highlight that the complex land ownership issues and abnormal costs of bringing forward development at the Marina must be overcome.

The feasibility/capacity study shows that to regenerate the western end of the Marina, it is necessary to deliver in excess of 1000 residential units. The design document translates this work into a scheme on the site which would mean a development that breaches cliff height (as found acceptable by the Inspector at the appeal in 2009/10) to achieve the necessary scale. This feasibility testing supports the conclusions of the Council’s Core Strategy Site Allocations Viability Study (2012) which similarly concluded on the need to deliver more than 1,000 dwellings.

At present Policy DA2 seeks ‘a minimum of 1,000 residential units’ as part of a development which does ‘not breach the cliff height within the Marina’. The evidence shows these two objectives are not mutually compatible, and if retained would undermine deliverability of any scheme for the redevelopment and improvement of the Marina.

For Policy DA2 to be justified and deliverable, it must provide the policy platform for a scheme which delivers circa 1,300 dwellings and which would, by necessity, breach the cliff height. In line with the NPPF, wording in the policy should not be unduly restrictive.

Cliff height restriction has been waived before. Inspector commented at inquiry: “Although some buildings would exceed the current cliff height, this would not result in a conflict with current planning policy; moreover, the major shift in policy approach since the 1970s means that different considerations now apply.”

In light of this, it would be reasonable for the Council (and indeed any Inspector at the City Plan Examination) to take the same view. It would be unsound for the Plan to maintain its current approach.

Statement of Changes:

Rather than having a blanket cliff height restriction in Policy DA2, it would be more appropriate for it to acknowledge that an appropriate balance must be taken between achieving regenerative benefits and protecting key views of the cliff and sea, whilst ensuring a high standard of architectural and urban design.

Any Other Comment:

The NPPF requires local planning authorities to take a positive approach to development and not over-burden development with policy expectations. It states that Plans should pay careful attention to viability and costs in plan-making and should be deliverable. It states that sites and development should not be subject to scale of policy burdens that their ability to be developed viably is threatened.

Unfortunately, the Plan as currently framed will do just that. Unless a pragmatic approach is taken to development at the Marina, its regeneration potential will not be realised and the investment, job creation, and potential for delivery of much needed new homes will be threatened. If the Council is serious about delivering the regeneration of the Marina, and in doing so meeting its objectively assessed need for development, we urge it to reconsider the restriction on building above the height of the cliff in Policy DA2.

Officer Response:

Your response is noted and welcomed. The costs associated with complex ownership issues are acknowledged.

Policy DA2 acknowledges that in order to move towards a more viable development across the entire Inner Harbour site a minimum of 1000 residential units are specified. It is considered that restricting development below the cliff height is appropriate in this sensitive location.
Further Details:

Strategy Statement
In view of its origin and the reason for the Marina's existence as the only safe harbour of any size between Dover and the Solent there should be priority given to the provision of a safe harbour for yachting and all other uses should be subject to this.

Given the fluctuation in the cliff height throughout the Marina we would suggest adding to the end of the second bullet point 'in order to protect the historic environment and the setting of the Grade 1 listed Kemp Town Estate'.

In the fifth bullet point we would suggest reference should be made to the SSSI status of the cliffs and preserving public access to them.

We do feel the description of the Marina as a District Centre is misleading and should be abandoned in favour of the words 'a sustainable mixed use district of the City' as used elsewhere in this section and throughout the document. Due to its geography it cannot fulfill the functions of a Centre, as it protrudes out into the sea, with cliffs on the one side where it is attached to the land. As a result of this, access is limited to one road and pedestrian and cycle users and of course boats. It cannot expand its area as it is limited by the sea on three sides and the cliffs on the other. To call it a District Centre implies an expanding function and influence, which if it were to be achieved could only be in an upwards direction and so conflict with the strategic objects in Bullet points 2 and 5

A Local priorities

Part 4 - It is important CP15 be included here. Most of the Marina's surrounding areas are either historically important or the South Downs National Park which should perhaps also be specifically mentioned

Part 6 Marine uses, such as boating, surfing, fishing leisure and recreation should be given priority rather than mere emphasis in the provision of retail activity and services dedicated to this use as well as support to the increased population.

Section B

This section should be made specifically subject to the Strategy set out at the beginning of Section DA2 and include a requirement to ensure that density does not exceed the capacity of the surrounding area to withstand it

Whilst the target for completion of the additional development in the DA2 site is some 17 years distant the Royal Sussex County Hospital, which has planning permission and is scheduled to commence in late 2013 and continue for 10 years, is another very substantial development in the area. We are concerned that the effect of such an immense amount of construction in such a small area over such a long period cannot but have a detrimental effect on the Kingscliffe and Kemp Town Conservation areas. We also doubt that the only A road, the coast road, will be able to carry all construction traffic thus forcing heavy vehicles onto unsuitable roads and forcing heavy lorries, vans and other traffic into the mainly narrow Conservation Area side streets.

Supporting Text

We are unclear on the merit of a section so labelled. Would it be clearer to label these points 'Further Factors affecting the area comprised in DA2'?

3.13 This section needs to make it clear that the restriction on building above the cliff height overrides that the inclusion of the Marina in CP12 as an area suitable for tall buildings.
3.15 We cannot see why, given the physical limitations of the Marina as a District Centre, if it has to be such, the Centre cannot include all 3 sites. This at least would remove the nucleus from the sea and provide a possibility of more of the usual features such as banks, post offices and doctors' surgery.

3.16 The concept of a transport interchange in the Marina is flawed as all buses servicing the Marina terminate there and there is no other form of transport such as tram of railway to interchange with. There is also no area within the Marina suitable for a collection of large stationary vehicles that is not also used for providing access either to residential areas or commercial deliveries.

3.17 It is recognised that development of the Black Rock site may envisage other uses to recreation and leisure, so the words "The Black Rock site........in this part of the City" should be deleted.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been noted and considered.

Protection of the geologically and ecologically sensitive environment at the Marina is provided in more detail in Part A Local Priorities and in the supporting text.

Brighton Marina will continue to be identified as a District Shopping Centre to reflect the ambitions of the city council to improve the retail offer in the Marina and in response to the needs of the future population of the Marina.

With regards to heritage assets close to the Marina, Policy DA2 has been amended to make reference to Policy CP15 Heritage, to reflect the need to protect the nearby historic environment.

Policy DA2 makes specific reference to protecting and enhancing areas of marine character as well as promoting marine-related leisure.

All new major development proposals are required to undertake a transport assessment to take account of and mitigate the potential impact and cumulative impacts of construction traffic and future travel to the area.

Paragraph 3.16 of the policy has been amended from 'transport interchange' to 'high quality bus interchange' to reflect the choice of modes of public transport available.
Further Details:

1 The document contains inexact wording, open-ended requirements and conflicting aspirations.
2 There is clear incompatibility between the statement on Page 33 that:
   'The strategy for the development area is to facilitate the creation of 'Brighton Marina' by supporting proposals which:
   'Do not breach the cliff height within the Marina'
3 And the statement on Page 155, Para 1 that refers to areas (including Brighton Marina), with the potential for tall buildings defined as 18 or more metres of height (approximately 6 storeys). This open-ended statement (that first appeared in SPG 15) gave rise to a 42-storey approved application by Brunswick and an application by Explore Living
   for 17 and 28 storey towers that was refused at appeal for technical reasons to do with S106 Agreements.
4 You cannot have both - either development does not breach the cliff height or it is allowed to be any height one chooses above six storeys.
5 Developers will seize upon the reference to SPG 15 on Page 156 to put in a new application for high-rise towers on the Marina. How then will you judge such an application?
6 There has been highly vocal local opposition to breaching the cliff height, supported by Council members, but clearly no one in the Planning Department is listening or if listening is not hearing.
7 The statement on Page 35 that: 'Provision is made for a 'minimum of 1,000 residential units' on the Marina Inner Harbour Is open-ended.
   You are aware that Explore Living interpreted this as 1,302 dwelling units including a 28-storey tower, a 16-storey tower and an 11-storey tower. The Planning Department supported this in spite of the fact that it 'breached the cliff height'.
8 In short which policy will prevail in the event of a new Planning Application by Explore Living or others?

I suggest you commission a detailed masterplan showing exactly how much residential development the Inner Harbour can provide if no part of the development were to exceed the height of the cliffs. I suggest it is far fewer than 1000 DU's if you are also to meet requirements for open space, retail, commercial and recreational uses

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been noted and considered.

Proposals for development that breach the cliff height will need to demonstrate that this is required to deliver the regenerative benefits outlined in policy DA2 in order to justify a departure from the policy as currently worded.
Further Details:

Huge costs associates with decommissioning and decontaminating the site. £1.5 - £2m to decontaminate and £0.5 to relocate the pressure reduction station. This is too prescriptive, far too heavily weighted towards the provision of employment floor space, missing an opportunity to encourage retail development on this site.

Cite NPPF and requirement of local authorities to take account of viability in plan making to ensure deliverability, specifically paragraph 173, "the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."

In this instance, even if there was sufficient market demand, to develop the site for predominantly employment uses, this type of use would not provide enough land value to overcome the contraints associated with the site, and will frustrate any development coming forward. We therefore wish to remove the obligation to provide a specific quantum of employment provision on this site.

Welcome allocation of residential development which site is suitable for, once remediated. However, would like to see specific residential numbers removed as this is considered a policy burden.

Considerable amount of space available for retail development and should not be constrained to just 'ancillary'. Considerable interest from food and non-food retailers for developing the site. Suggest relocating the 4000 sq m of retail development allocated for the Inner Harbour, and instead promoting the Inner Harbour as a regional destination for leisure, tourist and destination uses. This will ensure the long term development viability of both sites and will improve connectivity and legibility with the Marina and surrounding areas.

Policy should be re-worded to ensure large scale retail development is not just constrained to the Inner Harbour but spread to include the Gas Works site. Suggest removal of 'ancillary' retail development in relation to Gas Works site.

Request policy include a variety of potential land uses including food and non-food, residential and employment floor space but for the quantum of these uses to be determined with due consideration for viably developing the site. Without these changes, the City Plan will not pass the test of soundness, as set out in paragraph 182 of the NPPF.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted and welcomed.

Your concerns regarding viability and the costs associated with remediating contamination are noted. These vary subject to the type of use proposed on the site; the degree to which the site is remediated; and the methods employed to remove contamination. More detailed information should be provided and will be considered with a development proposal for the site.

In terms of the amount of employment space proposed, one of the strategic objectives in the City Plan is to maintain a balanced and sustainable approach to accommodating growth over the plan period. This site is considered suitable for employment floorspace and this is supported by an up to date Employment Land Study. A significant reduction in the amount of employment floor space identified for the site would undermine the city's ability to meet forecast employment floorspace needs. Though variation from the policy target floorspace will be considered if sufficient evidence is submitted to demonstrate non viability.
The site lies outside a designated shopping centre which is the appropriate location for major new retail floorspace. The Brighton & Hove Retail Study 2011 does not recommend the identification of any additional district or local centres. As such significant retail development on this site would be contrary to national and local policy.

The reference to the number of residential units on the site has been amended to a minimum of 85 residential units.

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<th>Mr Andrew Coleman</th>
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<td>Part Three: Development and Special Area policies</td>
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Further Details:

Policy does not consider potential impact of coastal change on Black Rock, in accordance with NPPF. Notwithstanding the marina wall acts as a 'terminal groyne' its unclear whether the potential impact of coastal change on Black Rock (including the impact of 'coastal squeeze' on the SNCI) has been taken into account in designating the site for major development.

Statement of Changes:

Recognition that coastal change should be taken into account.

Any Other Comment:

Officer Response:

Your comments are noted. The Strategic Flood Risk Assessment (SFRA) states that the existing standard of defence along Brighton's seafront is considered to be adequate. The proposed approach to accommodating growth in the city has been screened against all types of flood risk and the SFRA has informed the Spatial Strategy.
Further Details:

The policy would benefit from clarification in terms of the need for additional retail floorspace identified in the evidence base and how this should be directed in terms of the City’s retail hierarchy. There should be clarification that the City centre and allocated sites such as DA1 should be the preferred location for new retail floorspace over as above lower order centres such as the Brighton Marina district centre. We note that the 2011 Brighton & Hove Retail Study Update recommends the designation of the Marina as a district centre.

At present the policy is drafted to reflect previous retail planning permissions.

Under B, we request the following amended wording:

‘Provision will be made for up to the following amounts of additional development to be provided by 2030.’

3.15

There needs to be clarification that there is no justification for an elevation in the status of the District Centre because this is not justified in the evidence base. This would also reinforce and be consistent with paragraph 4.44 which states that the Council intends to maintain the Marina’s district centre designation. We request the following additional wording at the end of paragraph 3.15:

‘it is not anticipated that there is a need to change the position of the District Centre in the retail hierarchy.’

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been noted and considered.

Policy DA2 allows for new ancillary retail floor space at the Gas Works and Black Rock sites to support the main uses identified for the site.

It is not considered appropriate to limit the amount of floor space for the uses identified under part B to allow for flexibility in the policy.

The Inner Harbour is identified as a District Shopping Centre and will remain so to allow for an expansion retail floorspace to serve the growing population that will result from the housing proposed for the Inner Harbour. This also make this a more sustainable community.
Customer No: 192  Customer Name: Tesco Stores Ltd
Rep Number: 2  Page/Para: /  Policy: DA2 - Brighton Marina, Gas Works and Black Ro
Support Status: Partly Object

Customer No: 140  Customer Name: Jill Sewell
Rep Number: 5  Page/Para: /  Policy: DA2 - Brighton Marina, Gas Works and Black Ro

Further Details:
The range of uses identified should include (or maintain) support for appropriate provision of new retail floorspace to meet local needs and encourage sustainable shopping patterns

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments have been noted.

Further Details:
a) Design - the sentence should end 'and reflect the unique location and surroundings of the Marina,' so as to ensure it is clear that the design as well as the durable materials must reflect the unique location. Ending the sentence with 'to reflect' could be interpreted as relating only to the materials.

Any Other Comment:

Officer Response:
Your comments are welcome and have been noted. The policy has been amended accordingly.
Further Details:

DA2 Brighton Marina
This area was previously identified as one of two sites for large scale renewable energy generation which appears to have been lost. The CSP would like to see this emphasis back in the plan.

Statement of Changes:

Any Other Comment:

Officer Response:

The suitability of the Marina for localised heat and power generation is subject to the outcomes and recommendations of the city's forthcoming Energy Study.

Further Details:

We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been noted.
Southern Water has assessed the sewerage system in the vicinity of this strategic site (please see spreadsheets submitted). The results show that the existing capacity is insufficient to accommodate the anticipated demand.

The development will therefore need to provide the local infrastructure required to connect to the sewerage system at the nearest point of adequate capacity. The location of this point will need to be determined when the development comes forward.

Ofwat, the water industry’s economic regulator, takes the view that the local infrastructure required to serve new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increased general charges.

Connection off-site is the mechanism by which developers can provide the local infrastructure required to service their sites. However, Southern Water has limited powers to enforce such connection. We therefore look to the planning authority to support this approach in planning policies.

It is important to give early warning to prospective developers regarding the need to connect off-site, as it will add to the cost of the development. Early warning will facilitate delivery of the necessary infrastructure. If the infrastructure is not delivered the sewers will become overloaded, leading to foul water flooding and pollution of the environment.

We therefore propose an additional bullet point in policy DA2.C.1 to recognise the need for local sewerage infrastructure.

**Statement of Changes:**

We propose the following text is included in policy DA2.C.1 to recognise the requirement for adequate utility infrastructure to serve the proposed development:

e) Sewerage capacity - the development must connect to the sewerage system off-site at the nearest point of adequate capacity.

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been considered and the policy has been amended in accordance with your suggested wording.
Further Details:

Marina
A priority for the Marina should be that it remains essentially and literally a marina, and the presentation of its position in the city plan (3.8, 3.9) ought to state this, instead of referring to the moorings and harbour as if a secondary feature. The poor public realm is attributed to the piecemeal process of developments, but the culprits are actually poor building design, overdevelopment and inappropriate usage.

The target for housing units will result in substandard development.
The most important principle in the stated strategy (page 33) is that any proposed schemes 'do not breach the cliff height within the marina'.

We support the local priority A10 (page 34) to conserve biodiversity and geodiversity.

Black Rock
The policy for the Black Rock Site includes a commitment to the provision of a single recreational facility (3a).

Statement of Changes:
But we see no overriding necessity for a large-scale dominant development here, and would prefer an emphasis on a development criterion of sympathy with the historic architecture and natural setting. We regret the past decision to reject the proposal submitted by the architects R H Partnership in December 2002 for the design, build, finance and operation of a Spa and Hotel.

Any Other Comment:
We welcome the plan (in Supporting text) to replace existing SPDs on the marina, and we particularly support paragraph 3.21 regarding the natural environment of the area.

Officer Response:
Thank you for your representation and your concerns are noted.

Brighton & Hove is required to meet it's full identified housing needs (over 15,000 new homes by 2030) and the strategic objectives in the City Plan support the delivery of mixed use development and the better use of land while balancing the city's other needs such as protecting its natural and historic environment. The Marina has been identified as a development area in the city that will help to meet some of the city's housing needs whilst protecting its character, improving public realm, providing community facilities and requiring a high standard of design.

Your support for other parts of the policy are noted and welcomed.
City Plan Part 1 Responses Received 27th May to 20th July 2012

Customer No: 191 Customer Name:
Organisation: Trust for Futurehealth Support Status: Partly Support
Rep Number: 3 Page/Para: 35/
Policy: DA2 - Brighton Marina, Gas Works and Black Ro
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
Part B, page 35
This policy refers to a health facility being delivered ‘within or in the vicinity of the Marina’. The Trust for Futurehealth supports this reference, but believes it should be more specific in directing health uses to the Black Rock site. The current wording of the policy leaves uncertainties as to exactly where the necessary health provision would be delivered and this may compromise the prospects of it being delivered. There is also public support for providing such a use at the Black Rock site.

Statement of Changes:
A health facility (insert: at or nearby the Black Rock site)(delete : within or in the vicinity of the Marina to be agreed with the PCT)

So that it reads:
A health facility at or nearby the Black Rock site

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments have been noted and considered. The Black Rock site has been identified primarily to deliver a leisure facility for the city. Other uses for the site, including a health facility, will be considered provided they do not prejudice the delivery of a leisure use.

Customer No: 191 Customer Name:
Organisation: Trust for Futurehealth Support Status: Partly Support
Rep Number: 4 Page/Para: 35/
Policy: DA2 - Brighton Marina, Gas Works and Black Ro
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
This policy refers to health facilities being delivered at the Brighton Marina Inner Harbour. However, the Trust for Futurehealth believes that any new health facilities granted planning permission in the future should be delivered in a coordinated fashion at the Black Rock site. Otherwise there is a risk of fragmented provision in and around the Marina.

Statement of Changes:
The wording of the draft policy should be changed to read as follows:-
Provision is made for a mixed use development comprising a minimum of 1,000 residential units, 5,000 sq m of retail development (A1-A5), 3,500 of leisure and recreation use, community facilities (including a community centre).

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments have been noted and considered. The Black Rock site has been identified primarily to deliver a leisure facility for the city. Other uses for the site, including a health facility, will be considered provided they do not prejudice the delivery of a leisure use.
Further Details:

We welcome the fact that the Gasworks site has been considered separately from the Marina and Black Rock as suggested in our response in March 2010 but the primary problem with the site remains.

In July 2009 Corby Council was found to be negligent for allowing contaminated dust to disperse over nearby homes during the regeneration of a former steelworks. Although the contaminants from steelworks and gasworks differ they share common elements known to be toxic such as cadmium, chromium, zinc and polycyclic aromatic hydrocarbons and a range of inorganic compounds containing arsenic, cyanide and thiochyanate.

The law firm Berrymans Lace Mawer, which acted for Corby Council, said at the time, ‘Even modern reclamation practices wouldn’t protect developers from this kind of potential liability. This, and other rulings [e.g. Steetly Chemical Works in 2009], have increased both the possibility of class action prosecutions for damages and the risk of future liability and consequently will do little to encourage the reclamation of any contaminated site in the UK including the Brighton Gasworks site.

Is it realistic to propose housing on this site and, if so, what allowances will be made to compensate for the cost of decontamination of the land. To what extent will the inclusion of housing on a site that may prove difficult or impossible to develop undermine the Plan's housing proposals?

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been investigated and considered. The costs associated with remediating contamination vary according to the type of use proposed on the site; the degree to which the site is remediated; and the methods employed to remove contamination. The council and the landowners are aware of contaminants on the site and current legislation requires the remediation of contaminants before redevelopment. These costs will be a consideration of future development proposals for the site and the requirements will be applied flexibly when considering the costs of decontaminating the land.
Further Details:

Marina
We strongly support the proposition that developments "do not breach the cliff height within the marina."

Since our area of concern, the East Cliff Conservation Area, is situated close to the Marina and the character of the area is affected by marine activity and quality, we are very concerned that this section of the draft city plan makes so little reference to the boats themselves or to any scope for research and innovation in marine science and engineering. The latter potential could be explored and promoted in connection with the plan's priority to conserve biodiversity and geodiversity.

We consider the Marina to have been overloaded with residential blocks, and to have competed with the city centre for similar retail and leisure amenities, to the detriment of both, and we regret the plan to continue with this policy.

Black Rock
We do not want a huge monolithic institution on this site, attracting crowds and traffic and not benefiting the appearance and routine experience of the surrounding public realm. We would prefer development schemes such as that which was submitted previously for a hotel. We are especially concerned that developments on this blighted wasteland site should follow and complement the existing character of Madeira Drive, and take full account of the proximity of important historic architecture and natural environment.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments regarding cliff height restriction on development are noted. Policy DA2 sets out local priorities for the Marina. Local priority 3 seeks to protect and enhance areas of marine character and the role for marine-related leisure, recreation and employment opportunities. 4,000 sq m of employment floor space is also identified for the Gas Works site.

Your comments regarding the residential blocks are noted. However in order for the city to achieve what is a challenging housing target (11,300 new homes by 2030) it is important that the best use is made of brownfield sites. New development within the Marina is expected to be below the cliff height and of a high standard whilst securing comprehensive improvements to the public realm and townscape.

Your comments regarding development at Black Rock are noted. The criteria for the strategic allocation for Black Rock within policy DA2 seeks to ensure that leisure and recreation development conserves the historic environment and perpetuates informal leisure uses on the seafront.
Further Details:

DA2: Brighton Marina and Black Rock Site

While the Society welcomes plans to develop the area around the Brighton Marina with housing, retail, industry and leisure facilities, we are concerned that the proposed number of dwellings would put enormous strains on existing road connections to the site; we suggest that any development must include radical improvements to the road system, such as a second road ramp to the Marina.

We believe that development on the Marina itself should generally be lower than the top of the cliff.

We are not convinced that the Marina itself is a suitable location for affordable family housing and suggest that this should be concentrated on the Gasworks site.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been noted and considered.

Your concerns regarding access to the Marina are noted. The Sustainable Transport policy (CP9) in the City Plan seeks to secure improvements in sustainable transport measures and accessibility to development areas identified in the city plan. All major development proposals will be expected to submit a transport assessment to identify the demand for travel they will create and address this by contributing to sustainable transport measures, reducing car use and where appropriate contributing towards improvements to transport infrastructure. In addition the Marina policy itself prioritises transport and access issue.

The Marina is considered suitable for affordable housing.
Part C3 of this policy refers only to leisure and recreation uses taking place at the Black Rock site, together potentially with enabling development. The Trust for Futurehealth believes that the site should be identified as having potential for a health facility. There is an accepted need for such facilities in the area and the Trust has established that there is public support for providing it at the Black Rock site. The current wording of the policy leaves uncertainties as to where the necessary health provision would be delivered and this may compromise the prospects of it being delivered.

Statement of Changes:

The wording of the draft policy should be changed to read as follows:
The Black Rock site has been allocated for 7,000 sq m of leisure and recreation purposes, not including ancillary retail and café uses associated with the primary leisure use. It is also considered that health uses could be complimentary to the proposed uses.

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments have been noted and considered. The Black Rock site has been identified primarily to deliver a leisure facility for the city. Other uses for the site, including a health facility, will be considered provided they do not prejudice the delivery of a leisure use.
Further Details:

We welcome the fact that the Gasworks site has been considered separately from the Marina and Black Rock as suggested in our response in March 2010 but the primary problem with the site remains.

In July 2009 Corby Council was found to be negligent for allowing contaminated dust to disperse over nearby homes during the regeneration of a former steelworks. Although the contaminants from steelworks and gasworks differ they share common elements known to be toxic such as cadmium, chromium, zinc and polycyclic aromatic hydrocarbons and a range of inorganic compounds containing arsenic, cyanide and thioyanate.

The law firm Berrymans Lace Mawer, which acted for Corby Council, said at the time, ‘Even modern reclamation practices wouldn’t protect developers from this kind of potential liability. This, and other rulings [e.g. Steetly Chemical Works in 2009], have increased both the possibility of class action prosecutions for damages and the risk of future liability and consequently will do little to encourage the reclamation of any contaminated site in the UK including the Brighton Gasworks site.

Is it realistic to propose housing on this site and, if so, what allowances will be made to compensate for the cost of decontamination of the land. To what extent will the inclusion of housing on a site that may prove difficult or impossible to develop undermine the Plan’s housing proposals?

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been investigated and considered. The costs associated with remediating contamination vary according to the type of use proposed on the site, the degree to which the site is remediated and the methods employed to remove contamination. The council and the landowners are aware of contaminants on the site and current legislation requires the remediation of contaminants before redevelopment. One of the strategic objectives in the City Plan is to maintain a balanced and sustainable approach to accommodating growth over the plan period. To remove the allocated uses on the site would undermine the objective of promoting economic prosperity and moving towards meeting the city’s housing needs.
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**Further Details:**

The proposal for 7,000 sqm of leisure and recreation use is historically linked to the failed scheme to deliver the Brighton International Ice Arena.

The Black Rock site now returns to the drawing board and its future development should not be constrained by the mistakes of the past. The City Plan should adopt a much more flexible approach to this site which may not preclude a leisure facility but which will allow for the wholesale consideration of other uses if such a facility fails to come forward.

It should also allow for, and encourage, the strategic consideration of Black Rock and other major seafront development sites e.g. King Alfred.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been noted and considered.

The provision of leisure facilities at Black Rock has been allocated taking into consideration the city's strategy for leisure facilities along the entire seafront. The floor space has been indicated in the policy to take account of the available land and the need for building heights to respect the adjacent East Cliff Conservation Area and the Grade I listed Kemp Town Estate. The policy allows for other uses on the site.

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The Black Rock site now returns to the drawing board and its future development should not be constrained by the mistakes of the past. The City Plan should adopt a much more flexible approach to this site which may not preclude a leisure facility but which will allow for the wholesale consideration of other uses if such a facility fails to come forward.

It should also allow for, and encourage, the strategic consideration of Black Rock and other major seafront development sites e.g. King Alfred.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been noted and considered.

The provision of leisure facilities at Black Rock has been allocated taking into consideration the city's strategy for leisure facilities along the entire seafront. The floor space has been indicated in the policy to take account of the available land and the need for building heights to respect the adjacent East Cliff Conservation Area and the Grade I listed Kemp Town Estate. The policy allows for other uses on the site.
City Plan Part 1 Responses Received 27th May to 20th July 2012

Customer No: 219  Customer Name: Mr Andrew Coleman
Organisation:      Support Status: Partly Support
Rep Number: 2  Page/Para: 35/ DA2 C    Policy: DA2 - Brighton Marina, Gas Works and Black Ro
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
Support recognition of flood risk but policy should also state that development should be resilient to the effects of climate change over its lifetime. These also include high temperatures (Marina could suffer from urban heat island, especially as there's no natural vegetation and the reflection from cliffs), storm surges, high winds and high waves. The developers should fund any improvements or maintenance of the Marina wall as well.

Statement of Changes:
add reference to resilience over lifetime of the effects of climate change

Any Other Comment:

Officer Response:
Thank you for your representation. Policy DA2 makes reference to the Strategic Flood Risk Assessment which takes account of climate change and makes recommendations to manage flood risks therefore it is not necessary to detail the level of mitigation required in the policy.

Customer No: 140  Customer Name: Jill Sewell
Organisation: Kemp Town Society      Support Status: Partly Support
Rep Number: 6  Page/Para: /    Policy: DA2 - Brighton Marina, Gas Works and Black Ro
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
If it is desirable to increase the quality and quantity of retail in the DA2 area we wonder why the Gas works site only has ancillary retail use projected. If, as is required in (d) links between the Gas works, the Marina, and Black Rock are improved this seems an ideal location for a retail outlet that would attract shoppers to the DA2 area. We would not have thought retail use is subject to the problems with the site which limit residential development here.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Brighton Marina Inner Harbour is a District Shopping Centre. Proposals for retail development at the Gas Works should be ancillary to support the identified mix and quantity of development on the Gas Works site but not to compete with the retail outlets at the Marina. Location of a large retail outlet in this location would be contrary to national and local policy.
Further Details:

Strategic Allocations in DA1 and DA2 should be phased with the proposal at Black Rock being allocated first. DA1 and DA2 should not be planned in isolation. The proposals contain some fine aspirations, but the current Brighton and Hove ‘offering’ is a set of wide-ranging music/conference venues that are able to cater for audiences from almost zero to around 7,000 (Brighton Centre). This places us on ‘The Circuit’ for most music acts: this is a big draw, bringing in many extra ‘Economic Agents’ into the city. Using the Amex is an alternative, but limits have been imposed. We do continue to attract some ‘Major’ acts, but this has a lot to do with our ‘Image’. If the Brighton Centre is redeveloped under the assumption that Black Rock will provide us with a 10,000-seat venue, and the Black Rock development does not proceed, this will reduce the economic prosperity. The Black Rock development should be completed before the Brighton Centre is considered for redevelopment.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been considered. The City Council will ensure that a strategy is devised so that the redevelopment of the Brighton Centre is adequately managed and does not result in a shortfall of music/conference venue space should Black Rock not be available.

Further Details:

South Downs National Park adjoining eastern part of Marina needs to be made clearer.

Policy mentions cycle links but is part of the National Cycle Network. Could improve Volks railway concept to move large volumes of people between the pier and the Marina.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. The supporting text in policy DA2, paragraph 3.21 has been amended to reflect the boundary of the South Downs National Park adjoining the eastern end of the Marina. The area is also covered policy SA5 South Downs.

The policy has been amended to incorporate reference to the potential of the area for district heating networks to reflect the findings of the Energy Study and comments received.

The policy has been amended to reflect your representation regarding the National Cycle Network.
### Customer No: 140  
**Customer Name:** Jill Sewell  
**Organisation:** Kemp Town Society  
**Rep Number:** 7  
**Page/Para:**  
**Policy:** DA2 - Brighton Marina, Gas Works and Black Rock  
**Support Status:** Partly Support

#### Further Details:

The use of this area needs to be expanded beyond exclusively leisure and recreation.

a) To include other tourism uses, such as a hotel, destination restaurant or bar and cafe uses which it is recognised would create jobs underpinning general leisure use at this end of the Seafront, drawing visitors to the area and linking the Marina area with the beach and seafront up to the Pier.

b) This section should make it clear that there is an absolute prohibition on development protruding in any way above Cliff on this site. This should ideally be a separate section c) with existing c) becoming d) and so on.

The concluding un-numbered paragraph of this section should be removed

#### Statement of Changes:

#### Any Other Comment:

#### Officer Response:

Thank you for your representation. Your comments have been considered. The Black Rock site is allocated primarily for leisure and recreation uses. However, the policy allows for complimentary and ancillary retail, café/restaurant and hotel uses. The strategy for the wider Marina seeks to improve the connectivity between the various parts of the Marina including the links between the seafront and the Marina.

It is not considered necessary to seek to specify a restriction on development above cliff height on the Black Rock site as the policy requires any development proposals to demonstrate how they would respect and enhance the setting of the nearby conservation area and listed buildings.

### Customer No: 219  
**Customer Name:** Mr Andrew Coleman  
**Organisation:**  
**Rep Number:** 4  
**Page/Para:** 38/ 3.19  
**Policy:** DA2 - Brighton Marina, Gas Works and Black Rock  
**Support Status:** Partly Support

#### Further Details:

Should also refer to other aspects of climate change - heat, water stress, high winds, storm surge and high waves. Should refer to coastal change.

#### Statement of Changes:

#### Any Other Comment:

#### Officer Response:

Your comments are noted. Policy DA2 requires a site specific Flood Risk Assessment for development proposals in accordance with the latest guidance in the Strategic Flood Risk Assessment and the Shoreline Management Plan to protect development from all types of flood risk.
Further Details:

Any development on Brighton Marina and in the Black Rock area should be below the level of the cliff and should protect the Heritage (SP15) of the Grade 1 Listed Kemp Town Estate.

The limited scope for the development of Black Rock needs to be widened to enable other uses to be put forward.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been noted.

Further Details:

Piecemeal development has spoilt the Marina but there is scope for improvement as long as any proposed schemes do not breach the cliff height. An extended promenade environment would be welcome.

A new conference centre should be built at Black Rock to replace the Brighton Centre, built to reflect, and be sympathetic to, the surrounding historic architecture and features.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments have been noted and considered.
Further Details:

I received a leaflet through the door regarding Toads Hole Valley development, and have read your guide to City Plan Policies.

I am in agreement for some commercial new development at:

1. New England Quarter and London road
2. Brighton Centre and Churchill Square
3. Brighton Marina and Black Rock

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your representation. Your comments are noted.
**Customer No:** 234  
**Customer Name:** John Lister  
**Organisation:** Natural England  
**Support Status:** Partly Support  
**Rep Number:** 3  
**Page/Para:** /  
**Policy:** DA2 - Brighton Marina, Gas Works and Black Rock Area  
**Section/Supporting Doc/Annexes** Part Three: Development and Special Area policies

Further Details:

In relation to DA2 (Brighton Marina, Gas Works and Black Rock Area) the plan establishes sound principles of development including:

- protecting and enhancing the ecological environment of the site
- improving linkages to green spaces and the existing Green Network
- using an ecological master plan
- a Public Realm Strategy (part of a citywide Urban Design Framework) that seeks to improve pedestrian routes and biodiversity (inter alia)

These principles are welcomed and seem to apply in most allocations. The use of landscape character assessments and of Landscape and Visual Impact Assessment, need to be considered where appropriate.

The text on Woollards Field South and on Toad’s Hole Valley makes reference to adverse impacts on the setting of the South Downs National Park. Whilst this is a key consideration, landscape character and impact are important considerations in other situations if enhancements are to be delivered.

In the case of DA2, it is not clear whether the impact of development on designated sites has been considered in any detail. Whilst this may not be a reason to resist development, issues of mitigation and compensation may need to be considered.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are welcomed and noted.
Further Details:
The Brighton Marina Company Limited have included a letter from Peter Brett Associates as part of their representation. The issues relate to the requirements of the SFRA and the FRA that Peter Brett have carried out for BMC.

SFRA is broadly in compliance with BMC 2011 FRA but does raise a couple of areas of uncertainty. The only slightly negative aspect of the SFRA is that it tends to overstate the risk of flooding from a breach of the existing defences suggesting that this would produce catastrophic flooding with little, or no, warning. Whilst it is true that there would be little warning of a breach, there is ample warning of the tidal conditions and therefore scope to 'be prepared'. It also fails to articulate the relatively low probability of a breach occurring in a well maintained defence.

These statements could be interpreted as presenting a greater risk than actually exists. The SFRA recommends that a detailed breach assessment is undertaken but due to a relatively small area and the large size of breach that would normally be modelled, this is likely to show a rapid inundation of the area.

Statement of Changes:

Any Other Comment:
Letter from Peter Brett Associates to Mike Holford on 19.03.12

The two assessments are broadly similar in conclusion but the SFRA does portray the current level of flood risk in terms which could be interpreted as somewhat pessimistic. BMC would like BHCC to consider whether the more detailed assessments could form part of the SFRA to further qualify the level of risk to the site. BMC have also submitted their Flood Risk and Surface Water Drainage Assessment as part of their representation.

Letter from Peter Brett Associate to John Davey (BMC) on 27.06.12

PBA acknowledge that SFRA is factually correct in its conclusions but reinforces that the message is overly negative and could be rephrased. Letter makes specific recommendation in order for the SFRA not to appear unduly negative.

Officer Response:
Thank you for your representation. Your comments have been noted and considered. No amendments to the policy are required. The role of the SFRA is to advise the local planning authority on locating development in the areas at lowest risk of flooding. The City Council has an interest in ensuring the SFRA is accurate as it is allocating the Marina for new development. Detailed flood risk assessments are required for individual development proposals in areas of higher flood risk which might show different findings from the SFRA at the time a planning application is made.
Customer No: 219  Customer Name: Mr Andrew Coleman
Organisation:  Support Status: Support
Rep Number: 1  Page/Para: 34/
Policy: DA2 - Brighton Marina, Gas Works and Black Ro
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
Part 6: welcome and strongly support reference to surfing. The area to the east of Brighton Marina is of local and regional importance as a surf ‘break’.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments have been noted.

Customer No: 70  Customer Name: Steve Ankers
Organisation: South Downs Society  Support Status: Support
Rep Number: 9  Page/Para: 32/
Policy: DA2 - Brighton Marina, Gas Works and Black Ro
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
We welcome the recognition of the proximity of the National Park, the commitment to resisting built development above cliff height at the marina and the intention to promote the recreation and wildlife links between the marina and nearby open spaces including the National Park. We also welcome the inclusion in the development area of the former Gas Works site at Black Rock. Given the proximity of the National Park, we would support development which complements its setting and seeks to ensure its assimilation into the landscape.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments are welcome and have been noted.
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<tr>
<th>Customer No:</th>
<th>221</th>
<th>Customer Name:</th>
<th>Mr Roger Lightbown</th>
</tr>
</thead>
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<td>Section/Supporting Doc/Annexes:</td>
<td>Part Three: Development and Special Area policies</td>
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**Further Details:**
I support the fact that it recognises the recreational use of the area, specifically in relation to its use as a surf spot.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Thank you for your representation. Your comments have been noted.

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<thead>
<tr>
<th>Customer No:</th>
<th>182</th>
<th>Customer Name:</th>
<th>Tony Mernagh</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organisation:</td>
<td>Brighton and Hove Economic Partnership</td>
<td>Support Status: Support</td>
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<td>Rep Number:</td>
<td>3</td>
<td>Page/Para:</td>
<td>/</td>
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<tr>
<td>Policy:</td>
<td>DA2 - Brighton Marina, Gas Works and Black Ro</td>
<td></td>
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</table>

**Further Details:**
The Economic Partnership welcomes the increase in the number of residential units from 650 in the previous draft Core Strategy to a minimum of 1000 in the City Plan. This quantum of residential units is suitable for localised heat and power generation which was included in the original Explore Living planning application [BH2007/03454] but is missing from the City Plan criteria.

The City Plan rightly places an emphasis on the development of brownfield sites but could go further in promoting greater housing densities on such sites to maximise their potential.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Thank you for your representation. Your comments have been noted. The City Plan has been amended to reflect the findings of the Energy Study.
Further Details:

Although the Marina is classified as a District Centre and has many [though not all] of the characteristics associated with such centres e.g. anchor supermarket, a significant number of retail units etc it has consistently failed to act as a District Centre. It is characterised by failing retail and it lacks many of the associated uses of District Centres e.g. banks, building societies, health-care facilities.

Hence the Economic Partnership welcomes the proposal to provide a range of facilities that 'accords with its district Centre status', which includes 'support' for independent retailers.

We appreciate that much of the detail of the City Plan will be delivered in the second phase but the nature of this 'support' could be further clarified. Does it just mean encouraging interest from independents or actively facilitating their tenancy or offering business support?

Since planning consent already exists for the 40 storey development at the outer harbour [BH2006/1124] which breaches the cliff height, the reference to any new developments not breaching the cliff should refer only to those at the inner harbour. The precedent for the outer harbour has already been set and, should the Brunswick scheme fail to be delivered, any new scheme should be able to benefit from the perceived reduction in scale that the distance from the cliff delivers.

Connectivity to the Gas Works site requires crossing the A259. Any solution proposing an underpass should be avoided.

Statement of Changes:

The City Plan could make a reference to improving the pedestrian linkage between the Marina and the Aquarium roundabout via Madeira Drive.

The Economic Partnership also continues to promote the idea of master-planning the seafront from the Marina to Hove Lagoon to avoid piecemeal development.

Any Other Comment:

Officer Response:

Thank you for your representation and your comments have been noted.

The retention of the designated Brighton Marina District Shopping Centre provides support for businesses by preventing a loss of retail uses to other uses. Policy DA2 aims to secure improvements to the retail offer at the Marina that will reinforce it's status as a district centre. Further information on support for independent businesses will be detailed in part 2 of the City Plan.

Reference to development not breaching cliff height at the Marina applies to all forthcoming development proposals and does not apply to existing consented development.

Policy DA2 makes reference to opening up pedestrian linkages between development on the Black Rock site and the Inner Harbour, facilitating pedestrian movement along the seafront.

The council is committed to writing and adopting a Seafront Strategy, which is in progress.
Further Details:
The Economic Partnership welcomes the increase in the number of residential units from 650 in the previous draft Core Strategy to a minimum of 1000 in the City Plan. This quantum of residential units is suitable for localised heat and power generation which was included in the original Explore Living planning application [BH2007/03454] but is missing from the City Plan criteria.

The City Plan rightly places an emphasis on the development of brownfield sites but could go further in promoting greater housing densities on such sites to maximise their potential.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments regarding heat and power generation at the Marina and the promotion of higher densities have been noted.

Policy DA2 and other development area policies in the City Plan have been amended to reflect comments made and the findings of the Energy Study and specify the priority to provide district heating networks.

The capacity to deliver the amount of residential development identified for the Inner Harbour is based on the need to build below cliff height.
Further Details:

Although the Marina is classified as a District Centre and has many [though not all] of the characteristics associated with such centres e.g. anchor supermarket, a significant number of retail units etc it has consistently failed to act as a District Centre. It is characterised by failing retail and it lacks many of the associated uses of District Centres e.g. banks, building societies, health-care facilities.

Hence the Economic Partnership welcomes the proposal to provide a range of facilities that 'accords with its district Centre status', which includes 'support' for independent retailers.

We appreciate that much of the detail of the City Plan will be delivered in the second phase but the nature of this 'support' could be further clarified. Does it just mean encouraging interest from independents or actively facilitating their tenancy or offering business support?

Since planning consent already exists for the 40 storey development at the outer harbour [BH2006/1124] which breaches the cliff height, the reference to any new developments not breaching the cliff should refer only to those at the inner harbour. The precedent for the outer harbour has already been set and, should the Brunswick scheme fail to be delivered, any new scheme should be able to benefit from the perceived reduction in scale that the distance from the cliff delivers.

Connectivity to the Gas Works site requires crossing the A259. Any solution proposing an underpass should be avoided.

Statement of Changes:

The City Plan could make a reference to improving the pedestrian linkage between the Marina and the Aquarium roundabout via Madeira Drive.

The Economic Partnership also continues to promote the idea of master-planning the seafront from the Marina to Hove Lagoon to avoid piecemeal development.

Any Other Comment:

Officer Response:

Your comments supporting the retention and improvement of the District Centre are welcome and noted.

Reference to development not breaching cliff height at the Marina applies to all forthcoming development proposals and does not apply to existing consented development.

With regard to improving pedestrian linkages, point number 4 of the Local Priorities section in the policy has been amended to reflect suggestions made.

A strategy for development along the seafront will be detailed in the forthcoming Seafront Strategy.
Further Details:
Role of art & design in creating an attractive public realm; the role of cultural provision in providing a vibrant and diverse night time economy- also links here with health to provide alternatives to drinking culture.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your representation. Your comments have been noted and considered.
DA3 Lewes Road area includes the University's Falmer campus and this is welcomed and supported and it is considered to be in line with this overall approach. The University also fully supports the strategy to further develop and enhance the role of Lewes Road as the City's academic corridor and its specific support for proposals which improve further and higher education providers.

Welcome DA3 Part A.1 and supporting text 3.24

Consider Part B underestimates the scale of growth planned within the Lewes Road Development Areas and particularly within its own Falmer campus. It considers that the combination of the strategic allocation of Preston Barracks (part C1.) and its planned academic and residential developments at its Falmer Campus (including its East Slope residences development (Part B5. Of Policy CP21) will comfortably provide substantially more than these identified figures.

Further information on these and other projects programmed for delivery in the period up to 2030, form part of the wider campus masterplan which is in the process of being updated.

**Statement of Changes:**

Part B of DA3 should be revised to read:

 '".Business School and additional academic floorspace (at least 25,000 sq m);
Student Accommodation (at least 2,500 rooms)..’

**Any Other Comment:**

**Officer Response:**

The University's support for the inclusion of the Falmer Campus and for the development of Lewes Road as an academic corridor is welcomed.

Policy DA3 is geared towards supporting educational development needs and we note your comments that the policy may underestimate the scale of growth planned. However, the policy does not preclude further development by the universities in addition to that specifically identified in the policy. As the University's masterplan is currently being revised though and no detailed capacity work has been seen by the council, it would be inappropriate to formally allocate further development at the present time.
Customer No: 76  
Customer Name: John Barry  
Organisation: Somerset Day Centre  
Rep Number: 5  
Page/Para: /  
Section/Supporting Doc/Annexes: Part Four - City Wide Policies (Healthy and Balanced Communities)  
Policy: DA3 - Lewes Road Area  
Support Status: Object

Further Details:
The Draft City Plan makes proposals for many key areas to address needs and problems across the City, including those relating to student accommodation and travellers. Our ageing population poses equally (and probably more pervasive) long-term challenges. I should like to suggest that the recognition of those needs should be reflected in the City Plan by the specific inclusion of Older People in the list of Citywide Policies. One example of why special attention regarding older people is needed across the board: simply crossing the road can be a problem for older people (and for disabled people and parents with children) - the default time allowed before pedestrian crossing lights change is simply not sufficient for those who move slowly. At the very least the needs of the older community should be considered as a matter of course in the planning, design and delivery of every service.

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments are noted.
### Further Details:

DA3.C.1 - Preston Barracks and Brighton University, Page 41
Southern Water has assessed the water distribution and sewerage system in the vicinity of this strategic site (please see spreadsheets submitted). The results show that the existing capacity is insufficient to accommodate the anticipated demand. The development will therefore need to provide the local infrastructure required to connect to the water distribution and sewerage system at the nearest point of adequate capacity. The location of this point will need to be determined when the development comes forward.

Ofwat, the water industry’s economic regulator, takes the view that the local infrastructure required to serve new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increased general charges.

Connection off-site is the mechanism by which developers can provide the local infrastructure required to service their sites. However, Southern Water has limited powers to enforce such connection. We therefore look to the planning authority to support this approach in planning policies.

It is important to give early warning to prospective developers regarding the need to connect off-site, as it will add to the cost of the development. Early warning will facilitate delivery of the necessary infrastructure. If the infrastructure is not delivered the water mains and sewers will become overloaded, leading to poor water pressure, foul water flooding and pollution of the environment.

We therefore propose an additional bullet point in policy DA3.C.1 to recognise the need for local water distribution and sewerage infrastructure. In addition, the development area is located within a groundwater Source Protection Zone. This signifies that the area requires a high level of protection to safeguard public water supplies. Development should therefore only be permitted if adequate mitigation measures can be implemented, to the satisfaction of the Environment Agency. Such measures must ensure that the vulnerability of the groundwater source to contamination is not increased, and that public health and the quantity of water supplies are protected.

### Statement of Changes:

We request that the following text is included in policy DA3.C.1:

- e) The development must connect to the water distribution and sewerage system off-site at the nearest point of adequate capacity.
- f) The development must ensure that groundwater sources are protected, to the satisfaction of the Environment Agency.

### Any Other Comment:

**Officer Response:**

Southern Water’s comments are noted. The policy with regard to Preston Barracks has been amended to make specific reference to water distribution, sewerage disposal and groundwater protection as requested.
Further Details:

If the plan is to support and enhance the beauty of the South Downs then it cannot be right to allow additions to the built complex for the universities and the stadium. These built developments detract from the beauty of the South Downs. (BHCC officer insert)

Statement of Changes:

Any Other Comment:

Officer Response:

The city has a very close relationship to the South Downs National Park. Many areas, including the University of Sussex and Community Stadium, can be seen from within the Park. Given the demands that the city faces, for instance for housing and employment floorspace, it is not possible to avoid further development in areas such as Falmer. However, City Plan policies endeavour to ensure high quality developments that take careful account of their sensitive surroundings.

While the “development area” boundary clearly includes the Amex stadium, there is almost no reference to the stadium in the text. The Secretary of State’s decision to allow the building of the stadium despite its impact on the national park was based on the promise of community and regeneration benefits. These have subsequently been watered down through successive applications to amend the terms of the original permission but we would urge the City Council to consider, through the plan, how such benefits might still be realised. We would also urge that any further development based on the stadium should have full regard to its location adjacent to the national park, and that appropriate wording be incorporated into the plan.

Statement of Changes:

Any Other Comment:

Officer Response:

Your concerns about the community and regeneration benefits associated with the Community Stadium are noted, although it is not clear from your response which particular benefits you feel have been “watered down.” Brighton and Hove Albion does run successful schemes, such as Albion in the Community, encouraging young people into sport. The stadium has brought other benefits, such as City College’s involvement in matchday catering and the community medical facilities. Given that the Community stadium is fully operational and that no significant further development is proposed on the site, it is not felt necessary to incorporate a site specific designation within policy DA3.

A variety of City Plan policies do address community and regeneration benefits in a city-wide sense and the council will continue to seek appropriate contributions as part of development proposals.

On a related issue, policy DA3 does state that the potential impact of other development in the area, such as at the University of Sussex's Falmer campus, must respect the setting of the South Downs National Park.
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<td>Organisation:</td>
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<td>Rep Number:</td>
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<td>DA3 - Lewes Road Area</td>
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<tr>
<td>Section/Supporting Doc/Annexes</td>
<td>Part Three: Development and Special Area policies</td>
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**Further Details:**

While recognising that within the Lewes Road Development Area (DA3) the existing Lewes Road District Centre is an established location for retail provision and a sequentially preferable location for new retail and town centre development (subject to site availability and other considerations), Tesco advocates the inclusion of retail floorspace within the range of uses detailed at DA3 Part A.3 to ensure the full range of existing and future local needs within the Development Areas can be met sustainably. Retail development could also contribute to delivering the wider objectives for the Lewes Road Corridor.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The council's 2011 Retail Study update does not identify a need for further allocations outside the existing District Centre boundary. Tesco Stores Ltd's view that new retail development could contribute to the wider Lewes Road objectives is noted. Any proposals for new retail development in the DA3 area could come forward under the tests set out in the National Planning Policy Framework and policy CP4. No amendment is therefore proposed to policy DA3.
Further Details:

SEC Amb have a demonstrable need to locate a new Make Ready Centre (MRC) in the Brighton area with the Woollards site being the most likely location. Such a development would support in the region of 275 jobs and help maintain and improve service delivery (patient care) to the community in and around Brighton and deliver very real life saving enhancements.

The general principles of Policy DA3 are supported in that we agree with the need to promote the Lewes Road corridor for academic, employment and residential improvement within the forthcoming City Plan.

However, we strongly feel that the policy approach taken in Policy DA3 in relation to the Woollards Field South site should be less prescriptive and should add in greater flexibility to accommodate a greater range of employment generating uses other than B1 office development. It is not considered that the continued allocation of 5,000 sqm of B1 office floorspace is reasonable or achievable for the reasons set out below.

The Woollards Field site has been allocated within the Brighton & Hove Local Plan 2005 for high tech business uses and general offices Use Classes B1 (a) and (b) under policy EM2 for a number of years. It has been surplus to requirements since 1990 but as yet remains undeveloped. The office market is currently depressed and therefore the policy should be flexible in its approach to delivering development on this and other key sites in the City. The draft policy is arguably even less flexible than the adopted policy EM2 as this allows for ‘small-scale B1 (c) and B2 uses will be acceptable in appropriately designed starter units on the identified sites’ which allows for a greater range of business uses at the site.

Paragraph 22 of the new National Planning Policy Framework (NPPF) requires Councils to avoid long term protection of employment sites and paragraph 158 requires them to specifically take into account relevant market and economic signals. It is considered that the prescriptive allocation of 5,000 sqm of B1 office space is not compliant with national policy and would not meet the tests of soundness as currently drafted. The Policy should be altered to allow a more flexible approach to employment generating uses more generally as it has been demonstrated that the site is not attractive to prospective office developers either in the current climate or indeed over the last 20 years.

In summary, whilst we agree with the overall principles of Policy DA3, the overly prescriptive approach to the delivery of B1 office floorspace at this site should be amended to be considerably more flexible to help foster alternative employment development (at equal or even higher employment numbers than might be accommodated on a B1 site) and deliver social benefits to the City.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support for the general approach of the policy to the Lewes Road corridor is welcomed.

The Ambulance Service’s comments about office development on the Woollards Field site and the soundness of the policy are noted. Clearly economic conditions have been very difficult over the last few years, but the council does not accept that the policy itself is unsound or that office development could not be delivered on the site. The site is well located for employment use, with good access by a variety of transport modes and close proximity to the two universities.

However, the potential job creation benefits of a Make Ready Station and the resultant improvements to the city’s infrastructure are recognised. Consequently, the policy has been amended to seek B1 office floorspace or other employment generating development that helps to meet these infrastructure needs.
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<th>Organisation: Trustees of Toads Hole Valley and Pecla Investments Limited</th>
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<td>Section/Supporting Doc/Annexes Part Three: Development and Special Area policies</td>
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<tr>
<td>Further Details:</td>
<td>We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)</td>
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<tr>
<td>Statement of Changes:</td>
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<tr>
<td>Any Other Comment:</td>
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<tr>
<td>Officer Response:</td>
<td>Your comments are noted and a reference to One Planet Living has been added.</td>
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<tr>
<th>Customer No: 230</th>
<th>Customer Name:</th>
<th>Organisation: University of Brighton</th>
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<td>Page/Para: Page 39/</td>
<td>Policy: DA3 - Lewes Road Area</td>
<td>Section/Supporting Doc/Annexes Part Three: Development and Special Area policies</td>
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<td>Further Details:</td>
<td>The specific requirements for the Preston Barracks/Moulsecoomb area are considered to be reasonable. In respect of the Falmer area, the policy provides guidance on the development of the Former Falmer High School but does not contain anything specific to the University's Falmer Campus. Although the campus' previous masterplan is largely built out, there may be further changes in the future, so it would be beneficial if the policy were to include an additional criterion to refer to the University's Falmer campus.</td>
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<tr>
<td>Statement of Changes:</td>
<td>Subject to provisions within policy DA3, and other relevant policies, development on the University of Brighton's Falmer Campus for university related uses will be supported.</td>
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<tr>
<td>Any Other Comment:</td>
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<tr>
<td>Officer Response:</td>
<td>The University's support for policy DA3 in relation to Preston Barracks and Moulsecoomb is welcomed.</td>
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<tr>
<td></td>
<td>Policy DA3 is largely geared towards supporting educational development needs. It is noted that the University may consider further development on its Falmer Campus in future. The policy does not preclude such development but, as no detailed capacity work has been viewed by the council, it would be inappropriate to formally allocate the campus for more development at the present time.</td>
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<td>Customer No:</td>
<td>219</td>
<td>Customer Name:</td>
<td>Mr Andrew Coleman</td>
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**Support Status:** Partly Support

**Further Details:**
Support recognition of air quality but should also refer to use of Community Infrastructure Levy to fund action that could improve air quality e.g. provision of cycling and public transport infrastructure, ‘scrappage’ scheme for polluting vehicles registered in the area, electric vehicle charging points, cleaner buses.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Air quality issues are specifically mentioned in policy DA3 and your support for the need to tackle this issue is welcomed. Policy CP7 of the City Plan addresses CIL and policy CP9 supports improvements to sustainable transport that will, as you point out, also help to improve air quality. It would not, however, be appropriate to cross refer in all policies to potential CIL funding for key objectives.

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**Support Status:** Partly Support

**Further Details:**

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
The City Plan recognises the importance of the creative industries and digital media sectors to the economy and employment. The policy reflects the recent planning brief for the site, which also recognises that the digital media and creative industries could be potential occupiers. Policy DA3 does not preclude use of Preston Barracks by these industries. It is not felt necessary to specifically allocate the site as a creative industries hub though, as this could restrict development, but use by these growing industries would generally accord with the land uses sought.
### City Plan Part 1 Responses Received 27th May to 20th July 2012

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**Further Details:**

The SDNPA support the aim of improving provision and access to education and commend the City Council on proposing high goals for zero carbon developments and achievement of an Outstanding BREEAM rating level.

There is a requirement for particular care over development proposed on the urban fringe of the city. As these proposals could have a significant impact on the surrounding landscape of the South Downs National Park careful consideration must be given to the impact of any proposals on the setting of the South Downs National Park and its two Purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA supports the overall aim of the spatial distribution of development to minimise transport impacts and the continued protection of the South Downs National Park.

Given the proximity of the University of Sussex and University of Brighton campuses at the north of Lewes Road to the SDNP, it is important that due regard is given to the impact of any development on the setting of the SDNP, and it’s purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA would expect there to be reference within the policy to the careful consideration that will be required of the impact of any redevelopment of these campuses (Policy DA3 A. 1.) on the South Downs National Park. The SDNPA would request to be involved in any future proposals.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The National Park Authority's support for the elements of the policy addressing education and sustainability are welcomed.

The concerns of the Authority about the proximity of the universities' campuses on Lewes Road to the National Park are noted. The potential for development which impacts upon the South Downs National Park is recognised and the policy has been amended to reflect this.

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**Further Details:**

Hyde notes that the Lewes Road area (DA3) has the potential to deliver ‘quick wins’ to boost affordable housing supply on land under the control of the Council (e.g. Preston Barracks). We would urge the Council to consider bringing forward the delivery of affordable housing in this development area.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The council is keen to see the redevelopment of the Preston Barracks site and recognises the importance of providing affordable housing to meet the city's needs. Some phasing of the Preston Barracks development seems likely, but the policy and planning brief seek uses to meet a wide range of key strategic needs. It is not felt that there is justification for policy DA3 specifically bringing forward affordable housing at an early stage in the overall development.
Further Details:
The American Express Community Stadium has extensive parking which on non-match days is rarely used. We suggest that the Council should work with the Stadium to agree how this parking can be used for park and ride on non-match days which will provide an attractive facility close to one of the City's main bus corridors. This will be consistent with the objectives of Policy CP9: ‘Sustainable Transport’ which sets the objective of better use of existing large car parks on the periphery of the City.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments about use of the Community Stadium car parking as a park and ride on non-match days are noted. Policy CP9 of the City Plan sets out the council's proposals for a co-ordinated approach to car park provision and management including "better use of out of centre car parks." Use of the Community Stadium's car parking could potentially be brought forward for use, as part of a comprehensive approach, under that policy. Allocating this use in policy DA3 would be not considered appropriate.
Further Details:
The Community Stadium Ltd (TCSL) is committed to working with the council to deliver a mixed-use regeneration scheme for the Falmer Released Land site.

In December 2011 a partnership of TCSL, Brighton Aldridge Community Academy (BACA) and Bridge Community Education Centre provided a collective response to the Student Housing Options Paper. The response detailed the longer-term aspirations for the retained land for student accommodation and academic led mixed-use regeneration scheme which will meet the city's core community and economic strategic objectives (detailed in the response). More recently TCSL has agreed with the City Council a temporary use of the Released Land site which has made it safer environment for the local community. TCSL fully supports the within Policy DA3 of the Falmer Released Land site.

TCSL endorse the overarching strategy and bullet points set out before Part A of the policy and support the local priority statements set out in part A of the policy.

TCSL is also concerned that Policy DA3 does not make any specific reference to the need of a Pupil Referral Unit (PRU) for BACA on the released land or in an acceptable alternative location. As long ago as August 2011 TCSL submitted a letter to the City Council's Chief Executive which outlined proposals for the Falmer Released Land for 'the Bridge Community Centre a Pupil Referral Unit for the BACA and car parking on the site'. We have consistently supported BACA with their aspirations to deliver the PRU and request that the City Plan is revised to reflect this need in Policy DA3. A new BACA would support students at VSR level 3 (students who have exhausted all mainstream support and need flexible bespoke 1-2-1 packages of support to overcome their behavioural, emotional and social barriers to learning). The facility could be part of the permanent home for the Bridge Community Education Centre and facilities and courses will also be hired/places available for other providers making the centre a long term self-sufficient unit. It will also be offered in the evening for rent by local youth clubs.

Statement of Changes:
Car parking for the Community Stadium should be specifically listed in the amounts of development list at Part B and that Policy DA3 is revised as follows:

DA3.3 Falmer Released Land, Former High School
Redevelopment for a range of uses including.. Educational use, A CAR PARK RELATED TO THE AMERICAN EXPRESS COMMUNITY STADIUM and the provision, on off site..

The city council's Planning, Employment, Economy & Regeneration Cabinet Member Meeting on 2 February 2012 stated that the planning brief for the Falmer Released land would promote uses for the site including 'AROUND 800 TIERED CAR PARKING SPACES TO SERVE THE AMEX STADIUM ON EVENT DAYS (and with the potential to provide further strategic benefits in respect of sustainable transport issues)' and

Supporting Text paragraph 3.33, page 46 - These uses could work in conjunction with CAR PARKING USE for the nearby American Express Community Stadium.

Any Other Comment:

Officer Response:
In response to your comments, securing a Pupil Referral Unit on the Falmer Released Land site has been added to the policy and supporting text.

Part C. 3 of policy DA3 refers to a car park as one of the possible uses for the Falmer Released Land site, but this is not a specific requirement. Securing this car park is not a key strategic aim of the policy and the potentially acceptable uses listed in the policy are very wide-ranging. It is not appropriate therefore to be specific about the possible car park in part B of policy DA3, which identifies key developments within the area to help meet the city's overall needs, but the policy does support its provision.
Further Details:
Woollards Field South
The text on Woollards Field South and on Toad’s Hole Valley makes reference to adverse impacts on the setting of the South Downs National Park. Whilst this is a key consideration, landscape character and impact are important considerations in other situations if enhancements are to be delivered.

(The use of landscape character assessments and of Landscape and Visual Impact Assessment, need to be considered where appropriate.)

It is assumed that all allocations and subsequent windfalls will be tested against a range of policies and criteria (particularly relating landscape and biodiversity) to ensure that development takes place in the right location and that the natural environment in and around the city are protected and enhanced.

Statement of Changes:

Any Other Comment:

Officer Response:
Your support for an impact assessment of any Woollards Field development upon surrounding landscape character and the South Downs National Park is noted and welcomed.

Further Details:
In part C, 1a where the policy talks of links through to Moulsecoomb Station, the policy should also talk of improving pedestrian and cycle links up to Moulsecoomb Station and through to Hollingdean. There is a real opportunity to provide a fairly traffic-free link to Hollingdean from Lewes Road, avoiding the Vogue Gyratory but it needs to be included in this policy.

The supporting text should also highlight the fact that Moulsecoomb and Falmer stations both have the potential to act as gateways to the South Downs National Park.

Statement of Changes:

Any Other Comment:

Officer Response:
Part C 1 a) addresses proposals for the Preston Barracks and Brighton University site. It would not be appropriate to make specific reference to a cycle route to/from Hollingdean within this policy. However, the City Plan is supportive of sustainable transport improvements, specifically through policy CP9. Improved and safe cycle routes will be sought and we note your comments that a route is possible from Hollingdean to the Lewes Road without the need to use Vogue Gyratory. In addition, the council is currently carrying out wide ranging improvements to the Lewes Road, which include better provision for cyclists and a dedicated cycle route at Vogue Gyratory.

Your comments about the railway stations acting as gateways to the South Downs National Park are noted. The supporting text (para. 3.27) has been amended to reflect this.
Further Details:

Brighton Aldridge Community Academy wishes to take the opportunity to formally respond to the draft city plan (May 2012). Our comments below relate specifically to Policy DA3 (Lewes Road area and the Falmer Released Land site).

BACA supports the overall aims of Lewes Road improvements. The strategy for the development area is to further develop and enhance the role of Lewes Road as the city’s academic corridor by supporting proposals which:

1. improve further and higher education provision in the Lewes Road area;
2. facilitate improved sustainable transport infrastructure that provides choice, including travel by bus, walking and cycling;
3. secure improvements to the townscape and public realm;
4. deliver inter-connected green infrastructure and biodiversity improvements, contributing to Biosphere objectives;
5. improve air quality in the Lewes Road area

However, BACA are very concerned that Policy DA3 does not make any specific reference to the need or delivery of a Pupil Referral Unit [PRU] for BACA on the Falmer Released Land or in an acceptable alternative location close to the academy. Over the last year BACA and the Aldridge Foundation have discussed this with numerous senior council officers and it has been agreed as a priority for BACA. We have received repeated assurances that the BACA PRU would be listed as a land use in the longer term development of the site and its omission is very concerning.

In addition TSCL have consistently supported BACA’s aspirations to deliver the PRU and it has been included in all proposals for the released land. A new BACA PRU would support students at VSR level 3. These are students who have exhausted all mainstream support and need flexible bespoke 1:1 packages of support to overcome their behavioural, emotional and social barriers to learning.

The facility would mainly cater for key stage 3 students, but specific courses for key stage 4 students would be accommodated. The facility could be part of the permanent home for the Bridge Community Education Centre. Facilities and courses at the BACA PRU will also be hired/ places available for other key stage 3 and 4 providers in the city making the centre a long term self - sufficient unit. It will also be offered in the evenings for rent by local youth clubs.

We formally request that the City Plan is revised to reflect this need in Policy DA3.

Investment in transport

BACA fully support the local priority as stated in section A.2 of Policy DA3: ‘Promoting and investing in improved bus, cycling and pedestrian routes along Lewes Road from The Level to the Universities in partnership with public transport operators in order to achieve a modal shift and thereby help reduce the impact of traffic and ensure that new development does not negatively impact on the air quality of the area’. BACA very much welcomes the proposed investment in transport links. Further to recent conversations with Gil Sweethenam we would urge you to consider improvements to BACA and The Bridge as part of this review. Currently transport links to BACA are extremely poor. As you will be aware the number 70 and 90 offering direct services to BACA have been cut, which means our students are now wholly reliant on public transport. The bus services into BACA play a crucial role for parents when making a decision about which school to send their child to frustratingly the poor services to our academy (multiple bus changes, long journeys) act as a deterrent for many prospective parents.

We often hear from parents who say they want to send their children to BACA because they are impressed by the facilities and the rate of improvement but the transport issue means it isn’t a viable option for them. We formally request that the City Plan is revised to reflect this need in Policy DA3.
In response to your comments, securing a Pupil Referral Unit on the Falmer Released Land site has been added to the policy and supporting text.

Your support for improvements to public transport along Lewes Road are welcomed. BACA's comments about specific bus services are noted, but cannot be addressed through the City Plan.

Further Details:

The section of the City Plan [page 42] dealing specifically with Falmer Released Land and the supporting text [3.33] identifies one of the uses as a car park for the Community Stadium but this does not appear in the suggested allocations to made in the City Plan Part 2 [page 41].

Since completion the Community Stadium has become an integral part of the city delivering in the region of £23m p.a. to the local economy. Given the continuing uncertainty about the provision of leisure opportunities at Black Rock and a replacement for the ageing King Alfred, the Community Stadium will form an increasingly important focal point for the city's sporting aspirations and Healthy City status. It will also contribute to policies SO1, SO2, SO3, SO8, SO9, SO13, SO15, SO20 and SO21. Measures to support its continued success should be strongly reflected in the City Plan.

Statement of Changes:

Any Other Comment:

Officer Response:

Part C. 3 of policy DA3 refers to a car park as one of the possible uses for the Falmer Released Land site, but this is not a specific requirement. Securing this car park is not a key strategic aim of the policy and the potentially acceptable uses listed in the policy are very wide-ranging. It is not appropriate therefore to be specific about the possible car park in part B of policy DA3, which identifies key developments within the area to help meet the city's overall needs, but the policy does support its provision.

Your comments about the importance of the Community Stadium to the city's economy, sporting aspirations and Healthy Cities status are recognised and noted. As the Local Enterprise Partnership states, a variety of City Plan policies address these issues. Given that the Community stadium is fully operational though, it is not felt necessary to incorporate a designation within policy DA3.
Further Details:
We support the provision of purpose-built student housing on campuses to take some pressure off local houses in multiple occupation. The design of student housing should be sufficiently flexible to allow change of tenure, should demands change in the future.

Statement of Changes:

Officer Response:
The Regency Society's support for the provision of additional purpose built student accommodation is welcomed. The design and layout of individual blocks will be considered at planning application stage but, in the interests of sustainability, the council supports the development of buildings that allow flexibility in their future uses.

Further Details:
The strategy for the Lewes Road development area is welcomed; namely facilitating improved sustainable transport infrastructure that provides choice, including travel by bus, walking and cycling, and improving the air quality of the Lewes Road area.

Statement of Changes:
We would wish for B&HCC to work with ESCC to ensure connectivity on Lewes Road between the respective authorities’ boundaries i.e. for walking and cycling opportunities. This should be reflected in paragraph 3.27.

Officer Response:
The County Council's support for efforts to improve sustainable transport and air quality along the Lewes Road is welcomed. Paragraph 3.27 has been amended to include a reference to co-ordinated working across local authority boundaries.
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**Section/Supporting Doc/Annexes**  
Part Three: Development and Special Area policies

**Further Details:**

Hyde notes that the Lewes Road area (DA3) has the potential to deliver ‘quick wins’ to boost affordable housing supply on land under the control of the Council (e.g. Preston Barracks). We would urge the Council to consider bringing forward the delivery of affordable housing in this development area.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Development of the Preston Barracks site is likely to be phased. The policy allocation includes a number of priority needs for the city, including housing, student accommodation and employment floorspace. It is not considered appropriate for the policy to specify that affordable housing should be specified for early delivery.

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**Further Details:**

Fully support

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The Partnership's support for the policy provisions for Woollards Field South are welcomed.
Further Details:
The provision of employment floor space in this location has always been regarded as something of a gamble. The inclusion of an Innovation Centre suggests that it might be linked to spin-out companies from the University of Brighton.

What preliminary assessment has been made of the potential mix between Innovation space and employment space to be placed on the open market?

Statement of Changes:

Any Other Comment:

Officer Response:
The variety of proposed uses on the Preston Barracks site has been carefully considered over recent years, culminating in the Planning Brief adopted in 2011. The council and University of Brighton have jointly commissioned a masterplan for the site, which will provide further clarification.

Further Details:
The section of the City Plan [page 42] dealing specifically with Falmer Released Land and the supporting text [3.33] identifies one of the uses as a car park for the Community Stadium but this does not appear in the suggested allocations to made in the City Plan Part 2 [page 41].

Since completion the Community Stadium has become an integral part of the city delivering in the region of £23m p.a. to the local economy. Given the continuing uncertainty about the provision of leisure opportunities at Black Rock and a replacement for the ageing King Alfred, the Community Stadium will form an increasingly important focal point for the city's sporting aspirations and Healthy City status. It will also contribute to policies SO1, SO2, SO3, SO8, SO9, SO13, SO15, SO20 and SO21. Measures to support its continued success should be strongly reflected in the City Plan.

Statement of Changes:

Any Other Comment:

Officer Response:
Part C. 3 of policy DA3 refers to a car park as one of the possible uses for the Falmer Released Land site, but this is not a specific requirement. Securing this car park is not a key strategic aim of the policy and the potentially acceptable uses listed in the policy are very wide-ranging. It is not appropriate therefore to be specific about the possible car park in part B of policy DA3, which identifies key developments within the area to help meet the city's overall needs, but the policy does support its provision.

Your comments about the importance of the Community Stadium to the city's economy, sporting aspirations and Healthy Cities status are recognised and noted. As the Economic Partnership states, a variety of City Plan policies address these issues. Given that the Community stadium is fully operational though, it is not felt necessary to incorporate a designation within policy DA3.
The provision of employment floor space in this location has always been regarded as something of a gamble. The inclusion of an Innovation Centre suggests that it might be linked to spin-out companies from the University of Brighton.

What preliminary assessment has been made of the potential mix between Innovation space and employment space to be placed on the open market?

Statement of Changes:

Any Other Comment:

Officer Response:

The variety of proposed uses on the Preston Barracks site has been carefully considered over recent years, culminating in the Planning Brief adopted in 2011. The council and University of Brighton have jointly commissioned a masterplan for the site, which will provide further clarification.
In particular development proposals relating to City College and the housing projections. To take City College first, there is significant concern locally with regard to the proposals to accommodate, is it 300 students in a redeveloped/refurbished Pelham Tower.

There also appears to be some confusion as whether the intended student tenants are Brighton University or City College! However, there is as I am sure Planning Department is aware and ongoing campaign by North Laine residents to oppose development which seen as contributing to anti social behaviour and extended licensing hours. The additional students located at the City College site could well contribute to these current issues.

Turning now to the housing projections, I note that the figure in City Plan is 1140 units of accommodation. It is with some scepticism that I view these figures given the limited number of sites for development and the that it is likely the units in question will be built at such densities that only apartments will be available when it is family accommodation which is required. How much accommodation can be squeezed onto the Anston House site for example on Preston Road? If the City is to grow by 39,000 by 2030, it is important that it is a balanced population giving due regard to the accommodation needs of families or is the council only concerned with the construction of homes for singletons and childless couples? However, I do commend heartily the redevelopment of the Open Market and the associated social housing planned for Francis Street.

I note in DA7 and the proposals concerning Toads Hole Valley are likely to include family units but this is also likely to be a very compact development especially if a third of the site is kept fallow.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your concerns about the possible impact on North Laine of student accommodation are noted. Policy CP21 sets out criteria that will need to be addressed by proposals and will ensure that issues such as noise disturbance, ant social behaviour and management are addressed through the planning application process.

The housing figures for DA4 reflect existing commitments to come forward at the Brighton Station site, as part of the regeneration of the Open Market as well as the identified opportunities on a number of sites such as the Coop, London Road and through the redevelopment of a number of employment sites identified including between 125-163 Preston Road (including the Anston House site) to bring forward new/ replacement office floorspace as well as housing. Policy CP19 Housing Mix sets out the requirement for new housing development to be of an appropriate mix of type, size and tenure reflecting the identified demographic analysis of need.

With regards to development density at Toad's Hole Valley; the proposals are not considered to constitute excessive development of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.
Further Details:

The Blackman Street site is a vacant plot which has stood unutilised for over twenty years since the demolition of a warehouse which previously stood on the site.

The site represents a wasted asset in a prominent gateway location on the edge of the London Road Development Area and presents a missing link between the edge of the town centre and other neighbouring development locations. Development of this site would act as a catalyst for future wider regeneration of the area.

The emerging planning policy position offers an important opportunity for the Council to work with the landowner and our client to identify and support specific productive uses to ensure that the site is brought back into productive use.

Local agent Fludes have extensively marketed the site for employment use, however, there has been no interest from office or other traditional employment uses. Firm interest has, however, been expressed by our client in bringing forward an innovative concept for both student housing and classroom space within a single mixed use building. This would represent a viable and economically beneficial use which would ensure that the site was brought into productive use in the short term. The proposals for the site are still being developed, however, will encompass both flexible space for classrooms/office (or potentially separate employment use) as well as a new study hotel. Further information on Study Hotels has been submitted with the representation.

With specific regard to the Blackman Street site there are also a number of specific considerations which necessitate the adoption of a flexible approach to any allocation/designation on this site:

The site is identified in the current adopted local plan for employment uses, however, this has not encouraged development of the site;

The site has been long term vacant for over twenty years and has been extensively marketed for some time without success. Marketing of the site has, however, identified that there is strong demand from private educational establishments for both student accommodation and classroom space;

There is a wider supply of existing vacant modern accommodation and extant consents within the immediate vicinity which are being actively marketed and which are more than sufficient to meet current demand.

Office development in the current market will logically only come forward if a specific pre-let can be identified (marketing has demonstrated no interest) or if future space is created as part of a flexible planning consent.

Through the Strategic Housing Land Availability Assessment (SHLAA - Update to SHLAA, 2011) process the Council have recognised that the Blackman Street site could facilitate an element of residential use and there is now broader recognition that mixed use is likely to have a key role in delivering employment space.

The specific merits of the proposed study hotel use are outlined in an additional document submitted with the representations. This current opportunity presents a rare opportunity to secure regeneration and enable development of the site in the short term. Through utilising a flexible consent this could bring forward employment use as part of a wider flexible mix of uses (If deemed appropriate consent could be secured for a flexible use under the provisions within Part 3, Class E of Schedule 2 of the Town and Country Planning (General Permitted Development Order) 1995 which allows a change of use specified on a permission to take place without further consent provided that this change takes place within ten years of the grant of consent)

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments propose use of the Blackman Street site for a study hotel. The Blackman Street site is allocated for 2,000 sq m of B1 office/research and development floorspace in policy DA4 of the City Plan. The city has a demonstrable need for new and high quality employment floorspace in central locations such as Blackman Street as shown by the Employment Land Study Review 2012.

The Review also considered this site as an excellent location for employment development. The approach in DA4 does allow an appropriate mix of uses at part iii) so long as the minimum employment floorspace figures are brought forward. It is therefore considered that the policy does provide for a sufficient flexibility and has considered deliverability and viability issues. The City Council continues to work closely with developers to bring forward existing office space commitments.

Consequently, no change to the allocation of the site is proposed.
Further Details:

I am NOT in agreement for major housing development at Toads Hole Valley, Brighton Marina, the Seafront and New England Quarter.

I gather you hope to plan for over 11,300 new homes over the next few years.

1. How are you going to supply water for all these homes. We already do not have enough water to supply the area with the present population. We will have continual drought restrictions if you go ahead with these proposals.

2. The city is congested at the moment. With another say 25,000 population and additional cars, the city will become even more congested.

3. I know a number of people from surrounding areas are not shopping or visiting Brighton any more because of high parking charges and congestion on the roads.

4. People like and come to Brighton because it is not overcrowded at the moment, but will be if you plan to build another 11,000 homes.

5. Why do you have to plan to increase in size all the time. Big is not always beautiful, as we have seen with the banks. Stand up to the government and say you only want limited new housing development. Do not let them dictate how many new homes should be built. We are already one of the most densely populated countries in Europe. Enough is enough.

6. Why are you not planning for a park and ride facility on the outskirts of Brighton. What about the football stadium with existing car parking spaces unused in the week, and most Saturdays and Sundays.

7. If Brighton becomes to large it will loose a lot of its appeal, and become another urban sprawl.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection and comments noted.

The City Plan must address how it will be meet its identified housing needs of 16,000 new homes over the Plan period. The City Plan recognises that it is not possible due to the physically constraints of the city to meet its full housing need alongside the need to meet other land requirements (for health, education facilities, employment sites etc.) and the need to respect the historic built and natural environment of the city.

The City Plan 11,300 housing target is considered to be a realistic local housing target based on the capacity exercise undertaken of potential housing sites (Strategic Housing Land Availability Assessment).

The City Plan recognises a key challenge to the city is water resource consumption. The City Plan sets out in CP8 Sustainable Buildings requirements for new developments to meet high water efficiency standards and incorporate facilities to recycle, harvest and conserve water resources.

The City Plan sets out in CP9 Sustainable Transport, how traffic congestion will be addressed including provisions for informal park and ride.
Further Details:
Watkin Jones Group delivers and manages student housing schemes. They are working with the Co-operative Group on the former Co-op site on London Road to develop student housing and retail. There is an agreement with the University of Sussex to use the accommodation primarily for postgraduate students. A previous application was refused but not on the principle of student housing. No concerns about student housing have since been raised by officers. In the absence of any objections, it must be suitable and justifies a site specific allocation for purpose built student accommodation.

The Student Housing Options Paper sought to address HMO issues and ensure provision of high quality purpose built student accommodation. Four sites were specifically identified and no reason given for excluding the Co-op site. Watkin Jones and the University of Sussex both recommended that the site should be included for student accommodation. The officer response was that the site was included in the SHLAA and had potential to help meet the City’s housing targets. Watkin Jones state that the Preston Barracks site is allocated for student accommodation but also listed in the SHLAA. Inclusion in a SHLAA does not commit to residential use as a SHLAA does not allocate sites.

Watkin Jones object to policy DA4 and consider that the Co-op site should be identified within the policy for purpose built student accommodation. Seven reasons are given. The site is the only one in the city linked to the University of Sussex and is an important part of its housing strategy. There is no objection in principle to student accommodation and it seems perverse to ignore it as an allocated site. The Preston Barracks site is allocated for student accommodation but also included within the SHLAA. Inclusion in a SHLAA, which does not allocate sites, does not preclude allocation of the site for student housing. The supply identified in the SHLAA exceeds the housing requirement. Given the surplus of housing sites, the Co-op is not needed for open market housing anyway. Student use of the Co-op site will help to free up existing family housing currently used as an HMO. The location of the Co-op is suitable for student accommodation. It is accessible to the campus by cycle and bus. Student use is the only viable use of the Co-op site and would contribute to the regeneration of London Road.

Statement of Changes:
The London Road area is suitable, accessible and sustainable for student accommodation and the policy text should reflect this. The Co-op site should be identified within the academic corridor. Part B of the policy should show a substantial increase in the number of student bed spaces from 300 to reflect the total capacity of all sites, including the Co-op on London Road.

Any Other Comment:
Officer Response:
Watkin Jones’ comments on the recent planning history of the Co-op site on London Road are noted. However, the absence on the most recent decision of a reason for refusal relating specifically to student accommodation use does not justify allocation for purpose built student accommodation. Rather, this reflects the current lack of an adopted planning policy covering the site or setting out criteria for student housing provision. The council considers the site to be wholly suitable for general housing and it would not be appropriate to preclude such use through a policy allocation for an alternative use.

Policy CP21 identifies five sites for purpose built student accommodation. In total, they will provide a minimum of 2,200 student bedspaces. These additional bedspaces will be of significant help in meeting the accommodation requirements arising from the growth in student numbers. However, the council also faces very challenging housing targets and, in order to address housing needs robustly, adequate availability of housing sites must be maintained. Criterion 7 of policy CP 21, which seeks to avoid the use of sites within the SHLAA, allocated by City Plan policies or with extant permission, is considered justified given the tight physical constraints on the city and its significant housing needs. The Co-op site is considered suitable for housing development and, in these circumstances, it would not be appropriate to allocate the site for student accommodation.

Watkins Jones appears to have misunderstood the Preston Barracks proposals. Mixed use development is sought on the site. Contrary to your comments, there is no conflict between the Preston Barracks allocation and the site’s inclusion within the SHLAA. A 300 dwelling figure for Preston Barracks is contained within both the SHLAA
and policy DA3. This figure for housing is in addition to, rather than instead of, the separate student accommodation provision and other uses also sought.

In conclusion, the council does not accept that the Co-op site on London Road should be specifically allocated for student housing, as general housing use would be an acceptable use and one that would help to meet the city's challenging housing targets. The 300 bed space student housing figure for DA4 New England Quarter and London Road area reflects the priorities for the area with regard to employment floorspace and residential development and the approach set out in CP21 in identifying sites for purpose built student accommodation.
Further Details:

Stonebridge Brighton Ltd’s (SBL) comments on this proposed Development Area relate to both education and employment use. For ease of reference the comments on each area are grouped together below:

Education

The summary of this area set out at paragraph 3.34 to 3.36 currently overlooks the wide contribution of educational uses within this area both through City College and also new private educational uses such as Belerby's college which is run by Study Group. These are a key part of the local context and will be key drivers in delivering future growth and regeneration.

Local Priority 4 advocates improvements in vocational training and further education as an extension to the academic corridor, however, there should also be specific recognition of the wider needs to address both current needs and demands from all forms of educational uses.

The recognised need to provide student housing within this area is supported, however, the specific allocation of 300 units relates just to the proposed campuses at Pelham Street and Preston Road which will help meet specific demand from City College. The actual level of demand for student accommodation and teaching space is anticipated to be much higher when additional requirements from language schools, foreign business schools and university path-finder colleges are also considered.

Employment

Local Priority 1 proposes to plan for a new business quarter accommodating 20,000 sqm of floorspace post 2016 (The specific breakdown of figures needs to be clarified as this currently indicates an oversupply of circa 1,000sqm.). SBL recognise that this objective represents one potential route to securing the regeneration of the area, however, given the general challenging economic conditions and weak local office market a B1 focused strategy to growth will at best only deliver very slow incremental improvements later in the plan period.

In this context the policy needs to include sufficient flexibility to ensure that other options for generating economic growth and enabling regeneration are supported, particularly if these can come forward earlier in the plan process.

One of the principle drivers in this area is to ensure that the area east of Brighton station comes forward as the preferred location for new office development needed in the City. This is specifically justified by reference to the Employment Land Study (2006) see Para 3.38. This approach is to be delivered through the imposition of a minimum office floorspace requirement on each of the identified development sites. SBL are concerned, however, that the justification for this approach is based on employment evidence prepared during very different economic conditions (The robustness of the evidence base to support the 20,000 sqm target and the appropriate role of B1 uses in driving forward regeneration should be re-visited through a reassessment of the Employment Evidence Base. Specific consideration should also be given to the appropriate role of other employment generating uses such as the educational sector and educational/study tourism).

Accordingly, SBL are concerned that the proposals to specifically require the provision of a very large quantum of office space across all DA4 sites is likely to undermine the wider efforts for regeneration as well as prejudice other positive uses which would contribute to the local economy through non-traditional forms of development.

The justification for the current approach to spread B1 uses across all DA4 development sites is based on the ‘Strategic Viability Assessment’ work undertaken in March 2012. In relation to the DA4 sites the assessment considered the viability of delivering the employment allocation for this area across just two sites. This concluded that this would not be economically viable given the lack of demand for large office suites and the general weakness of the Brighton office market. As a specific outcome of this analysis the assessment work advises that ‘consideration needs to be given to the capacity of each of the sites to individually deliver a proportion of the office space allocated to this policy.’
This fallback position which now reflects the approach set out within Policy DA4 has not, however, itself been specifically assessed in terms of viability. The assessment work did, however, note that 'the low returns and the limited capacity of the sites to deliver both the anticipated office floorspace and any enabling development is likely to see development come forward in the latter part of the plan period.'

This would effectively mean that if the requirement to deliver a specific quantum of office space is rigidly enforced the regeneration of all of the sites within this area will realistically stagnate until the office market significantly improves. The fundamental basis for the requirement of such a large level of new office space must, therefore, be revisited and careful consideration given to the need for a more flexible approach.

As part of this re-evaluation of the employment position it is considered that the role of large existing vacant spaces and premises such as New England House should be given further consideration to determine the productive role which these area could play through refurbishment and renewal to address the demands for new B1 office space.

SBL are also concerned that the ‘Strategic Allocations’ for this area in actual fact represent specific Site Allocations which should be more appropriately included within the Part 2 document. The piecemeal allocation of sites for the envisaged B1a and B1b requirements and only around one tenth of the estimated residential targets does not represent a holistic approach to future planning for this area and by not representing a joined-up approach runs the risk of actually undermining the regeneration of the area.

Unsound: The current policy approach focuses a large quantum of B1 floorspace within the DA4 area which is not justified by up to date evidence and which reflects an approach which recent analysis identifies will effectively stagnate development until later in the plan period.

Given the current economic conditions the regeneration of sites will only realistically come forward where there is strong demand for uses or where a specific end user has been identified. Currently the student market is strong in Brighton and there is considerable demand for new growth. The office market is, however, flat. In order to meet the dual objectives of delivering regeneration and meeting realistic employment targets the Council will need to adopt innovative and flexible approaches to secure new growth and development.

The current policy approach is not considered to be JUSTIFIED, and would not be sufficiently FLEXIBLE to ensure that the wider plan objectives are realised.

**Statement of Changes:**

The Development Area designation should recognise the role and benefits of ‘study/educational tourism uses’.

The baseline figures for B1 employment use should be revisited and the distribution of development re-visited to ensure that it is suitably robust. The specific apportionment of employment targets to individual sites should be deleted from the Part 1 plan.

**Any Other Comment:**

**Officer Response:**

Comments noted.

**Education**

The council recognises the contribution that Bellerby's College has played in the regeneration of the New England Quarter area. It is considered that part 4 of the policy does address the contribution of educational uses within the area by stating that it will support improvements to vocational training and further education within the area as an extension to the Academic Corridor.

The need for student accommodation has been addressed in the City Plan through CP22 and appropriate allocations within Development Area proposals. Part i) A 6 of the policy refers specifically to other education providers and the council would welcome the provision of additional purpose built accommodation to meet their students' needs. Paragraph 4.208 also makes clear reference to the range of education providers within the city, including “the language schools." The policy applies equally to the purpose
built student accommodation of all the city’s education providers.

The need for student accommodation has to be balanced with the identified need for housing and employment over the Plan period.

Employment
An Employment Land Study Review 2012 has been undertaken and this has informed the final version of the City Plan. It is considered that this provides up to date justification for the sites that are safeguarded through the City Plan Part 1 and those sites that are identified for new employment floorspace. The city has a demonstrable quantitative and qualitative need for new and high quality employment floorspace in central locations as shown by the Employment Land Study Review.

It is therefore considered that the policy does provide for a sufficient flexibility and has considered deliverability and viability issues. The City Council continues to work closely with developers to bring forward existing office space commitments.
Motoring and Leisure Services Limited (known as the CSMA Club) are the owners of Britannia House and the land adjacent identified within the City Plan as the Blackman Street site. Our comments relate to Policy DA4 of the City Plan which concerns the New England Quarter, London Road and this particular site.

The general principles of Policy DA4 are supported in that we agree the City’s primary office location should be both recognised and supported within the forthcoming City Plan but we strongly feel that in the best interest of economic development the policy approach taken by the Council in the draft City Plan, and in particular Policy DA4, should not be overly prescriptive and add in greater flexibility for a greater mix of development.

It is recognised that the latest draft of the City Plan (following the Policy Options Papers) factors in flexibility for sites through Policy DA4C 1 i) which allows an appropriate mix of uses (C3/A1/A3) on sites providing that the minimum threshold of B1a and B1b office space set out by DA4C 1 is met.

However, it remains our view that a wider range of uses could be allowed in such locations to provide flexibility in order to make provision for appropriate land uses in the City and to create more inclusive, mixed and therefore sustainable communities.

The evidence base for the City Plan recognises that the environmental constraints to the City mean that much new employment floorspace in the future will have to be found by recycling existing employment sites, particularly post 2016 although many recent developments have been redevelopment of existing sites. What is clear is that many allocated employment sites in the existing Local Plan (2005) have lain vacant and undeveloped for a number of years during economically advantageous times and also the current recession. There needs to be greater recognition by the Council in City Plan policies of the needs of the market and greater flexibility delivered through its policies to allow sites to develop as a mix or as alternatives to B1 office development.

Paragraph 22 of the new National Planning Policy Framework (NPPF) requires Councils to avoid long term protection of employment sites and paragraph 158 requires them to specifically take into account relevant market and economic signals.

It is important to note that the deliverability of sites included in the previous Masterplan for the New England Quarter has been slow. Block J has only recently gained planning permission (having been left undeveloped for a considerable length of time) for redevelopment and the office element of Block K has still to be commenced. The land adjacent to Britannia House at Blackman Street has been marketed for a significant period of time for B1 office development with no interest. GB Liners has planning permission for major office development but this will not be developed until or if the market makes such a proposition viable. Therefore policy should be flexible in its approach to delivering development on the various key sites considered and also in the wider City.

DA4 allocates 5 sites located within the New England Quarter and London Road area for B1a and B1b uses with some flexibility for C3, A1 and A3 uses. It cannot be agreed that this prescriptive approach to allocating development to particular locations will help to deliver development on the ground taking into account market viability. This was the approach that was largely taken in the existing Local Plan and as acknowledged in the various previous consultation papers, it is time for a revised approach. It is difficult to see how a site specific policy could indicate a mix of uses considered acceptable to ensure viability of development in a difficult economic climate. These are competing aims; the market determines viability and overly prescriptive policies can be harmful in achieving these and getting development off the ground.

It is considered that Policy DA4 should allow greater flexibility of uses and through doing so, the Policy could help safeguard and facilitate B1 office development whilst also recognising the need for additional flexibility through a range of criteria relating to viability, deliverability and benefits of alternatives and mixed uses.

In some part, the supporting text of Policy DA4 recognises this, particularly Paragraph 3.39 however these comments have not been sufficiently reflected within the Policy itself.
In this regard criteria ii. of Policy DA4 should be extended to include other appropriate uses such as uses appropriate in residential areas (for example, student accommodation) to enable developers to respond to the market which would help to facilitate and deliver the required level of office development within the City.

It is considered that this change to the Policy would help safeguard the need for B1 development whilst also recognising the need for additional flexibility through the proposed criteria relating to an appropriate mix, a high level of design and provision for green infrastructure. If developments are carefully designed and managed in terms of its impact on residential and public amenity, and a strong viability case is put forward to justify, for example a C2 use, which would help to deliver B1 development then we cannot agree its correct that such development should be restricted by the District Plan.

Further to the points made above, we do not support the minimum threshold of B1 development on each of the sites allocated by DA4. Policy DA4 prescribes business floorspace in 5 individual locations within the New England Quarter and London Road area however, in our view there are other sites within this location that do have the potential to deliver office development. The Policy should be altered to allow a more flexible spread of B1 uses across the New England Quarter and London Road areas whilst facilitating a wider range of development that is viable in the current market. It is appreciated that listing identified sites can help facilitate and deliver new office development. However by taking an overly prescriptive approach (as Policy DA4 does at the moment) to delivery of floorspace on individual sites there is a risk of further vacant or undeveloped sites that cannot meet such requirements in a tough economic climate.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments propose use of the Blackman Street site for a study hotel. The Blackman Street site is allocated for 2,000 sq m of B1 office/research and development floorspace in policy DA4 of the City Plan. The city has a demonstrable need for new and high quality employment floorspace in central locations such as Blackman Street as shown by the Employment Land Study Review 2012.

The Employment Land Study Review also considered this site as an excellent location for employment development. The approach in DA4 does allow an appropriate mix of uses at part iii) so long as the minimum employment floorspace figures are brought forward. This is change from the adopted Brighton & Hove Local Plan policy for this site. It is therefore considered that the policy does provide for a sufficient flexibility and has considered deliverability and viability issues. The City Council continues to work closely with developers to bring forward existing office space commitments.

Consequently, no change to the allocation of the site is proposed.
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**Further Details:**

DA4.C.3 - 125-163 Preston Road, Page 51
Southern Water has assessed the water distribution and sewerage system in the vicinity of this strategic site (please see spreadsheet submitted). The results show that the existing capacity is insufficient to accommodate the anticipated demand.

The development will therefore need to provide the local infrastructure required to connect to the water distribution and sewerage system at the nearest point of adequate capacity. The location of this point will need to be determined when the development comes forward.

Ofwat, the water industry's economic regulator, takes the view that the local infrastructure required to serve new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increased general charges.

Connection off-site is the mechanism by which developers can provide the local infrastructure required to service their sites. However, Southern Water has limited powers to enforce such connection. We therefore look to the planning authority to support this approach in planning policies.

It is important to give early warning to prospective developers regarding the need to connect off-site, as it will add to the cost of the development. Early warning will facilitate delivery of the necessary infrastructure. If the infrastructure is not delivered the water mains and sewers will become overloaded, leading to poor water pressure, foul water flooding and pollution of the environment.

We therefore propose an additional bullet point in policy DA4.C.3 to recognise the need for local water distribution and sewerage infrastructure.

**Statement of Changes:**

We propose the following text is included in policy DA4.C.3 to recognise the requirement for adequate utility infrastructure to serve the proposed development:

- The development must connect to the water distribution and sewerage system off-site at the nearest point of adequate capacity.

**Any Other Comment:**

**Officer Response:**

Southern Water's comments are noted. The policy with regard to Preston Road sites has been amended to make specific reference to water distribution and sewerage disposal as requested.
### Customer No: 125 Customer Name: Trustees of Toads Hole Valley and Pecla Investments Limited

**Support Status:** Partly Object

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**Section/Supporting Doc/Annexes** Part Three: Development and Special Area policies

**Further Details:**

We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are noted. It is considered that Toads Hole Valley is different to the other seven development areas as it is greenfield site. However reference to the policy contributing to delivering the principles of the One Planet approach has been added to supporting text.

### Customer No: 192 Customer Name: Tesco Stores Ltd

**Support Status:** Partly Object

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**Further Details:**

The range of uses identified should include (or maintain) support for appropriate provision of new retail floorspace to meet local needs and encourage sustainable shopping patterns

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Tesco Stores Ltd's view that new retail development could contribute to the local needs and encourage sustainable shopping pattern is noted. The council's 2011 Retail Study update does not identify a need for further allocations outside the existing Town Centre boundary. Ground floor ancillary retail uses are included in the list of permitted uses in DA4.C.1.iii. Any proposals for new retail development in the DA4 area would come forward under the tests set out in the National Planning Policy Framework and policy CP4. No amendment is therefore proposed to policy DA4.
Further Details:

DA4 New England Quarter and London Road

The New England Quarter should be looking at high levels of sustainability building on what was achieved through progressive planning policy e.g. Jurys Inn, One Brighton etc. Given it is so central and close to good public transport links and because air quality is also an issue, car free development should be heavily promoted here.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial objection and comments noted. Development within DA4 will be assessed against city wide policy CP8 Sustainable Buildings. Opportunities for car free development will be assessed against city wide policy CP9 Sustainable Transport. Further opportunities for car free housing will be taken forward in a new Parking SPD to be produced by the council.

Further Details:

APEC is keen to preserve the level of affordable workspace for artists and artists groups across the city and, more specifically, in the Hove Station (DA6) area. Pleased to see numerous statements through the Plan to the importance of the arts to the character of the city and supporting the provision of affordable workspace and generally welcomes the policy.

APEC is concerned though that the Plan uses the term "affordable" in a number of places in relation to rents for artists workspace without being clear about what constitutes "affordable." Queries the "average" rent paid for artist workspace set out in the Creative Industries Workspace Study 2008. The "average" figures given in that study are higher than those generally affordable by arts practitioners and makers and cover the wider creative industries sector. APEC itself would not be viable at the higher rents mentioned in the study and other similar artist workspaces offer similar rents to APEC. Clarity on the definition of "affordable" will be critical to the success of the policy. Stresses the contribution made by this sector to society and to the health of their communities. Hope that these comments will help to plug a small but vital gap in an otherwise impressive policy.

Statement of Changes:

Clearer definition of the word "affordable" in relation to workspace provision particularly for artists/makers workspaces.

Any Other Comment:

Officer Response:

Partial support and comments noted regarding that affordability of workspace will vary depending on the nature and type of creative industries businesses and organisation and this will be reflected in a footnote to the supporting text in DA4 and CP5.
Further Details:

This is the view of the North Laine Community Society (NLCA). We support these Development Area policies, particularly with regard to mixed use and office space which would help the needs of both employment and housing. Improvements to the London Road shopping area are essential and welcome.

The new Open Market will achieve greater integration and accessibility for people living and shopping in the area along with the additional homes currently being built in association with Hyde Housing. We would prefer the vacant Co-op building to provide further mixed use of offices, retail and residential to support the existing community and revitalise the area rather than rooms for students. The NLCA have concerns with regard to provision of student accommodation close to residential areas and the potential for late night disturbance and anti-social behaviour. London Road shop fronts are poorly designed and in bad repair. With joint support from the landlords and the Council the area could be transformed by reducing the area frontage and fasciae of the shops and businesses to a uniformed design with the addition of repair to windows and frontage of the premises above, which are mostly flats. We support key provision for vocational training in the city centre to support jobs for the future (3.41) but we question the proposal for expansion of facilities at City College as this cannot be met long term. The reason for this is if the College sells or leases Pelham Tower for student accommodation a new-build on the College car park would not be able to accommodate the essential requirements needed, or be able to expand in the future. The NLCA has concerns about the proximity of the building to the adjoining North Laine residential area. It is essential that all new build and refurbishment should be an exemplar of sustainable living such as One Planet Living principles (3.34). This was first promoted for the whole of the New England Quarter which, sadly, resulted in just one building being erected on these principles.

For the new City Plan there is potential for joint action between the private sector, landowners, developers and the Council to meet the needs of sustainable living and improve the public realm across the City for the future.

The NLCA is pleased to note the change of policy to retain the use of New England House for start-up businesses.

Statement of Changes:

Paragraph 3.41 We would like the provision of student accommodation removed.

Any Other Comment:

Officer Response:

Welcome partial support.

Policy CP21 identifies five sites for purpose built student accommodation including Pelham Street Campus. In total, they will provide a minimum of 2,200 student bedspaces. These additional bedspaces will be of significant help in meeting the accommodation requirements arising from the growth in student numbers and therefore no change is proposed.

Your concerns about the possible impact on North Laine of student accommodation and the longer term requirements of City College are noted. Policy CP21 sets out criteria that will need to be addressed by proposals and will ensure that issues such as noise disturbance, anti social behaviour and management are addressed through the planning application process.

Part 3 reflects the partnership approach that would be required to redevelop/ refurbish key sites along the London Road. Development within DA4 will be assessed against city wide policy CP8 Sustainable Buildings.
Customer No: 172  Customer Name: Richard J Taylor
Organisation:  Support Status: Partly Support
Rep Number: 1 Page/Para: / Policy: DA4 - New England Quarter and London Road A
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
I received a leaflet through the door regarding Toads Hole Valley development, and have read your guide to City Plan Policies.

I am in agreement for some commercial new development at:
1. New England Quarter and London road
2. Brighton Centre and Churchill Square
3. Brighton Marina and Black Rock

Statement of Changes:

Any Other Comment:

Officer Response:
Welcome partial support for commercial development identified for the New England Quarter and London Road area.

Customer No: 186  Customer Name: Jackie Lythell
Organisation: Arts and Creative Industries Commission  Support Status: Partly Support
Rep Number: 5 Page/Para: 47/ Policy: DA4 - New England Quarter and London Road A
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
Recognition of the role and importance of culture and creative industries in regenerating areas of the city eg of Lively Cities project in Providence Place and cultural events and programmes in London Road area

Statement of Changes:
Section A point 4 p 48 - add in reference to working with cultural partners in improving London Road area

Any Other Comment:

Officer Response:
Partial support welcome and comments noted. The role and importance of cultural and creative industries and organisations in the regeneration of the development area is recognised and this has been included in the supporting text.
Customer No: 128  Customer Name: Selma Montford
Organisation: Brighton Society  Support Status: Partly Support
Rep Number: 3  Page/Para: 0/  Policy: DA4 - New England Quarter and London Road A
Section/Supporting Doc/Annexes  Part Three: Development and Special Area policies

Further Details:
We support these Development Area policies, particularly with regard to mixed use and office space, which would help the needs of both employment and housing. Improvements to the London Road shopping area are essential and welcome. The new Open Market will achieve greater integration and accessibility for people living and shopping in the area along with the additional homes currently being built in association with Hyde Housing. We would prefer the vacant Co-op building to provide further mixed use of offices, retail and residential to support the existing community and revitalise the area rather than rooms for students.

Statement of Changes:
London Road shop fronts are poorly designed and in bad repair. With joint support from the landlords and the Council the area could be transformed by reducing the frontage area and fascias of the shops and businesses to an improved design with the addition of repair to windows and frontage of the premises above, which are mostly flats.

It is essential that all new build and refurbishment should be an exemplar of sustainable living such as One Planet Living principles (3.34). This was first promoted for the whole of the New England Quarter, which, sadly, resulted in just one building being erected on these principles. For the new City Plan there is potential for joint action between the private sector, landowners, developers and the Council to meet the needs of sustainable living and improve the public realm across the City for the future.

Any Other Comment:
The loss of 'City Gate' (above the vacant Blockbusters shop) is a concern. This was a community led base for people of all ages to meet as groups of all ages for activities such as dancing and is a loss for local people, especially the elderly.

Officer Response:
Welcome support and comments noted.

Part 3 of the policy reflects the partnership approach that would be required to redevelop/refurbish key sites along the London Road. Development within DA4 area will be assessed against city wide policy CP8 Sustainable Buildings.

With regard to the Co-op building, your comments are also noted. However, whilst the previous application was refused on the grounds of overdevelopment, the reasons for refusal did not state that the area was unsuitable for student accommodation.

Your concerns about a tall building with any redevelopment proposals at City College are noted. Policy CP12 Urban Design sets out the assessment requirements for any proposals for tall building. Please note, the visual impact of the replacement buildings was carefully considered as part of the previous redevelopment proposals for Pelham Street site.
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### Further Details:

DA4 - I support the development area policies for mixed use and office space which I believe would help employment and housing.

Improvements to London Road shopping area are urgently needed and the new Open Market will hopefully create a community based shopping and meeting area for local people. Many shopfronts are rundown and in need of improvement.

The Coop should provide a mix of offices retail and residential which would support the existing community and revitalise the area. I cannot support a proposal for student accommodation as we have too much student accommodation in the area already.

I object to the proposals to expand City College. If the Pelham Tower were used for student accommodation the new build car park would not be large enough to accommodate the needs of the vocational studies and there should not be a tall building on the present car park.

### Statement of Changes:

### Any Other Comment:

I couldn’t make your email to work.

### Officer Response:

Welcome partial support and comments noted.

Part 3 reflects the partnership approach that would be required to redevelop/ refurnish key sites along the London Road.

With regard to the Co-op building, your comments are also noted. However, whilst the previous application was refused on the grounds of overdevelopment, the reasons for refusal did not state that the area was unsuitable for student accommodation.

Your concerns about a tall building with any redevelopment proposals at City College are noted. Policy CP12 Urban Design sets out the assessment requirements for any proposals for tall building. Please note, the visual impact of the replacement buildings was carefully considered as part of the previous redevelopment proposals for Pelham Street site.
Further Details:

No mention is made of the fact that National Cycle Route 20 runs through the area and should be a key focus for improvement.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial support and comments noted. Amendments have been made to the supporting text to refer to the NCN Route 20. Improvements to cycle routes are covered in Part 6 of the policy.
Further Details:

We wish to submit comments specifically in respect of draft policy DA4, which is the strategic policy relating to the London Road and New England Quarter area. Our comments relate to the approach that is taken within the policy toward the provision of new and replacement B1 employment floorspace.

We welcome the fact that the approach set out in the (now withdrawn) Core Strategy has been changed, which partly reflects the advice set out in the Council’s Viability Study background paper (2012), and also the comments we made in respect of viability. Nevertheless, we do not believe that the draft policy is sufficiently flexible to take account of viability issues, particularly in the light of the NPPF, and that the policy is not deliverable.

Accordingly in its current form, we do not believe that policy DA4 is justified.

The NPPF carries clear advice in respect of plan making and viability (Paragraph 173).

We acknowledge that the Council has sought advice on the issue of viability. As a result, the previous strategy that was set out in the Core Strategy whereby 20,000 sq m of floorspace was sought on no more than 2 sites has sensibly been abandoned. However, the Viability Study background paper states at para 3.7:

'Following standard conventions in the development industry, developer profits were based on an assumed percentage. Normally this is about 20% of costs. Assumed profit figures reflect levels of risk - the higher the potential risk, the higher the profit margin in order to offset those risks. In this instance, given the tight lending criteria of banks and the difficult economic conditions, the viability assessments have assumed a relatively high target profit margin of 25% which is considered to be realistic given the state of the market at the time of writing.'

The document was produced prior to the publication of the NPPF, and it does not reflect the need to take account of a return for a landowner as well as a developer. In this respect we consider that the issue should be reconsidered.

Vantage Point - Office Uses

Although it is not clearly expressed, our understanding is that the 1000 sq m target would be intended to be provided in addition to the re-provision of the existing floorspace in any redevelopment scheme. The existing building provides approximately 3440 sq metres (37,000 sq ft) of B1 floorspace, which suggests that the Council would expect any redevelopment scheme to provide 4400 sq metres of class B1 floorspace in any redevelopment scheme. We do not believe that this would be viable or deliverable, for the following reasons:

It is difficult to secure occupiers at the present time, and commercial rents are not at a sufficient level to ensure that new B1 floorspace is generally viable.

The overall amount of office floorspace sought by the policy is unlikely to attract funding. It would require a substantial pre-let, at least in part, which is unlikely to be secured in the foreseeable future.

It would not be viable to provide this quantum of space on a speculative basis.

From a design perspective, we do not believe that the site has sufficient capacity to be able to provide this quantum of B1 floorspace together with other, higher value uses (such as residential and/or student accommodation) in sufficient quantity to ensure a viable and deliverable redevelopment overall.

For these reasons, we believe that the policy as currently formulated is arbitrary in nature, and it does not have sufficient flexibility to ensure that the regeneration that is sought would be deliverable.
Other Uses
Draft policy DA4 also seeks to provide other uses at Vantage Point and other strategic sites, and in this respect the policy states:

An appropriate mix of uses including residential (C3) and ancillary retail (A1) and restaurants and cafes (A3) at ground floor will be permitted;

We support this approach. However, we believe that the development of some student housing would also be appropriate at the site. This is likely to produce relatively high values and is a land use that could help to ensure the overall viability of a development scheme. We acknowledge that the policy already seeks to provide 300 student bed spaces in the policy area (paragraph B), although this is not allocated to any specific site.

Statement of Changes:
We believe draft policy DA4 should be redrafted so that it seeks a more modest quantum of employment floorspace, which is viable and is likely to be delivered. This approach would be consistent with the NPPF.

To develop this theme, it is clear that the existing building is largely unoccupied and further that it is unlikely ever to attract a new occupier. It is therefore questionable whether the building should be treated as ‘existing’ employment floorspace. It is widely acknowledged that the city contains a significant quantum of empty poor quality office space, but that there is a relative shortage of available good quality space.

With this in mind we feel that Policy DA4 would be more deliverable if it were to seek a lesser quantum of space, as this is more likely to be viable, as opposed to the current strategy which is likely to result in the building remaining vacant and undeveloped.

We therefore suggest that the policy is amended to seek the provision of up to 2000 sq metres of employment floorspace at the site in total.

This would be fully supported by the NPPF, which seeks to prevent the long terms protection of sites for employment purposes if that use is unlikely to be taken up (Paragraph 22).

Any Other Comment:
Periworld has recently acquired the property from the previous owners, Spen Hill Developments Ltd.
Savills previously submitted representations to the Council on behalf of the previous owners of the site. We confirm that Periworld Ltd agrees with these earlier comments, and these representations should be considered in that light.

Please note that we wish to appear at the City Plan examination in order to expand upon the points that are set out in the representation.

Officer Response:
As indicated in the draft City Plan, an Employment Land Study Review 2012 was undertaken to inform the final version of the City Plan. This Study indicates both the qualitative and quantitative need for employment floorspace over the plan period. The Study also considered this an excellent site for employment redevelopment.

The approach in DA4 does allow an appropriate mix of uses at part iii) so long as the indentified employment floorspace figures are brought forward. CP 3 Employment Land, within the supporting text, acknowledges the considerations that will be given in the short term to issues such as viability. However given the potential shortfall in office floorspace over the plan period and the priority to manage the greater delivery of office floorspace in the city, particularly in central Brighton it is considered that the approach in DA4 and the allocation of this site is justified and provides for a sufficient flexibility. The capacity of the site to accommodate the amounts of development proposed in the draft City Plan has been reexamined through a site capacity assessment. On the basis of this assessment the policy has been revised to require no net loss of B1a floorspace.
Support the proposed City Plan but reaffirm the belief previously expressed in response to the Student Housing Options Paper that the former Buxtons site (on the junction of Ditchling Road and Oxford Place) should be added to the list of strategic development sites as it could potentially deliver around 100 student residences.

**Statement of Changes:**

Inclusion of Buxtons site as strategic allocation for student housing.

**Any Other Comment:**

**Officer Response:**

Policy CP21 identifies five sites for purpose built student accommodation. In total, they will provide a minimum of 2,200 student bedspaces. These additional bedspaces will be of significant help in meeting the accommodation requirements arising from the growth in student numbers.

However, the council also faces very challenging general housing targets and, in order to address housing needs robustly, adequate availability of housing sites must be maintained. Criterion 7 of policy CP 21 specifically seeks to avoid the use of sites with extant permission. This is justified given the tight physical constraints on the city and its significant housing needs. The Buxton's site, as shown by the extant planning permission for 28 apartments, is suitable for housing development and it would not therefore be appropriate to allocate the site for student accommodation.
Further Details:

The College aims to be an outstanding and responsive college at the heart of learning in Brighton & Hove, By 2014/15, with the development of the Pelham Street campus regeneration, the College will meet its vision of being an outstanding and responsive College, inspiring learners, creating opportunities and changing lives. The redevelopment of the Pelham Street campus provides an excellent opportunity to place learning, in general, and City College, in particular, at the heart of Brighton & Hove’s future economic and social development. The regeneration of the Pelham Street Campus will significantly support the college in the delivering its own strategic goals as well as significantly contributing to the economic and social well-being of the city.

The college remains fully committed to improving education facilities across our campus sites not that funding is no longer available from the Learning & Skills Council's Building Colleges for the Future programme. Like most FE establishments city college remains on a journey of organisational change and quality improvements. Developing and implementing new plans for improving the College’s accommodation is a key priority.

As part of our work in developing a robust and community supported planning application for Pelham Street, we are working on a socio-economic impact assessment of the scheme which will clearly set out the direct and indirect benefits alongside an economic resilience and regeneration rationale.

The College is pleased and fully supports the inclusion of DA4 New England Quarter and London Road area which includes the city college’s plans for the regeneration of the Pelham Street Campus.

Firmly welcomes the strategy for the area set out in the first part of the policy and specifically endorses the DA4 local priorities of ‘working with education providers and funding partners to support improvements in vocational training and further education within the area as an extension to the Academic Corridor’.

However concerned with the amounts of developments set out in Part c of the policy - 300 bed space student housing does not accurately reflect the College's ambitions and previous discussions with the City College.

Specifically in October 2011 we submitted a joint response, co-signed with the University of Brighton to the Student Housing Policy Options consultation in which we stated the potential for between 500 and 600 student residences for the University of Brighton as part of a mix of uses for the regeneration of our Pelham Street Campus. This level of student accommodation has not been taken into account in the draft City Plan.

The following pages of the City Plan reference a lower, albeit minimum 300, number of student residences associated with the Pelham Street Campus regeneration - pages 41, 49 and 186.

During pre-application discussions with the Local Planning Authority in October 2011, November 2011, March 2012 and April 2012 we have consistently proposed student residences of c.500 units.

Statement of Changes:

The College and University firmly believe that a greater number of student residences can be accommodated on the Pelham Street regeneration scheme and we would wish for this to be more accurately reflected in the final published version of the City Plan. Indeed by the time the City Plan has been through the statutory examinations, the College will have submitted detailed plans which will include student housing proposals in excess of 300 units.

Any Other Comment:

The need and demand for dedicated student accommodation is high and is firmly recognised in the UK’s first dedicated Student Housing Strategy (2009-2014), published by the city council. The strategy states that there are approximately 5,813 bed-spaces in university halls of residence provided by the Sussex University and the University of Brighton in the city. This falls someway short of providing dedicated accommodation for the estimated 37,000 further, higher and international college students residing in the
Increase the provision of university-managed accommodation to offer a guaranteed bed-space for 90% of incoming first year students and for 90% of level two students. This will require the development of 1,728 bed spaces in university halls of residences.

Extend partnership working with private sector landlords and other stakeholders to ensure the continuing supply of high-quality, affordable, private rented housing for the majority of returning students that seek this type of accommodation. It aims to acquire head-leased properties for 50% and 70% of level two and three/plus students, respectively. This will require an additional 2,681 bed spaces in head-leased, university-managed accommodation.

State funds however, are not given to universities or further education colleges to develop accommodation for their students. The onus is therefore for the private sector, universities and colleges to seek innovative development opportunities, like that presented at the Pelham Street Campus and finance student accommodation projects at a time of significant economic and bank lending pressure.

**Officer Response:**

Partial Support and comments noted.
The Council recognises the contribution the City College makes to the economic and social well-being of the city. The Council worked closely with City College on their previous plans for the regeneration of the Pelham Street Campus and has provided City College with pre-application advice on the current regeneration proposals.

Note comments regarding the capacity of the site to accommodate more than 300 student bed spaces. However this will need to be examined through the planning application process. Policy CP21 allocated the City College site for 300 student bedspaces on the basis of the previous proposals that the council had resolved to grant planning consent for.

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**Customer No:** 171  **Customer Name:** Chris Sevink  
**Organisation:** Ditchling Rise Residents Association  
**Support Status:** Partly Support  
**Rep Number:** 9  
**Page/Para:** 49-50/  
**Policy:** DA4 - New England Quarter and London Road A  
**Section/Supporting Doc/Annexes**

**Further Details:**

We support the appropriate redevelopment to improve provision of business and residential space. With mixed used development, we are concerned that mixes are appropriate, and have regard to potential conflicts, for example, between trade premises that might expect deliveries at times that may disturb any residents.

There should be acknowledgement that noise will be managed as well as air quality (3.46)

**Statement of Changes:**

We would like to see acknowledgement in the appropriate part of the document that potential noise/disturbances will be taken into account in planning for mixed use development. In particular at p.51 - 52. Here financial viability of mixed use proposals is mentioned, and design and management to ensure appropriate level of amenity, but not the viability of mixing active spaces such as restaurants with residential (where there may be noise, extractor fan etc issues).

Environmental improvements should include a better noise environment – with reduced traffic noise impact and development that as can be forseen avoids noise impacts on existing or newly developed neighbourhoods

**Any Other Comment:**

**Officer Response:**

Welcome support.

Reference to noise quality has been included in the policy.
### City Plan Part 1 Responses Received 27th May to 20th July 2012

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**Further Details:**

Overall, we generally support Policy DA4 in respect of its approach to mixed use development (office and residential) at 125-163 Preston Road, Brighton.

However, work carried out on our client’s site (137-147 Preston Road) to support a recent planning application for the redevelopment for residential and commercial uses has demonstrated that provision for a significant amount of commercial floorspace in this location would be unviable.

**Statement of Changes:**

As such, this policy should be reworded to allow a more flexible approach to employment floorspace in this location.

**Any Other Comment:**

**Officer Response:**

Partial Support and comments noted. It is considered that the approach to these employment sites do represent a more flexible approach to employment floorspace in this location allowing residential use to help deliver the replacement employment floorspace.

Your referenced work on viability to support a planning application for the site will need to be considered through the planning application process.

### Customer No: 219  Customer Name: Mr Andrew Coleman

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**Further Details:**

Support recognition of air quality but should also refer to use of Community Infrastructure Levy to fund action that could improve air quality e.g. provision of cycling and public transport infrastructure, ‘scrapage’ scheme for polluting vehicles registered in the area, electric vehicle charging points, cleaner buses.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Partial Support and comments noted. Amendments to the City Plan and CP7 Infrastructure and Developer Contributions in particular reflect that it is a long term intention of the council to implement CIL. Future development that is liable to contribute to CIL will provide for strategic city-wide general infrastructure as identified in the Infrastructure Delivery Plan (IDP). The IDP reflects the priorities in the Air Quality Management Plan and no amendments is therefore proposed to DA4.
Further Details:

We support the strengthening of links between the NEQ, London Road and North Laine areas.

Improvements to the London Road shopping area are essential and welcome. The shop fronts are in bad repair; therefore the Council should encourage landlords to make improvements by reducing the area frontage and fasciae of the shops. Small upgrades such as these would transform the area.

We would prefer the vacant Co-op building to provide further mixed use of offices, retail and residential to support the existing community.

We support the provision for vocational training in the area to support jobs for the future, such as at City College.

However, if City College lease or sell Pelham Tower for student accommodation this would stymie any future expansion for the college because there would not be the land to build on.

It would mean that a proposal to build on the College’s car park would have to show a very tall building to support all the College’s teaching needs. This would be a permanent blight on the North Laine conservation area, with its narrow streets of terraced houses and would be totally out of character to the area.

Pelham Street is an inappropriate street to locate 300 students. Late night noise and antisocial behaviour already have a negative impact on the quality of life of North Laine residents. The impact of late night noise on the quality of life of North Laine residents is already the No 1 priority of the North Laine LAT. Students returning home to Pelham St after a night out will cause disturbance to residents of the narrow terraced streets of North Laine caused by the late night economy. The impact of such schemes on local residents needs to be considered.

Pelham St is adjacent to a conservation area. Another tall building located in Pelham St will have an adverse impact on the North Laine Conservation Area, particularly in Sydney Street.

Statement of Changes:

Any Other Comment:

The Co-op building is not earmarked for student housing in the City Plan. This is because the Council would not want students in that area (London Road) as they would cause noise and disruption to residents. A Council representative told us this at the 26 June workshops. If it is undesirable to have students in London Road, why is it desirable to have them in North Laine?

Please note that there were discrepancies in the plan with reference to the number of students planned for Pelham St. In DA4 it says 300 students; in an annex it says 600 students. Moreover it says in 4.211 that planning permission has been granted for 300 bedspaces. This is not the case as the planning application by City College was withdrawn once funding from the LSC was no longer available.

Officer Response:

Your concerns about the possible impact on North Laine of student accommodation are noted. Policy CP21 sets out criteria that will need to be addressed by proposals and will ensure that issues such as noise disturbance, antisocial behaviour and management are addressed through the planning application process.

The policy allocates the City College site for 300 student bedspaces and the Infrastructure Delivery Plan has been amended to reflect this. You are correct that the City College site has no planning permission for student accommodation. This was a drafting error. The supporting text (paragraph 4.211) has been amended to state that the council has previously resolved to grant planning consent, but that the development did not proceed.
Further Details:
There is significant demand for the development of affordable housing in the New England Quarter and London Road area (DA4) which is well served by public transport and local amenities. The ongoing regeneration of the Open Market and the New England Quarter being undertaken by Hyde will create a new link between the London Road shopping centre and Brighton Station, helping to facilitate this aspiration.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted.

Further Details:
We support the efforts to revitalise key sites and areas, including London Road Town Centre. A mix of uses can help regenerate the area. As well as active ground floor uses, other uses such as residential and student housing can play an important role in enhancing the viability and vitality of town centres. Development of such uses in town centres, such as London Road Town Centre, accords with national planning policy, and we would therefore recommend that an additional criterion is included in Policy DA4 to this effect.

Statement of Changes:

Any Other Comment:

Officer Response:
Welcome support for the revitalisation of London Road shopping centre. The role and location of purpose built student accommodation is addressed in CP21. It is not considered appropriate to include student housing as at DA4.c.1.ii as the priorities for these identified sites are to bring forward high quality modern office floorspace to address the qualitative and quantitative need (Employment Land Study Review 2012).
Wired Sussex is very supportive of the strategy outlined in the City Plan to build on the existing strengths of New England House. It will ensure that NEH’s current evolution towards becoming a key hub for the creative and digital sector in the city is explicit and that resources and support can and accelerate activity towards that goal.

Following on from the work undertaken in the Council for Industry and Higher Education’s Fuse Report (see http://www.cihe.co.uk/cihe-task-force-urges-far-reaching-changes-to-ensure-uk-is-a-leader-in-the-creative-digital-and-information-technology-industries), and subsequently developed in the Brighton Fuse research project (see http://www.brightonfuse.com), Wired Sussex would define the cluster for which New England House has such importance as the Creative, Digital and IT sector (or CDIT for short). For Brighton and Hove, CDIT is an important term to champion as it points to a key competitive strength for our digital cluster relative to that of other cities. Brighton’s asset is the way that companies here make creative use of technology, innovating at the intersection of the creative economy and the digital sector and bringing skill sets together in new ways. This is what the concept of CDIT captures that existing definitions do not.

The ecosystem that supports the CDIT cluster across the city is certainly present in concentrated form within New England House. Sustaining and growing the mix of cultural and creative organisations and the digital and technology businesses which together are an ever more significant element of New England House is an important element in creating a City Plan that supports the knowledge based employment so central to the city’s prosperity.

This means that, as the draft City Plan makes clear in reference to NEH, a range of workspace options needs to be provided within the building which are appropriate to the various needs of CDIT businesses from arts-based to high tech, enabling them to mutually coexist and engage.

As a number of reports have made clear, there is a real challenge with employment space for the CDIT sector in the city. In part, that is because of the speed with which this sector is currently growing. It is certainly the case that, whilst NEH is important in providing a hub for the sector, in itself it in no way solves the issue of workspace need. We would actively support the development of the area around New England House as workspace for a range of industries (including CDIT) which would provide move-on space for businesses which grow beyond the confines of NEH.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed and comments noted. Reference has been amended throughout the policy to Creative, Digital and Information Technology (CDIT) hub as requested.
Further Details:
Fully Support

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed.

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Customer No: 63  
Customer Name: Roger Hinton

Organisation: Regency Society

Support Status: Support

Rep Number: 5  
Page/Para: /  
Policy: DA4 - New England Quarter and London Road A

Section/Supporting Doc/Annexes  
Part Three: Development and Special Area policies

Further Details:
DA4: New England Quarter and London Road

The New England Quarter has failed to live up to expectations or to exploit the huge opportunity that this brown-field site offered. In particular there was a failure to develop Brighton Station as a vital transport interchange and a failure to produce any buildings of real architectural quality. The location of the new supermarket did nothing to reverse the decline of the shopping area in London Road. It is also clear that the area lacks imaginatively designed, high quality public spaces and legible pedestrian routes. We believe that any further developments in the area should be framed to address these earlier shortcomings and that efforts should be made to improve the environment of London Road and, to develop the north-south ‘green corridor’.

We support the creation of new office buildings and accept that the valley corridor is a suitable location for tall buildings, providing that they are well designed.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed and comments noted. The local priorities set out in DA4 alongside city wide policies CP12, CP13 and CP8 will address the concerns raise in your comments regarding building quality, public realm and sustainability.
As one of the main routes into the city and its international cultural and heritage offer, the regeneration of London Road is vital. The architectural heritage is hidden by the run down, dreary shop fronts and lack of coherence to the area, feeder areas for recognition of the role and importance of culture and creative industries in regenerating areas e.g. of Lively Cities project. There are opportunities to work with cultural organisations to improve this area and address some of the creative sectors needs.

**Statement of Changes:**

Support welcome and comments noted. The role and importance of cultural and creative industries and organisations in the regeneration of the development area is recognised and this has been included in the supporting text.

---

The Economic Partnership accepts that, for many employment sites that are not straightforward to develop, there may have to be a compromise on the mix of uses to include a residential element.

**Statement of Changes:**

Support welcomed and comments noted.
Further Details:

We welcome the regeneration of London Road
3.85 the Open Market provides more than ‘affordable goods for those on lower incomes’ – it supports small local business and has the potential to be a community hub.

We support work to improve air quality and public transport, cycling, walking routes and reduce the number of people exposed to poor air quality. As London Road is an area shown by the strategic noise map to have very high noise levels, and reduction of traffic noise is one of the mechanisms by which a sustainable city will be arrived at, as set out on p.18, noise should be included here. Implementation of the Noise Action plan should be included:

We support the linking of green space, but it should include all open space here?

Statement of Changes:

To motivate regeneration we would like to see more equitable representation of the open market in this document, as a site that offers small business opportunities, offering an alternative in the mix of retail in the city rather than labelling it as a place for the poor to shop.

We want to see 6. Read:
".... achieve a modal shift and help reduce the impact of traffic and ensure developments do not increase the number of people exposed to poor air quality or traffic noise"

And an additional priority:
"To work with highways and other relevant authorities to implement the Noise Action Plan and reduce exposure to high levels of traffic noise and ensure developments do not increase the number of people exposed to high levels of traffic noise”.

Providence Place should be included in this greenway network, in particular as it potentially provides a link between the station and the Level.

Any Other Comment:

Officer Response:

Welcome support and comments noted.

Amendments have been made to references to the Open Market as requested.

The Noise Action Plan for the Brighton Agglomeration was produced by Defra in 2010. This identifies priority areas for action. The Defra mapping predicts that households most affected by traffic noise are those closest to major roads: London Road, Lewes Road & the seafront. The City Council have trialled a 'Noise Action Plan Support Tool' & reported the findings to Defra. In response to the noise maps, the City Council are currently working with Environmental Protection UK & Defra advisors on designating some local open spaces as ‘quiet areas’. The Noise Abatement Society is currently working with the City Council & local people to create a city ‘sound map’, which will be used to tackle noise problem hot spots. The Noise Action Plan is reflected in the Council's Local Transport Plan 3 recognises the link between traffic levels on main roads and the highest levels of transport noise in the city. The vision and objective is to control and mitigate carbon emissions, air quality and noise effects of the city's transport systems and reference to improving air quality has been included in the supporting text to DA4 and amendments to part 6.

Reference to Providence Place Gardens have been made to the supporting text.
### Customer No: 182  Customer Name: Tony Mernagh

**Organisation:** Brighton and Hove Economic Partnership  
**Support Status:** Support  
**Rep Number:** 43  
**Page/Para:** /  
**Policy:** DA4 - New England Quarter and London Road A

#### Section/Supporting Doc/Annexes

**Further Details:**

The Economic Partnership accepts that, for many employment sites that are not straightforward to develop, there may have to be a compromise on the mix of uses to include a residential element.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Welcome support and comments noted.

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### Customer No: 182  Customer Name: Tony Mernagh

**Organisation:** Brighton and Hove Economic Partnership  
**Support Status:** Support  
**Rep Number:** 9  
**Page/Para:** /  
**Policy:** DA4 - New England Quarter and London Road A

#### Section/Supporting Doc/Annexes

**Part Three: Development and Special Area policies**

**Further Details:**

A better description of the proposed use for New England House would be to refer to the Creative, Digital and Information Technology [CDIT] hub rather than ‘creative industry and digital media hub’.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Support welcomed and comments noted, references have been amended in the policy to CDIT as requested.
Further Details:

Statement of Changes:
A better description of the proposed use for New England House would be to refer to the Creative, Digital and Information Technology [CDIT] hub rather than `creative industry and digital media hub`.

Any Other Comment:

Officer Response:
Comments noted, reference have been amended as requested.

Further Details:

Statement of Changes:

Fully Support

Any Other Comment:

Officer Response:
Support welcomed.
### Customer No: 192  Customer Name: Tesco Stores Ltd
#### Rep Number: 5  Page/Para: 1  Support Status: Partly Object  Policy: DA5 - Eastern Road and Edward Street Area

### Further Details:
The range of uses identified should include (or maintain) support for appropriate provision of new retail floorspace to meet local needs and encourage sustainable shopping patterns.

### Statement of Changes:

### Officer Response:
Your comments are noted.

The up to date Retail Study for Brighton & Hove indicates that there is no additional capacity for convenience retail floorspace to 2030. There is capacity for 57,00sqm of comparison floorspace. In terms of planning applications for new convenience retail floorspace, each will be dealt with on its merits. An amendment has been made to the Edward Street Quarter strategic allocation to allow ancillary retail as part of the redevelopment.

### Customer No: 250  Customer Name: Rob Huntley
#### Rep Number: 1  Page/Para: 1  Support Status: Partly Object  Policy: DA5 - Eastern Road and Edward Street Area

### Further Details:
Partly Support/Partly Object.

The identification of the Freshfield Business Park and the Gala Bingo Hall site as appropriate for major redevelopment is appropriate and is supported.

However, as these are 2 distinct sites, separated by a road, in very different uses, with different freehold ownerships and exhibiting fundamentally different characteristics, it is inappropriate and unrealistic for the policy to require (as it appears to do), that the 2 sites must be developed together comprehensively.

### Statement of Changes:
Separate treatment of Freshfield Business Park and Gala Bingo sites in policy terms.

### Officer Response:
Your comments are noted.

Your concern that the strategic allocation for Freshfield Road Business Park and Gala Bingo comprises two distinct uses is noted but it is considered that a comprehensive approach to the two sites is essential. The findings of the updated Employment Land Study indicate that the Business Park provides a useful function and role in the city. For that reason the allocation has been amended to reduce the number of residential units being provided on the site from 215 to 110 to enable it to be provided primarily at the front of the site. However a comprehensive approach to redevelopment and improvement of the site are still being sought. Therefore the allocation still includes Freshfield Road Business Park.
Further Details:
We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments are noted. It is considered that Toads Hole Valley is different to the other seven development areas as it is greenfield site. However reference to the policy contributing to delivering the principles of the One Planet approach has been added to supporting text.

---

Further Details:
There has been minimal consultation with local people. This will affect the Carlton Hill area massively but I could not find one resident who was aware of it.

The development on the old Amex site is huge but what will it have for local people apart from years of noise and dust while it is built?

A building of some architectural merit is badly needed here not another faceless lump of offices and coffee shops.

What will be done to reduce traffic on Carlton Hill? Developments on the Amex site and in Circus St will increase traffic which is already heavy in rush hours

Statement of Changes:
Do a meaningful consultation! This form and the supporting documents are great but nobody knows to look at it.

Any Other Comment:

Officer Response:
Your concerns relating to further development of the Amex Site and Circus Street are noted. Both sites have been identified for development for a number of years with supplementary planning documents having been consulted upon and then adopted in 2006. The aim of the policy is to ensure that redevelopment is properly managed and to secure wider benefits to the public realm and adjoining residential areas.

Officers have consulted extensively on the city plan including direct notification of the 8 week consultation last summer to 750 stakeholders, residents groups and residents. In addition, all neighbourhood and residents groups were invited to two City Plan Workshop Events. There were also a number of articles in the Argus about the City Plan and the documents were made available in all libraries and City Direct Offices.

Your comments on future planning briefs for these sites are welcomed and your details will be passed on to the appropriate officer.
Representations to Policy DA5 – Eastern Road and Edward Street Area; Strategic Allocation 2 - Edward Street Quarter

2.1 We note that the Draft Plan identifies eight development areas which are proposed to accommodate the majority of new housing, employment and retail development over the plan period up to 2030. One of these development areas is in DA5 - Eastern Road and Edward Street Area. This development area is underpinned by four strategic development sites, one of which is the Edward Street Quarter (including the former AMEX House site).

2.2 Part B of Policy DA5 sets out the minimum amounts of development to be secured by 2030 through strategic allocations and through allocations in Part 2 of the City Plan. For the Edward Street Quarter, the policy identifies the area for: ‘30,000 sq m of high quality office floorspace and 165 residential units’.

2.3 We support and endorse the identification of the Edward Street Quarter as a strategic allocation for mixed use development. This will assist in making better and more efficient use of this under-used site and an appropriate mix of uses ensures that an area is not wholly dependent upon any one use to sustain it. Mixed use developments also help reduce the need to travel and bring vibrancy to areas and by promoting usage over longer periods of the day can add to the natural surveillance and thus safety of locations.

2.4 We also consider it helpful that Policy DA5 seeks to identify the acceptable and appropriate land uses and the quantum of floorspace or number of residential units sought. However, we consider that it would be more appropriate for the quantum of floorspace and number of residential units to be expressed as an estimate or approximation and for the wording in the policy to make it clear that this will be subject to viability testing.

2.5 We also consider that the land uses specified in Policy DA5 is high quality office floorspace (Class B1a) and residential (Class C3) should be extended to include the following land uses:-- Shops (Class A1) and- Restaurants and Cafes (Class A3)

2.6 We consider that these additional land uses would provide an appropriate mix of land uses on the Edward Street Quarter site and in accordance with the Draft Plan's objectives.

2.7 Policy DA5 states that ‘a Planning Brief will be prepared for the site’. The recognition that a Planning Brief will be prepared for the site is welcomed. As you will be aware, American Express is keen to continue to work co-operatively and collaboratively with the Local Planning Authority with the emerging detailed proposals for the Edward Street Quarter site. In this respect, the Local Planning Authority will be aware that American Express' advisory team have begun investigating massing on the site in accordance with Policy DA5 of the Draft City Plan. Although this exercise has not yet been completed, it demonstrates that 30,000 sq m of high quality office floorspace (together with the number of residential units envisaged) would provide a very high density and seems to represent over development of the site. It is likely to be overbearing and incompatible with the surrounding area. For this reason, we would suggest a reconsideration of the office floorspace for the site to be reduced to approximately 20,000 sq m, subject to viability testing.

2.8 In parallel, American Express' advisory team has also begun assessing the financial viability of the land use mix and quantum proposed in Policy DA5 of the Draft Plan. Again, whilst this analysis has not yet been concluded, preliminary conclusions indicate that, for viability reasons, a broader mix and land uses is likely to be required. The additional range of land uses we consider, at this stage, are likely to help the viability situation are set out in paragraph 2.5 of these representation.

Statement of Changes:

Any Other Comment:
Your comments and support for the policy are noted and welcomed. In terms of the request to add ancillary retail, cafes and shops to the mix of uses that would be supported in the Edward Street Quarter this has been agreed and part C2 of the policy amended accordingly.

You raise concerns in relation to the capacity of the site for the identified amounts of development. In response to these concerns, and in the interests of enabling this scheme to come forward early in the life of the City Plan, the amounts have been amended from 30,000sqm office space to 15,000-20,000sqm and from 165 residential units to 65.

**Customer No:** 250  **Customer Name:** Rob Huntley  
**Organisation:** Hargreaves  **Support Status:**Partly Object  
**Rep Number:** 2  **Page/Para:** /  **Policy:** DA5 - Eastern Road and Edward Street Area  
**Section/Supporting Doc/Annexes**

**Further Details:**

In view of the characteristics of the 2 sites, the nature of development that may be appropriate for the Freshfield Business Park and the Gala Bingo Hall site are very different. This should be reflected in the policy treatment of these sites.

**Statement of Changes:**

In view of its prominent location on the Eastern Road frontage, in close proximity to tall buildings, the range of development appropriate on the Gala Bingo site would include residential, convenience retail, community and associated elements.

The Freshfield Business Park site is unlikely to be appropriate for residential development in view of its separation from nearby residential areas by abrupt level changes and its established commercial character. Non-food and bulky goods retail, trade counter uses, distribution, vehicle and other service uses are amongst those appropriate for this site.

**Any Other Comment:**

The freehold interest of the land on which Freshfield Business Park stands is in different ownership to that of the long term leasehold interest. This is likely to restrict the ability to achieve a beneficial redevelopment unless these ownership interests can be unified.

**Officer Response:**

Your comments are noted and welcomed. Your concern that the strategic allocation for Freshfield Road Business Park and Gala Bingo comprises two distinct uses is noted but it is considered that a comprehensive approach to the two sites is essential. The findings of the updated Employment Land Study indicate that the Business Park provides a useful function and role in the city. For that reason the allocation has been amended to reduce the number of residential units being provided on the site from 215 to 110 to enable it to be provided primarily at the front of the site. However a comprehensive approach to redevelopment and improvement of the site are still being sought. Therefore the allocation still includes Freshfield Road Business Park.

In terms of your proposal to widen the range of uses allowed on the site, it would be contrary to the sustainable spatial strategy of the plan to allow retail development on this site. Additional comparison retail development should be provided in established retail areas (see policy CP4 Retail Provision).
Further Details:

DA5.A - Eastern Road and Edward Street, Page 56
Southern Water has re-assessed the water distribution and sewerage system in the vicinity of the strategic allocations of this development area (please see spreadsheet submitted). The results confirm that the existing capacity is insufficient to accommodate the anticipated demand in the Edward Street Quarter and Freshfield Road Business Park.

The development will therefore need to provide the local infrastructure required to connect to the water distribution and sewerage system at the nearest point of adequate capacity. The location of this point will need to be determined when the development comes forward.

We support recognition of this issue in Section A of the policy, bullet point 8. It would be helpful to re-word the text to make it clear to prospective developers that they will need to connect off-site, as this will add to the cost of the development. Early warning will facilitate delivery of the necessary infrastructure.

Statement of Changes:

We propose that bullet point 8 in policy DA5.A is reworded as follows:

8. Ensuring that the development connects to the water distribution and sewerage system off-site at the nearest point of adequate capacity.

Any Other Comment:

Officer Response:

Your comments are noted and welcomed.

In response to your comments the supporting text of the policy (para 3.55) has been amended to add reference to need for new developments to connect to the water and sewerage systems off site at the nearest point of adequate capacity.

Further Details:

The specific criteria which will apply to development at Circus Street are not unduly restrictive. The policy requires development at Circus Street to deliver wider community benefits including playspace, public realm and a training place agreement. Given the range of development on the site this may be reasonable for the development as a whole. However if the University is bringing forward elements for educational use separate from the wider development it is not considered reasonable for the university to provide benefits, which are not related to the University's development.

Statement of Changes:

Criterion 3 (d) is amended to clarify this point. Add to the beginning "Relevant parts of"

Any Other Comment:

Officer Response:

Your comments are noted. The wider community benefits and improvements will be expected to be provided as part of the overall scheme.
Further Details:
BHFOE would suggest that this area should be extended to include the old St Mary’s school site that the Health Trust has bought immediately east of the Royal Sussex County Hospital. In the short term it might be being used but in the longer term it has potential to support more development.

Statement of Changes:
In paragraph 3.52 there is mention of the Regional Transport Board. This no longer exists and should be deleted.

Any Other Comment:
Your comment is noted and welcomed.

Your suggestion regarding the inclusion of St Mary’s School within the development area boundary are noted. The future of this site will be addressed through Part 2 of the City Plan. In the meantime community uses like schools remain protected under policy HO20 of the Local Plan.

The reference to the Regional Transport Board will be removed from the policy.

Further Details:
4b p57: add in the role of art and design is very important in any redevelopment of the sites in this area Circus St should be referenced in the Cultural Quarter and Valley Gardens in addition to the reference here

Statement of Changes:

Any Other Comment:

In response to your comments reference to public art has been added to C2b relating to the Edward Street Quarter as this allocation includes priorities for the public realm. In addition, reference to public art and design has been added to paragraph 3.51 of the supporting text that relates to matters to be covered by a comprehensive design guide for the area.

The current policy titles “Central Brighton” and “Valley Gardens” identify geographical locations that would be easily identified by most residents. Overall, it is not felt that there would be significant benefits from changing the boundaries or renaming either policy. Both policies should help to support and encourage cultural and heritage assets within the city.
Further Details:

DA5 Eastern Road and Edward Street Area
With the anticipated growth in population there is an imbalance in school development in the city with much of it concentrated in the west of city and nothing in the east where there is already a deficit. There is the possibility of schools on Edward Street Quarter site or on the old St Mary’s School site which was recently acquired by the Hospital Trust and should probably be included in this development area as the site is currently underutilised. If a new school is not included in this area, then consideration needs to be made for it somewhere else in the east of the city.

Further properties for development that have been identified within DA5 boundary include the BT exchange building adjacent to area 4 and the NHS building housing patient records, all of which will become electronic, in area 2. In addition, it is suggested that the inclusion of St James St and St Georges Road should also be considered for inclusion in this strategic area as the two are closely related.

The public realm in this area is quite rightly noted as being need of improvement and this emphasis is supported.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted.

The need for additional school places in the area are noted in the policy and are being sought through the expansion of existing schools. Where this is not possible it will be achieved via the allocation of a new school site in Part 2 of the City Plan.

Your comment relating to the inclusion of St James Street and St Georges Road within the development area are noted. This has been previously considered but the lack of development sites within the area led to it being discounted as an option. Additionally the introduction of a significant boundary change at this stage in the Plan preparation would require an additional stage of consultation.
| Rep Number: | 4 | Page/Para: | 0/ | Policy: | DA5 - Eastern Road and Edward Street Area |
| Section/Supporting Doc/Annexes | Part Three: Development and Special Area policies |

**Further Details:**

We suggest an acknowledgement in the introduction that the area is surrounded by, and variously adjacent to, six conservation areas and a number of listed buildings.

Although a number of tall buildings have been unfortunately permitted in this area in the past, this is not a mistake which should be repeated in the future. We take the view that there should be no further tall buildings permitted in this area other than for further Hospital uses - refer to our response to Section CP12 - Urban Design.

We support the general objective (3.49) to secure a better public realm here and the strategy (A1) to improve the townscape through the adoption of design guidance. We welcome the specific proposal (A9) for green infrastructure including substantial tree planting and soft landscaping.

**Statement of Changes:**

**Edward Street**
The Edward Street Quarter may well benefit from high quality employment-led redevelopment, but the precedent set by the Amex development is excessive in scale and aggressive in massing, and we hope lessons will be learned from this for the Planning Brief (2e).

**Any Other Comment:**

**Circus Street**
The Circus Street Site should be developed with maximum pedestrian through-routes including some public east-west steps, views of and from its steep slope, and the preservation or reapplication of some locally historic materials and built forms. Historic architecture and listed buildings of Grand Parade should be respected and complemented by neighbouring redevelopment.

In the supporting text the development area is said to lie within a tall buildings area with two large potential development sites. This should be qualified by an undertaking that developments should be proportionate and sensitive to the wider context.

**Officer Response:**

Your comments are welcomed and noted.

In response to your comment relating to conservation areas and Listed Buildings within and adjoining the Development Area, amendments have been made to paragraph 3.48 of the introductory text and 3.51 of the supporting text to add reference to CAs and LBs and that they will be addressed through a future Urban Design Framework.

Your concerns about further tall buildings in the area are noted. However linked to policy CP12 Urban Design and a urban design framework taller buildings may still be appropriate subject to high quality design and careful siting and assessment.

Your support for improved public realm, townscape and improved green infrastructure are welcomed.
Further Details:

Brighton College believes that the Freshfield Road Business Park and particularly the Gala Bingo Hall site should have serious consideration towards the provision of educational uses and assembly and leisure uses, under Use Class D1 and D2 of the Town and Country Planning (Use Classes) Order 1987 respectively. The College welcomes initiatives in relation to training place agreements and would also (in line with the Sports Facilities Plan) welcome the initiatives to encourage public use of private facilities, in order to meet the needs set out in the report; Brighton College in fact offers such flexibility at present on our existing site when possible.

Given the College’s continued success and demand for spaces (both of which benefit the local economy through the College’s own spending and defrayment of our employees’ salaries locally), we could envisage utilising some of the site to enhance the school’s provision for local and boarding pupils. This might include some or all of potential additional boarding capacity, a sporting venue (with potential for community use as well) and/or incremental educational facilities. Such development would have a focus on sustainability (like the College’s last two buildings and those being submitted for planning at the moment), would take account of their surrounds (celebrating heritage), encourage sport (were sporting use to be progressed), enhance the community, create jobs and generate inward investment. The inward investment would depend on the utilisation of the space but the build costs and ongoing operational costs which flow into the local economy might come from boarding income from outside of the City and/or might come from donations from philanthropists and parents who live outside of the City and potentially the UK (creating an export flow for the UK). Therefore, to consider the site DA5 for D1 and D2 use would seem to open up another option value for the Council and the UK which appears entirely in lines with the key aims of the City Plan.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted and welcomed.

The success of Brighton College and associated benefits to Brighton & Hove are recognised and welcomed.

It is considered that the addition of D1 and D2 uses to the allocation for Freshfield Road Business Park/Gala Bingo Hall would not be appropriate. This site is identified for employment uses and has been partially released for residential use to enable the city to meet a challenging housing target.

The City Council will be happy to work with Brighton College to help identify sites to meet the College’s needs.
DA5 Eastern Road and Edward Street Area

We would like to see in the introduction to this section of the plan recognition of the proximity of the entire length of this development area to the East Cliff Conservation Area.

We broadly welcome the fairly careful design and placement of the Patching Lodge development, whereas we consider both the new Amex building and the projected hospital expansion to be cases of overdevelopment, and would wish to see a more sensitive scale and impact in any future developments in the area.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted and welcomed.

In response to your comments on East Cliff Conservation Area, amendments have been made to paragraph 3.48 (introductory text) and 3.51 (supporting text) to add reference to the adjoining conservation area and that this will be addressed through a future urban design framework.

Your concerns about overdevelopment at the American Express site and the Hospital are noted. This area has been identified as appropriate for taller buildings. In terms of safeguards as set out in the policy, special care will be taken over design and policy CP12 Urban Design will apply along with a future Urban Design Framework.
In view of the proximity of Brighton College [one of the city’s most successful ‘exports’] to Freshfield Road there should be some flexibility to allow the possibility of a future educational use (D1) on the site.

Any Other Comment:

Officer Response:

Your comments are noted.

The importance of Brighton College as an asset to the city is recognised by the city council and guidance will be provided to the College to guide its expansion. In terms of Freshfield Road Business Park - this is currently identified as an employment site and residential development is being allowed on the site to meet the city’s identified needs. This requirement outweighs the need for D1 uses on the site.

Fully Support

Statement of Changes:

Any Other Comment:

Officer Response:

Yours comments are noted and welcomed.
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Further Details:
The Cathedral Group supports the inclusion of policy DA5 'the strategy for the development area to secure significant improvements of the public realm and townscape making the area more attractive, accessible and safer for the residents, employees and visitors and to deliver the amounts of development'.

We welcome the inclusion of the regeneration of the Circus Street site as outlined on page 57 of the draft City Plan for the proposed amounts of development. The development will be of a high standard of design and help to meet the shortfall in purpose built student accommodation.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments are noted and welcomed.

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Further Details:

Fully Support

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed.
In view of the proximity of Brighton College [one of the city’s most successful ‘exports’] to Freshfield Road there should be some flexibility to allow the possibility of a future educational use (D1) on the site.

Any Other Comment:

Officer Response:

Your comments are noted.

The importance of Brighton College as an asset to the city is recognised by the city council and guidance will be provided to the College to guide it's expansion. In terms of Freshfield Road Business Park - this is currently identified as an employment site and residential development is being allowed on the site to meet the city’s identified needs. This requirement outweighs the need for D1 uses on the site.

Fully Support

Statement of Changes:

Any Other Comment:

Officer Response:

Your comment is welcomed and noted.
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Further Details:

Points that should be included in the policy:

1. Local character & lower density - the wider area around Hove station is predominantly of low rise residential suburban character, this should be recognised and reflected in the policies. To consider the Hove Station Area just as the narrow boundaries defined in the proposed policy is wrong and fails to understand the make-up of the area. The area should be considered in the context of the homes down to Blatchington Road and north to Old Shoreham Road.

2. Low rise - The height of the tower blocks in the Clarendon area is an unfortunate exception, not the norm. Future development should be kept to four storeys maximum.

3. Parking - parking is massively under pressure in the area around the Clarendon estate and the roads to the south. Any new development should be required to provide at least as many parking spaces as the number of residential units it provides. New businesses should be required to provide at least as many spaces as the maximum number of customers they expect.

4. Traffic increase - as the proposed policy identifies, traffic in the area near the Clarendon is already very busy and the air quality is poor. Large numbers of new residential and business units should be resisted on the basis that this will worsen the problem.

5. Number of new homes - the proposed provision of 575 new homes (at point B) is too high. That number of new units would have an unacceptably damaging impact on local services, such as schools, health facilities. Furthermore the creation of 150 new units in the Conway Street Industrial Area also is too many.

6. Green spaces - there should be an expectation for new developments to provide green spaces and trees, especially in the Clarendon area.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. Whilst your concerns over the amount of housing proposed in the area are noted, based on objectively assessed housing requirements and a review of the Strategic Housing Land Availability Assessment (SHLAA) this has been reviewed up. However policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.
City Plan Part 1 Responses Received 27th May to 20th July 2012

Customer No: 235  Customer Name: Master Howard Murray

Support Status: Object

Rep Number: 1  Page/Para: /  Policy: DA6 - Hove Station Area

Section/Supporting Doc/Annexes  Part Three: Development and Special Area policies

Further Details:

Once again I must congratulate Brighton and Hove council on their amazing ability to convince the people they represent, and who's employment you are in, namely the people who live in Brighton and hove, that the council are putting them first and taking the quality of life into account, and not just making it possible for Mr French and his associates to increase his personal wealth probably by several millions, but also pander to the most self serving, self righteous greedy and self indulgent members of the human race namely architects and property developers. Many examples of concrete boxes stacked one on top off the other have been built only to be demolished after a few years i.e. within my life time which is testimony of the build quality and quality of life they provided. Architects seemed to have discovered the art of making money out of nothing by building this with a short life span so they can redeveloped the same space over and over again.

This development. Will block out a vast section of the sun light for those who Live closest to them and create a feeling of oppression and over crowdedness, over looked and depressing site, it's an already an industrial site may be it should be given a new lease of life as small industrial units and studio type units where people could live above their business, at a reasonable height, no more than three story's.

Hears hopping you see the Light and put the people first.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments which have been noted. The policy reflects that the sustainable location of the area along with its current built form offer redevelopment opportunities which are likely to be realised by 2030. Due to the objectively assessed needs of the city (employment, housing etc) the area is allocated for mixed use development, predominantly employment and residential. It is not considered appropriate to apply a blanket height limit of 3 storeys throughout the area. However the policy has been amended to make clear guidance will be prepared to consider a number of factors in detail such as design including the height of buildings. Other policies protect against adverse impacts on amenity including daylight/sunlight, privacy, overlooking etc.
Further Details:

Points that should be included in the policy:

1. Local character & lower density – the wider area around Hove station is predominantly of low rise residential suburban character, this should be recognized and reflected in the policies. To consider the Hove Station Area just as the narrow boundaries defined in the proposed policy is wrong and fails to understand the makeup of the area. The area should be considered in the context of the homes down to Blatchington Road and north to Old Shoreham Road.

2. Low rise - The height of the tower blocks in the Clarendon area is an unfortunate exception, not the norm. Future development should be kept to four storeys maximum.

3. Parking - parking is massively under pressure in the area around the Clarendon Estate and the roads to the south. Any new development should be required to provide at least as many parking spaces as the number of residential units it provides. New businesses should be required to provide at least as many spaces as the maximum number of customers they expect.

4. Traffic increase - as the proposed policy identifies, traffic in the area near the Clarendon is already very busy and the air quality is poor. Large numbers of new residential and business units should be resisted on the basis that this will worsen the problem.

5. Number of new homes - the proposed provision of 575 new homes in the (at point B) is too high. That number of new units would have an unacceptably damaging impact on local services, such as schools, health facilities. Furthermore the creation of 150 new units in the Conway Street Industrial Area also is too many.

6. Green spaces - there should be an expectation for new developments to provide green spaces and trees, especially in the Clarendon area.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. Whilst your concerns over the amount of housing proposed in the area are noted, based on objectively assessed housing requirements and a review of the Strategic Housing Land Availability Assessment (SHLAA) this has been reviewed up. However policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.
Further Details:

Hove Station. The plan mentions there are already tall buildings in the area. These are actually 2 roads down from the proposed development area, and the plan does not take into account that on the actual road of the development there are small terraced houses. An exceptionally tall building would not fit in with the character of this road. Furthermore the high number of high rise flats in the area means that it does not need more of the same - family homes are needed.

Statement of Changes:

Maximum 3 storey development, plus a the plan states a minimum number of 3 bedroom family homes, which are much needed in this area.

Any Other Comment:

Officer Response:

Thank you for your comments which have been noted. It is not considered appropriate to apply a blanket height limit of 3 storeys throughout the area and background evidence indicates there is a need for a range of dwelling sizes. In view of the constraints on the city it is not considered appropriate to exclude flats from this location. However the policy has been amended to make clear guidance will be prepared to consider a number of factors in detail such as design including the height of buildings. Other policies protect against adverse impacts on amenity including daylight/sunlight, privacy, overlooking, traffic etc.
Further Details:

Local character & lower density - the wider area around Hove station is predominantly of low rise residential suburban character, this should be recognized and reflected in the policies. To consider the Hove Station Area just as the narrow boundaries defined in the proposed policy is wrong and fails to understand the make-up of the area. The area should be considered in the context of the homes down to Blatchington Road and north to Old Shoreham Road.

Low rise - The height of the tower blocks in the Clarendon area is an unfortunate exception, not the norm. Future development should be kept to four storeys maximum.

Traffic increase - as the proposed policy identifies, traffic in the area near the Clarendon is already very busy and the air quality is poor. Large numbers of new residential and business units should be resisted on the basis that this will worsen the problem.

Parking - parking is massively under pressure in the area around the Clarendon estate and the roads to the south. Any new development should be required to provide at least as many parking space as the number of residential units it provides. New businesses should be required to provide at least as many spaces as the maximum number of customers they expect.

Number of new homes - the proposed provision of 575 new homes in the (at point B) is too high. That number of new units would have an unacceptably damaging impact on local services, such as schools, health facilities. Furthermore the creation of 150 new units in the Conway Street Industrial Area also is too many.

Green spaces - there should be an expectation for new developments to provide green spaces and trees, especially in the Clarendon area.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. Whilst your concerns over the amount of housing proposed in the area are noted, based on objectively assessed housing requirements and a review of the Strategic Housing Land Availability Assessment (SHLAA) this has been reviewed up. However policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.
Further Details:

LaSalle Investment manage the Sackville Road Trading Estate on behalf of Coal Pensions. The site is a mix of warehouse space, retail space and trade counters. It is relatively low density, ageing and contributes little to the appearance or vitality of the area. The site is significant in size and an important part of Hove Station Area and future redevelopment aspirations.

As a result of the current condition of the site, and the opportunities for redevelopment, a major mixed use scheme was developed in consultation with the City Council. This scheme was subsequently approved by the Council under planning application ref BH2009/00761 (Sackville Place scheme).

Whilst delivery of the approved scheme has stalled due to wider economic issues, LaSalle's commitment to comprehensive redevelopment remains.

The approval of the Sackville Place scheme has established some key principles in relation to the redevelopment of the site and these should be reflected in the supporting text to Policy DA6. Whilst LaSalle support the identification of the Hove Station Area and the overarching aims of regeneration and renewal, they strongly object to the inflexibility of the proposed policy and the lack of any regard to the planning permission for Sackville Place, and the principles it establishes. The Policy should be reworded so that it actively supports and facilitates the redevelopment of the Sackville Place site.

The approach adopted in Policy DA6 (and elsewhere, particularly CP3), to focus on ‘employment-led' regeneration and preserving ‘employment' floorspace is outdated. This approach does not accord with the emphasis in the NPPF on growth and job creation and will, through its inflexibility, stifle new investment, redevelopment and growth - the very things it broadly seeks to achieve.

The NPPF introduces a presumption in favour of sustainable development and requires all plans to be based upon and reflect the presumption. The Framework emphasises the need to ‘proactively drive and support sustainable economic development’ and ‘making it easier for jobs to be created’. The emphasis is on jobs, investment and economic growth in its broadest sense rather than a focus on B-Class uses. In this regard it is our view that the approach to Policy DA6 is out of line with the Government’s approach.

The NPPF goes on to state that:

“The Government is committed to securing economic growth” (para 18)

and

“The Government is committed to ensuring the planning system does everything it can to support sustainable economic growth” (para 19)

It also emphasises the need for flexibility and to avoid the long term protection of sites allocated for employment use. It states

“Policies should be flexible enough to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in economic circumstances”. (para 21)

Policy DA6 does not do this.

The delivery of regeneration and development is clearly very important to the future prosperity of the Country. The City Plan acknowledges that the redevelopment of previously-used land should be actively encouraged. Indeed the delivery of the Plan wholly relies on successful regeneration. However Policy DA6 as drafted is too restrictive, will place too great a burden on redevelopment proposals and therefore fail to deliver its overall aspiration. The Government is quite clear, paragraph 173 of the NPPF states:
“Plans should be deliverable. Therefore, the sites and the scale of development identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”.

By constraining development proposals to the provision of equal or greater amounts of ‘employment’ floorspace rather than linking new development to economic development and job creation; Policy DA6 will limit the opportunity to redevelopment and restrict the renewal of the Hove Station Area. Furthermore, in relation to Sackville Place, the policy fails to provide the flexibility for a scheme here to evolve, in response to market signals and to successfully deliver much needed regeneration, investment and job creation.

Specific Comments
Paragraph 3.61. Support is given to the recognition that the redevelopment of sites in the area could help to increase the capacity of under-utilised sites and address townscape and public realm improvements.

Paragraph 3.63. The paragraph implies that new homes in the area should not be permitted because ‘development must avoid increasing the number of people exposed to poor air quality’. Clearly new development can help to minimise impacts on air quality but might not be able to address existing problems. Equally the reference to capacity for junctions is unhelpful and serves no purpose and should be deleted.

Paragraph 3.65. It is inaccurate to state that all existing units in the Hove Station Area, are relatively modern. For example the units at Sackville Trading Estate are 25 years old and nearing the end of their useful economic life, one third of the space is now vacant here. Further it is contradictory to encourage redevelopment through Policy DA6 and also state that ‘it is therefore a priority to continue to protect and enhance the existing employment floorspace provision in the area’. This part of the paragraph should be removed.

The reference to the need to ‘demonstrate that existing occupiers have been suitably relocated’ as part of development proposals, is not justified and is wholly in conflict with the NPPF’s requirement to ensure that proposals are not ‘burdened’ by obligations. This obligation will often be out of the direct control of applicants, this will add to uncertainty and cost and therefore jeopardise the viability of proposals. In some instances it might prevent otherwise acceptable schemes which could bring significant benefits. This reference should be deleted.

Paragraph 3.65 also acknowledges that reference to ‘employment’ in the Hove area is not limited to B-Class uses but also includes other uses in the area. This approach is broadly welcomed, however it should also acknowledge that the area includes retail uses and that the principle of additional retail has been permitted on the Sackville Place site. The paragraph should be reworded. The emphasis should be placed on employment generating uses and not B-Class uses. There should also be specific recognition of the planning permission for retail development at Sackville Place.

Paragraph 3.66. The text acknowledges the benefits of mixed use redevelopment in facilitating regeneration and the creation of a more vibrant area – this is welcomed. However the paragraph and policy constrain the prospect of this by restricting development which results in net losses of ‘employment’ floorspace. This approach, as set out above, does not accord with the NPPF which focusses on economic development, job creation and the need for flexibility. The reference to ‘net gains in employment floorspace’ should be deleted.

Paragraph 3.67. The aspirations for the area to be a focus for creative industries does not appear to be based on sound evidence and appears to be aspirational but potentially not deliverable. The Hove Station Area is not ‘slightly out-of-centre’, it is a highly accessible location in terms of both the road network and public transport. It is unrealistic to assume that redevelopment could take place in a manner in accordance with the Policy i.e. to bring forward lower value employment space. The paragraph should be deleted.

Paragraph 3.70. It is clearly inappropriate to refer to Sackville Road Trading Estate without reference to and acknowledgement of the planning permission for the redevelopment of the site and the principles which have been established, particularly for food retailing and unrestricted comparison goods retailing. The paragraph should be amended accordingly.

Paragraph 3.71. It is inappropriate to maintain the allocation of the Waste Management Site. It has been allocated for a significant number of years without success, and there appears to be little prospect for its development in the near future. The NPPF is quite clear. Paragraph 22 states that “planning policies should avoid the long term protection
of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed”. This allocation should be removed in accordance with paragraph 22 of the NPPF. The allocation should be removed from the Plan and the paragraph deleted.

Allocation of Waste Management Site
The continued allocation of the Waste Management site is unjustified. The site has been allocated for a significant number of years without success, and there appears to be little prospect for its development in the near future. The NPPF is quite clear. Paragraph 22 states that:
"planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed."

This allocation should be removed in accordance with paragraph 22 of the NPPF.

Furthermore the continued allocation of the site will constrain redevelopment in the immediate surrounding area due to the blight caused by the unknown prospects of a Waste Management site. The uncertainty will have a particular impact on the prospect for residential development as part of the mixed use redevelopment of sites in the area. Both developers and future occupiers will have concerns about the impact waste operations might have on their properties, which in turn will affect values and therefore commercial viability.

The result will be that the objectives of Policy DA6 will be constrained due to the continued waste management allocation. Given the priority for the City is to meet its housing, employment and other priority land use needs, the waste management allocation should be deleted.

Statement of Changes:
The allocation of the waste management site should be deleted.

Policy DA6 should be amended as follows:

DA6 Hove Station Area
“The strategy for the development area is to secure the long term regeneration opportunities around Hove Station area and enable its development as an attractive and sustainable (delete: employment-led mixed-use area) (insert: focused on employment generating uses). The aim is to secure the creation of a high quality (delete: employment) environment that will attract investment and new employment (insert: generating) opportunities for the city and promote the efficient use of land through mixed use developments.

A. The local priorities to achieve the strategy are:
1. The preparation of guidance to promote and coordinate (delete: employment led mixed-use) (insert: the) regeneration of under-used land and buildings;
2. Improving the public realm and townscape focusing on the Conway Street area and the industrial/retail frontages along Sackville Road, Old Shoreham Road and Goldstone Lane;
3. Ensure that development takes account of and contributes to the improvement of the public realm and townscape, environmental and open space improvements, pedestrian and public safety particularly around the Conway Street area;
4. Enhancing the sustainable transport interchange at Hove Station by improving the walking and cycling network in the wider area, improving permeability within the area and strengthening north-south connections and east-west connections along Old Shoreham Road;
5. Continuing to encourage more efficient use of under-used sites (delete:; to retain employment floospace and protect employment sites in accordance with CP3 Employment Land);
6. Maintaining and strengthening the creative industries business cluster in the area by seeking to ensure that workshops, office space, studios, storage and other premises remain affordable, appropriate and available for use;
7. Ensuring sufficient water and sewerage capacity is either available or can be provided in time to serve new development. Development must address surface water flooding risks and incorporate appropriate surface water drainage measures (see CP11);
8. Creative use of development to (insert: where possible and practical) integrate new green infrastructure including green space, accessible green roods, green walls and other features which support Biosphere objectives.
B. Provision will be made by 2030 for the following minimum amounts of development:
C. The Strategic Allocation in the Hove Station Area is:

1. Conway Street Industrial Area

Comprehensive employment-led mixed use redevelopment to deliver more effective use of the under-used land and buildings, requiring the retention and provision of an additional 3,000m² net gain in employment floorspace with a shift into high quality flexible office/business (B1) floorspace, the provision of 150 residential units and enhancements to the streetscape. This will be considered in the context of Development Plan policies and the following criteria:

a) Proposals relating to individual buildings and/or sites within this area will need to demonstrate they will not prejudiced the objectives of this allocation and will facilitate the retention of employment floorspace and the delivery of the amounts of B1 employment floorspace and residential units;

b) Additional employment floorspace and changes in existing employment uses will be expected to provide a range of office and flexible workspaces including larger floor plate offices and affordable business floorspace suitable for small business and the digital media/creative industries;

c) Measures to improve safe pedestrian and cyclist access through the site to Hove Station will be expected;

d) Proposals within this area will be expected to pay particular attention to facilitating social inclusion, social integration and crime reduction measures”.

Any Other Comment:

Officer Response:

Thank you for your comments. It is important to note that the NPPF does not replace Planning Policy Statement 10 Planning for Sustainable Waste Management or its companion guide (to be replaced by the National Waste Strategy in due course).

The City Plan does not allocate the waste site it merely reflects the allocation for waste management use as a road-to-rail transfer facility in the adopted Waste Local Plan (WLP). The Waste Local Plan will be replaced in due course by the Waste & Minerals Plan and a Waste and Minerals Sites Plan Development Plan Document (DPD). The latter will reassess the allocations in the Waste Local Plan (including the coal yard) and will be subject to consultation. It is therefore considered appropriate to make clear the coal yard site is safeguarded in accordance with the adopted and emerging Waste Development Plans. In view that the main site lies between the railway and Newtown Road Industrial Area it is not considered to undermine the intention of policy DA6.

There are a number of applications relevant to this area, it is not considered appropriate to specifically reference the Sackville Place application. Whilst the particular merits of the application justified the inclusion of an element of retail it did not set in place justification for a retail allocation. Indeed in accordance with the NPPF and supported by the Retail Study the City Plan maintains the existing hierarchy of retail centres within which any additional retail should be provided unless supported by a sequential test and, depending on size of floorspace, impact assessment.

In accordance with the latest background studies (employment, housing, retail etc) the policy approach seeks to deliver the jobs needed within the city whilst providing flexibility in respect of genuinely redundant employment floorspace. Planning legislation helps to ensure flexibility in respect of planning policies where material considerations indicate appropriate. There is a need within the city for employment floorspace including higher value office jobs. For the reasons detailed above it not considered appropriate to amend the policy to reference employment generating uses.

Air quality is a key issue in respect of sustainable development. It is therefore important the supporting text makes clear the issues in the area. Subject to appropriate design and transport measures, redevelopment should not be unduly restricted. The references to existing occupiers and creative industries have been amended to help ensure they can be appropriately addressed.
Further Details:
As a local resident I am very concerned with the potential for no height restriction and the proposed numbers of housing and employment spaces within the Conway street development. The impact on the local neighbourhood would be extremely damaging, with an envitable increase in traffic and pollution via newtown and fonthill roads. The impact equally on the infrastructure including schools, medical facilities, parking etc.

The most important aspect of consultation is to ensure it is as wide and inclusive as possible, from those homes whose views will be blighted, or suffer from light pollution, increased footfall in quiet residential areas, what ever is agreed has to be in keeping with the needs and wishes of Hove residents.

We need to focus our retail resources in around george street, which is suffering at the moment.

I have grave concerns regarding building a leisure facility in the heart of hove, it must be what the local neighbourhood needs, not an opportunity to attract those outside of the area which will impact on traffic pollution and noise.

Where does our neighbourhood plan fit with this aspect of the City plan?

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your comments. The proposals you reference are not those proposed within DA6 in the City Plan but relate to a scheme promoted and consulted upon by a developer/landowner in the area.

Policy DA6 seeks to retain an employment focus in the area and, in recognition of the redevelopment opportunities, promotes mixed use redevelopment (predominantly employment with residential mix). It does not promote the provision of additional retail or major leisure facility. Policy DA6 in conjunction with future guidance and the other policies in the development plan should help to ensure the other issues you raise are appropriately addressed.
Customer No: 129  Customer Name: Michael Johnson

Support Status: Object

Policy: DA6 - Hove Station Area

Section/Supporting Doc/Annexes: Part Three: Development and Special Area policies

Further Details:
Smarten up run down areas such as London Rd and Lewes Rd, areas around Hove station and Sackville Road.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your comments. Policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.
Further Details:

Points that should be included in the policy:

1. Local character & lower density – the wider area around Hove station is predominantly of low rise residential suburban character, this should be recognized and reflected in the policies. To consider the Hove Station Area just as the narrow boundaries defined in the proposed policy is wrong and fails to understand the makeup of the area. The area should be considered in the context of the homes down to Blatchington Road and north to Old Shoreham Road.

2. Low rise - The height of the tower blocks in the Claredon area is an unfortunate exception, not the norm. Future development should be kept to four storeys maximum.

3. Parking - parking is massively under pressure in the area around the Clarendon estate and the roads to the south. Any new development should be required to provide at least as many parking space as the number of residential units it provides. New businesses should be required to provide at least as many spaces as the maximum number of customers they expect.

4. Traffic increase - as the proposed policy identifies, traffic in the area near the Clarendon is already very busy and the air quality is poor. Large numbers of new residential and business units should be resisted on the basis that this will worsen the problem.

5. Number of new homes - the proposed provision of 575 new homes in the (at point B) is too high. That number of new units would have an unacceptably damaging impact on local services, such as schools, health facilities. Furthermore the creation of 150 new units in the Conway Street Industrial Area also is too many.

6. Green spaces - there should be an expectation for new developments to provide green spaces and trees, especially in the Clarendon area.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. Whilst your concerns over the amount of housing proposed in the area are noted, based on objectively assessed housing requirements and a review of the Strategic Housing Land Availability Assessment (SHLAA) this has been reviewed up. However policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.
Concerned by the intended density of housing and business within the Conway Street development, in particular the increase of traffic and the need for adequate parking provision. The development of Park House will additionally exacerbate these issues and its residency provision should be accounted towards to the overall target for the area. Concern is already expressed by residents regarding the increased volume of traffic using Fonthill Road (which at peak times has become a rat run) the frequent flouting of speed regulation and the aggressive driving and manner of some motorists.

The plan mentions townscape. The existing high rise blocks in the area are totally out of scale and character to the surrounding neighbourhood. Further high rise development raises the risk of the concrete canyon ambience such as exampled by the New England Quarter. Contrary to the somewhat premature statement by a prospective developer this area is not appropriate for high rise development. It is hoped that whatever evolves for this area will be on a realistic scale to blend with the wider locality and to have character that, unlike the New England Quarter, engenders a sense of community.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. Policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.
I agree with the overall intention of the plan to improve the area and intention to form a well designed alternative to the current muddle of buildings, unpleasant areas of concrete, dishevelled industrial buildings and areas such as the Conway Street bus garage which are well past their useful date. In particular

1. Throughout the plan the intention seems to be to encourage high quality development of both residential and business/industrial units to attract, for example (and I quote) ‘creative industries’. The current plan to allocate a Waste Transfer allocation area running through the development both North and South of Hove Station puts blight on the planning process before it has even started. Who will want to invest, work, or live in an area which will clearly be designated and used for waste transfer? The presence of this in the plan goes diametrically against the other objectives of the plan. The Waste Transfer Station allocation area within DA 6 of the draft City Plan must be removed.

2. The development of Hove Station to provide a transport hub should be encouraged. Bus access must be improved and the ‘drop off’ areas enlarged. The car park should be maintained.

3. It must be remembered that, notwithstanding the wish to increase the use of alternative forms of transport that Hove contains a large number of elderly and or disabled people who will continue to need access to their cars. It is unlikely that an 85 year old, recovering from a heart operation can easily use a bicycle. Improved access to Hove Station would help but so would an increase in short term car parking and car parking for disabled badge holders

4. Signage need to be improved through the area for the large number of foreign visitors and students of English as a Foreign Language who use the local educational and recreational facilities. Safety of these visitors should also become a priority

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments which have been noted. The City Plan does not allocate the waste site it merely reflects the allocation for waste management use as a road-to-rail transfer facility in the adopted Waste Local Plan (WLP). The Waste Local Plan will be replaced in due course by the Waste & Minerals Plan and a Waste and Minerals Sites Plan Development Plan Document (DPD). The latter will reassess the allocations in the Waste Local Plan (including the coal yard) and will be subject to consultation. It is therefore considered appropriate to make clear the coal yard site is safeguarded in accordance with the adopted and emerging Waste Development Plans. In view that the main site lies between the railway and Newtown Road Industrial Area it is not considered to undermine the intention of policy DA6.

The policy and supporting text have been amended to promote improvements to wheelchair, pushchair and bicycle access over the railway at the station and to ensure appropriate provision for disabled people dependent on private car use is taken into account. Policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the other issues you raise are appropriately considered and addressed.
Further Details:

We have received notification of the meeting for local residents to discuss the outline planning proposals for the Conway Street Bus garage site. This was the first we had heard of the potential development of the site and as we live very close by we are grateful for the notification, however we are unfortunately on holiday and unable to attend the meeting on 17 July.

We have found it difficult to find much information on the proposals (the only information/images available seem to be on the Brighton Argus website) and we assume that there would be more information provided at the meeting. However in view of the short notice of the meeting it would be much appreciated if this could be made available on the Council website and further details can be provided about the how the forthcoming planning process and consultation will work.

Based on the information and drawings that we have been able to see, we would just have the following initial comments:
- One of the drawings in particular seems to show extremely high (skyscraper!) towers which are not at all in keeping with the style and character of the surrounding area.
- It is suggested that there would be around 250 new homes, which would mean at least 500 new residents within the site. Presumably full provision has been made for new schools/doctors/dentists and other facilities to cope with this large sudden influx of people.
- The type of housing that is needed in the area is houses and not flats.
- Parking is extremely limited in the area and the roads are very congested. What would be the proposed route into and out of the new development and the large numbers of visitors to the cinemas, offices, galleries and homes on the site? The roads around the Bus Garage are notorious rat-runs and Fonthill Road gets extremely busy, causing numerous accidents at the difficult junction of Fonthill/Newtown Road, which is just outside our house. The area simply cannot cope with extra traffic.

We don't object to the development of the area in principle, as it is quite run down and would probably get worse if and when the bus station moves. However we do feel that it would be best kept as a similar class of use (i.e mainly business use) and the buildings should not be any higher than the existing tower blocks.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. The proposals you reference are not those proposed within DA6 in the City Plan but relate to a scheme promoted and consulted upon by a developer/landowner in the area. At the time of writing, the developer has not submitted a planning application so there are no details which can be put onto the council's website in this respect.

Policy DA6 seeks to retain an employment focus in the area and, in recognition of the redevelopment opportunities, promotes mixed use redevelopment (predominantly employment with residential mix). Policy DA6 in conjunction with the other policies in the development plan seek to ensure the issues you raise are appropriately addressed. The City Plan and related documents are available on the council's website.
Further Details:

DA6 Hove Station Area:
We consider that a policy which permits high buildings of between 18m (6 storeys) up to 45m (15 storeys) in this area which is quite inappropriate here. Refer to our response to Section CP12 Urban Design in which our reservations regarding the Tall Buildings policy are discussed further.

Tall buildings do not mean higher density - Figs 1 and 2 below demonstrate this quite clearly. Fig 1 shows a 3 storey development set out around the perimeter of a square of open space. Fig 2 shows a development of exactly the same floor area set in the middle of the same open space. To achieve the same floor area this would need to be 15 storeys, not 3. And the density is identical.

Statement of Changes:

Respect for the listed (grade II) station, the surrounding late Victorian buildings and small scale shops in the Hove Station conservation area should influence the scale of new residential units. At the same time there are several single storey commercial buildings which could be replaced with more substantial buildings. The factory buildings along the railway line could set the scale for any new industrial buildings.

Any Other Comment:

High buildings in Conway Street would be a disaster - it is hard to count how high the proposed buildings are, but about 20-22 storeys. In housing unit terms, it is the equivalent of 9 or 10 x PortZEDs, and even Sussex Heights has only about 100 flats.

Officer Response:

Thank you for your comments. Policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.
Southern Water has re-assessed the capacity of the sewerage system in the vicinity of the strategic allocation in this development area (please see spreadsheet submitted). The results confirm that the existing capacity is insufficient to accommodate the anticipated demand.

The development will therefore need to provide the local infrastructure required to connect to the sewerage system at the nearest point of adequate capacity. The location of this point will need to be determined when the development comes forward.

We support recognition of this issue in Section A of the policy, bullet point 7. It would be helpful to re-word the text to make it clear to prospective developers that they will need to connect off-site, as this will add to the cost of the development. Early warning will facilitate delivery of the necessary infrastructure.

In addition to the above, the development is located within a groundwater Source Protection Zone. This signifies that the area requires a high level of protection to safeguard public water supplies. Development should therefore only be permitted if adequate mitigation measures can be implemented, to the satisfaction of the Environment Agency. Such measures must ensure that the vulnerability of the groundwater source to contamination is not increased, and that public health and the quantity of water supplies are protected.

**Statement of Changes:**

We propose that bullet point 7 in policy DA6.A is reworded as follows:

8. Ensuring that the development connects to the water distribution and sewerage system off-site at the nearest point of adequate capacity. Development must address..  
We also request an additional bullet point:  
f) Protecting groundwater sources from pollution to the satisfaction of the Environment Agency.

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been considered and the policy has been amended in accordance with your suggested wording.
Further Details:
The range of uses identified should include (or maintain) support for appropriate provision of new retail floorspace to meet local needs and encourage sustainable shopping patterns.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your comments. The council's 2011 Retail Study update does not identify a need for further allocations outside the existing retail centres. It supports the consolidation of retail within the existing retail centres thus helping to maintain their vitality and viability. It is considered the future additional demand for retail will be appropriately satisfied via the City Plan's Churchill Square allocation within the Regional shopping centre. The study does not recommend the designation of a new centre in the Hove Station Area (Goldstone Retail Park). It is not therefore considered appropriate to include retail within the specified mix of uses for the Conway Street strategic allocation. Any proposals for new retail development in the DA6 area could come forward under the tests set out in the National Planning Policy Framework and policy CP4.

Further Details:
We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments have been noted. It is considered that Toads Hole Valley is different to the other seven development areas as it is a greenfield site. However, whilst not included within the policy for the Hove Station Area, reference to the policy contributing to delivering the One Planet approach has been added to DA6's supporting text.
In partnership with the City Council and the Brighton & Hove Bus Company, Matsim Properties is currently in the process of assembling the 2.4 hectare site bounded by Ellen Street, Conway Street, Ethel Street and the railway line (see Site Location Plan submitted) for mixed use redevelopment.

Draft proposals for the site have been discussed with the Planning Strategy Team and with City Councillors and, a scoping request has been submitted in order to agree the content of the forthcoming planning application’s Environmental Statement.

The development would follow the relocation of the bus company to a purpose built depot at Argus House in Crowhurst Road (subject to planning).

Draft Proposals
The supporting text to Policy DA6 of the 2010 Draft Core Strategy stated that "Redevelopment of sites within the area could therefore help to increase the capacity of under-utilised sites and also to address townscape and public safety improvements". Matsim Properties has reviewed a number of development options for the site and has carried out a viability assessment of different land uses and the quantum of development necessary for redevelopment to be financially feasible. It has been careful to seek to address the concerns raised within the Core Strategy.

The proposals seek to introduce a major new mixed use hub and a statement entrance to the city at Hove Station. All existing buildings will be demolished (apart from The Agora Centre), and a series of new buildings and spaces (including five landmark towers) will be developed. The forthcoming application will demonstrate a need for all parts of the development which includes the following elements:

- 95,000 ft² (8825m²) of new office floor space (B1) including 10 start-up units;
- Circa 400 Residential units (C3);
- Approximately 250m² of new external public realm;
- 9 screen cinema with 300 parking spaces (D2);
- 9-10 restaurants, wine bars and coffee shops (A3 & A4);
- A new 40,000 ft² (3716m²) food store;
- 60,000 ft² (5574m²) of non-food retail floor space;
- 400 additional parking spaces;
- Healthcare premises (D2) 8,000 ft² (743m²);
- Art gallery (D1) 2500 ft² (232m²);
- New climbing wall (D2);
- Associated hard and soft landscaping.

Draft Policy DA6 & Conway Street Strategic Allocation
Principle of Policy DA6 and its Strategic Allocation is welcomed (eg support in the City Plan for the redevelopment of a large underused brownfield site in a gateway location). However, there are three fundamental faults with DA6 which could ultimately stop a comprehensive redevelopment scheme being delivered.

Office Development
DA6 seeks an employment-led mixed use redevelopment of the site with the existing 18,700m² employment space replaced and an additional 3000m² of B1 office floorspace provided.
The Conway Street Industrial Area currently generates 265 employment positions and an additional 382 jobs off site as shown in the following table (all figures are full time equivalent).

<table>
<thead>
<tr>
<th>Business/Location</th>
<th>On-site Employment</th>
<th>Off-site Employment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brighton &amp; Hove Buses</td>
<td>80 on-site and 370 off-site</td>
<td></td>
</tr>
<tr>
<td>Custom Pharmaceuticals</td>
<td>110 on-site</td>
<td></td>
</tr>
<tr>
<td>Essential Hygiene, Unipart &amp; Furniture Village</td>
<td>31 on-site and 12 off-site</td>
<td></td>
</tr>
<tr>
<td>Build Centre</td>
<td>20 on-site</td>
<td></td>
</tr>
<tr>
<td>Gill House</td>
<td>Vacant (so detailed as zero)</td>
<td></td>
</tr>
<tr>
<td>Industrial House</td>
<td>24 on-site</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>265 on-site and 382 off-site</td>
<td></td>
</tr>
</tbody>
</table>

The Brighton & Hove Bus Company employees will be retained when the company relocates, after which the Conway Street area will employ 186 people (excluding The Agora offices which will be retained within the redevelopment). This low level of existing employment provision is indicative of the current economic climate and the poor condition of the various premises which largely no longer meet modern market requirements. Based on the Homes & Communities Agency ‘Employment Densities Guide (2010)’ the proposed office accommodation (8,825m2) would generate approximately 735 skilled employment positions (12m2 per full time equivalent member of staff). Accordingly, the proposed development would provide nearly four times the level of employment provision than at present.

It is understood that there is currently 39,000m2 (420,000ft2) of vacant available office space within the city. Furthermore the level of take up between Jan 2011 and Jan 2012 declined to 2323m2 (25,000ft2) compared to an average historical uptake of 12,000m2 (130,000ft2). Current market trends for 2012 suggest that this low uptake is set to continue (source: Stiles Harold Williams).

Whilst we understand the need to provide additional employment space, there is a substantial amount of vacant office space in the city. As such, there is no demonstrable need or justification to provide 3000m2 of office floorspace on the Conway street site. We would contend that the redevelopment of these poor quality buildings with Grade A offices will provide the type of accommodation needed within the City. Furthermore, banks and other institutions will not finance speculative office development in any event. As such, not only is it likely that this level of office floorspace will not be delivered, this element of the policy would stop the whole redevelopment being approved or built.

For these reasons, we therefore request that the policy is amended to require a net total of 8,825m2 of B1 floorspace.

Leisure & Retail Uses
Given that the draft policy is unlikely to deliver a comprehensive redevelopment scheme for viability reasons, the wording needs to be amended to allow for a more robust mix of uses. The financial appraisal carried out by Matsim Properties concluded that in addition to residential accommodation, a mix of retail and leisure development also needs to be provided. Not only will this spread the viability risk of the development but it will help to provide a truly mixed use scheme suitable for a gateway location.

Council officers have previously suggested that retail and leisure uses could form part of proposals for the site on an ‘enabling development’ basis (i.e. that they would not comply with the requirements of Policy DA6 but would be necessary to cross finance the main development). Such an approach has historically been very difficult to achieve at the development control stage and could jeopardise delivery of the development. Furthermore, without the support of a development plan allocation, the provision of town centre uses outside the identified town centre would be significantly more difficult to justify against retail policies set out in the National Planning Policy Framework.

On this basis we request that the wording of the Strategic Allocation is amended to allow retail and leisure uses on an even basis with office and residential provision.

Residential
The Draft City Plan identifies a housing requirement of 15,800-19,400 new homes over the plan period to 2030 (790-970 per annum), but only makes provision for 11,315 homes. Whilst the physical constraints of the city are acknowledged, the ability to meet the identified need with taller developments does not appear to have been reviewed as part of the City Plan process (the last tall buildings review was carried out in 2003). There is therefore a risk that the Secretary of State could conclude that the draft City Plan is unsound and not fully in accordance with NPPF requirements.
The Conway Street Strategic Allocation identifies the site for 150 residential units together with enhancements to the streetscape. However, the draft proposals for the property show a capacity for approximately 400 residential units. We therefore request that the wording of the policy is altered to reflect this capacity and maximise the potential for housing delivery.

Existing Occupants
Whilst Matsim Properties is under no obligation to relocate the existing businesses within the Strategic Allocation area, the smaller local businesses (Dolly Dagger, Masquerade etc) are being assisted where possible. It is assumed that the larger businesses (Furniture Village, Custom Pharmaceuticals, Build Centre) will not require any assistance.

We hope that the wording of the policy will be amended accordingly, should you wish to discuss the potential of the Conway Street further, please contact the planning agents.

Statement of Changes:
See above however in summary:
Request the policy is amended to require a net total of 8,825m2 of B1 floorspace.

Policy wording amended to allow for a more robust mix of uses (for reasons of viability). On this basis it is requested the wording of the Strategic Allocation is amended to allow retail and leisure uses on an even basis with office and residential provision.

Request that the wording of the policy is altered to reflect a capacity for 400 residential units in the strategic allocation and to maximise the potential for housing delivery.

Any Other Comment:
Officer Response:
Thank you for your comments. In response to the issues raised and taking into account the latest background studies (employment, housing, retail etc) the policy has amended the minimum employment figure required for the site to a retention/replacement of 12,000sqm (acknowledging a shift into B1 office).

The council's 2011 Retail Study update does not identify a need for further allocations outside the existing retail centres. It supports the consolidation of retail within the existing retail centres thus helping to maintain their vitality and viability. It is considered the future additional demand for retail will be appropriately satisfied via the City Plan's Churchill Square allocation within the Regional shopping centre. The study does not recommend the designation of a new centre in the Hove Station Area (Goldstone Retail Park). It is not therefore considered appropriate to include retail within the specified mix of uses for the Conway Street strategic allocation. Any proposals for new retail development in the DA6 area could come forward where it meets the tests set out in the National Planning Policy Framework and policy CP4.

The NPPF includes leisure as a main town centre use. Alternative locations need to be justified via the application of a sequential test (town centre first, then edge of centre, then locations well connected to centre). The City Plan supports the provision of leisure facilities including cinema within the strategic allocation for the Brighton Centre and Churchill Square area, which lies in the regional shopping centre. There is no evidence to justify the inclusion of a significant leisure/cinema use at Hove Station. It is not therefore considered appropriate to include leisure within the specified mix of uses for the Conway Street strategic allocation. Any proposals for new leisure facilities could come forward where they meet the tests set out in national and local policy.

The housing figure in the policy is a minimum figure. The policy recognises there is a need for the area to retain an employment focus in order to meet the employment needs of the city. However, based on the latest studies it is accepted the minimum figure should be increased to 200 residential units.
<table>
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<tr>
<th>Customer No:</th>
<th>218</th>
<th>Customer Name:</th>
<th>Mr Ivan Mainprize</th>
</tr>
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<td>/</td>
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<tr>
<td>Policy:</td>
<td>DA6 - Hove Station Area</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section/Supporting Doc/Annexes:</td>
<td>Part Three: Development and Special Area policies</td>
<td></td>
<td></td>
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</tbody>
</table>

**Further Details:**
Concern about the scale of residential and employment development and the impact on existing area infrastructure eg. schools - lack of primary school places for existing residents in Newtown Rd, Fonthill, Sackville road area.

Development especially of the type recently printed in the Argus, shows a preference for high rise buildings which will block light to local houses north of the development zone and create windy wastelands in the areas directly below.

3.71 - waste management facilities at coal storage site - there is reference to utilising waste for heating/power technologies in future i.e. a Power Station. This is completely inappropriate for a densely populated residential area.

Despite the plan's enthusiasm for green transport options, the reality is that further development in a tightly constrained residential and business area will lead to more traffic, even if the council wishes it were not so - deliveries for industrial use are hardly going to be made by bicycle, leisure facilities will result in people driving to the area. If parking is not permitted then any retail or leisure business will fail and will not be replaced creating a ghetto.

**Statement of Changes:**
Reduce residential new development numbers for Hove Station area.

Remove any reference to power/heating technologies being developed in the coal yard site Develop a realistic and practical transport policy, not an ideological one , that assumes no-one will drive in future.

Restrict the height of any development to a maximum of the current skyline

**Any Other Comment:**

**Officer Response:**
Thank you for your comments. Whilst your concerns over the amount of housing proposed in the area are noted, based on objectively assessed housing requirements and a review of the Strategic Housing Land Availability Assessment (SHLAA) this has been reviewed up. However policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.
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<th>Customer Name:</th>
<th>Ali McKinlay &amp; Kelsey Jordan</th>
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<td>Part Three: Development and Special Area policies</td>
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</table>

Further Details:

We support the general statements about improving the quality of the streetscape of the proposed development area and the rationale for the City to increase housing and employment in the City.

Furthermore we agree that the area DA6 Hove Station area is a sensible area to be developed and could provide the local community with many benefits however there are many significant concerns predominately related to the proposed size of the developments: 575 residential units and 4,000m2 office space. Comments on these concerns are listed in the next section.

There are a lot of different residential areas that will be affected by this development including the Conway Street and Ellen Road flats, the victorian housing in Fonthill Road and subsidiary roads and the houses on the south side of the station. The document should make clear that any proposed development should not adversely affect the quality of life of existing residents who have chosen to live in the area for the quality of life it provides.

Statement of Changes:

7. The council is proposing to build a minimum number of residential units and office spaces and this is indicated to be within a certain land area. There is no reference to building height restrictions. The development of multi-story blocks is of particular concern to residents close to the site including reduction in natural light and increase in light pollution.

8. In any future documents that specify development areas and development sizes then it would be useful to provide all information in common measurements. For example, the plan proposes 4,000m2 of office space but does not specify the size of the strategic allocation area or the larger development area. It is difficult to comment on the proposed size of developments when not all information available is provided. In addition, if possible size of proposed residences, or within a range, would also be useful as 575 is difficult to picture.

Any Other Comment:

We would be interested in knowing Hove Stations view of the proposed development.

We would be interested in knowing how the Neighbourhood Plans and Area Action Plans are developed and at what stage these are currently at.

We would like to add our support to the request made following a meeting between councillors and residents on 17th July that council planning resources are made available to support the area in developing a Planning Brief for this development area as per the planning brief prepared for Park House.

Officer Response:

Thank you for your comments. Whilst your concerns over the amount of housing proposed in the area are noted, based on objectively assessed housing requirements and a review of the Strategic Housing Land Availability Assessment (SHLAA) this has been reviewed up. Evidence indicates there is a need for a range of dwelling sizes, in view of the constraints on the city it is not considered appropriate to exclude flats from this location. However policy DA6 in conjunction with the proposed guidance and the other policies in the development plan seek to ensure the issues you raise are appropriately considered and addressed.

The supporting text to DA6 has been amended to support the provision of school and essential health facilities. The policy and supporting text have been amended to
promoted improvements to wheelchair, pushchair and bicycle access over the railway at the station.

The preparation of a Neighbourhood Plan is not compulsory. A neighbourhood plan is prepared by the local community where it chooses to do so. However a neighbourhood area and forum (in accordance with the Localism Act 2011) need to be in place before a plan can be advanced. At the time of writing neither a neighbourhood area nor a neighbourhood forum for the Hove Station area have been designated. The city council seeks to prepare guidance/planning brief for the Hove Station Area however, at the time of writing, it is at an early stage and nothing has been published.
Further Details:

These representations relate to the proposed regeneration of the Hove Station area and its designation for mixed use employment and housing, in particular the identification of Becks Peugeot Garage site as a protected employment-led (residential and employment) mixed use site.

On behalf of Discovery Properties LTD (who is an experienced developer of retail and commercial schemes throughout the Country eg Kenilworth, Chichester, Wells, Bristol, Tavistock) we support the principles in the Draft City Plan in relation to the designation of the Hove Station area for regeneration. The principle of the need to regenerate, with the station as a focus for new development, can be supported. However, these proposals in their current form are, in our view, contrary to the policy set out within the NPPF relating to ensuring the delivery of economic growth. The continuation with the employment proposals on the Station area site despite the non-implemention of the proposals in the Local Plan represents a lack of realism. Given that the opportunity has existed for employment-led regeneration to come forward for at least five years, this would in the context of the technical guidance notes to PPS4 (which are still extant) be outside the normally expected ‘reasonable timeframe’ for retail and other town centre uses to become available.

The proposed development areas location due to its accessibility would potentially make suitable forms of development within the area sustainable in the context of the policies of the National Planning Policy Framework (NNPF). However, Discovery Properties LTD doubts the Council’s strategy, in particular regarding the potential delivery of the mix of uses that is being put forward. In this regard, one of the key sections of the NPPF relates to ‘delivering sustainable development’. In NPPF, section 1 (paras 18 to 22) the Government’s commitment to securing economic growth to create jobs and prosperity and to ensure the planning system can support sustainable economic growth should be important pillars of how the Council prepares and adopts this City Plan. The various objectives for how the planning system can help achieve economic growth are set out in para 21 of the NPPF. One of the objectives for Councils is ‘to identify priority areas for economic regeneration, infrastructure provision and environmental enhancement’. The fact that the Council has identified the Hove area for regeneration would accord with this objective.

However, para 22 of the NPPF is an important consideration and states: ‘Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.’ The Council has maintained the policy intention in the Brighton & Hove Local Plan 2005 for the Hove Station area (including the Becks Peugeot site) eg ‘protected’ for employment purposes. The fact that the protection of the Becks Peugeot site and the intention for some form of employment-led regeneration (B2) is being maintained despite the lack of success that has been achieved through the Local Plan proposals for the site in our view suggests the Council is seeking to rely on an employment-led regeneration where there is no reasonable prospect of that use coming forward to lead regeneration as the Council intends.

Given the history of the Hove area in general, the Council should review the intention for the regeneration of the Hove Station area to be employment-led. Discovery Properties LTD and its team consider that the strategy for the regeneration of the Hove Station area should be reconsidered with particular regard to allowing the principle of retail use to provide the catalyst for the regeneration of the Hove Station area. In this regard, the Council’s policy DA6 for the Hove Station area and related policy CP3 (Employment Land) should be re-worded to include particularly convenience goods retailing (a supermarket) in the permitted mix of uses. It is also considered that the Becks Peugeot site given its accessibility and position within the Hove Station regeneration area would be the best site for a supermarket to come forward, potentially along with other uses. Given this possibility, it is also suggested that the Hove Station area could be identified in retail terms as a district centre which could potentially allow other smaller scale retail uses to come forward that would help regeneration of the area. In this regard a mixture of retail, employment and residential would be more realistic and also viable.

There have been a number of studies carried out under the auspices of Central Government (albeit under the previous Government) that recognise the benefits that food retailing could bring in terms of acting as a pump primer to the regeneration of what have historically been difficult areas to develop. A report produced by DTZ has been acknowledged by Planning Inspectors as confirming the importance of retailing to generate returns to cross-subsidise the regeneration of wider areas. Signet Planning has recently been involved in a number of such cases including a larger regeneration site at Derby where the Council had longstanding intentions to develop an eight hectare site in the middle of the city for solely residential use as part of its regeneration strategy. With the collapse of the housing market and little interest in significant employment
development the Council accepted the principle of a food supermarket to bring forward the regeneration process. There are other similar examples across the country.

Officer insert : comments also allotted to CP3 and CP4)

**Statement of Changes:**

Accordingly, Discovery Properties Ltd requests that policy DA6 (Hove Station Area) be re-worded to secure the following:

1. Recognise that retail (particularly a supermarket) should be an appropriate use within the Hove Station area.
2. Allocate the Becks Peugeot Garage site to be the location for a supermarket.
3. Consider (in conjunction with Discovery Properties Ltd and other landowners) a Masterplan for the wider area with a supermarket on the Becks Peugeot Garage site.
4. Designate the Hove Station area in retail terms as a district centre to promote other forms of use that will overall provide a viable mixed use scheme and the regeneration of the area.

An appropriate change to accord with the above should also be made to draft Policy CP3 (Employment Land). (Officer insert : and also CP4 Retail Provision)

We are willing to discuss this further to demonstrate the deliverability of what is being put forward.

**Any Other Comment:**

**Officer Response:**

Thank you for your comments which have been noted. Based on the latest background evidence, which objectively assess the development requirements of the city, and for the reasons provided in response to your comments detailed against CP3 and CP4 it is not considered appropriate to amend policy DA6 as suggested in your representations.
Customer No: 227  Customer Name: Mrs Rachel Travers

Organisation:  Support Status: Partly Support
Rep Number: 2  Page/Para: /  Policy: DA6 - Hove Station Area
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:

I agree this area should be developed as it is currently an eye sore with lots of underused and ugly industrial buildings, some of which have been vandalised e.g. goldstone lane.

I agree there needs to be effective use of the space so housing/flats/offices need to be built up in towers to maximise the number, but this has to be attractively landscaped, with sufficient parking underground for the predicted increase in number of cars.

I object to the 9-screen cinema development. If the intention is to make a nice, artistic quarter, a 2-screen art house style cinema would be better, with space for artistic exhibitions and cafe instead.

No planning should be approved for more fast food restaurants in this development.

Statement of Changes:

I would want to ensure sufficient space is protected in the plans to include a new primary school for Hove. There is a significant lack of primary school places to meet the growing population in this part of Hove.

Significant levels of traffic use Fonthill Rd especially at rush hour Am and PM as this is one of very few places to cross the railway line. Traffic management would need to be seriously considered and I would support road bumps and 20 mph limit. Hopefully the development being so near to Hove station would encourage people to use the train, but there needs to be buggy/wheelchair access to the north side of the railway line. Improving the current footbridge and also where the stairs drop down from the south side of the station to Conway St itself. Currently parents with prams need to walk south quite far past the video shop to get back north to the station and going round that corner is hazardous.

I would like to see some space reserved for leisure/sports e.g. could a new home be found for the very well thought of Brighton and Hove Gymnastics Club? Their current home in the very run down church could be be improved dramatically, increasing local children's participation in sport.

Any Other Comment:

Officer Response:

Thank you for your comments. Several of the proposals you reference are not those proposed within DA6 in the City Plan but relate to a scheme promoted and consulted upon by a developer/landowner in the area.

Policy DA6 seeks to retain an employment focus in the area and, in recognition of the redevelopment opportunities, promotes mixed use redevelopment (predominantly employment with residential mix). It does not promote the provision of additional retail or a major leisure facility. However sport provision is supported in the new para 3.69 which has also been amended to support the provision of school and essential health facilities. The policy and the new para 3.70 have been amended to promote improvements to wheelchair, pushchair and bicycle access over the railway at the station.
Further Details:
The provision of 3,000 sqm of employment space in addition to the existing approximately 19,000 sqm in this part of the city presupposes that it will become a concentrated employment hub, which it has never been.

Although this is a site in obvious need of development, it is not obvious what mix of uses will lead to a successful development, especially in the current economic climate [which may last for another decade]. Although it currently has a number of tenants from the creative industries it is not necessarily a location that would be attractive to the digital industries.

In general, more flexibility should be afforded a developer in the proposed mix of uses including D2 Assembly & Leisure.

In the supporting text [3.65], as part of future development proposals applicants are being asked to demonstrate that existing occupiers have been suitably relocated in order to minimise local job losses. This appears to be quite an onerous condition given the larger benefit of redeveloping such a high-profile site.

The proposal for 150 residential units in the Conway Street Industrial area seems to be timid and does not appear to reflect the suitability of this site for tall buildings [in addition to those already adjacent to the site]. The City Plan should substantially increase the number proposed to help meet the shortfall between need and supply in the housing numbers.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. In response to the issues raised and taking into account the latest background studies (employment, housing, retail etc) the policy and supporting text has been amended to reflect the following: The minimum employment figure required for the strategic allocation has been reduced to a retention/replacement of 12,000sqm (acknowledging a need to be focussed on employment in order to meet employment needs and a shift into B1 office); the minimum housing figure required for the strategic allocation has been increased to 200 units; paragraph 3.65 has been amended to help appropriately address existing occupiers, and; amendments made to justify and facilitate the delivery of the approach to employment including creative industries.

The NPPF includes leisure as a main town centre use. Alternative locations need to be justified via the application of a sequential test. The City Plan supports the provision of leisure facilities including cinema within the strategic allocation for the Brighton Centre and Churchill Square area, which lies in the regional shopping centre. There is no evidence to justify the inclusion of a significant leisure use at Hove Station. It is not therefore considered appropriate to include leisure within the specified mix of uses for the Conway Street strategic allocation.
Further Details:

APEC is keen to preserve the level of affordable workspace for artists and artists groups across the city and, more specifically, in the Hove Station (DA6) area. Pleased to see numerous statements through the Plan to the importance of the arts to the character of the city and supporting the provision of affordable workspace and generally welcomes the policy.

APEC is concerned though that the Plan uses the term "affordable" in a number of places in relation to rents for artists workspace without being clear about what constitutes "affordable." Queries the "average" rent paid for artist workspace set out in the Creative Industries Workspace Study 2008. The "average" figures given in that study are higher than those generally affordable by arts practitioners and makers and cover the wider creative industries sector. APEC itself would not be viable at the higher rents mentioned in the study and other similar artist workspaces offer similar rents to APEC. APEC is also concerned about the proposed shift in the Hove Station area into high quality flexible office/business (B1) floorspace, which is likely to further increase rents. Clarity on the definition of "affordable" will be critical to the success of the policy. Stresses the contribution made by this sector to society and to the health of their communities. Hope that these comments will help to plug a small but vital gap in an otherwise impressive policy.

Statement of Changes:

Clearer definition of the word "affordable" in relation to workspace provision particularly for artists/makers workspaces.

Any Other Comment:

Officer Response:

Thank you for your comments. Policy DA6 and its supporting text have been amended to provide greater clarity in respect of affordable workspace for creative industries.

Further Details:

BHFOE would disagree that all the stores on the Goldstone Retail Park are bulky goods stores as suggested in para 3.70. There is no reason why JJB Sports or Toys R Us for example have to be there and could not be accommodated in a town centre location. In reality it is probably true of all the stores there. This site has also had a negative impact on Hove Park, both from the traffic it generates and the visual intrusion on the park and the harm to its setting.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments which have been noted.
The provision of 3,000 sqm of employment space in addition to the existing approximately 19,000 sqm in this part of the city presupposes that it will become a concentrated employment hub, which it has never been.

Although this is a site in obvious need of development, it is not obvious what mix of uses will lead to a successful development, especially in the current economic climate [which may last for another decade]. Although it currently has a number of tenants from the creative industries it is not necessarily a location that would be attractive to the digital industries.

In general, more flexibility should be afforded a developer in the proposed mix of uses including D2 Assembly & Leisure.

In the supporting text [3.65], as part of future development proposals applicants are being asked to demonstrate that existing occupiers have been suitably relocated in order to minimise local job losses. This appears to be quite an onerous condition given the larger benefit of redeveloping such a high-profile site.

The proposal for 150 residential units in the Conway Street Industrial area seems to be timid and does not appear to reflect the suitability of this site for tall buildings [in addition to those already adjacent to the site]. The City Plan should substantially increase the number proposed to help meet the shortfall between need and supply in the housing numbers.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your comments. In response to the issues raised and taking into account the latest background studies (employment, housing, retail etc) the policy and supporting text has been amended to reflect the following: The minimum employment figure required for the strategic allocation has been reduced to a retention/replacement of 12,000sqm (acknowledging a need to be focussed on employment in order to meet employment needs and a shift into B1 office); the minimum housing figure required for the strategic allocation has been increased to 200 units; paragraph 3.65 has been amended to help appropriately address existing occupiers, and; amendments made to justify and facilitate the delivery of the approach to employment including creative industries.

The NPPF includes leisure as a main town centre use. Alternative locations need to be justified via the application of a sequential test. The City Plan supports the provision of leisure facilities including cinema within the strategic allocation for the Brighton Centre and Churchill Square area, which lies in the regional shopping centre. There is no evidence to justify the inclusion of a significant leisure use at Hove Station. It is not therefore considered appropriate to include leisure within the specified mix of uses for the Conway Street strategic allocation.
Further Details:

Royal Mail’s Hove DO falls within the Hove Station Area development area boundary.

Royal Mail’s Hove DO is not identified on the Hove Station Area map as a protected employment site, which are subject to Policy CP3 (3) and (4).

Note the quantity of development expected to come forward within the Development Area.

Royal Mail’s Hove DO is operational and Royal Mail currently has no plans to vacate the site.

Notwithstanding this, given that the site is within short walking distance of Hove Station and surrounded by residential properties to the south and west, it is our opinion that the Hove DO site presents a good opportunity for redevelopment. We note here that Royal Mail promoted the site for alternative uses in September 2010 as part of the Council’s Strategic Housing Land Availability Assessment (SHLAA).

Statement of Changes:

Royal Mail does not object to the inclusion of their Hove DO site within the Hove Station Area development boundary, however we request that the supporting policy or text to this allocation explicitly states that the re-provision / relocation of Royal Mail’s Hove DO operations will be required prior to any redevelopment of their site. This will ensure that Royal Mail’s operations will not be prejudiced and they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000.

Furthermore, should Royal Mail’s site be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of their site will need to yield both sufficient value to fund the purchase and fit-out of a new sites and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate their operations. In addition, it would be essential that any new facility is provided prior to the demolition of the existing and / or that suitable temporary accommodation is provided, if necessary, to ensure the continuity of service.

Royal Mail would welcome the opportunity to meet with the Council to discuss the preparation of any guidance in respect of their Hove DO site, as referred to under Point 1 of the DA6 Hove Station Area.

Any Other Comment:

Our requests as detailed in representations on DA6, DA8, SA2 and CP3 accord with the Government’s National Planning Policy Framework (NPPF) (published March 2012) which ‘provides a presumption in favour of sustainable development’ and from which we consider paragraphs 14, 19-20, 21,35,47, 50, 161 to be of particular relevance.

Further, Royal Mail would welcome the opportunity to meet with the Council to discuss the inclusion of their sites in the emerging Brighton & Hove Draft City Plan Part 2 which we understand will include the Council’s Site Allocations and Detailed Policies:

- Hove Delivery Office (DO), 88 Denmark Villas, Hove, BN3 3UG;
- Portslade Delivery Office (DO), 39-41 Boundary Road, Brighton, BN41 1AA;
- Rottingdean Delivery Office (DO), Nevill Road, Brighton, BN2 7JQ; and
- Brighton Delivery Office (DO), Office (OFF) / Industrial (IND), 62 North Road, Brighton, BN1 1AA.

- all of which are strategically important to Royal Mail

Officer Response:
Royal Mail has full control of this site as landowner. The site will only come forward for redevelopment with the agreement of the landowner. Whilst the council accepts the need for the Royal Mail to continue to provide its services, these issues can be fully addressed by the landowner and it is not considered necessary to amend the policy.

Further Details:

(Officers insert: comments submitted following developer proposals in the Argus for several hundred homes, approx 100,000sqft office/1,000jobs, 9 screen cinema and art gallery)

No objection to the principle of redevelopment of the site for leisure/offices/housing but the scale of this is horrific and would I imagine require a change to the access road. I don’t think the current access via Fonthill road from the North would be sufficient or how the local parking/road system/public transport would cope, especially parking to accommodate the cinema complex.

Absolute and total objection to buildings higher than any in the existing area due to the risk of shadow and overlooking in the Newtown road and surrounding area (my personal interest). The view to the west is currently pretty good. I would object to anything that significantly altered this. I would want to know exactly what impact buildings of this height would have at various times of the year.

Railway Issue: I imagine a significant number of new residents wanting to use the railway from Hove station at peak times. It is already impossible to get a seat on trains departing Hove at these times so some provison by the railway operators might need to be considered to cope with the additional usage.

Integrity of the area: any local commercial development should be designed to encourage local businesses and limit the number of ‘chain type brands’ allowed to be present - if the new area is just populated by Macdonalds and Starbucks it adds no soul to the community. The long term future of Brighton and Hove needs to reflect its roots of being eclectic and individual and encourage expression of a unique style - along the lines of North Laine rather than Churchill Square! A cinema complex should reflect diversity with a sprinkling of commercial blockbusters rather than a deluge - not a popcorn and hot dog style development. Encourage local artists, musicians and performers etc ala festival style.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments. The proposals you reference are not those proposed within DA6 in the City Plan but relate to a scheme promoted and consulted upon by a developer/landowner in the area.

Policy DA6 seeks to retain an employment focus in the area and, in recognition of the redevelopment opportunities, promotes mixed use redevelopment (predominantly employment with residential mix). Policy DA6 in conjunction with the other policies in the development plan seek to ensure the issues you raise are appropriately addressed.
**Further Details:**

The role of art and design could be particularly important in improving the legibility and public realm in this area and should be recognised in the text. The role of artist and creative companies working in the area should also be flagged as part of the regenerative process. This area would benefit from taller buildings varying the landscape which could be mentioned specifically.

**Statement of Changes:**

We are delighted to see the commitment to retaining the creative studio space allocations in this area. We are mindful of the need to be clear about the definition of ‘affordability’ in relation to the rental levels that creative industries and artists can afford.

**Officer Response:**

Thank you for your comments. The policy and supporting text have been amended in respect of affordable provision for the creative industry sector. The policy has also been amended to make clear design issues will be consider through the preparation of guidance.

**Further Details:**

DA6, Hove Station Area, para 4: we suggest that the North-South movement also across the railway (especially by pedestrians) is highlighted. There are key accessibility issues that need to be addressed. In para 3.71 we particularly welcome the reference to opportunities for the development of district heating/combined heat and power technologies. In Para 3.61, point A8 we would like to see a commitment to restoring the Victorian street tree heritage. In para 3.69 we would like to see a commitment to public art. We would expect that the existing housing stock and surrounding facilities on the Clarendon and Ellen Estate be upgraded to conform to 21st Century environmental and amenity standards.

**Statement of Changes:**

We are delighted to see the commitment to retaining the creative studio space allocations in this area. We are mindful of the need to be clear about the definition of ‘affordability’ in relation to the rental levels that creative industries and artists can afford.

**Officer Response:**

Thank you for your comments. Amendments to policy DA6 and its supporting text have been made to help address the accessibility issues raised. Your support re district heating/combined heat and power is welcomed and noted. It is not considered appropriate to specifically reference the restoration of Victorian street trees, the policy does however seek public realm and greening improvements which could include such restoration. Public art is considered to be addressed appropriately through a separate policy. The policy seeks to secure general enhancement of the area.
Further Details:

Hove Station Development Area and land north of Newtown Road in particular.

Unit 56 Newtown Road:
Newtown Ventures Ltd owns Unit 56 Newtown Road which is located on the corner of Goldstone Lane (see enclosed Site Location Plan). The property was previously used for industrial purposes but has been vacant for a number of years despite a comprehensive marketing campaign by Flude Commercial since January 2004.

Despite planning permission for 2 x 4 storey office blocks with parking (BH2004/02582), there continues to be a lack of interest in occupying or redeveloping the property for employment purposes. Flude has confirmed that the land has a negative site value and the District Valuer has concluded that the building is unviable and will not be occupied in its current condition.

Unit 56 is clearly redundant for employment purposes and a new approach needs to be adopted in order to regenerate the site and surrounding area.

Brighton & Hove Local Plan (2005):
The Newtown Road industrial area is allocated as an EM1 employment site in the adopted Local Plan which seeks to protect the property for B1(b & c) and B2 purposes. The EM1 allocation includes Unit 56 Newtown Road, Becks Peugeot Garage and the Tecni-Form site on Goldstone Lane together with the other commercial uses on the west side of Newtown Road.

National Planning Policy Framework (2012):
Paragraph 22 of the NPPF states the following:
“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

The long term protection of Unit 56 by Policies EM1/EM3 has failed to deliver business or industrial development on the site. As such, this is exactly the type of site that the NPPF seeks to release for other uses in the interests of positive planning.

The identification of the Hove Station Development Area (DA6) for regeneration is much needed and therefore welcomed in principle. Policy CP3(4) seeks to allocate the land for employment-led (residential and employment) mixed use development on the land north of Newtown Road and stipulates that there will be no net loss of employment floorspace. Given that there is no demonstrable demand for Unit 56 either in its current form or to be redeveloped as flexible office space, the retention of the site for employment purposes (either on its own or as part of a mixed use scheme) cannot be justified and would conflict with policies set out in the NPPF. For this reason we request that reference to the site in Policy CP3(4) is removed altogether.

Proposed Uses:
We understand that Signet Planning has submitted representations on behalf of Discovery Properties Ltd in relation to the Becks Peugeot Garage and the adjoining sites. These representations have promoted retail-led regeneration of the area with a new supermarket on the Becks site and the Hove Station area being designated as a district centre. Newtown Ventures Ltd fully supports these proposals.

Paragraph 4.2 of the Draft City Plan identifies a housing requirement of between 15,800 and 19,400 new dwellings over the plan period to 2030 (790-970 new homes per annum). However, Policy CP1 only makes provision for 11,300 new homes to be built (565 units per annum). This approach is inconsistent with the National Planning Policy Framework which requires Local Plans to meet the need for housing in full (Paragraph 47). Whilst the supporting text acknowledges the short fall, the City Plan provides little
explanation as to the options reviewed (for example whether limited release of protected land is possible) before concluding that 11,300 dwellings is the maximum number that can be delivered.

Figure 2 (Housing Trajectory 2010-2030) clearly shows that a 5 year housing supply will not be delivered. Furthermore, the table in CP1 demonstrates that an additional buffer of a minimum of 5% has not been included. For these reasons, the approach fails to comply with paragraph 47 of the NPPF and there is a real possibility that the Secretary of State will conclude that the Plan is unsound.

Given the conclusions of Inspectors reviewing other Core Strategies/Local Plans (Bath and East Somerset Council, Hull City Council and Wigan Metropolitan Council) there is a real possibility that the Brighton & Hove City Plan will be rejected in its current form. It is in the interests of all parties that this does not happen and as such we propose that the housing land supply options are reviewed at this stage rather than proceeding to the submission stage.

The allocation of land north of Newtown Road for residential purposes could make a significant contribution to the identified housing shortage.

Please contact planning agent if you wish to discuss the issues raised in these representations further.

(Officers insert : agent put comments forward for DA6 and CP3. Officers have also allotted these comments to CP1)

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments which have been noted. Based on the latest background evidence, which objectively assess the development requirements of the city, and for the reasons provided in response to your comments detailed against CP1 and CP3 it is not considered appropriate to amend policy DA6 as suggested in your representations.

Further Details:

Support the safeguarding of coal yard site for waste use with the proviso that any proposal for waste uses on the site should explore the opportunities for the development of district heating/combined heat and power technologies.

Statement of Changes:

However further sites within the city need to be indentified for small scale recycling, upcycling and composting and the movement away from a waste based system to a sustainable resource use system, not to mention other eco technologies

Any Other Comment:

Ensure the plan is fully supportive of providing space for a whole range of eco technologies so we can stop talking about waste and start talking about resource use

Officer Response:

Thank you for your comments which have been noted. Amendments to the City Plan, including policy DA6 and its supporting text, have been made to reflect the findings of the Energy Study. Policy CP8 Sustainable Buildings promotes the inclusion of eco technologies. Part 1 of the City Plan is a strategic document and therefore only allocates strategic sites. Part 2 of the City Plan will be identifying non strategic sites. Requests for the identification of small scale recycling, upcycling and composting can therefore be put forward when Part 2 is consulted upon (anticipated early 2014).
Customer No: 149  Customer Name: Janita Bagshawe
Organisation: Brighton Dome Festival Ltd and the Royal Pavilion and Museums  Support Status: Support
Rep Number: 7  Page/Para:  Policy: DA6 - Hove Station Area
Section/Supporting Doc/Annexes: Part Three: Development and Special Area policies

Further Details:
Role of art & design in creating an attractive public realm; the role of cultural provision in providing a vibrant and diverse night time economy- also links here with health to provide alternatives to drinking culture.

Statement of Changes:
Any Other Comment:

Officer Response:
Thank you for your comments. The policy promotes public realm enhancements and the creation of a sense of place which may include respective art and design proposals. In accordance with CP5 Culture and Tourism appropriate cultural provision will be supported subject to meeting policy and NPPF requirements.

Customer No: 63  Customer Name: Roger Hinton
Organisation: Regency Society  Support Status: Support
Rep Number: 6  Page/Para:  Policy: DA6 - Hove Station Area
Section/Supporting Doc/Annexes: Part Three: Development and Special Area policies

Further Details:
DA6 Hove Station Area

We welcome suggestions to develop the area around Hove Station with office and industrial space as a well as housing. We would support any moves to establish a 'sustainable transport interchange'.

Statement of Changes:
Any Other Comment:

Officer Response:
Your support is welcomed and noted.
Support the more efficient use of buildings around Hove station. This is a key gateway into the city by road and rail and the area could be utilised much more efficiently to create local jobs, or jobs for people who could commute to the area by train.

Consideration must be given to the setting of the older more historical buildings in this area, however successful renovation of this type has been achieved elsewhere in the city, showing the old and the new can complement each other where necessary.

With the right development it is certain that the area could perform the role of becoming a high quality employment area for the city. Support is also given for the enhancement of the sustainable transport interchange at Hove station, particularly given the air quality concerns at the Sackville and Old Shoreham Road junctions. In the early morning rush hour, the Sackville Road junction is heavily congested due to the number of drivers using only one lane to travel north. If redevelopment were to happen in this location, the impact on this junction should be a key priority and no development should result in more congestion in the early morning peak.

**Statement of Changes:**
Add into para. 3.63 that developments should not cause further congestion on the Sackville Road and Old Shoreham Road junctions, particularly in the AM and PM peaks.

**Officer Response:**
Your support is welcomed and noted. Other policies in particular CP9 Sustainable Transport already require the effects of a development on traffic congestion to be taken into account and addressed. It is not therefore necessary to add the suggested reference in para 3.63.
Further Details:

I attended the recent presentation of this development proposal’s I was asked to submit my questions in writing.

Q1 hectare and acre are meaning less to the average lay person when you refer to 700 new homes, I believe that the COOK Goldstone valley development was approx. 25 units per hectare, you are proposing 50 units per hectare which seems a very high level of density, can you give some current example of this density in the City or an example near what you are proposing.

Q2 In the question and answers there is no mention of the size of the children play space or the size of the open space by what I take to mean a recreational park similar to the existing parks in Hove. Please confirm if this is correct, what size will it be how will this be configured can you give some example of similar sized schemes in the City.

Q3 there is no size given to the allocation of food growing space I presume you mean allotments what size is being considered for this.

Q4 What Maximum height will the development be for both industrial and housing stock.

Q5 In view of the total disaster made with the planning concerning parking at the L&G site and the impact of additional parking on all the roads and streets within a 1,000 m radius of their offices, I see there is no mention of additional space for parking in this development can we get an assurance at this early stage of the planning you will get this right in this development for the new residence and the existing residents in Goldstone Valley and Hangleton.

Q6 you mention that 40% of housing i.e. 280 units will be affordable housing by that I assume you mean housing association or council housing, how much of this housing stock will be in flats or maisonette type accommodation we were told that it was too early to answer this which I find difficult to understand as the footprint will vary hugely and must have been taken into consideration in the initial brief.

Q7 Is any of this 40% of affordable housing being set aside for key workers such as nurses public transport workers etc. as is done in many London boroughs and other cities.

Q8 The question of traffic access was widely debated and we were assured that suitable realignment will be made of King George Sixth Avenue (snaky hill) can you give me an assurance that the residents of Goldstone valley will be consulted at the earliest possible moment of this highly controversial issue.

Statement of Changes:

Any Other Comment:

Officer Response:

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

Provision will be made for 2ha of public open space with children’s play space and informal sports facilities. There are no detailed plans for the configuration of this yet.

It is not possible to provide detailed information regarding the configuration of the housing at this stage.

Residents will have further opportunities to comment as detailed proposals for the site emerge.
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<th>Julian Mason</th>
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**Support Status:** Object

**Further Details:**
This is the only green space between us and the A27. Surrounding roads could not support the extra traffic. This area should be made into parkland and conservation area.

**Statement of Changes:**
No. 81 bus service has been scapped so makes no sense to build more houses. Should protect green spaces. Why 40% social housing?

**Officer Response:**
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city's needs.

Housing affordability is a major issue for the city, particularly for many families and for newly forming households. The council is committed to enabling the provision of high quality affordable housing for people who are unable to access or afford market housing. Demand for affordable homes significant exceeds supply. The 40% affordable housing requirement will help to contribute towards the demand for affordable homes in the city.
Customer No: 153  Customer Name: Brian Fitch

Section/Supporting Doc/Annexes  Part Three: Development and Special Area policies

Further Details:
Object to 700 homes with 50-75 dwellings per hectare.

The landscape would be ruined by building and development.

Statement of Changes:
The valley should be protected from development and used as a haven for wildlife, and provide a nature area for residents.

Any Other Comment:
A development of 700 new homes would be totally out of character with the surrounding area and downland. The Valley provides a magnificent sweep of downland that forms a backdrop to the city.

Officer Response:
Landscape will be protected - the policy requires that Due regard will be given to the impact of development on the setting of the South Downs National Park and it’s purposes.

Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development.
As the site no longer has any statutory protection through a national designation, it would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city's needs.
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**Support Status:** Object

**Further Details:**

Have you any idea of the awful and dangerous traffic conditions of King George V1 Avenue and Goldstone village area? Have you any idea what a minimum extra 700 vehicles will do to the now awful rush hour with School runs etc.? What about all the extra cyclists who ignore the to the Highway Code. Why should the value of my house be depreciated by blocking my view of the South Downs.


Better community facilities? Since you lot were elected our facilities have got worse and you even get free parking-not having to pay the exorbitant fees they are now. What tosh.

All you think about lining your pockets and the possible kick -backs from the Highway Maintenance Firms who do hundreds of jobs every week-an extra 700 cars and even more Service vehicles?

I came to live here in my Golden Years when Grand Avenue was grand -not a congested parking area with freedom for the cyclists.

The air was clean with nice views-that is why my house cost so much. You people are completely deaf to residents wishes-but YOU WILL HAVE A FIGHT ON YOU HANDS.

I personally will do everything in my power to stop this lunacy and there are Hundreds and thousands more in Portslade like me who will fight you every inch of the way. You will get the shock of your life when we demonstrate

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry.

Any development would need to ensure there would not be an unacceptable negative impact on the amenity of existing residents in the area, however potential depreciation of property value is not an issue that is able to be considered through the planning system.
Further Details:
Surprised that Green Party want to get rid of a green space.
Concern about impact of development on the house prices/values of surrounding area which are high. Too much traffic associated with scale of development. Object to office development for traffic reasons.
Concern about disruption that construction will cause and health hazard.

Statement of Changes:

Any Other Comment:

Officer Response:
The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city's needs.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

Potential depreciation of property value is not an issue that can be considered through the planning system.
Further Details:
I am aggrieved at having to take a major decision without concrete models or plans but plan based upon the hypothetical and idealistic.
I object on the evidence given to the extent of further density of traffic impacting on the area, which has already been severely hit by new parking restrictions and the agreement of the Council of the City Park development.
I object to the density of housing on this site which will not be in keeping with current levels in the area.
I object to offices being built when I know of inner city offices that are vacant as well as offices along the London Road that have been vacant for long periods.

Statement of Changes:
I would like the plan to reflect the current quality of life already enjoyed in this area with good quality family homes that the ones already encompasses. Whilst I feel there is a need for the Council to meet its targets – set by the government on social housing I feel the council has found a convenient space to dump all its housing hit of non tax payers and benefit seekers on our doorstep. 40% affordable housing is too high and I cannot imagine by looking at the current city affordable housing it will be architecturally pleasing.

Any Other Comment:
I hope this plan will be given further consideration, as it affects many good citizens of the area and could change the whole character of the area for good. Personally I chose to live here because it was Suburban not overly congested. I feel this plan will devastate the area and its quality of life.

Officer Response:
The City Plan can only allocate the site for development and provide criteria for a future scheme. Detailed plans are drawn up by developers as they would actually enact the development.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.

Housing affordability is a major issue for the city, particularly for many families and for newly forming households. The council is committed to enabling the provision of high quality affordable housing for people who are unable to access or afford market housing as well as helping people make the step from social or affordable -rented housing to home ownership. The city council considers that the most pragmatic approach to meeting the unmet need is to require that all new suitable residential development (as defined with reference to the site size thresholds set out in the policy) provides a viable and deliverable proportion of affordable housing.
Further Details:
This area should be made into wildlife protection area, parkland, conservation area.
700 new homes will stretch infrastructure to the limit. Traffic down George IV is dangerous already without adding more.
Can't believe Green Party want to build on this land. Plenty of brownfield sites.
No building on this site.

Statement of Changes:

Any Other Comment:

Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

The majority of housing development in the City Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings - this has looked at over 300 sites.

The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 16,500 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 16,500 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.

Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development.
Further Details:

We the undersigned strongly object to the proposal of the development of Toads Hole Valley, as laid out in the City Plan, because of the following reasons:

The proposal for 700 homes on this site at a density of 50 - 75 dwellings per hectare is totally unacceptable. This will lead to ‘rabbit hutch’ living by those families occupying these homes and the area itself becoming vastly and unhealthily overcrowded. Compared to similar situations elsewhere at this high a population density, this can only lead to no privacy or proper individual living space for residents, undue noise from neighbours, social unrest and civil disruption, which will overspill into nearby existing areas.

This very high percentage, 40% being social housing will, as has been shown in all other towns with area of high proportion of social housing, cause undesirable ‘problem’ families to occupy estate and lead to ghettoised area being formed, similar, for example, to Moulescoombe and Whitehawk in Brighton. This, in its turn will reduce the current sense of pleasure and security of existing residents living in this neck of Hove plus will negatively affect the financial value of existing properties upon adjacent lands.

With the high number of envisaged homes and offices, along with the new school that has been proposed, the number of cars needing to access and exit this site will be at a minimum, we estimate, of 1000 vehicles daily. These vehicles will have limited access points: either from along Goldstone Crescent, or from King George V1 Avenue, or from the roundabout at the top of that hill. This extra traffic flow at peak times will cause traffic congestion plus serious noise pollution and air pollution. The council’s hope that everyone will use bicycle or public transport is a dream from cloud cuckoo land!

Where will these extra vehicles be able to park? Will every new unit have a garage? If not, this proposed new estate’s roads will be full of cars. Perhaps, in this case, it is council’s intention to make new residents pay dearly for roadside parking, thereby creating more income and a precedent for existing areas nearby without garage facilities: an option not favoured in the least by us, or other we know.

Having 3 or 4 storey buildings at the bottom of the site, as was strongly suggested by your planning officers when we questioned them on Thursday, will despoil the garden city view one has at present when entering into Hove down King George V1 Avenue. It will also unfavourably detract from the present pleasant semi-detached, spacious layout of homes elsewhere in the valley on the other side of King George V1 Avenue.

Planning officers at your public meeting at West Blatchington windmill last week suggested that King George V1 Avenue may be diverted through the new estate and the traffic slowed down. To remind you: this is a major road link into and out of Hove, with a very high volume of traffic of both cars, and large lorries going to and fro the local ports of Newhaven and Shoreham. With that high volume of traffic passing through the new estate it will be vastly detrimental to the wellbeing of the new residents, which is contrary to how you envisage the new development in your proposed city plan. Also, because this is the main thoroughfare into / out of Hove from the main London Road, you cannot seriously mean to slow this all down to 20mph. The extra pollution caused by vehicles travelling that slowly in high gear will definitely negatively impact upon the health and welfare of all local people - be they coming or existing.

You talk of having a "growing space" for vegetables. With all that extra air pollution eventually entering the soil for the high volumes of traffic caused by your proposals, do you really believe people will want to eat any of the vegetables grown there?

We agree to the proposal to a new school. It is needed, but only as long as it is eventually built with large playing-fields, plus other facilities, that may be used by all the local residents when the school is not in session. However, as a coda, we remind you that council demolished a perfectly decent-sized school, plus playing fields, in Hangleton Road, near the Grenadier public house, not that many years ago. Please try to think further ahead for future generations and retain the valuable, perfectly good, assets that we already have, before knocking them down.

In conclusion:
We agree that it is wise for the council to include this area as part of a city-wide plan, in the hope that it may have some control over any future development of the site to (hopefully) match the well-planned spaciousness of the other side of the 'cook-built' valley, possibly with the 'garden city' approach as advocated by The Hove Civic Society, and not at all like the high density, aesthetically low-appeal, visual mish-mash that is your architectural legacy at the new Brighton Station residential site. However, we strongly disagree on the present proposal for Toads' Hole Valley in the city plan. Moreover, we are disgusted at the Council expecting current residents to decide to accept or reject these proposals within such a very limited time-frame, yet the only information given to us to make this decision is a line drawn on a map and cloudy, vague ideas about number of homes and a wish-list for various developments to be included. There should have been present at Thursday's public meeting, an architectural scale model of the site for current residents to view, available along with (at least) 3D technical drawing of the types of homes, developments and layout that the council envisage being built upon this site. We understand that this is at an early stage in the proposals, but we still believe that you are definitely not fulfilling your legal requirements to "give the residents sufficient information to enable them to give an informed judgement" - as laid down in the legal framework for consultations between all councils and residents.

Statement of Changes:

Any Other Comment:

Officer Response:

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed. The residential amenity of residents will be considered in the production of detailed designs.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The school playing fields would be available for use by the community.

This is an early stage of consultation and there will further opportunities for engagement as detailed plans are developed.

Further Details:
Object to the proposals.

Statement of Changes:

Any Other Comment:

Officer Response:
Objection noted.
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**Further Details:**
Wholly object to development to Toads Hall area and to all facets; housing, roads, land, school, shops, businesses

**Statement of Changes:**

**Any Other Comment:**
Wholly object to development to Toads Hall area and to all facets; housing, roads, land, school, shops, businesses

**Officer Response:**
Objection noted. The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city's needs.
Further Details:
We attended one of the drop-in sessions at W.Blatchington Windmill, concerning the Toads Hole Valley Plan.

We find it very difficult to judge the feasibility of the proposal as pertinent information was not provided.

There is no indication of the road lay-out, which we suggest is a vital aspect of the development, especially as there could be in the region of 1000 cars owned by the residents in the proposed site. That’s without people driving to the school and other buildings.

Also, there were too many minimum values quoted in the proposal i.e. minimum of 700 residential units and minimum of 25,000 sq m of office space. How many could this turn out to be?

Additionally, it would appear from the text concerning the public open space, local shops/community facilities and the site for nature conservation, that there is no guarantee that these would definitely be provided e.g. ‘should’ appears 4 times in paragraphs 3.85/86 in , ‘may’ and ‘should’ in 3.87 and ‘expected’ in 3.88.

During a discussion at the session, it was pointed out that there was already a housing shortage in the City. We find it difficult to understand why there is a need for extra office space as surely this would attract more people to the area. We understand that there is already work taking place upgrading office space in the City e.g. in Preston Road.

Incidently, we consider it strange that this proposal has been put forward without informing the owners of Court Farm House at the top of King George V1 Avenue, as this building is included in the site.

By the way, your map shows it as King George 1V Avenue (not very professional!).

We cannot understand why a ‘Green’ Council would wish to encourage development of a greenspace, not only with housing but also office space.

We understand that the site was dismissed for the Albion’s Football Stadium as it also needed to entail commercial development.

We suggest you drive along the A27 by-pass to appreciate the amount of open space that can be viewed both sides of the road, especially in the Toads Hole Valley area. This would disappear thanks to a ‘Green’ Council.

If the Supplementary Planning Document had been published in the first place, it would have been easier to comment specifically at this stage on the proposals.

Statement of Changes:

Any Other Comment:

Officer Response:

Detailed information on a scheme for the site will only be available once a scheme is drawn up by a developer.

The government require us to meet full local housing needs in our area. Without allocating Toads Hole Valley there would be a risk the City Plan would be found ‘unsound’. This would not prevent development, but would restrict the City Council’s ability to influence the nature and location of development to best meet the city’s needs.
Further Details:

Goldstone Valley Residents Association has a membership of 900 households within the boundaries of Woodland Drive, Nevill Road, King George VI Avenue.

As a residents association we are committed to protect the area from unsuitable development and ensure that conditions, services, traffic density and parking policies are improved and to fight against any proposals that seek to undermine our standards of living. We are therefore opposed to these proposals.

INFRASTRUCTURE

One of our main concerns is the effect that a mixed development of this size will have on our creaking infrastructure. We think it is most likely that residents will live and work in the same area, even if homes and employment are co-located. We are told that the Council will not be able to deliver a Park and Ride transport system. This is a poor state of affairs given the expected vehicle movements. To hope that new residents will use public transport or bicycles was a somewhat fatuous remark by the council at the event on the 27th June.

With 700 households, a school, shops and businesses planned, access to/from the site is critical, given the number of cars needing to access and exit the site will be about 1000 vehicles daily. These vehicles will have limited access points: either from Goldstone Crescent, or from King George VI Avenue or from the roundabout at Dyke Road Avenue. This extra traffic flow at peak times will cause traffic congestion plus serious noise and air pollution. We were astounded that there would be no access from the A27 Brighton Bypass and object most strongly that you intend to inundate our area with such traffic volumes. We already have traffic congestion problems at peak times along Goldstone Crescent, Nevill Road and King George VI Avenue due to the bypass and exacerbated by vehicles from City Park (Legal and General).

An increase in traffic of such magnitude can only worsen noise and air pollution to unacceptable levels. Your Frequently Asked Questions document states that 'the development will need to improve road safety and improve bus and cycle links within the area'. We consider without an A27 link to the site, that road safety will be seriously compromised by the vastly increased traffic movements.

We were told that King George VI Avenue may be diverted through the new estate and the traffic slowed down. The means by which traffic iston slowed down is not specified. We are strongly against the balnket imposition of 20 mph speed restrictions, believing that they should be limited to school areas (and then only at schools starting and leaving times) and to dangerous narrow roads and junctions. With that high volume of traffic passing through the new estate it will be detrimental to the wellbeing of the new residents, which is contrary to how you envisage the new development is your proposed city plan. This is a major road link into and out of Hove and a very high volume of traffic of both cars, and large lorries serving local business, supermarkets and the ports of Newhaven and Shoreham.

A further concern is the supply of adequate water supplies, given the housing/business density and the recent hose-pipe ban by Southern Water. This situation must be made worse due to the fact that this current green space will be concreted over to a large extent, thereby reducing a large water catchment area. We are concerned that there should be access to local shops, adequate provision of health facilities (give the lack of doctor's surgeries in the area) and good community facilities. It was brought to our attention that when Broadbridge Heath in Sussex was constructed, the residents had few facilities and no entertainment locally resulting in residents having to travel out of the area, increasing traffic and pollution.

HOUSING

We are concerned with the type of housing and density of properties planned for this site. 50-75 dwellings per hectare is a large increase on the current density in the surrounding area. The provision of 40% affordable housing is very likely to lower the value of properties in Goldstone Valley. This very high percentage will, as has been shown in all other towns and areas of a high proportion of social housing, cause undesirable ‘problem’ families to occupy the estate. This, in turn, will reduce the pleasure and security of existing residents living in the Valley. A teacher, attending the consultatio told us that she had taught in a school which was part of a similar development to that planned at THV. Being bounded by similar highways to THV, the developmetn quickly became a ghetto and was shunned by those living on its outskirts.
Three of four storey buildings are proposed at the bottom of the site, which will destroy the open and green view we have currently when entering into Hove down King George VI Avenue. They will also unfavourably detract from the present pleasant semi-detached spacious layout of homes on the other side of the Avenue.

**PARKING**

We realise that proposals are at the first stage but we are very mindful of the deterioration brought to our streets by Legal & General staff working at City Park (to the west of Hove Park). The firm presented their 'Green Travel Plan' to our Ward Councillors, aimed at maximising public transport and minimising street parking by their staff. It did not work, and is a disaster, as sufficient public transport, at convenient times, was simply not available and staff continue to park their cars all over the streets, parking on bends, blocking driveways and causing such mayhem that some residents have asked for parking restrictions to be imposed.

Adequate parking for so many households is therefore of prime interest to us, as insufficient parking will result in overspill to surrounding residential areas with all its inherent problems, rises in exhaust pollution and anger directed against the new arrivals.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

Utilities companies will be involved in the development of the site to ensure that adequate infrastructure is in place to support the scheme.

The density of development is considered to strike an appropriate balance between preventing overdevelopment of the site and ensuring a significant contribution towards meeting the city's housing need. The planned 50-75 dwellings per hectare density is only slightly in excess of that commonly found in the surrounding area.

Housing affordability is a major issue for the city, particularly for many families and for newly forming households. The council is committed to enabling the provision of high quality affordable housing for people who are unable to access or afford market housing as well as helping people make the step from social or affordable -rented housing to home ownership. The city council considers that the most pragmatic approach is to require that all new suitable residential development (as defined with reference to the site size thresholds set out in the policy) provides a viable and deliverable proportion of affordable housing.

Community facilities will be provided on site and will be available for use by existing residents of the area.
Further Details:
Too many houses in a small space. Road infrastructure can't cope. Area of natural beauty. Pollution will get worse. Negative impact on house prices/values in surrounding area. No need for more offices or schools.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city's needs.

The City Council's updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively. A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry.

Potential depreciation of property value is not an issue that can be considered through the planning system.
Further Details:

re the proposed Toads Hole proposals for housing etc. One aspect I do feel very concerned about is the road junction of Holmes Avenue and Court Farm Road, Hove.

I would suggest that 40% of the traffic feeding down into Hove via King George IV Avenue from the bypass turns left at the traffic lights at Hangleton Road/Court Farm Road junction and then turns immediately right into Holmes Avenue. The only traffic which would not turn right into Holmes Avenue are the local residents of Court Farm Road for the obvious exits off King George IV Avenue are either into Goldstone Crescent or Nevill Road, before the traffic lights are reached.

When traffic is light the speed which vehicles make this sweep from King George IV Avenue into Holmes Avenue is frightening. When traffic is heavy, as at school times of Blatchington Mill School, traffic coming up Holmes Avenue have to move across the already queuing traffic in Court Farm Road whilst waiting at the traffic lights in order to turn right for access to the Brighton bypass. And yet must still leave space for traffic from the traffic lights such as the buses to enter Court Farm Road from Hangleton Road who themselves are competing for space with the traffic trying to exit King George IV Avenue to go south down Holmes Avenue.

The junction is already a nightmare and should you be in a car trying to turn right from Holmes Avenue into Court Farm Road the driver can not see how clear it is looking left due to the waiting cars at the traffic lights. Moreover the vehicles leaving the Hangleton estate from the north side of the traffic lights are coming down a hill and are already moving fast as they cross Hangleton Road to make leaving Holmes Avenue very hazardous.

This junction has to be the most dangerous in the City without adding addition vehicles.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.
Customer Name: Jutta Wuttke

Support Status: Object

Policy: DA7 - Toads Hole Valley

Further Details:
What is with the wildlife? I'm sure rare plants etc.
Traffic, transport situation.
More offices, houses, school - more cars - pollution - dangerous.
Parking? - like the offices in Hove Park - all over the streets even on the pavements.

Statement of Changes:
I would have liked to have the National Park included in this land.
NO SCHOOL - NO parking for offices.
Major road construction on Dyke Road.
New bus service. School too far from anywhere
More space for wildlife

Any Other Comment:
We've got already 2 secondary schools in the area. If there are noew houses - more people will move to Brighton.
How can NHS Service cope with more people?

Officer Response:
The Site of Nature Conservation Interest at Toads Hole Valley will be enhanced and conserved, and ecologists will be involved in the preparation of a detailed scheme for the site.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry, however provision of additional primary school capacity has not been ruled out. Although there are already secondary schools in this area, finding a suitable site for a new school is problematic, and opportunities must be taken where they arise.

A doctor's surgery could be included as part of the scheme.
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**Further Details:**

I do not support the proposed development of the Toads Hole Valley and object to the latest proposal of Building 750 homes, a new school & Office block.

**Transport**

Goldstone Crescent, Dyke Road & Nevill road are already extremely busy roads at peak times and additional traffic will cause further congestion getting into town. Goldstone Crescent is already dangerous with speeding cars driving along the park this will only be exaggerated with additional traffic. 15 years of road maintenance whilst new roads are created.

**Environment**

15 years of large lorries excavating and bringing in building supplies. What happened to wildlife that has taken to area? This was an area of natural outstanding beauty when Brighton and Hove Albion wanted to build a stadium there, what’s changed?

Congestion and Pollution from additional traffic

The picturesque view as you drive down King George the VI avenue will be lost.

**Secondary Schools**

We already have 2 large successful secondary schools in West Hove, why is there need for a 3rd? surely this would be better built in East Brighton where there are currently no secondary schools.

**Improved walking and cycling links**

There is already a path from the Downsman public house that leads all the way to the dyke, my kids scoot on this already why does it need improved links? The 77 bus also frequently takes people up to the Dyke, why is this an issue?

To summarise I cannot see how this development will benefit the people of Brighton and Hove, or the people in the surrounding area. In my view this will damage the quality of life around the goldstone Valley / Hangleton area.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city's needs.
A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry. Finding a suitable site for a new school is problematic; therefore opportunities must be taken where they exist.

Although links to the South Downs already exist, there are opportunities to improve these to enable and encourage more people to take advantage of the recreational activities on offer.

Detailed considerations of amenity impacts would be made once a planning application is submitted for development of the site, and would ensure there will be no unacceptable impact in the quality of life of existing residents.

Office development not supported. This is a residential area. Car parking not addressed. Access to A27/ King George VI Avenue not addressed I.E impact of high numbers of office workers on local area not addressed.

**Statement of Changes:**

Removal of paragraph 3.80

**Any Other Comment:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The City Council's updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.
Further Details:
It’s a c**p plan, tear it up and bin it

Statement of Changes:

Any Other Comment:
Hands off our green spaces

Officer Response:
Comment noted!
Further Details:

I am writing to express my objections to the development of Toads Hole Valley.

I strongly believe this area should be left as a buffer against the noise and pollution from the A27 (Brighton Bypass) & to protect the wildlife that depends on this type of habitat. This land is made up of a wooded area adjacent to natural scrub, unlike the areas of farmland north of the A27.

My initial concerns are:

Lying in a valley, what precautions will be made against flooding?

What will the controls of Traffic speed/additional traffic along King George VI Avenue be?

What provisions will control Access out of Goldstone Crescent onto King George VI Avenue (will need traffic lights/ roundabout, speed bumps/speed cameras, police enforcement)

At the best of times, Access onto the Roundabout at the top of Dyke Road is treacherous (as above) what traffic controls will be put in place to ensure fluid movement of vehicles?

Light pollution from street lighting/ security lighting, noise etc (My daughter suffers from M.E & needs darkness to sleep, noise aggravates her condition).

Suitable safe crossing points for student / residents / workers attending new secondary school & offices.

I AM Absolutely 100% against new school being built as an academy - schools should be financed by the local authority not 'palmed' off to central government or private companies.

When new 'industrial area built i am insistent that there should be be sufficient parking for total work force/visitors without overspill into existing residential areas, I will not tolerate under any circumstance a parking zone being introduced in this area & will not pay to park outside my house.

Exhaust fumes from Bypass/ King George VI Avenue being trapped in the valley making air quality poor for residents. Noise / pollution being carried on prevailing winds causing a disturbance.

Maximum Height level of new buildings not to be above kerb level of existing Roads.

Due to prevailing winds (from west to east) what guarantees do existing resident have regarding dust/pollution/noise during the construction period (will the developer provide adjacent properties with the latest double glazing/sound proofing?)

Why is green field being developed before brown field sites (e.g Shoreham harbour, Black Rock)?
will low cost housing lower the value of my property due to criminal activity? (direct correlation between poverty & crime - national statistics). If so what compensation can I expect?

Effects on local wildlife - Skylarks, newts, toads, birds of prey - this 'scrubland' is different to farmland north of A27

Will trees be planted to screen this development?

Carbon neutral? Blatchington Mill school has just had two all weather pitches built on their site. the remit stated that hardcore for this project would be sourced locally to zero the carbon footprint, the contractors were not able to find enough recycled aggregate for two hockey pitches locally let alone the 700 homes plus all the planned extras at Toads Hole.

Statement of Changes:

Any Other Comment:

Officer Response:

The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city's needs.

The Environment Agency would be consulted on any proposed scheme for the development of the site to ensure there would be no unacceptable adverse impact on the risk of flooding, either on the site or elsewhere.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site. Development proposals will address the issues of highways safety on King George VI Avenue, noise, light and other traffic impacts from the A27 and provide improved links to adjacent residential areas.

No tall buildings or tower blocks are proposed.

The western bank of Toad's Hole Valley is an identified SNCI and lies outside the strategic allocation for the area. As part of a future redevelopment measures will be expected to be undertaken to improve the quality and biodiversity of the SNCI and to improve walkways through the area and to the National Park.
Further Details:
I do not support the proposed development of the Toads Hole Valley and object to the latest proposal of Building 750 homes, a new school & Office block

Transport
- Goldstone Crescent, Dyke Road & Nevill road are already extremely busy roads at peak times and additional traffic will cause further congestion getting into town
- Goldstone Crescent is already dangerous with speeding cars driving along the park – this will only be exaggerated with additional traffic
- 15 years of road maintenance whilst new roads are created

Environment
- 15 years of large lorries excavating and bringing in building supplies
- What happened to wildlife that has taken to area
- This was an area of natural outstanding beauty when Brighton and Hove Albion wanted to build a stadium there - what’s changed?
- Congestion and Pollution from additional traffic
- The picturesque view as you drive down King George the VI avenue will be lost

Secondary Schools
- We already have 2 large successful secondary schools in West Hove, why is there need for a 3rd? surely this would be better built in East Brighton where there are currently no secondary schools

Improved walking and cycling links
- There is already a path from the Downsman public house that leads all the way to the dyke, my kids scoot on this already why does it need improved links?
- The 77 bus also frequently takes people up to the Dyke, why is this a an issue?

To summarise I cannot see how this development will benefit the people of Brighton and Hove, or the people in the surrounding area. In my view this will damage the quality of life around the Goldstone Valley / Hangleton area.

Statement of Changes:

Any Other Comment:

Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for
development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city’s needs.

A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry. Finding a suitable site for a new school is problematic; therefore opportunities must be taken where they exist.

Although links to the South Downs already exist, there are opportunities to improve these to enable and encourage more people to take advantage of the recreational activities on offer.

Detailed considerations of amenity impacts would be made once a planning application is submitted for development of the site, and would ensure there will be no unacceptable impact in the quality of life of existing residents.
Further Details:

Having studied the policy documents at the library, it has become obvious that it is full of contradictions by various parties.

In addition we could not find the highways report as there appears to be NO reference as how access to the site is proposed. This is a vital factor as the site is situated between roads that DO NOT offer as is at present, able to deal with the proposed increased traffic for a School, 750 houses, factories, eco centre, etc., etc. What about the park and ride, buses, car parking etc.

The Council is at present unable to look after what they already have. The school premises are full of weeds, rubbish and very poorly maintained structures. The roads are full of holes, the kerbs with weeds. Have to reduce bus services to save money. As Brighton has failed its pollution levels, it now wants to increase this with MORE factories, cars, and buses. I fail to see how this can be even be considered. It seems to us that The Council has just looked at a map, seen a space and then tried to find something to fill it.

There has not been a full explanation of exactly what 40% affordable housing means. Is this Council, Housing Association or shared purchase. If it is any of these we cannot see that 50% private purchase will be achieved for the remaining houses, seeing that “they should be of the highest quality” we assume it means also the Affordable Housing. How is this achieved?. When the Council gives its present rate payers value for there large sums each year, then it would be the time to consider adding to its liabilities.

We could find numerous other points, however we think the Council should abandon this proposal certainly at this time.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. There are no plans showing how access to the site will be facilitated as this will be considered once a detailed planning application is submitted. Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

Evidence supporting the City Plan shows a clear need for additional housing and employment land to meet the city's needs. The sea to the south and South Downs to the north mean there are very few available sites to locate the required development.

Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.
Further Details:

The following are just some of my objections to the City Plan proposals and in particular Toads Hole Valley. I should point out that I live in the Goldstone Valley area and therefore this particular proposal is of greater personal interest to me.

I really don't agree with all this development in the South East of England and especially in cities such as this which are already extremely overcrowded. The idea of ‘000s of additional homes being built just horrifies me and even more so if it’s not done on existing brown sites.

Toads Hole Valley:

Unlike my local residents association who state “No objection to development only to what goes there” I totally object to any development on this key green area. As you clearly state in one of your own hand outs this was known as the “Sussex Area of Outstanding Natural Beauty”. I fail to see, and never will, as to why the designation of the National Park should suddenly change this and allow you to propose such a horrendous development to take place. In fact why was this area ever allowed to be purchased by a private builder; I guess that's history....

The land was not considered suitable for the Amex Stadium and now all of a sudden it is suitable for a key development!

Some other key concerns...

1) Affordable homes
Grave concerns about 40% of affordable homes and the impact of affordable homes on local character and no doubt anti-social behaviour; why 40%? I understand that it is NOT a government requirement for new developments. I feel affordable homes need to be spread throughout the city, not concentrated in specific areas; I fear that this will become another Whitehawk or Moulsecomb if you’re not very careful.

2) Traffic impact:
King George V1 is already a nightmare, how will it cope with some 700+ (more like 1500+) additional cars trying to gain access to/from this proposed development area? Impact of traffic from City Park was significant; the spread of parking resulting from Legal and General was significant, e.g. Parking problems in Goldstone Crescent, Nevill Rd, Nevill Way Thought extremely unlikely that residents will live and work in the same area even if homes and employment co-located and therefore key concerns about traffic measures. At key times of the working day it’s already impossible to get to the by-pass in any acceptable time period, what’s going to happen given this proposal, it will just become a complete Nightmare!

3) Infrastructure
Huge volume of people associated with a 700 home development needs infrastructure to cope Are water resources adequate? Concerns about density of development given that existing area made up on 3 or 4 bedroom houses Already very Poor public Transport links in the Goldstone area; I see your hand outs suggest that there will be improvements but how given the fact that the city centre is already totally over crowded, There’s no more room for buses on these roads. Important that there is access to local shops; provision of health facilities (doctors surgeries are already poorly provided for in Goldstone area) and community facilities (also very few) and decent roads.

4) Character of area
Out of a total of some 47 hectares you’re proposing just 0.5 of a hectare for food growing; well what will that achieve given the food shortages we’re all be facing in the years to come. On top of that just 2 hectares of open space; in other words 45 hectares of concrete, just what we need right now given all the concerns about the climate etc. etc. Concerns regarding appearance of the houses and whether this will reflect the character of the Goldstone Valley area

Statement of Changes:
Officer Response:

Housing affordability is a major issue for the city, particularly for many families and for newly forming households. The council is committed to enabling the provision of high quality affordable housing for people who are unable to access or afford market housing as well as helping people make the step from social or affordable -rented housing to home ownership. The city council considers that the most pragmatic approach is to require that all new suitable residential development (as defined with reference to the site size thresholds set out in the policy) provides a viable and deliverable proportion of affordable housing.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The utilities providers will work closely with the City Council and the developer to ensure that adequate infrastructure is in place to cope with the extra demand.

Customer No: 142  Customer Name: Mary Slack

Organisation:          Support Status: Object
Rep Number: 0  Page/Para: 0/  Policy: DA7 - Toads Hole Valley
Section/Supporting Doc/Annexes

Further Details:
Objects to houses being built on Toads Hole Valley

Statement of Changes:

Any Other Comment:

Officer Response:

Objection noted
Further Details:
We strongly object to the plans for Toads Hole Valley (policy DA7). The area is too small to build 700 new homes, offices and a school.

The build up of traffic on the roads is bad enough especially since the Alliance & Leicester building had been made into offices.

The congestion of traffic would be a continuous nuisance to those affected.

Statement of Changes:

Any Other Comment:

Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.
### Further Details:

I do not support the proposed development of the Toads Hole Valley and object to the latest proposal of Building 750 homes, a new school & Office block. This development will not benefit the people of Brighton and Hove, or the people in the surrounding area. It will damage the quality of life around the goldstone Valley / Hangleton area.

**Transport** -
- Goldstone Crescent, Dyke Road & Nevill road are already extremely busy roads at peak times and additional traffic will cause further congestion getting into town
- Goldstone Crescent is already dangerous with speeding cars driving along the park - this will only be exaggerated with additional traffic
- 15 years of road maintenance whilst new roads are created

**Environment** -
- 15 years of large lorries excavating and bringing in building supplies
- What happened to wildlife that has taken to area
- This was an area of natural outstanding beauty when Brighton and Hove Albion wanted to build a stadium there - what’s changed?
- Congestion and Pollution from additional traffic
- The picturesque view as you drive down King George the VI avenue will be lost

**Secondary Schools** -
- We already have 2 large successful secondary schools in West Hove, why is there a need for a 3rd? Surely this would be better built in East Brighton where there are currently no secondary schools

**Improved walking and cycling links** -
- There is already a path from the Downsman public house that leads all the way to the dyke, my kids scoot on this already why does it need improved links?
- The 77 bus also frequently takes people up to the Dyke, why is this an issue?

**In brief:**
# Too many houses in space
# Road infrastructure can’t cope
# It’s an Area of Natural Outstanding Beauty
# It won’t improve the area
# Pollution - will cause health issues
# It will devalue my house
# No need for offices or school - we already have empty ones in house

### Statement of Changes:

Any Other Comment:

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.
Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development.

A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry. Finding a suitable site for a new school is problematic; therefore opportunities must be taken where they exist.

Although there is some access to the South Downs from this part of the city, it is considered that improvements can be made to encourage more people to take advantage of the Downs.

Potential depreciation of property value is not an issue that is able to be considered through the planning system.
Further Details:

1. This area already has 2 secondary schools and does not need another one.

2. The planned development is far too big.

3. Hangleton road is already a busy road that people speed along and a secondary school and 700 hundred houses plus offices would make it a night mare during rush hour and dangerous.

4. There is already a hose pipe ban every summer because of the water shortage in the area so where would all the extra water come from.

5. King George the iv avenue can be a problem to get out of in the rush hour so an extra 2000 children being driven to school and 700 resident and office premises would not all be able to go down this road even if it where redeveloped access would be required from the A27 not king George IV avenue.

6. The link road onto the A23 would not be able to cope with the extra traffic

Statement of Changes:

Any Other Comment:

Officer Response:

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry. Although there are already secondary schools in this area, finding a suitable site for a new school is problematic, and opportunities must be taken where they arise.

The density of development is considered to strike an appropriate balance between preventing overdevelopment of the site and ensuring a significant contribution towards meeting the city's housing need. The planned 50-75 dwellings per hectare density is only slightly in excess of that commonly found in the surrounding area.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Southern Water will work closely with the City Council and the developer to ensure that the water and waste water infrastructure can cope with the extra demand.
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<tr>
<th>Customer No</th>
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<th>Maria Rayner</th>
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<td>Section/Supporting Doc/Annexes</td>
<td>Part Three: Development and Special Area policies</td>
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**Support Status**: Object

**Further Details:**
- Too many houses for space - Traffic issue - difficult enough getting out of Goldstone Crescent into King George V1 as it is.
- Office space - enough parking?? Legal & General building is an example of this where there is not enough parking and overflow into nearby roads. Do not want controlled parking. One reason I moved here was because there is none.
- Devalue our properties - 15 years of disruption!! Pollution!

**Statement of Changes:**
Do not want it to go ahead!!!

**Any Other Comment:**
Surprised the green party want to ruin the green area!

Why develop a new office site when there are so many rundown ones in Brighton that could be renovated.

**Officer Response:**
The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

Potential depreciation of property value is not an issue that can be considered through the planning system.
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<th>Customer No:</th>
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<th>Mike Weatherley MP</th>
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<td>Section/Supporting Doc/Annexes</td>
<td>Part Three: Development and Special Area policies</td>
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**Further Details:**

I write with regard to the proposed development of Toad’s Hole Valley to highlight my views and to pass on representations that I have received from concerned residents.

While I appreciate that more people want to live in Brighton & Hove than there are available homes, I strongly believe that building over Toad’s Hole Valley, a greenfield site that borders, and feels very much part of, the South Downs National Park, is completely inappropriate. Many residents feel the same way.

Toad’s Hole Valley should arguably have formed part of the South Downs National Park. It is a slice of unique Sussex Downland after all. It is only because it found itself neglected for years, and south of the A27, that it was not included.

Building on Toad’s Hole is a slippery slope, especially in light of the housing scheme that the Green Administration wishes to build on the National Park in Horsdean, that will only encourage future attacks on the South Downs. I feel that pursuing this scheme is a most disrespectful response to the recognition that our beloved South Downs have been afforded.

I strongly feel that such countryside should not be developed and worry that the Green Administration’s plans for a high-density development in this spot will further damage the eco credentials of our city. Concreting over this unofficial nature reserve sends out the wrong message, at a time when we should be encouraging people to value the natural environment.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development.

Given this lack of protection, the site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city’s needs.
Further Details:

Well Toads Hole Valley has afforded the City Council an opportunity to claim some former farming land since the creation of the Brighton by-pass. Is the land now owned by the Council or by the Cook family (land owners in this area of Hove who have carried out much of the housing construction over the last 30/40 years). Will the Council be deriving a development levy/tax income form any change in the use of the designated land. If this is the case, which is my belief, how are the funds to be used?

Turning to the proposal it smacks of complete over development of the site.

If 700 new homes (houses/tower blocks?) are granted Planning Approval this will add something of the order of 2,800 new residents to this area. Possibly 1,400 of these will be of school age and a large primary school structure would be required. There are nearby secondary schools-Blatchington Mill and Hove Park but these are already over subscribed and have children arriving daily from other parts of the City by bus or parental car lift. Under the present educational “lottery” system there will be no guarantee that children living in the developed Toads Hole valley development will be able to walk/bike to school and this will add to local road congestion.

One presumes that the Council development Plan will also have allowed for the proposed development not so far away at the present Conway street Bus station/land around proposed development by Matsim properties. What additional population growth in the three tower blocks proposed and where will the children from these homes be sent to school. The Hove park area seems to be ripe for massive over development and a degrading of the quality of life for the existing (extant) population of this area.

The whole development will be close to the by-pass. What are the pollution (vehicle exhaust gas) levels running at this time? Will the proposed new residents have good air quality and more importantly what are the traffic noise levels before additional local traffic makes its way to the by-pass.?  

Turning in more detail to the local road net work the present entry to the by-pass (A27) and cross over to Devil’s Dyke is already extremely busy particularly in rush hour times. I am not sure how successful some road alterations will help the overall position. The “dip” at the bottom of King George V1th Avenue is already a dangerous place with many accidents over recent years despite traffic calming measures and reduced speed restrictions. With such a steep hill it is not surprising and the same will be replicated on the proposed development area –steep down hill road(s).

The Council seeks to maximise Public transport to minimise car use. This is not working in this area as the local route bus No.81 Route is not totally economic and is loss making to the extent that Jason Kit-Cat and the Green led council will be withdrawing the subsidy from September affecting evening services (withdrawal of these in the winter months). So no joined up thinking with the Toads Hole Development plan proposed?

II am surprised that 25,000 sq m of new office space is proposed when there is an over supply (empty offices) of such space in the city. I do acknowledge that it will be attractively sited and therefore make an “easy let” but at the expense of other firms re-locating from less favoured sites (transport delays/road congested areas) surely?!!

If space is to be given to work creation should it not be light industrial units designed for small businesses such as are seen in St.Joseph s area at the rear of Homebase and Currys on the Old Shoreham Road? I appreciate that they may not be easily “stacked sky wards” which makes it less job creative than an office block. Where are the local reasonable paid jobs in Brighton & Hove? Not all school leavers are part of the IT and University led economic development.

In summary the Council Planning department have seen this “blank canvass” space and sought to maximise housing/office/school/park(?) space by filling the whole expanse in one go. I would advocate a “stepped approach” on a much smaller scale initially and request that you take my views into account. I am a long standing resident of Hove (Goldstone Valley Area) having initially moved into this area in 1980. I therefore feel that my views are based on reasonable principals and in the knowledge of the local schools that my children have attended.

Statement of Changes:
I have been “circulated” by way of doorstep delivery the Council City Plan for Toads Hole Valley. This was received yesterday -6th July. May I initially express concerns that the leaflet distribution has only been carried out some 14 days before the City Plan being considered on the 20th July –this therefore affords little time for local residents to consider and express opinions on the proposal. Also many residents may be on holiday at this time and will be disenfranchised!

Officer Response:

Yes, the City Council will seek development contributions from the developer to facilitate necessary improvements to local infrastructure resulting from the development of the site.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

A new school is proposed for the site to address the issue of over-capacity in existing schools. The increase in school capacity also takes into account the increase in demand from the proposed development near Hove Station.

Detailed considerations of air quality and traffic noise impacts would be made once a planning application is submitted for development of the site.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue. Road safety will be of paramount importance for any proposals for the development of Toads Hole Valley. These are not considered insurmountable. Options to address road safety, access and improving sustainable transport access will be some of the measures that will be considered as a matter course. Local residents will be consulted on these options next year as part of work on a Planning Brief for the site.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.
<table>
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<tr>
<th>Customer No:</th>
<th>103</th>
<th>Customer Name:</th>
<th>Councillors Jayne Bennett and Vanessa Brown</th>
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<tr>
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<td>Policy:</td>
<td>DA7 - Toads Hole Valley</td>
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**Further Details:**

The proposal is contrary to the spatial strategy for the city as it is not located in an accessible sustainable transport location and is not in need of regeneration or renewal. We already have a totally flawed road system. King George VI Avenue is dangerous and an accident black spot. Further traffic will make things worse. Any development and business traffic entering the area will be dependent on the road network.

Proposals for road improvements would be very difficult and costly and if part of THV was used for new road access there would be insufficient land for the development sought on the site. Furthermore Hove Park Ward is already very congested with all day parking in the surrounding roads due to the lack of parking spaces on the City Park development.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.
City Plan Part 1 Responses Received 27th May to 20th July 2012

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<th>Mr Paul Gibb</th>
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**Support Status:** Object

**Further Details:**

1. No details have been given about how the site would be accessed - a major concern. Both King George VI Avenue and the Devil's Dyke roundabout are already extremely busy, and adding the pressure of traffic from a 700+ housing development, offices, shops and a secondary school could cause gridlock at peak times of the day, and would surely make the surrounding roads much more congested. It is hard to see how this fits with the stated aims of a 'sustainable' 'low carbon' development

2. Brighton and Hove's primary schools are already under enormous pressure, with last minute arrangements being put in place last year to deal with extra capacity. The proposed development is mostly made up of family homes, yet no provision has been made for an extra primary school.

3. The plan states there will be a 'minimum' of 700 new homes - yet does not state a maximum - this is surely leaves the plan wide open to interpretation at a future date and could lead to an even bigger development being built.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry, however provision of additional primary school capacity has not been ruled out.

There is some flexibility in the level of development, however the ensure includes numerous criteria to ensure that there is no unacceptable impact on the surrounding area, and to prevent overdevelopment of the site.
Further Details:
The proposal is overdevelopment of the site. A density of 50-75dph is totally out of keeping with the surrounding area that has a density of 25dph. There is far too much employment space when we already have empty offices across the city and it is completely the wrong place to build a new secondary school. We already have two secondary schools in close proximity - instead it should be located further into town.

Statement of Changes:

Any Other Comment:

Officer Response:
The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment. No tall buildings or tower blocks are proposed.

Although there are already secondary schools in this area, finding a suitable site for a new school is problematic, and opportunities must be taken where they arise.
Further Details:

This land had been deliberately neglected by the owners, who live abroad having let the farm house, until the land lost its status of AONB, in the hopes of planning permission for the purposes of development. This became possible when it was cut off from the rest of the South Downs by the A.27 bypass and was subsequently omitted from the SDNP.

As some sort of development now seems inevitable we sincerely hope that BHCC will endeavour to limit the environmental impact by making every effort to include Public Open Spaces and to ensure that the views across to the SDNP and to the sea are still available to be enjoyed by all. There is already a great shortage of green open space within our overcrowded city.

Consideration must be given to the roads as in the rush hour the working population already has great difficulty getting in and out of the city with large tailbacks down Dyke Road for access to the roundabout and during summer weekends visitors can take hours to get into Brighton and Hove as all roads get gridlocked. This is also a water catchment region so parking on concrete should be kept to a minimum.

Statement of Changes:

Any Other Comment:

Officer Response:

Due regard will be given to the impact of development on the setting of the South Downs National Park will not be adversely affected. The policy includes a requirement for 2ha public open space, as well as improved access to the National Park and enhancement of the SNCI.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.
**City Plan Part 1 Responses Received 27th May to 20th July 2012**

**Customer No:** 103  **Customer Name:** Councillors Jayne Bennett and Vanessa Brown  
**Organisation:** Brighton and Hove City Council  
**Rep Number:** 1  **Page/Para:** /  
**Support Status:** Object  
**Policy:** DA7 - Toads Hole Valley  
**Section/Supporting Doc/Annexes**

**Further Details:**

We object in the strongest possible terms to Toads Hole Valley being included as a strategic site for housing and mixed use development in the proposed City Plan.

The site was previously protected until 2020 and it was only to be considered as a last resort. There are many brownfield sites in the city - development should be on these sites before development of greenfield sites is contemplated. Protection of important greenfield land is supported by the CPRE. It is an important green space as it is a green lung between Hove Park Ward and the bypass. It forms a welcoming entrance into Hove and has long landscape views down to the sea which should be protected. The proposal to allocate this site for development is contrary to the aims of the Urban Fringe policy on page 94 which is 'the protection and enhancement of the wider landscape role of land within the urban fringe, the setting of the South Downs National Park and the protection of strategic views in and out of the City'.

It is an important haven for wildlife like skylarks

The chalk downland at THV acts as an aquifer for the city and will be contrary to the urban fringe policy, point 3.147 on page 98.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The majority of housing development in the city Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings – this has looked at over 300 sites.

The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 16,500 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 16,500 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.

The City Plan has explored opportunities for residential development on a number of office and employment sites. It allows for the loss of poor quality, redundant commercial space to residential and identifies opportunities for mixed use employment and housing development. However it is important that the city retains a balance of jobs and homes in the city and that we retain and provide for a supply of good quality employment floorspace in the city.

Toads Hole Valley is not classified as part of the urban fringe for the purposes of Policy SA6.

The Environment Agency would be consulted once a planning application is submitted for the development of the site to ensure there is no unacceptable increase in the risk of flooding, either within the site or elsewhere.

The density of development is considered to strike an appropriate balance between preventing overdevelopment of the site and ensuring a significant contribution towards meeting the city's housing need. The planned 50-75 dwellings per hectare density is only slightly in excess of that commonly found in the surrounding area.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry. Although there are already secondary schools in this area, finding a suitable site for a new school is problematic, and opportunities must be taken where they arise.

The City Council's updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.
Further Details:

It is my understanding that Toad's Hole Valley is a water catchment area. Currently every time it rains, the road at the bottom of the valley floods significantly and when there is heavy rain the water running off turns into a fast flowing river along Goldstone Crescent, several inches deep. If Toad's Hole Valley were to be built on, the additional water running off all the resulting concrete would exacerbate the existing flooding problem considerably, causing danger for motorists and creating a no-go area for pedestrians.

The only access to Toad's Hole would have to be from King George VI Avenue, an accident blackspot which is already overloaded with traffic (even more so since Woodland Drive had speed humps installed as it is the only unrestricted road out of the centre of Hove and in particular from Legal and General). Adding the amount of traffic that such a large scale development would generate would result in many more accidents, especially at the junction with Goldstone Crescent opposite which would be the only convenient place to build the access road into Toad's Hole.

The bank on the Downland Drive side of the site is designated as an SNCl. If the rest of the valley were to be built on, the wildlife and delicate balance of that site would be destroyed as it would be an isolated strip of green surrounded by a sea of concrete and as such could not survive for any length of time. The deliberate destruction of this site would be extremely irresponsible, not to mention very sad.

The area is simply not suitable for the proposed development. There are hardly any nearby shops, the only doctor's surgery in the area already has a full patient list, there is no nearby dental surgery, nothing for young people to do in the area and little public transport (even having saved the 81 bus, it only runs once an hour in the evenings). How could this cope with the increased use from 700 new homes? The area would become a ghetto.

It would be a very long walk from the furthest point of the valley to the nearest bus stop too!
While the City Plan promises improved transport links, it is hard to believe that this would actually happen, given the recent fight that residents of Goldstone Valley have had to retain their only bus service in the evenings.

There are empty offices all over the city, yet here is a plan to build more, bringing yet more traffic into an area already overwhelmed by it.

Statement of Changes:

I would like to see Toad's Hole Valley permanently protected from development. If that is not possible then at least the development needs to be in keeping with the rest of the valley. Given the dangerous access to the site, it is not somewhere to be building schools and offices, thus bringing more traffic to an already overloaded area which is an accident blackspot. No one wants to see children being killed trying to cross this dangerous road to access Toad's Hole.

Any Other Comment:

Please reconsider this proposed development. It is not suitable for the area and would create more problems than it would solve.

Officer Response:

The Environment Agency would be consulted on any proposed scheme for the development of the site to ensure there would be no unacceptable adverse impact on the risk of flooding, either on the site or elsewhere.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.
Development of the site provides an opportunity to secure better bus services to an area that we hope will benefit local residents. The policy also allows for the development of local community facilities including a doctor’s surgery.

The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.

Measures would be taken to enhance and conserve the SNCI.
We strongly object to any development in Toads Hole Valley because of the impact it would have on the area.

Some years ago there was a proposal to enlarge Blatchington Mill School. As a result a two story building was erected dwarfing the three story one adjacent. At the time there was a consultation period of just two weeks, in the summer time, when people are away on holiday. It could be coincidence but the Toads Hole Valley consultation only allows people two weeks to comment and at a time when many people are away on holiday. This scheme will affect a wide area but we doubt if the whole area have been made aware of the impact it could have on their daily lives. The Blatchington Mill School extensions were built by stealth and it would appear that Toads Hole Valley is taking the same path.

Traffic
The roads near to the valley are unable to cope at peak times with the current levels of traffic. The building of 700 homes plus a secondary school would cause complete gridlock.
King George VI Avenue has seen a number of fatal accidents and an extra potential of 1,400 cars using it on a daily basis is unthinkable. Frequently there are traffic queues in Nevill Road, from Court Farm Road to Old Shoreham Road, not just at peak times.
Goldstone Crescent, Shirley Drive and Hangleton Road are also very busy.
City Park workers add to the problem by using the whole area as a staff car park, congesting the roads and adding to the problem. The City Council traffic representative did not seem to know, or care, where the vehicles would emerge from the proposed development.
We think the traffic department should get out more as they appear to think that children are not driven to school, or collected, but all use bus services. Perhaps if all the potential residents of "Toads Hole Valley Town" were only allowed to use cycles then the Old Shoreham Road "Rolls Royce" bike lane would get some use.
Hundreds of thousands of pounds of hard working tax paying residents money has been wasted on putting in bike lanes that are not used. Special traffic lights for bikes have been installed. Cyclists do not stop at traffic lights, they go onto the pavement. At most traffic light junctions there is a space marked out for cycles. We have yet to see a single cycle actually use this space.

Services
The current NHS services are already stretched in the area and it is usually difficult to get a doctors/dentists appointment within a short period of time. Another 700 homes would make it impossible.
We know that our two hard working City Councillors have collected a very large number of signatures on a petition opposing the development. We hope that you will make an exception, for once, and listen to the voice of the people.

ANY consultation period should be at least 3 months long and include a wider area that may be affected.

Statement of Changes:

Any Other Comment:

Officer Response:
The large number of comments received on the proposals for Toads Hole Valley is indicative of the public awareness of this issue.
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for
development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

A new doctor's surgery would be provided on site. The local NHS Trust is consulted on the City Plan and is aware of the proposals for new homes in the area.
Further Details:

After attending the recent meeting regarding the development proposals for Toads Hole Valley we strongly oppose the current development plans as the proposals are far too extensive for the area. The following factors in particular should be taken into consideration:-

Parking and infrastructure

With no access from the A27 the only access points will be from the roundabout at the top of King George VI Avenue and at the bottom of this road. At “rush hour” Hove bound traffic on the slip road for this roundabout backs up onto the A27 and has a detrimental effect on the westbound exit slip road from the A23. By avoiding this bottleneck and using the Hangleton Lane exit the residential roads will also become clogged and congested resulting in more pollution which contradicts the statement on the B&H Council website, "There is an urgent need to improve traffic flow, reduce congestion and cut down on pollution in Brighton & Hove…..we have serious problems with traffic related air pollution in the city, which damages local people’s health"

The proposal includes 25,000 sq m of office space. This is simply staggering!!! The problems already created in terms of traffic and parking due to the office development at Hove Park (near the Grey Hound Stadium) will be repeated at this site and the roads between the two sites will be impossible to use in peak times causing more pollution and serious risks to school children who do not travel to school by car. Court Farm Road is increasingly being used by office workers at the Hove Park site and often we cannot access the parking outside our home for many hours of the day making it especially difficult when we have visitors - I particular visitor to our house is disabled and often has to park several metres from our house which never would have been the case prior to the offices - I fear this problem will get worse with more offices in such a residential location.

As more than half of the 700 new homes will have 3 or more bedrooms this could mean at least 1 or 2 cars per house!!! Where will they park and again the increase to the struggling infrastructure will be increased.

To expect residents to use public transport ie buses and cycles is totally unrealistic. Brighton & Hove Bus Company is already cutting services on unprofitable routes because the Council are withdrawing subsidies. The 81 service in the evening which serves Goldstone Valley is being cut! The 14c bus which goes to the Dials area of the city is a great route but totally useless to use as in the afternoon there is one bus an hour!!! At £4.40 for a day ticket this is hardly cost effective either!

Again B&H Council’s website is contradictory -“The council is unable to save all the lossmaking routes it wanted, due to cuts in government funding and rising costs for bus companies - particularly the price of diesel. This left the council £226,000 short of funds required to maintain existing subsidised routes. Around a dozen services will cease, saving almost £230,000”.

New Secondary School

Surely the place this city needs a new secondary school is to the south central/east of the city!!! If you actually look at a map of the city the east section is woefully provided for as is the southern section. Presumably the children attending this new school will travel from outside the local area. Keeping children as local to their homes as possible has to be an advantage in all areas including keeping more cars off the road and children off buses etc not to mention wasted time travelling and the importance of belonging to a school within your immediate community. Hove has three secondary schools - new schools should be considered in the right areas with these factors taken into consideration. Stanley Deason school in the east of the city was closed down. What a great pity - don’t close failing schools - improve them! Let children have the benefit of a school in their community to belong to and feel proud of instead of giving them the burden of having to travel to get to school.

Flooding
Surely this is a major concern! Toads Hole Valley sits in a valley!!! - what assurances are you able to give that flooding will not occur given the recent changes in our climate? Will the Council pay for the 'flood defences' and 'suitable arrangements for sustainable surface water drainage' in accordance with the recommendations of the Strategic Flood Risk Assessment? If so, will this be at the expense of local services and grants to charities?

We feel very strongly that the City Plan should not be adopted in its current format which includes the development of Toads Hole Valley and ask for our views along with other similar ones to be taken into consideration.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

Although there are already secondary schools in this area, finding a suitable site for a new school is problematic, and opportunities must be taken where they arise.

The Environment Agency would be consulted once a planning application is submitted for the development of the site to ensure there is no unacceptable increase in the risk of flooding, either within the site or elsewhere.
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<td>Part Three: Development and Special Area policies</td>
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**Further Details:**

Living in the Goldstone Valley area I am extremely concerned about the DA7 plan for Toads Hole Valley. As with many of the local residents, I commute to work along the A23 and existing traffic links along King George IV Avenue can only barely cope with the existing volume of traffic. A further development of the proposed scale would make traffic around this area unworkable. The recent cuts to bus services in this area also mean that using public transport when travelling into Hove or Brighton is rarely possible. You will thus have an extra significant volume of traffic blocking routes INTO the city. The council has clearly demonstrated in its recent cuts that it is NOT prepared to subsidise local bus services to alleviate the local traffic problems. Any additional residential/educational/office development in this area will not be supported by the local transport links. This is an area with a strong community spirit populated by families and the elderly. We strongly oppose the development which will lead to a dangerous increase in traffic. We chose to live on the edge of the city because it is quieter and safer and close to green downlands. I urge the council to rethink the location of this development because the current roads and communal outdoor space in this area is already stretched to capacity.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.
Further Details:

I am writing to protest at the proposal to develop Toads Hole Valley with Building 750 homes and offices (DA7). Firstly it would seem senseless to build 750 new low cost houses not part of a mixed community as this has already been proven not to improve integration and creates division within society. The location is an area of outstanding national beauty and home to much wildlife which would be severely disrupted by this development. There will be 15 years of disruption for local residents while this development is created. Hove has many high quality secondary schools, surely this sort of development would be better in East Brighton. The infrastructure from there to central Brighton or Hove would not be able to cope, there is no rail link and traffic along Goldstone Crescent and Dyke Road would grind to a halt at peak times.

Statement of Changes:

Any Other Comment:

Officer Response:

The development will comprise a mixed of affordable/market housing and property sizes as there is a requirement for 40% affordable housing and minimum 50% 3+ bedroom family sized dwellings.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry. Finding a suitable site for a new school is problematic; therefore opportunities must be taken where they exist.

Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city's needs.
Customer No: 37  Customer Name:  David Wagg

Organisation: 
Rep Number: 1  Page/Para: /  Policy: DA7 - Toads Hole Valley
Section/Supporting Doc/Annexes  Part Three: Development and Special Area policies

Support Status: Object

Further Details:
- Access. King George V1 Avenue is the only access route to the site. You acknowledge that this is a main route into Hove. Yet your plans for this lack substance and detail e.g. slowing down traffic will bring Hove to a holt.
- Density. Your plan includes "inter alia" 700 homes which alone is a greater density than the Goldstone Valley area. Why?
- Tyne of Building. Why more officers when there are empty offices throughout Brighton. Height up to 4 storeys out of keeping with the areas.
- Cars. 700 homes = at least 700 cars. Officers = another 200 cars say. School = say 100 cars. Area cannot cope with an extra 1000 cars at least.

Statement of Changes:
If the land is to be developed, it should be in character and in keeping with the Goldstone Valley area. The Cool family have recently built good quality new houses in Goldstone Crescent and Queen Victoria Avenue – what is wrong with a similar estate in Toads Hole Valley? The area could probably handle 250 new homes – but certainly not 700.

Any Other Comment:
I feel that this plan has not been fully thought through and I therefore object strongly to it. I trust that my comments will be considered in detail to prevent what I can only define as another example of Green idealism.

Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

The City Council's updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.
Further Details:

I object to the building of 700 homes, a school & offices as King George V1 Avenue & secondary Roads will never be able to cope with such a high volume of traffic. King George V1 is already very busy. The terrain is steep which could tackle flooding lower down in the area. This land should be kept as an open area to link with the South Downs National Park. There are many Brownfield sites within the city.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The Environment Agency would be consulted on any proposed scheme for the development of the site to ensure there would be no unacceptable adverse impact on the risk of flooding, either on the site or elsewhere.

Links the South Downs National Park would be improved as a result of the development of the site.

The majority of housing development in the city Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings – this has looked at over 300 sites.
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**Further Details:**

1. Why is there only one consultation day. (during July when a lot of people are on holiday, so are unable to comment!!!).

2. Why is planning trying to be rushed through?

3. The previous Council Administration had marked Toads Hole Valley as ring fenced until 2020, before reviewing the site, why have the Greens decided to bring that date forward.

4. Green party should not be supporting building on the Green Fringes of our City.

5. Is it being done for financial reasons - additional Council Tax from 700 houses?

6. What Modelling has been carried out for Congestion, Noise, and pollution? (The Council got it so completely wrong with City Park, where roads such as the Drove Way are now packed with Parked Cars. It has changed the shape of the whole area for the worse) We now Double Yellow lines painted outside our house, timed slots for parking around the Hove Park.

7. Our existing Doctors Surgery has a two week waiting list just to see the Doctor.

8. What reduction in the Council tax will be enjoyed if this scheme goes through?

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The consultation period on the draft City Plan lasted for 6 weeks.

Planning is not being rushed. Inclusion of the site as an allocation in the City Plan allows consideration of what form development should take through public consultation well in advance of the submission of a planning application.

The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city's needs.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

It is intended to provide an additional doctor's surgery on the site, as well as other community facilities.
Further Details:

No infrastructure for a development of this size, water, supply and waste disposable.

Site is shrouded in fog and mist most of the day in winter.

No thought given to people who live there.

Statement of Changes:

No Changes, find another site.

Any Other Comment:

The Council are not representing the Tax Payers who live there.

What about the traffic it will be horrific.

Officer Response:

Utilities companies will be involved in the development of the site to ensure that adequate infrastructure is in place to support the scheme.

Amenity impacts will be considered when a detailed scheme is drawn up, with there being no unacceptable impact on existing residents. Existing residents will also be able to benefit from the additional open space provision and community facilities.
Objection to Policy DA7

Toad's Hole Valley is part of the countryside of the South Downs and should be protected because it has great landscape value forming part of that magnificent sweep of Downland that forms the backdrop to the city.

Until recently the land was deemed to have such fine landscape value that it was of national importance. It still has great landscape value, which whilst not now deemed to be of importance to the nation, is of great local importance.

Toad’s Hole Valley is a defining feature of the Hangleton and Knock ward, with existing housing wrapped around two sides. Whilst the land is private, like any other farmland, the views across the land are freely available for all to enjoy and are greatly valued. The ward is suburban, not urban, and this large green triangle of countryside is an essential feature of this suburban area.

The fact that the landowners have chosen to neglect their farmland is not a reason why it should be developed; such an irresponsible approach to land stewardship is not uncommon on the urban fringes of cities and it should not be rewarded.

The owners’ neglect was one of the reasons why the site wasn’t included in the National Park; the other was that the site is mainly appreciated from the city and it is the visual amenity of the site to the surrounding urban area within the city that is the principle reason why the site should be protected.

A development of 700 new homes, with 50-75 dwellings per hectare and 40% affordable housing, would be completely out of character with the surrounding area and there would be little prospect of the new development integrating with the existing.

With this amount and density of development views to and from the South Downs National Park would be adversely affected.

There are no visual images in the city plan as to how this site would be likely to look if it were developed, yet it is only when people can see what is proposed that they can really make informed Page 2 of 6 18/07/2012 comments. What is proposed by the policy is a dense urban development very different from the surrounding area or from the wonderful open valley that is there now. With the recent advancements in 3D modelling it should be possible to create visual images for the public to view.

It is even more difficult to envisage what the impact of 25,000 sq.m. office development. The proposed floor-space would be two thirds the amount in the new Amex House, but what form it would take and what its impact would be is a mystery. Given that the offices would have poor access to the railway and excellent access to the trunk roads, it is reasonable to anticipate the offices would generate considerable amounts of road traffic.

Traffic

The area suffers from serious traffic problems that would not be solved or mitigated by the proposed development. Whilst the bypass removed the through traffic from Hangleton Road and King George VI Avenue, traffic volumes again increased following improvements to the A23.

King George VI Avenue is a main access road into Hove from the trunk road network that is steep, dangerous and noisy. Without re-routing the traffic, any development of the
Valley would be severed from the existing development by this forbidding road. The proposal is ambivalent as to whether or not the traffic would be re-routed, because any new road would require expensive engineering that may not be justified by the value of the development proposed.

If the traffic were to be re-routed around the other side of the Valley, closer to the bypass, the new road would have to rejoin the network at the bottom of the Valley and would have to carry all the traffic currently on King George VI Avenue. Therefore, the new road would similarly create a barrier between the new development and the existing, probably following a line at the foot of the wooded bank, thereby severing the new neighbourhood from Downland Drive.

It isn’t sufficient to include vague requirements for improvements to road safety. We need to know what exactly is possible and what is feasible. The traffic volumes in King George VI Avenue currently give rise to serious traffic problems in Goldstone Crescent, Nevill Road, Holmes Avenue and Hangleton Road. THERE HAVE BEEN MULTIPLE DEATHS ON THIS STRETCH OF ROAD ALREADY.

Currently the traffic has an adverse effect on the residential amenity of all those streets. The proposals to develop the Valley do not Page 4 of 6 18/07/2012 acknowledge those problems, yet they would inevitably exacerbate them.

Proposed School Secondary School Including a proposal for a secondary school is clearly designed to generate support for an unwelcome development, but policy DA7 would not guarantee that a school would be built. It does not require the landowner to fund construction of the school, the city council doesn’t have a budget with which to construct the school, (THE CITY COUNCIL IS UNABLE TO MAINTAIN EXISTING SCHOOLS) and presently there are no Government grants for such schools. So in all likelihood, the rest of the site would be developed with houses and offices whilst the land reserved for the school would remain vacant.

Other Associated Benefits
The proposed 2-hectare public open space would only be large enough to serve the new development; it really would not be a significant new amenity for the surrounding area. Similarly the proposed doctor’s surgery, community meeting space and local shops would only serve the new residential area. The notion that developing the Valley would in any way improve the biodiversity of the area lacks credibility, as also does the claim that there would be no adverse effect on water catchment or water run off/ flood risk. Page 5 of 6 18/07/2012

Strategy
The campaign to Save Toad’s Hole Valley supports the development and redevelopment of brown field land in the city, and is strongly of the view that the city council should renew its efforts to identify and foster redevelopment opportunities within the existing built up area.

Conclusion
The campaign calls on the city council to reaffirm its commitment to protecting Toad’s Hole Valley from development. The beautiful Downland around our city is precious; it should be treasured, not squandered; it is irreplaceable.

Statement of Changes:

Any Other Comment:

Officer Response:

Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city's needs.

Due regard will be given to the impact of development on the setting of the South Downs National Park will not be adversely affected. The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed. The City Council can only
allocate the site for development in the City Plan, it does that produce detailed plans for the development - this would be done by a developer in advance of a planning application.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The Environment Agency would be consulted during the determination of a planning application for the site to ensure that there would be no unacceptable increase in the risk of flooding on the site or elsewhere.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry.
### Further Details:

Large scale development on a small green area south of the A27 bypass. The council needs to consider the consequences of this development on the local area and residents. Have calculated that proposed 700 new homes, 50% of which will be family sized homes, is likely to result in an additional 2150 people, based on an estimated 4 people per home. However, some have been identified as 3+ bedrooms, meaning that it is possible for up to 6 people in these properties making the above estimate conservative.

It would be useful to have a comparison development for 25,000 sq m of office floor space for people to have a sense of scale. It is noted that the 25,000 sq m of office is a minimum so concerned that this will likely increase. No mention of car parking provision for the employment uses. Most people like the convenience of a car so most will probably drive despite opportunities for car sharing. Parking by office workers in the area is already a problem and residents find it difficult to park in near their homes. For example, Woodruff Avenue, Nevill Road and Goldstone Crescent. The area around Hove Park has become a car park because of the lack of parking provision at the Legal and General business.

A new secondary school was mentioned but there is concern about whose needs it will meet and how many pupils it can take or any provision for primary schools, which are over prescribed in the area already. If a school is to be added in the latter stages of development, this is likely to put pressure on existing schools.

Open space requirements, enhancing the SNCI, links to the SDNP and adherence to One Planet Living principles in the policy are 'carrots' to placate any opposition to the proposals.

Wouldn't want my council tax money wasted on inferior environmental standards on this construction project therefore building to high standards of sustainability and design should not have to be highlighted as a point.

Local healthcare and GP facilities in the area are already overstretched and shouldn't have to cope with the added burden of new patients. With an influx of new residents, a new healthcare facility is of great importance.

Road safety and improvements to road, bus and cycle links is a grey area. Assuming each household will have at least one car, this is 700 additional cars, leading to deterioration of road safety. King George VI Avenue is already an accident 'blackspot' and is busy all the time and has dangerous junctions such as with Goldstone Crescent and Nevill Road. Additional traffic will lead to more accidents on the local road network.

There is a strong possibility of flooding and will be made worse by the amount of hard surfaces arising from the development. The lower areas already experience localised flooding which affects Goldstone Crescent which will be made worse. This also raised the question of water shortages in times of drought and where will the supply of water for the 700 homes and offices come from.

### Statement of Changes:

### Any Other Comment:

King George VI Avenue is incorrectly marked on the plans as King George IV Avenue, proving that the department drawing these up have no local knowledge of the area.

### Officer Response:

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry, however provision of additional primary school capacity has not been ruled out.

The City Council itself will not develop the site so no Council Tax money will be used in its construction - development will occur if a private developer submits a planning application that it approved by the City Council.

The site is not in a flood risk area. However any proposal would still need to demonstrate that risk of flooding has been considered and if appropriate, mitigation measure put in place. The Environment Agency would be consulted on this issue too.

As I look out of my window at Nevill Road now (at 6.30pm on a Thursday) I see once again south travelling traffic stretched right back to King George IV Avenue [not a typo, applicants spelling]. This happens every morning and evening at rush hour or two and often during other times of the day. And not only in Nevill Road but also Dyke Road, Shirley Drive and Goldstone Crescent. To contemplate bringing in another 1000 car into the area is ludicrous and we will progress from serious congestion to gridlock. To say that you will 'manage' traffic options is just council speak and is frankly unbelievable. Putting a few more buses on and cycle lanes in will not go anywhere near addressing the problem. People will still use their cars. There are a number of brownfield sites that can be developed and they should be built on first.

As I see it the more housing you provide, the more migration there will be into the area which will mean you need to put more housing and so the problem perpetuates itself.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The majority of housing development in the city Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings – this has looked at over 300 sites.

The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 16,500 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 16,500 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.
Further Details:

The green promise was not to support projects such as this and were elected as such - hypocrisy.

I don’t believe that the traffic that this development would produce can be managed along the hangleton road, king george iv.

Basic facilities such as water cannot be supported.

There is no control of standard highway code to parking in this area, this council accepts parking on the pavement, around corners and over driveways. supply roads into the main sections cannot today exit easily.

There are already many schools in the immediate area.

The area should be developed to enhance the wildlife it supports.

Statement of Changes:

Cease the DA7 project.

Any Other Comment:

Officer Response:

The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city’s needs.

Southern Water will work closely with the City Council and the developer to ensure that the water and waste water infrastructure can cope with the extra demand. The policy has been amended to ensure that the development provides local infrastructure to the water and sewer system at the nearest point of adequate capacity.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.
**Customer No:** 209  
**Customer Name:** Mr Steve Gibson  
**Support Status:** Object  
**Rep Number:** 1  
**Page/Para:** /  
**Policy:** DA7 - Toads Hole Valley  
**Section/Supporting Doc/Annexes** Part Three: Development and Special Area policies

**Further Details:**

This will add to an already congested area.  

The development will increase stress on already overloaded infrastructures and considerably lower living standards during a number of years due to noise and general pollution due to building work.  

Furthermore it will create havoc as roads will need to be cut off to enable building access to construction equipment.  

I live in hangleton and feel this is a highly inappropriate scheme that will significantly affect the lives and well being of my young family.  

**Statement of Changes:**

That this plan does not go ahead.  

**Any Other Comment:**

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.  

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.  

Whilst construction work would have some impact on the local area, conditions can be attached to planning permissions to ensure this is minimised.
Further Details:

Having experience of travelling in the surrounding area only today I was on the tail end from Court Farm Road from Nevill Road Old Shoreham Road traffic lights this was at 9.40am for an appointment at the Conway Clinic. Parking at a vacant spot near to the ticket machine I arrived 5 minutes late for a 10am appointment. Yesterday afternoon I had to wait a considerable time to drive out of Goldstone Crescent to turn left for Hangleton Road. The traffic coming down King George VI Avenue was endless I believe due to road closure on the A27 by-pass due to an accident.

It would be interesting to know how many times in any one week ambulances respond using King George VI Avenue for emergencies where I live (Edward Ave) there is not a day we do not hear ambulances using that road.

With the proposed development without any doubt traffic management would have to be wizards to prevent major congestion any roads leading to and through to what would be another estate. It is bad now with no real answers which has been increasing by the year. Woodland Avenue North has no access onto Dyke Road Avenue or King George VI Avenue. All traffic is directed on to Goldstone Crescent making race tracks of roads leading down from it by speeding drivers in a hurry to make by many back up King George VI Avenue to reach the by-pass or wherever.

In my opinion the development is a good one in the right place but not the proposed area should be refused on the grounds of increased traffic on existing overloaded roads within the surrounding area with no foresight on improvement to existing main roads to and from the site. There appears to be no land for development of very much needed homes the answer will have to be outside of the City.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Even with privision of houses at Toads Hole Valley the city will not be able to meet its assessed housing need. Discussions are ongoing with neighbouring authorities to establish whether other areas have capacity to accept some of the city’s housing need.
Further Details:

My first criticism is directed at the little time allowed for local people to consider such important plans. I assume that you have taken quite some time to come up with your proposals and to give only something like two weeks for a considered response is unacceptable. I also note that it has been brought to our attention at what everyone would consider to be a peak holiday time.

At present the traffic and parking situation in a working day impinges on our lives seriously enough, without the creation of a bigger problem, which must occur as a result of your new development. We live in a road off Court Farm Road, and cars are already parking in the street from the Hove Park offices opposite the Engineerium. With plans for new homes, schools and offices the situation can only be made worse.

One of your stated aims is an improvement in road safety. Surely the best form of safety is to reduce the number of cars and buses, and yet you propose an increase. Where are these safe link roads going to be sited?

How do you propose to conserve and enhance the 10 hectare Site of Nature Conservation importance? You plan to build 700 new homes and 25,000 sq m of office space, and a new school. I cannot see how these opposing plans dovetail logically.

You mention links to the South Downs National Park. Surely it is all too easy to gain access at the present time.

Statement of Changes:

Any Other Comment:

Officer Response:

There was a 6 week consultation period on the draft City Plan.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Detailed consideration of road safety implications and mitigation, and measures to enhance the SNCI, would be considered once a detailed scheme for the site is submitted.
Further Details:

Having seen the exhibition at West Blatchington windmill, I would like to register my objections to the scheme.

I feel the proposal, with its high density housing has not taken into account the infrastructure of the area. Whilst the detailed plans of roads and housing were not on show it is obvious that this will result in overdevelopment of the site. No mention was made of the road layout especially entry into the site which will not be permitted from the A27 Hangleton by pass. The ministry of transport has already confirmed that this is not possible.

Whilst I realise that you are under pressure to provide more housing, it is surely better to look to East Brighton – Ovingdean, Woodingdean and Saltdean. Whenever I journey by 14 bus to Peacehaven I see large areas of land inside the Brighton boundary which could be developed for housing.

As hove cemetery is nearly full, Toads Hole alley would be an ideal place for a new cemetery. The area would then be able to conserve the S.N.C.I and still be an open space whilst providing a green burial site on the remainder.

Statement of Changes:

Any Other Comment:

Officer Response:

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

The other locations mentioned are all located in the South Downs National Park, which has the highest level of protection against development. Although Toads Hole Valley was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development.

The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city’s needs.

Using the site to meet some of the city’s unmet housing, employment space and school capacity needs is considered to be a better use of the site than a new cemetery.
For many years Toad’s Hole Valley has been vulnerable to pressure from landowners and developers. Before the Second World War there was a proposal to erect film studios on the land. East Sussex County Council compulsorily purchased the lower part for school playing fields but it did not work out as flints kept coming to the surface. In the end it was returned to the former owners. Later the Albion used that part as a training ground but it too failed. Since planning controls were introduced a planning application was made for a superstore and the site was once favoured by the Brighton and Hove Albion Football Club for a new stadium.

The site is a beautiful expansive sweep of downland scenery which frames views of the By-pass and offers glimpses of the city and the sea. The way in which it was landscaped after the By-pass construction reflects the promises given by the Department of Transport at the time of the construction of the by-pass. The By-pass design was promoted as a rural route and assurances were given by the Department of Transport at the Public Inquiry to this effect. Objectors had been concerned that the By-pass would generate development on the AONB land south of the By-pass. Mr Collins, principal witness, gave assurances on this matter and Mr Chitty, the landscape architect, emphasised the wide scale nature of the landscaping planned to minimise its disruption. The embankments on the south had long easy, grassed gradients to preserve downland appearance. In recent years it has suffered from trespass and, again, a cynical observer might consider that the landowners were trying to establish the site as a brownfield capable of development. The scars resulting from these unauthorised activities could be removed easily.

During the preliminary stages of the first Hove Borough Local Plan, the Borough Council, against the recommendation of the Director of Planning, (Dr Michael Ray), included the possibility of developing Toad’s Hole Valley in suggested development areas. But, following public consultation, this was dropped and the site was protected by downland preservation policies. The landowners challenged these at the last Hove Local Plan Inquiry and the local plan inspector clearly rejected their case.

In the inspector’s report she wrote:- "4.25 Toad’s Hole Valley is a roughly triangular-shaped area of about 43 ha; it is bounded by King George VI Avenue to the south-east, Downland Drive to the south-west and the By-pass to the north. On the opposite sides of both King George VI Avenue and Downland Drive is residential development. Typical of the landscape of the AONB, Toad’s Hole Valley is asymmetrical in shape with a steeply sloping south-western side and a more gentle slope to the north-east. Toad’s Hole Valley is free from development; with the exception of the wooded western slope, the Valley is in agricultural use. Toad’s Hole Valley is excluded from the ESA which covers the downland to the north of the By-pass; however, this is not a planning designation. The Valley includes some of the best and most versatile land which, in accordance with policy S12(d) of the Structure Plan, should be protected from development.

4.26 From King George VI Avenue, the broad horizons to the north and north-west of Toad’s Hole Valley are not seriously interrupted by the By-pass or traffic moving upon it. From the north-east beyond the By-pass, on the road leading to Devil’s Dyke, traffic moving upon the By-pass rather than the By-pass itself is visible; but these vehicle movements do not seriously affect the perception of Toad’s Hole Valley as part of Downland. At closer range, especially from the higher ground of Downland Drive, the Valley is of sufficient size for its downland character to be readily appreciated in its own right. In my view, therefore, the character of Toad’s Hole Valley itself and its relationship with the wider downland have not been significantly changed by the construction of the Bypass; it continues to make an important contribution to both the AONB and the exceptionally fine setting of the town of Hove.

She also rejected the objectors’ arguments that the Toad’s Hole Valley should not be covered by downland protection policies, stating (in paragraph 5.42 of her report) that ‘I consider that the statement that Toad’s Hole Valley is an intrinsic part of the Downland landscape is well justified’. She also declined to include it in land to meet the future development needs of Hove (her paragraph 5.45-48).

The Principle of Releasing Toad’s Hole Valley for Development

The proposed release does not accord with the strategic aims of the City Plan where it is stated that: ‘Significant new development will be directed to areas of the city with
good sustainable transport links and to those areas in need of regeneration and renewal’ (page 16, para 2.2, 4th bullet).

Toad’s Hole Valley, being a green field site, is not in need of regeneration or renewal; moreover it has poor public transport accessibility, and there is no prospect of the area being served by anything better than a basic suburban bus service.

For similar reasons, the proposed release is in conflict with the first strategic objective of the plan which reads:

SO1 Ensure that all major new development in the city supports the regeneration of the city, is located in sustainable locations, provides for the demands that it generates and is supported by the appropriate physical, social and environmental infrastructure.

The proposed release of Toad’s Hole Valley is in conflict with the ninth strategic objective, which properly identifies that it is the South Downs that must be protected, not just the South Downs National Park; that objective reads:

SO9 Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.

Thus, there is a serious inconsistency between the council’s core strategy and the proposal to release Toad’s Hole Valley, which was, of course, an afterthought.

Releasing Toad’s Hole Valley for development would prejudice the proposed redevelopment of brown-field sites. There is plenty of evidence that brown-field sites are only redeveloped in the absence of opportunities to develop green-field sites. The officers have indicated that, if released, development of this green field site would be likely to occur early in the plan period, probably between 2014 and 2019, so it would be most likely to cause further delay to the major brown-field redevelopments the council has been struggling to promote.

The only reason for releasing Toad’s Hole Valley is to chase an unrealistic housing target. Previously housing targets for Brighton and Hove have respected the fact that the towns are constrained by the sea and the South Downs; moreover the current target was agreed on the basis that Toad’s Hole Valley would not be developed as it was then still protected by AONB status. Whatever the external pressures, the council should remain steadfast in its commitment to protecting the South Downs from development in accordance with SO9.

As a downland site, Toad’s Hole Valley is characterised by (a) high landscape value, which remains despite the best endeavours of the owner to degrade it, (b) good quality agricultural land, which the owner is refusing to exploit, (c) an aquifer collecting rainwater for the benefit of the city, and (d) an area of biodiversity. The draft city plan offers no reasons as to why those constraints should be set aside.

This site in the South Downs can only be released once for development, so only in exceptional circumstances should its release be contemplated. Covering the site with a residential neighbourhood does not present a special case for its release. Only recently the city council resisted at public inquiry releasing Toad’s Hole Valley for a community stadium, even though that was argued to be a very special case and, whilst the requirement to construct a regional hospital might have been argued to be an even more special case, that facility is to be located on a cramped site in Kemp Town, in a location much better suited to residential development.

The proposed release of Toad’s Hole Valley is being driven by the Strategic Housing Market Assessment but, however much new housing is built, the demand for new dwellings will not be reduced. The City’s housing market is driven by London’s, which itself has an international dimension; the outer London boroughs and Brighton are cheaper than inner London, which fosters outward migration; as the outer boroughs are not prepared to release more land, more pressure is being diverted out of greater London, and particularly to Brighton, which has always been attractive to Londoners. New homes in the city are marketed in London; the more that are built, the more Londoners will be attracted to move to the city.

Toad’s Hole Valley scored very badly in the Strategic Land Availability Assessment for good reasons and was assessed as being ‘not available’ for development.

Feasibility of developing Toad’s Hole Valley to accord with policy DA7 The policy sets ambitious expectations for the development of Toad’s Hole Valley to be a highly sustainable suburb with a minimum of 700 dwelling units at 50 to 75 dwellings her hectare, 50% having 3 or more bedrooms, many with gardens, and 40% affordable, 25,000 sq.m. office space for the knowledge economy, a new secondary school, new footpath cycleways to the Downs, and other supporting facilities.
Regrettably no feasibility study has been undertaken to demonstrate that this policy is in any way realistic or deliverable. So a false prospectus is being used to induce support for the release of this site; presenting such claims that cannot be substantiated probably contravenes the UK Code for Non Broadcast Advertising.

Traffic
The site is separated from the built up area by a steep dangerous road: thus, with the current road layout, any new development would not be integrated with the existing and children would have to cross the dangerous road; much was made of this problem at the Community Stadium inquiry. The obvious engineering solution is a roundabout at the bottom of King George VI, but traffic coming down the hill would still approach this junction at high speed. Constructing another route to relieve King George VI Avenue is being considered, but that would add significantly to the total development costs and the feasibility has not been tested. Also any new road would be required to carry all the traffic currently using King George VI, so the severance effect between the new and old developments would simply be displaced.

Sustainability
The site is not in a sustainable location because it has, and always will have, poor public transport services, with journey times of about 30 mins to central Brighton, whereas access to the trunk road network is excellent. The travel time by road from the site to the M25 is only 35 mins (including in the morning peak), to Gatwick about 30 mins and to outer London town centres no more than an hour.

The location would not encourage sustainable lifestyles, rather it would be ideal for commuting to work by car, anywhere in Sussex, Surrey or South London.

Housing Numbers
No attempt has been made to demonstrate how 700 dwellings, would be crammed on to this steep site, at a density that would be more twice that of the surrounding area. In the absence of any feasibility studies and computer simulations, it is unreasonable to expect the public to visualise what is proposed. Without such visual aids, local people will undoubtedly anticipate that the new neighbourhood would be similar in character to the adjacent areas, which clearly isn’t going to be the case.

It is claimed the housing numbers can be achieved without buildings exceeding ¾ storeys and that views of the Downs will be protected, but these assertions lack credibility and have not been tested.

Policy DA7 is silent regarding the provision of car parking and there are concerns there may be inadequate provision within the proposed new development, creating parking pressures in the surroundings areas.

Policy CP20 requires 40% of the units to be affordable, with the council requiring a large proportion of those to be 3/4 bedroom dwellings. This would be a substantial burden on the total development costs of the scheme because the grants (from the Housing and Communities Agency) for affordable housing are being discontinued, which means these units would either have to be subsidised by the rest of the development or by the council, which is itself experiencing financial problems. The costs of achieving the affordable housing requirement would inevitably bring pressure to dilute other features of the proposed scheme.

Zero Carbon Housing and the provision of services
This would be an expensive site to develop because the land is very steep and the site has no services - no access roads, electricity, gas, water supply, sewerage or cable. Also the costs of installing all those services (and constructing the proposed relief road) would have to be incurred at the beginning of the development period, significantly increasing total development costs.

It is said that the new housing would be zero carbon (Sustainable Housing Code Level 6) but that standard may not be achievable as it would add significantly to the cost of each unit, in the order of £50K. This would be a huge cost to absorb developing a well-serviced site on level land but, as the unavoidable costs of servicing this site would be particularly high, it is most unlikely there would be the funds to achieve zero carbon homes.

It is said the proposed development would protect the aquifer, which would necessitate measures to prevent surface water being lost via the sewers to the sea or by surface water run off. Again this would be expensive, adding further to total development cost, so may not be achievable.

Proposed Secondary School and other Community Facilities
Policy DA7 indicates the development would include a new secondary school on a 5-hectare site, but the officers have no idea how the new school would be funded and advised that the council has no budgetary provision. Currently the Government is only financing ‘free schools’, which normally involve the conversion of existing properties, rather than new build. Whilst initially a site would undoubtedly be identified for a school, if Toad’s Hole Valley were released for development, but without funding the site would remain vacant and would eventually have to be made available for other uses, such as more housing.

Improved pedestrian and cycle links are to be constructed to the Downs, 2 hectares of public open space are to be laid out, 0.5 hectares set aside for food cultivation, green infrastructure provided and improvements made to the nature conservation area, but no assessment has been undertaken to show that any (or all) of these facilities could realistically be funded by the proposed development.

In summary, the council has offered no evidence that its lavish prospectus for developing the site, as detailed in policy DA7, has any possibility of being delivered. If the site were to be released, it is more than likely the resulting development would be a serious disappointment, creating just another dull suburb or worse. To achieve all the benefits in the council’s prospectus, the landowner would inevitably argue that more higher value development would have to be included in the scheme.

Conclusions
The release of Toad’s Hole Valley would be an unacceptable incursion of the built up area into the South Downs that would significantly damage the city’s downland setting and conflict with policy SO9 of the city plan’s core strategy.

The proposal further conflicts with the city plan’s core strategy which requires new developments to be in areas that are in need of regeneration and renewal, and have good sustainable transport links, whereas Toad’s Hole Valley fulfills neither criterion.

Releasing Toad’s Hole Valley for development would be likely to prejudice delivery of the proposed redevelopments of major brown-field sites that are critical elements of the city plan.

The council has offered no evidence that it would be feasible for the development package proposed in policy DA7 to be delivered, and many aspects of the policy are contradictory or ambiguous.

Statement of Changes:
Recommendation
We, therefore, call on the council to delete the draft policy DA7 and defend strategic policy SO9.

Officer Response:
Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development.

The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city’s needs.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents. Specific details regarding parking provision would be examined once a detailed scheme for development of the site is produced.

The majority of housing development in the City Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings - this has looked at
The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 15,800 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 15,80 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

Details of viability will be assessed as part of a future development scheme - there is some flexibility as to what is required to be provided on the site. Funding will be found for the new school.

Utilities companies would ensure that adequate infrastructure is put in place to support the development of the site.
Further Details:

I am writing in response to the proposals contained in the City Plan, specifically those related to the development of the Toads Hole Valley site.

The first thing to say is that I was disappointed by the lack of information available at the drop in sessions in terms of important considerations such as the proposed layout of the site, road access to it and how increased traffic flows would be managed. It seems we were being consulted but without any information on which to base our views.

I have serious concerns about the effect the proposals will have on the traffic flows and congestion in the area. 700 new housing units, a school and business premises are proposed. The domestic residences alone are likely to generate 1400 extra vehicles, plus the traffic associated with a secondary school and businesses. The area is already very busy, especially at peak times, being situated on a main access road into the western part of the city. Traffic and parking have already been seriously increased by the Legal and General development in Nevill Road. As a local resident this has made it very difficult to leave or enter our area with long waits at road junctions and traffic lights. What is proposed will only make the problems worse. All the ‘environmental statements’ about using cycles, public transport etc. sound good but experience shows that they don’t work in practice. We were told this about the L & G development but it didn’t work!!

I am also concerned about what appears to be complete saturation of the site with building, bearing in mind the difficult sloping terrain of the site. I cannot see how it is going to be possible to fit that many units into the site in a way which will be sympathetic both to the new residents and to the nature of the area next to the National Park.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed. Due regard will be given to the impact of development on the setting of the South Downs National Park.
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<tr>
<th>Customer No:</th>
<th>204</th>
<th>Customer Name:</th>
<th>Mr Adrian Johnson</th>
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<td>Policy: DA7 - Toads Hole Valley</td>
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**Further Details:**

The area is heavily populated on a residential level and the proposal to provide a minimum of 700 residential units is a major cause for concern. The roundabout at the top of King George VI Avenue is already a traffic hotspot especially at peak periods and the bottom of King George VI Avenue is a notorious accident black spot which has resulted in a number of deaths.

**Statement of Changes:**

Remove the proposal to provide a minimum of 700 residential units.

**Any Other Comment:**

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

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<th>Customer No:</th>
<th>89</th>
<th>Customer Name:</th>
<th>Mr and Mrs E S Hynson</th>
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<td>Policy: DA7 - Toads Hole Valley</td>
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**Further Details:**

We are very much against your proposals, which amount to the overdevelopment of the site.

Building firms will try to arrange for as many units as they can, in order to increase their profits.

You have the opportunity to arrange the development of the area sympathetically, for the future benefit of your citizens.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city's needs.
Further Details:

The previous draft Core Strategy only proposed development on the green fringe, including Toad’s Hole Valley, as a very last resort should the city’s housing, employment and education requirements not be able to be met on brownfield sites alone. Although we believe there is a strong case to have the previous draft Core Strategy policy reinstated, we will listen carefully to what local residents have to say about the proposals.

- If, as a last resort it does indeed have to be developed we believe that the policy as currently formulated is unlikely to be deliverable. In particular:
  1. the number of homes proposed is too high. We would not want to see ‘shoebox’ housing crammed onto the site in order to make up the required target. This site would be much more suited to family housing.
  2. Transport and access arrangements for the site will be extremely challenging. King George VI Avenue is already dangerous and the roundabouts at the top of Dyke Road Avenue are already extremely busy and extra traffic will only make the situation worse. Building a new access road through the site would be expensive.
  3. The amount of recreation and open space proposed is not high enough and should be increased.
  4. The height and density of any buildings must be such that the views to the South Downs from the existing built up area are not unduly impeded.
  5. One third of a million square feet of office space on this site is too high. What guarantees are there that there is demand for it, bearing in mind the lack of success in marketing Patcham Court Farm over very many years.
  6. The site is on an aquifer and is also on a very steep slope. Both these factors will pose significant logistical challenges for development.

Statement of Changes:

Any Other Comment:

Officer Response:

The previous Core Strategy was withdrawn by the City Council following advice from a Government Inspector that it was unlikely to be found ‘sound’ due to its approach to housing provision.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed. There will be a minimum 50% family sized dwellings of 3+ bedrooms.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Due regard will be given to the impact of development on the setting of the South Downs National Park and its purposes.
Further Details:

Surprised and disappointed with the amount of development proposed at Toads Hole Valley. Had reluctantly supported the balanced proposal last autumn on the basis of the provision of substantial public open space. This is a totally different level of development and CPRE have concerns about the level of housing (particularly as a minimum), employment floorspace (again as a minimum) and school (with related transport issues). Welcome open space, informal sports, food growing space, enhancement to SNCI and links to SDNP. Toads Hole Valley site must not be developed until all brownfield sites and other opportunities have been used and must not be seen as an easy option.

Statement of Changes:

Any Other Comment:

Officer Response:

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

The majority of housing development in the city Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings – this has looked at over 300 sites.

The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 16,500 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 16,500 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.

The City Plan has explored opportunities for residential development on a number of office and employment sites. It allows for the loss of poor quality, redundant commercial space to residential and identifies opportunities for mixed use employment and housing development. However it is important that the city retains a balance of jobs and homes in the city and that we retain and provide for a supply of good quality employment floorspace in the city.
Customer No: 143  Customer Name: Peggy Morris
Organisation:  Support Status: Object
Rep Number: 1  Page/Para: /  Policy: DA7 - Toads Hole Valley
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:

Statement of Changes:

Any Other Comment:

Officer Response:

Objection noted.

Customer No: 71  Customer Name: Gavin Button
Organisation:  Support Status: Object
Rep Number: 1  Page/Para: /  Policy: DA7 - Toads Hole Valley
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:

This area of Hove already has incredibly busy roads due to the amount of people who live in the area. The new development would make the roads and amenities in the area overused and cause many people to consider moving.

Statement of Changes:

The Toad Hall Valley area should be left untouched or the number of houses should be greatly reduced.

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.
Customer No: 211    Customer Name: Mr Robert Farrell
Organisation:       Support Status: Object
Rep Number: 1       Page/Para:  
Policy: DA7 - Toads Hole Valley
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:

I am very concerned about the proposed development of this site as there seems to be no point of access that is not at an accident blackspot. How can access be considered to this site from what is already an accident blackspot?

This area is already overloaded with traffic, with Goldstone Crescent (a much narrower road than either Nevill Road or Woodland Drive) becoming the main thoroughfare into and out of the town, since the 20 mph speed restriction was introduced in Nevill Road, and the speed humps in Woodland Drive, sending all the traffic that used to be spread across three roads into/out of town into one (Goldstone Crescent) as it is now the only unrestricted road out of the centre of Hove and in particular from Legal and General. Adding the amount of traffic that such a large scale development would generate would result in many more accidents, especially at the junction with Goldstone Crescent opposite which would be the only convenient place to build the access road into Toad's Hole. Queues at this junction already have long tail backs, with residents forced to inhale exhaust fumes from stationary vehicles which are queuing for 15 minutes or more at busy times of the day.

Toad's Hole Valley is also a water catchment area and there is already considerable flooding whenever it rains heavily, which would only get worse if the area were to be covered in concrete. Where would all the water draining off these buildings go? Straight on to King George VI Avenue and into Goldstone Crescent, causing even worse flooding. This is dangerous for both pedestrians and motorists alike.

Where will the sewage be drained to? The current ancient sewer runs along Goldstone Crescent - how will this cope with another 700 homes, plus offices and other developments?

The west bank of the site being designated as an SNCI, if the rest of the valley were developed this area would become an isolated strip of green which could not survive for any length of time. The loss of this special site would be indefensible.

The area is not in the least suitable for the proposed development. With no shops or healthcare facilities nearby, no facilities for young people and currently no accessible public transport. It is hard to believe that the promised improved transport links would materialize, given the recent fight by Goldstone Valley residents to retain their only evening bus service and the cutbacks in bus subsidies.

The last thing the area needs are more offices. The move into the area by Legal and General has caused nothing but nuisance for residents, with every private road in the area used by L&G workers as their car park, not to mention the increased volume of traffic at peak times. There are empty shops and offices all over the city - why not convert those into homes instead of building yet more offices that no one wants?

Statement of Changes:

Toad's Hole Valley should be permanently protected from development.

If that is not possible then at the very least the development should be in keeping with the rest of the valley and should be housing with shops and healthcare facilities, with a large green area of parkland.

Given the dangerous access to the site, it is not somewhere to be building at all, but in particular not schools and offices, thus bringing more traffic to an already overloaded area which is an accident blackspot. The likelihood of people being killed trying to cross the road to access Toad's Hole is very high, as can be demonstrated by the crossing that was installed only a few metres from there, where a child was hit by a car shortly after the crossing was installed. It is already impossible to cross at the crossing near the junction of Nevill Road and King George Vi Avenue due to the volume of traffic. Adding more by developing this site is just asking for trouble.

Any Other Comment:
Please reconsider this proposed development. It is not at all suitable for the area and would create more problems than it would solve.
Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents. The policy also allows for the development of local community facilities including a doctor’s surgery.

The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.

Southern Water will work closely with the City Council and the developer to ensure that the water and waste water infrastructure can cope with the extra demand.

The western bank of Toad’s Hole Valley is an identified SNCI and lies outside the strategic allocation for the area. As part of a future redevelopment measures will be expected to be undertaken to improve the quality and biodiversity of the SNCI and to improve walkways through the area and to the National Park.
**Customer No:** 141  
**Customer Name:** Norah Buckley  
**Organisation:**  
**Rep Number:** 1  
**Page/Para:**  
**Section/Supporting Doc/Annexes:** Part Three: Development and Special Area policies  
**Policy:** DA7 - Toads Hole Valley  
**Support Status:** Object

**Further Details:**

I utterly object to the plan to build on this green area – I object to the increase in traffic on A27, Holmes Ave & Hangleton Road (+ King George 6th Ave) I desire more residents parking & less noise. Holmes Ave is already a rat run & this will get worse. Why is the Windmill still not a one way system?

**Statement of Changes:**

A complete investigation of all Brownfield sites within the town and an explanation of why they are not being used first plus an explanation of hwy all empty properties are not redeveloped instead.

**Any Other Comment:**

The Green Council has now agreed to concreting the level, asphaltling Blatchington Mill playing fields and now this. My environment has deteriorated rapidly since they came into power and I nor they have attracted any major investors into the City. Please sort King Alfred first.

Please reply personally to all of the above.

**Officer Response:**

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The majority of housing development in the city Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings – this has looked at over 300 sites.

The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 16,500 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 16,500 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.

The City Plan has explored opportunities for residential development on a number of office and employment sites. It allows for the loss of poor quality, redundant commercial space to residential and identifies opportunities for mixed use employment and housing development. However it is important that the city retains a balance of jobs and homes in the city and that we retain and provide for a supply of good quality employment floorspace in the city.
### Customer No: 94  
**Customer Name:** Pat Davis  
**Support Status:** Object  
**Policy:** DA7 - Toads Hole Valley

#### Further Details:
I do not wish to see any further development of any kind in this area. What is being proposed is asking for another Whitehawk to Moulsecoomb area. Access is not viable on this site in terms of safety and it would cost more taxpayers money to make it safe.

#### Statement of Changes:

#### Any Other Comment:

#### Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

Affordable housing will only comprise 40% of the dwelling provided on the site.

### Customer No: 146  
**Customer Name:** Michael Prodger  
**Support Status:** Object  
**Policy:** DA7 - Toads Hole Valley

#### Further Details:
Complete objection to DA7. Land is unfarmable and undevelopable. Council should CPO it and add to National Park. Increase the size and use of existing schools. Already plenty of office space in the city. DA7 is a poor solution to a simple problem.

#### Statement of Changes:

#### Any Other Comment:

#### Officer Response:
Comment noted. Land is considered to be developable. The City Council has no powers to alter the National Park’s boundaries.

The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.
Customer No: 145  
Customer Name: J E Prodger

Support Status: Object

Rep Number: 1  
Page/Para: /

Policy: DA7 - Toads Hole Valley

Further Details:
Object to proposals.

Statement of Changes:

Any Other Comment:

Officer Response:
Objection noted.
**Further Details:**

The campaign to ‘Save Toad’s Hole Valley’ objects in principle to the release of the Valley for development.

A development of 700 new homes, with 50–75 dwellings per hectare and 40% affordable, would be completely out of character with the surrounding area and there would be little prospect of the new development integrating with the existing.

It is absurd to claim that developing the Valley with this amount and density of development could be done in a way that would ensure views to and from the South Downs National Park would not be adversely affected.

There are no visual images in the city plan as to how this site would be likely to look if it were developed, yet it is only when people can see what is proposed that they can really make informed comments. What is proposed by the policy is a dense urban development very different from the surrounding area or from the wonderful open valley that is there now.

With the recent advancements in 3D modelling it should be possible to create visual images for the public to view.

It is even more difficult to envisage what the impact of 25,000 sq.m. office development. The proposed floor-space would be two thirds the amount in the new Amex House, but what form it would take and what its impact would be is a mystery. Given that the offices would have poor access to the railway and excellent access to the trunk roads, it is reasonable to anticipate the offices would generate considerable amounts of road traffic.

**Traffic**

The area suffers from serious traffic problems that would not be solved or mitigated by the proposed development. Whilst the bypass removed the through traffic from Hangleton Road and King George VI Avenue, traffic volumes again increased following improvements to the A23.

King George VI Avenue is a main access road into Hove from the trunk road network that is steep, dangerous and noisy. Without re-routing the traffic, any development of the Valley would be severed from the existing development by this forbidding road. The proposal is ambivalent as to whether or not the traffic would be re-routed, because any new road would require expensive engineering that may not be justified by the value of the development proposed.

If the traffic were to be re-routed around the other side of the Valley, closer to the bypass, the new road would have to rejoin the network at the bottom of the Valley and would have to carry all the traffic currently on King George VI Avenue. Therefore, the new road would similarly create a barrier between the new development and the existing, probably following a line at the foot of the wooded bank, thereby severing the new neighbourhood from Downland Drive.

The traffic volumes in King George VI Avenue currently give rise to serious traffic problems in Goldstone Crescent, Nevill Road, Holmes Avenue and Hangleton Road. Currently the traffic has an adverse effect on the residential amenity of all those streets. The proposals to develop the Valley do not acknowledge those problems, yet they would inevitably exacerbate them. It isn’t sufficient to include vague requirements for improvements to road safety. We need to know what exactly is possible and what is feasible.

**Car Parking**

Currently the areas surrounding the Valley do not have serious car parking problems but that could change, if the proposed new homes and offices were not required to have adequate provision.
Proposed School Secondary School

Including a proposal for a secondary school is clearly designed to generate support for an unwelcome development, but policy DA7 would not guarantee that a school would be built. It does not require the landowner to fund construction of the school, the city council doesn't have a budget with which to construct the school, and presently there are no Government grants for such schools. So in all likelihood, the rest of the site would be developed with houses and offices whilst the land reserved for the school would remain vacant.

Other Associated Benefits

The proposed 2-hectare public open space would only be large enough to serve the new development; it really would not be a significant new amenity for the surrounding area. Similarly the proposed doctor’s surgery, community meeting space and local shops would only serve the new residential area.

The notion that developing the Valley would in any way improve the biodiversity of the area lacks credibility, as also does the claim that there would be no adverse effect on water catchment or water run off/flood risk. Strategy

The campaign to Save Toad's Hole Valley supports the development and redevelopment of brown field land in the city, and is strongly of the view that the city council should renew its efforts to identify and foster redevelopment opportunities within the existing built up area.

Statement of Changes:

The campaign calls on the city council to reaffirm its commitment to protecting Toad's Hole Valley from development. The beautiful Downland around our city is precious; it should be treasured, not squandered; it is irreplaceable.

Any Other Comment:

Why Toad’s Hole Valley should be protected:

The Valley is part of the countryside of the South Downs and should be protected because it has great landscape value forming part of that magnificent sweep of Downland that forms the backdrop to the city.

When viewed from north Hove, the Valley is an integral part of the rolling Downland landscape, through which the thin line of the A27 passes. Were this site to be developed, the Downs would not start until beyond the bypass and so they would be hardly visible from Hove.

Until recently the land was deemed to have such fine landscape value that it was of national importance. It still has great landscape value, which whilst not now deemed to be of importance to the nation, is of great local importance.

Toad’s Hole Valley is a defining feature of the Hangleton and Knoll ward, with existing housing wrapped around two sides. Whilst the land is private, like any other farmland, the views across the land are freely available for all to enjoy and are greatly valued. The ward is suburban, not urban, and this large green triangle of countryside is an essential feature of this suburban area.

The fact that the landowners have chosen to neglect their farmland is not a reason why it should be developed; such an irresponsible approach to land stewardship is not uncommon on the urban fringes of cities and it should not be rewarded.

The owners’ neglect was one of the reasons why the site wasn’t included in the National Park; the other was that the site is mainly appreciated from the city and it is the visual amenity of the site to the surrounding urban area within the city that is the principle reason why the site should be protected.

Officer Response:

Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. The site would be likely to be developed even without allocation in the City Plan; the allocation gives the City Council more control over the development to enable it to better meet the city’s needs.
Due regard will be given to the impact of development on the setting of the South Downs National Park and its purposes. The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed. The City Council can only allocate the site for development in the City Plan, it does that produce detailed plans for the development - this would be done by a developer in advance of a planning application.

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The Environment Agency would be consulted during the determination of a planning application for the site to ensure that there would be no unacceptable increase in the risk of flooding on the site or elsewhere.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry.
Further Details:

I am writing to object to the development of the site for the following reasons:-

1. The roads in the area cannot support the current level of traffic. The development would create further gridlock. Roads leading into the city have been narrowed to create
cycle lanes which mean that Dyke Road, Goldstone Crescent, Nevill Road and Hangleton Road have traffic queues leading into the city each school day morning between
8am and 9am.
This causes drivers to use the smaller roads to try and jump the queues.

2. There is a large amount of privately owned student housing within the City. Both Universities have seen a significant drop in applications this academic year, some of these
potential students will choose not to come and study here. As I work at Brighton University I am also aware that we are seeing an increase in the number of local people who
will continue to live at home and study in the city. This will result in some of the privately owned housing being let/sold to other members of the community. Also both
Universities have spent significant amounts to build new and update existing halls of residence.

3. There are a number of office buildings in the Preston park area which have been empty for years. Why is this not being utilised instead? We do not need a further
development of office buildings in the city. The Council got it so badly wrong when they allowed City Park to be built on the old site of the Alliance and Leicester building. A
large majority of staff working there drive and park in the roads surrounding the building. Local residents were assured that this would not happen as staff would be
encouraged to use public transport.

4. The council have already earmarked brown field sites which are going to be built on. Sackville Trading Estate, the Coop site in London Road, the Barracks site in Lewes
Road, 72 units on the corner of Goldstone Crescent and Old Shoreham Road, the Queens Road casino site near Brighton Station. A large plot in Portland Road. I am certain
that there are lots more areas like these. These developments area already in residential areas in the city.

5. I cannot see how building a large housing estate on the edge of our city is going to be of any benefit to the residents who currently live in this area.

6. Overall the current Green Council want to build on the edge of the city because it easier. I think all areas and buildings which are not occupied within the current City limits
should be investigated BEFORE any building is put on any of the green areas surrounding our city.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for
development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency
on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed
considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to
enable the market to function effectively.
The majority of housing development in the city Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings – this has looked at over 300 sites.

The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 16,500 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 16,500 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.

The City Plan has explored opportunities for residential development on a number of office and employment sites. It allows for the loss of poor quality, redundant commercial space to residential and identifies opportunities for mixed use employment and housing development. However it is important that the city retains a balance of jobs and homes in the city and that we retain and provide for a supply of good quality employment floorspace in the city.

Further Details:

The development described in the circulated leaflet raises a number of questions that require comment.
Road/vehicle access to and from the area gives cause for concern.
How much office/business capacity is vacant in Brighton & Hove? How much parking would be provided for the businesses?
How much playing field space would be provided for the school?
What ages would the school cater for?
What medical facilities etc. are to be provided for the elderly?
How can building on land inhabited by skylarks be condoned?

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The City Council's updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively. Levels of parking provision would be established at the planning application stage.

The current proposal is for a new secondary school, although provision for primary age children has not been ruled out. The total school site would have a minimum space requirement of 5 hectares. Playing fields provided with the school should be for dual use by the local community when not being used by the school.

It is intended to provide a doctor's surgery on the site.
Further Details:
I am NOT in agreement for major housing development at Toads Hole Valley, Brighton Marina, the Seafront and New England Quarter.

I gather you hope to plan for over 11,300 new homes over the next few years.

1. How are you going to supply water for all these homes. We already do not have enough water to supply the area with the present population. We will have continual drought restrictions if you go ahead with these proposals.

2. The city is congested at the moment. With another say 25,000 population and additional cars, the city will become even more congested.

3. I know a number of people from surrounding areas are not shopping or visiting Brighton any more because of high parking charges and congestion on the roads.

4. People like and come to Brighton because it is not overcrowded at the moment, but will be if you plan to build another 11,000 homes.

5. Why do you have to plan to increase in size all the time. Big is not always beautiful, as we have seen with the banks. Stand up to the government and say you only want limited new housing development. Do not let them dictate how many new homes should be built. We are already one of the most densely populated countries in Europe. Enough is enough.

6. Why are you not planning for a park and ride facility on the outskirts of Brighton. What about the football stadium with existing car parking spaces unused in the week, and most Saturdays and Sundays.

7. If Brighton becomes to large it will loose a lot of its appeal, and become another urban sprawl.

Statement of Changes:

Any Other Comment:

Officer Response:
Southern Water will work closely with the City Council and the developer to ensure that the water and waste water infrastructure can cope with the extra demand.

The government require us to meet full local housing needs in our area. Without allocating Toads Hole Valley there would be a risk the City Plan would be found 'unsound'. This would not prevent development, but would restrict the City Council's ability to influence the nature and location of development to best meet the city's needs.
### Further Details:

The policy fails to make any reference to the need for car parking on the site for residents of at least 700 dwellings and employees of 25,000 sqm office space. There is likely to be an additional 500 cars at least introduced to the Goldstone Valley area that will add to the already overloaded road network. Experience at City Park offices has led to dramatically increased kerbside parking and parking restrictions do not solve the problem but merely move the problem further afield.

### Statement of Changes:

There are lots of transport pressures in the area particularly from HGVs using Goldstone Crescent to access retail parks, Old Shoreham Road and Sackville Road. HGVs should be prohibited from using Goldstone Crescent which is mainly residential in nature with lots of turnings/junctions. The illuminated warning sign on the Crescent has been welcomed.

### Any Other Comment:

Direct addressing of car parking provisions with the Development Proposal.

### Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.
### Further Details:
- Loss of green area and wildlife therein
- Increased pollution due to private cars
- Increased traffic pollution due to 700 units being built
- Increased nuisance to nearby residents due to increased volume of traffic
- We bought our house because the by-pass was to be built. Now proposed plans negate the effects of the by-pass on Hangleton Road.

### Statement of Changes:
- Re-instatement of AONB. The boundary to the South Downs National Park was artificially drawn by the by-pass.
- Realign King George VI Avenue in any event.
- Traffic problems on Nevill Road, Goldstone Crescent addressed with concrete plans.

### Any Other Comment:
Residents of Hangleton Road will not benefit from this development in any way. Instead their quality of life will deteriorate because of traffic noise, traffic pollution and overcrowding. Also increased volume of traffic causing more traffic jams.

Nevill Road's recent traffic changes have made matters worse. Reversal of these changes immediately would help the traffic flow. This applies to the Old Shoreham Road, Sackville Road junction where one line of traffic has been lost for traffic going straight down Sackville Road. This causes long back ups and bus delays.

Toads Hole Valley has been deliberately run down and neglected - deteriorating over the years. The owners earmarked it for development long ago. The land could have been regenerated as an attractive parkland. The lower ground area is prone to flooding.

### Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment that will address noise, air quality and other traffic impacts. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Although a greenfield site is to be lost, this is considered necessary to contribute towards meeting the city's unmet need for new housing and employment space. The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 16,500 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 16,500 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.

The Environment Agency would be consulted on any proposed scheme for the development of the site to ensure there would be no unacceptable adverse impact on the risk of flooding, either on the site or elsewhere.
Further Details:

1. The 47 hectares is at present privately owned. It is a pleasant looking valley but not accessible by the general public. Nor does it appear to be effectively used by the owner. Its market value will have been considerably enhanced by the publications of the City’s proposals. Unless the City can obtain it by compulsory purchase it means we will pay much more.

2. Most of the proposals have been based on investigations and reports (to be used in support) made up to six years ago! The following examples will indicate my concerns.

   - Infrastructure Capacity. 2006
   - Urban Characterisation Study. 2009. In the last three years there has been a considerable change in the City’s population with many more people from other countries. City Planners claim from 2001-2007 statistics that 4000 people come from London to live here every year and some 60% of households move within the City. No mention is made why so many of our young people have to move away to find work or less expensive property.

   - Strategic Housing Market. 2008. This information is used but it does not indicate whether it was before or after the Banks needed tax payers to rescue them!

3. Why is there a need for better quality office buildings? Another City Park to give us parking problems (or City Revenue)? There is the idea that people working there will use public transport, bicycles or possibly the use of Weekend Park & Ride facilities. The council has overlooked the real possibility that a vast amount of office work will be done at home in the next few years because of the rapid advances in Hi Tech communications. Even now some conferences are held using such communications technology to avoid expensive travel and time going to conference centres.

4. The new school ought to be a Technical College. In view of the recent reported failures of our education system we should be considering this type of school that can develop useful skills that not only interest a lot of teenage children but also prepare them for well paid skilled work. It could also allow the workshops to be used outside school hours for retired people to pursue their hobby interests that can no longer be done in small houses with tiny gardens and no garages.

   No mention has been made about caring for the elderly. The proposals have overlooked the increasing numbers of elderly people who want to have facilities they can enjoy as well as be respected and cared for.

   Will the affordable housing be kept as City property or sold off at ridiculously low prices after a few years of tenancy? Hopefully it will remain owned by the City and the income dedicated to maintain the property and the additional infrastructure.

   The infrastructure will probably be the most costly item to satisfy. Extensive Civil engineering is required to develop safe access roads, bus route extensions and create dedicated links to the Downs etc. Are tunnels or bridges to be used and if so will there be facilities for the less able to use?

   We need far more accurate information and, in particular some indication of the proposed layout and access roads before we can make sensible responses. What about the cost?

   The present information is not enough to convince me that it is sufficiently far sighted. For that reason I reject it.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council itself will not develop the site so will not be responsible for purchasing the land.

Many background studies have been recently updated to ensure the City Plan is based on a robust, up-to-date evidence base.
City Plan Part 1 Responses Received 27th May to 20th July 2012

The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.

No detailed decisions of the characteristics of the school have yet been made.

More detailed information on the development of the site will be available once a scheme is submitted by a developer.

Customer No: 95  Customer Name: M T O’Connell

Organisation: Support Status: Object
Rep Number: 1  Page/Para:
Policy: DA7 - Toads Hole Valley
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
Main concern is the increased traffic flow on the roads leading to the city; Dyke Road; Goldstone Crescent (already an overused rat-tun); Nevill Road (already suffering unacceptable congestion in rush hours) and Hangleton Road (already heavily used and often enduring speeding)

Statement of Changes:
Restore AONB status (the boundary of the South Downs National Park was artificially and illogically drawn at the by-pass) - when does and AONB cease to be an AONB?
Answer: Only when you cover it with concrete!

Any Other Comment:

Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

The City Council has no powers to restore the AONB. The boundary of the South Downs National Park was given extensive consideration and was subjected to a Public Inquiry before being finalised.
Further Details:

I do not support the proposed development of the Toads Hole Valley and object to the latest proposal of Building 750 homes, a new school & Office block
Transport -
Goldstone Crescent, Dyke Road & Nevill road are already extremely busy roads at peak times and additional traffic will cause further congestion getting into town Goldstone Crescent is already dangerous with speeding cars driving along the park - this will only be exaggerated with additional traffic 15 years of road maintenance whilst new roads are created

Environment -
15 years of large lorries excavating and bringing in building supplies What happened to wildlife that has taken to area This was an area of natural outstanding beauty when Brighton and Hove Albion wanted to build a stadium there - what's changed? Congestion and Pollution from additional traffic The picturesque view as you drive down King George the VI avenue will be lost

Secondary Schools -
We already have 2 large successful secondary schools in West Hove, why is there need for a 3rd? surely this would be better built in East Brighton where there are currently no secondary schools

Improved walking and cycling links -
The 77 bus also frequently takes people up to the Dyke, why is this a an issue?

To summarise I cannot see how this development will benefit the people of Brighton and Hove, or the people in the surrounding area. In my view this will damage the quality of life around the goldstone Valley / Hangleton area.

Statement of Changes:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city's needs.

A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry. Finding a suitable site for a new school is problematic; therefore opportunities must be taken where they exist.
Although links to the South Downs already exist, there are opportunities to improve these to enable and encourage more people to take advantage of the recreational activities on offer.

Detailed considerations of amenity impacts would be made once a planning application is submitted for development of the site, and would ensure there will be no unacceptable impact in the quality of life of existing residents.
| Customer No: | 13 | Customer Name: | Karen Tiltman |
| Organisation: | | Support Status: | Object |
| Rep Number: | 1 | Page/Para: | / |
| Section/Supporting Doc/Annexes | Part Three: Development and Special Area policies |
| Policy: | DA7 - Toads Hole Valley |

### Further Details:

I do not support the proposed development of the Toads Hole Valley and object to the latest proposal of Building 750 homes, a new school & Office block.

**Transport**:  
- Goldstone Crescent, Dyke Road & Nevill road are already extremely busy roads at peak times and additional traffic will cause further congestion getting into town.  
- Goldstone Crescent is already dangerous with speeding cars driving along the park – this will only be exaggerated with additional traffic.  
- 15 years of road maintenance whilst new roads are created.

**Environment**:  
- 15 years of large lorries excavating and bringing in building supplies.  
- What happened to wildlife that has taken to area.  
- This was an area of natural outstanding beauty when Brighton and Hove Albion wanted to build a stadium there - what's changed?  
- Congestion and Pollution from additional traffic.  
- The picturesque view as you drive down King George the VI avenue will be lost.

**Secondary Schools**  
- We already have 2 large successful secondary schools in West Hove, why is there need for a 3rd? surely this would be better built in East Brighton where there are currently no secondary schools.

**Improved walking and cycling links**  
- There is already a path from the Downsman public house that leads all the way to the dyke, my kids scoot on this already why does it need improved links?  
- The 77 bus also frequently takes people up to the Dyke, why is this an issue?

To summarise I cannot see how this development will benefit the people of Brighton and Hove, or the people in the surrounding area. In my view this will damage the quality of life around the goldstone Valley / Hangleton area.

### Statement of Changes:

### Any Other Comment:

### Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan.

Although the site was previously classified as an Area of Outstanding Natural Beauty, this designation was removed when the South Downs National Park came into force. The site is not included in the National Park and therefore is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city's needs.
City Plan Part 1 Responses Received 27th May to 20th July 2012

A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry. Finding a suitable site for a new school is problematic; therefore opportunities must be taken where they exist.

Although links to the South Downs already exist, there are opportunities to improve these to enable and encourage more people to take advantage of the recreational activities on offer.

Detailed considerations of amenity impacts would be made once a planning application is submitted for development of the site, and would ensure there will be no unacceptable impact in the quality of life of existing residents.

Customer No: 169  
Customer Name: Gwyn Millyard  
Organisation:  
Rep Number: 1  
Page/Para: /  
Support Status: Object  
Policy: DA7 - Toads Hole Valley  
Section/Supporting Doc/Annexes: Part Three: Development and Special Area policies

Further Details:

My main concern is the access to the site if the very large number of houses etc are put on it. At the moment, following the re-working of the Neville Road/Old Shoreham Road traffic lights, the traffic now backs up way past Woodland Drive. If the traffic onto Toads Hole Valley has to come off into King George VI Avenue and then Neville Road, it is a disaster waiting to happen. Accidents, hold ups will be an everyday occurrence.

This has obviously not been thought through. Like so many schemes in the City it has been done without thought to the residents who pay council tax which in turn pays the councillors fees/wages.

The 81 bus is being cut back which goes to Goldstone Valley, would that be re-instated?

Why so many houses, and which shops - not Tesco hopefully.

I'm fairly sure if the council want this to go through, it will. I am not alone in feeling lip service is being paid to the community.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

There is a large unmet housing need in the city, and the potential of development sites to contribute towards meeting this need should be maximised.
Further Details:

I have attended the meeting/Blatchington Mill on Thursday 12th July and was grateful to be able to meet the many local residents who are very strongly opposed to such a large development so near to the wonderful South Downs National Park. Why have we, as long standing local residents waited so long to retain the wonderful Southdown’s with the chance of the wildlife to thrive and the air extended to the existing families lining around Hove. We have the sea & the downs - we have the most elegant & beautiful historic buildings that the public from all over the world come to visit. We already have in Brighton/Hove the Whitehawk & Moulescoombe estates and the rear of the Toad’s Hole there is the large housing estate, & of course all around Carden Avenue there exist established large council housing! How many more “estates” are to be squashed into the wonderful historic Brighton/Hove. The natural beauty if this area with the Sea & downs, wildlife, plants and fresh air – why destroy everything that this whole area has been famous for.

I appose this development very strongly, as do all the people of Brighton & Hove.

Statement of Changes:

Why not:

Spend time & money making all the empty houses, flats and businesses in the area come to life! Does the council not see all the empty shops? – Why should we bring the occupants of 700 homes (approx 1,500) with all their cars, bikes etc into an area of outstanding beauty.

There are not enough jobs for people already living here, so I suppose housing benefits, unemployment payments etc will be very much on the increase, does this meant “council tax” will rocket for the hard working local population?

Any Other Comment:

Officer Response:

The government require us to meet full local housing needs in our area. The recent study undertaken indicates the need for 16,500 homes by 2030 - however the city can only identify sites for 11,300 new homes including 700 at THV. The only way that the City Plan will be found sound, without allocating THV, is if the 16,500 new homes can be met in full within the city. Work undertaken indicates this is not achievable without a significant loss of open space and employment land.

The City Plan has explored opportunities for residential development on a number of office and employment sites. It allows for the loss of poor quality, redundant commercial space to residential and identifies opportunities for mixed use employment and housing development. However it is important that the city retains a balance of jobs and homes in the city and that we retain and provide for a supply of good quality employment floorspace in the city.
Further Details:
The height and massing of new buildings will be very detrimental to the residents of King George VI Drive and Woodland Avenue. In the autumn and winter Toads Hole Valley can be subject to mists and fogs and can be very damp. Small wonder that the new football stadium was not built there. We get mists up here at times, it will be more frequent in the valley.

Statement of Changes:

Any Other Comment:

Officer Response:
The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

Due regard will be given to the impact of development on the setting of the South Downs National Park and its purposes.
Residents are keen to see improvements to infrastructure in their area and may endorse the building of extra facilities. However these may not be deliverable on the ground due to expense and viability issues. There should be more detailed assessment of the viability of the entire project before THV is added to the City Plan.

Detail - The proposal DA7, to release Toad Hole Valley for development, is incompatible with strategic aims in Part 1 of the City Plan which are underpinned by the principal that

‘Significant new development will be directed to areas of the city with good sustainable transport links and to those areas in need of regeneration and renewal’ (page 16, para 2.2, 4th bullet).

Toad Hole Valley is not currently in need of regeneration or renewal and it has poor public transport links with no prospect of more than a basic bus service. Strategic Objective SO1 ‘Ensure that all major new development in the city supports the regeneration of the city, is located in sustainable locations, provides for the demands that it generates and is supported by the appropriate physical, social and environmental infrastructure.’ (Page 16).

Toad Hole Valley is only accessible by private motor vehicles at present. Any development of the site would inevitably encourage out-commuting by road and be attractive to businesses that are highly dependent on the road network.

Strategic Objective SO9 ‘Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs’ (page 17)

The release of Toad Hole Valley would conflict with SO9, as it would erode part of the South Downs and reduce the likelihood that previously developed sites would be brought forward for development. (Brownfield land is less likely to be developed, if there is a green field option.)

Toad Hole Valley lies within an aquifer, which has previously been cited as a reason for not developing the site. According to the Environment Agency, the site is in a groundwater source protection zone - outer zone edged in turquoise – see:

http://maps.environmentagency.gov.uk/wiwy/wiwyController?value=BN3+7LE&submit.x=16&submit.y=5&submit=Search%09&lang=e&ep=map&topic=groundwater&layerGroups=4&scale=9&textonly=off#x=527772&y=106503&lg=4&scale=10

The development prospectus for Toad Hole Valley is impressive, but there is no evidence that the expensive proposals detailed could currently be delivered. Here are a few examples:

Rerouting King George VI Avenue; the 5 hectares allocated for a school; 2 hectares of public open space; the multi-use community facility; green infrastructure; pedestrian and cycle links; the children’s play area; improving the nature conservation. All would add to the costs, with no financial return. Who would pay for these – certainly not 700 houses (40% of them social). The proposal for a new secondary school, including sports facilities and the provision of shops and cafes would all need to be funded. Where is the money to come from?

The Energy infrastructure proposals - to deliver district cooling, heating and power networks - are worthy aims, but there is no detail, for example, how the fuel would be transported to site.

The document states that the development will make provision for improved pedestrian and cycle links to the South Downs National Park. There are serious obstacles to providing this link.

Statement of Changes:

Any Other Comment:

Officer Response:

Details of viability will be assessed as part of a future development scheme - there is some flexibility as to what is required to be provided on the site. Funding will be found for the new school.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents. The wider impact of the development will be
The allocation of Toads Hole Valley is not as an alternative to brownfield land. Brownfield land has been maximised, but this is not sufficient to meet the city's needs. The majority of housing development in the city Plan (94%) is identified on brownfield land. There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings - this has looked at over 300 sites.

The Environment Agency would be consulted once a planning application is submitted for the development of the site to ensure there is no unacceptable increase in the risk of flooding, either within the site or elsewhere, or any unacceptable risk to groundwater supplies.
Further Details:

I am writing to express my concerns in regards to the proposed development of Toads Hole Valley. After attending one of the consultations sessions held at Blatching Windmill last night, I am now in an informed position to write to the council with my concerns.

Whilst I understand the need for additional housing in Brighton and Hove area and that the council must meet targets set by the government to provide housing I have serious concerns as to the impact that this development will have upon the local infrastructure within Hangleton. I have listed my concerns below;

1. Why is it necessary to build 700 homes? Surely in considering what is best for the local area a lesser number of homes would be more appropriate?

2. Are you able to share with us your impact assessment upon the local infrastructure?

3. I would particularly interested to see an impact assessment on the increase of traffic on the through roads, Nevill Road in particular, which serves as direct access from central hove out to the proposed Toads Hole Valley estate thereby increasing traffic; more cars, more buses?

4. I understand that the plans do not provide a new primary school, since there is already an identified need for additional primary school place in the Hangleton area, particularly with the September 2012 intake, surely you need to provide additional primary school to support population of the proposed development or have funding allocated to develop Blatchington Mill infant School?

5. Whilst we understand that the development would be built to high standards of sustainability and design and incorporate ‘One Planet Living’ principles this contradicts the impact that such a development will have on the surrounding area.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry, however provision of additional primary school capacity has not been ruled out.

All development has some form of impact on the surrounding areas, and steps will be taken to minimise this.
Further Details:

No access details to proposed development. Is it one road in and the same road out?

An additional senior school is shown in the Toads Hole policy but there is inadequate provision for Infant and Junior pupil at the moment. The policy says additional provision has been made but this is often in unsuitable accommodation such as annexes to (already over-crowded) Junior schools. Is there provision within the Plan to build additional Junior and Infant schools?

There is a lot of Office Space in Brighton and Hove Town Centres which is unoccupied. Why do we need to build additional offices?

Statement of Changes:

Access roads to be fully described.

Description of additional Infant and Junior placements in the near-travel area to Toads Hole Valley.

A proper rationale in the document which shows the economic and social benefit of building additional offices at Toads Hole Valley.

Any Other Comment:

Parking availability. Is it likely to spill over onto neighbouring areas?

Officer Response:

Detailed plans showing access to the site would be drawn up when a scheme is submitted by a developer.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry, however provision of additional primary school capacity has not been ruled out.

The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.

The wider impact of the development on the road network will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.
Further Details:
Toad’s Hole Valley was designated part of the South Downs Area of Outstanding Natural Beauty (AONB) back in the 1960’s and retained that status even after the A27 bypass was built but was excluded from the National Park when it came into being in April 2010. We recognise that this land no longer has a national designation. However, we note that it has also been removed as land forming part of the Urban Fringe since the 2010 consultation.

In response to the Housing Delivery Options Paper last year we objected to any proposals that provide for development on the Urban Fringe in favour of new housing being located in the most sustainable sites, ensuring that brownfield and low landscape value sites are developed first. This general principle objective remains.

However, should development on this site proceed, then given the proximity to the National Park, we would expect no damaging visual impact. The design and density of development on this site will be crucial if it is to avoid damaging the views in and out of the National Park. We welcome proposals to improve the SNCI and for improved pedestrian and cycle links to the South Downs National Park. However, we await further details as to how this will be best achieved given the boundary is the A27.

Statement of Changes:

Any Other Comment:

Officer Response:

The majority of housing development in the city Plan (94%) is identified on brownfield land (previously developed land). There has been an extensive site search carried out as part of a housing study (called the Strategic Housing Land Availability Assessment) to seek housing sites that can accommodate 6 or more dwellings - this has looked at over 300 sites.

Due regard will be given to the impact of development on the setting of the South Downs National Park and it’s purposes.
Further Details:

Waste Water Treatment
As you are aware, the capacity of the current waste water treatments works at Shoreham Harbour is limited and any enhancement/expansion needs will need to be addressed in the joint Area Action Plan for this site. The works serve Shoreham as well as the western parts of the City. The approximate limit is for a further 4000 dwellings and there is also a biological limit in terms of future population. This is an infrastructure constraint which needs to be taken into account and may impact on the timing of delivery of key developments not only in Shoreham but also in the western parts of the City. This may impact on the proposed development area of Toads Hole Valley if this is within the catchment area.

(Officer note: these representations allotted to SA1, CP7, DA8, DA7 and Annex 2 ‘Infrastructure Delivery Plan)

Statement of Changes:

Any Other Comment:

Officer Response:

MH comment

From Maps previously supplied by Southern Water THV is not in the catchment for the Shoreham WWTW. Talking to Adur to clarify this and will speak to SW.
Customer No: 213  Customer Name: Bevan
Organisation:                   Support Status: Partly Object
Rep Number: 1  Page/Para:       Policy: DA7 - Toads Hole Valley
Section/Supporting Doc/Annexes  Part Three: Development and Special Area policies

Further Details:
I don't want to see Toads Hole Valley - until recently designated an AONB - built on, but I understand the constraints on development space imposed by the city's location between the sea and the Downs.

If the valley really has to be built on, I should hate to see this green field site squandered on a poorly thought out plan and the current plan is imprecise and open to (mis)interpretation.

Statement of Changes:
1. Transport: how is the A2038 to be improved and who will pay for it? What pedestrian crossing facilities across the A2038 will be provided? What commitment will the council give to supporting public transport links particularly in the early stages of any development when it may not be profitable for the bus company? The provision of office car parks that could be used as 'park and ride' suggests that planners expect people to commute in from other areas using private cars (having a 'sustainable travel plan' for the offices doesn't mean that people won't drive themselves.)

2. Water: I see nothing in this section of the plan about water - whether supply, conservation or drainage - and would expect it to be included.

3. Community facilities: who will pay for these and would their construction be early in the development? What incentives will there be for shops to open there, given the general trend for small shops to disappear?

4. Education: Who will pay for the school to be built? Will the layout of the grounds be such that public use of the grounds is possible out of school hours without jeopardising school security?

5. Sustainable technologies: these tend to cost more - are they compatible with 'affordable' housing?

6. Improved links with the National Park: does this just mean widening the existing path running behind Hangleton Way, or does it mean a new link?

Any Other Comment:
Re: secondary schools: is there the same requirement for playing fields for sixth form colleges as for Yr7-11 schools? If not, is relocating BHASVIC to free that site for a Yr7-11 school out of the question? The area of B&H where a new secondary school is needed is the centre of the city.

Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.

Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

Southern Water will work closely with the City Council and the developer to ensure that the water and waste water infrastructure can cope with the extra demand. The policy
Southern Water has assessed the water distribution and sewerage system in the vicinity of this strategic site (please see spreadsheet submitted). The results show that the existing capacity is insufficient to accommodate the anticipated demand. The development will therefore need to provide the local infrastructure required to connect to the water distribution and sewerage system at the nearest point of adequate capacity. The location of this point will need to be determined when the development comes forward.

Ofwat, the water industry’s economic regulator, takes the view that the local infrastructure required to serve new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increased general charges.

Connection off-site is the mechanism by which developers can provide the local infrastructure required to service their sites. However, Southern Water has limited powers to enforce such connection. We therefore look to the planning authority to support this approach in planning policies.

It is important to give early warning to prospective developers regarding the need to connect off-site, as it will add to the cost of the development. Early warning will facilitate delivery of the necessary infrastructure. If the infrastructure is not delivered the water mains and sewers will become overloaded, leading to poor water pressure, foul water flooding and pollution of the environment.

We therefore propose an additional bullet point in policy DA7.C.1 to recognise the need for local water distribution and sewerage infrastructure.

**Statement of Changes:**

We propose the following text is included in policy DA7.C.1 to recognise the requirement for adequate utility infrastructure to serve the proposed development:

n) The development must connect to the water distribution and sewerage systems off-site at the nearest point of adequate capacity.

o) The site will be the subject of..

**Any Other Comment:**

**Officer Response:**

Comments noted.
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| Given the need for additional development land in the Brighton area I broadly accept the proposed development of Toads hole Valley which lies very close to my home. I am however very concerned about the following two aspects of the proposal:
| (1) **Traffic:** Both King George the VI Avenue and Goldstone Crescent are already busy roads that to my knowledge have suffered multiple fatalities in the last year. Motorists speed on these roads creating an especially dangerous situation given that this is a residential area with many young families. The development must not be allowed to bring additional traffic down these roads and should ideally include traffic calming measures on them.
| (2) **Affordable housing:** I believe the planned percentage of affordable housing is totally inappropriate given the size of the development. I also believe that the type of affordable housing must be planned to fit in with the local community (i.e. part equity schemes). I believe this is essential to ensure the successful integration of the development into the local community. I would actively oppose any scheme that led to large numbers of unemployed tenants living in such a remote part of town given that this location will isolate them from employment opportunities / support and impact on the cohesion of the local community. |

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| The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.
| The wider impact of the development will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Detailed considerations of the impacts on specific roads would be undertaken once a development scheme is proposed for the site.  
<p>| Housing affordability is a major issue for the city, particularly for many families and for newly forming households. The council is committed to enabling the provision of high quality affordable housing for people who are unable to access or afford market housing as well as helping people make the step from social or affordable -rented housing to home ownership. The city council considers that the most pragmatic approach is to require that all new suitable residential development (as defined with reference to the site size thresholds set out in the policy)provides a viable and deliverable proportion of affordable housing. |</p>
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**Further Details:**

The range of uses identified should include (or maintain) support for appropriate provision of new retail floorspace to meet local needs and encourage sustainable shopping patterns.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

There is the potential for allowing local retail needs to provided within the site.
Further Details:

It is our considered opinion that these plans are attempting to cram too much into a valuable, semi natural downland plot which would be better utilised by keeping as much of it's naturally occurring green character as possible in order to fit in with your other objectives so that it can become 'peoples downland' within easy reach of houses. Whilst the City Plan refers to only half of the City area being built up, there is a world of difference between the South Downs outside the built up area and open land within the built up area where people live, such as Toads Hole Valley. Hopefully B&HCC will recognise its greenfield potential and keep the proposed high quality housing to a minimum (700 maximum, rather than the stated minimum) and concentrate initially on brownfield areas and current empty properties. It is essential that this greenfield site is not seen as a soft option by the City Council.

Unfortunately the current private owners of Toads Hole Valley have neglected this land for many years. This led to its loss of AONB status and together with it being cut off from the South Downs by the Bypass its subsequent exclusion from the SDNP. Whilst we do not think this a a good basis to propose development of this last remaining large area of open land, 47 hectares, we reluctantly partially support the idea of it being included in the City Plan as it will probably be developed in some way and thus change from the private to the public domain.

However, the environmental impact of this new proposed urban overspill development will be huge and require enormous new infrastructure of all kinds before it can be given credibility (including social – such as schools, doctors, public transport and sewage disposal into already overcrowded systems). As the South Downs are a water catchment zone, parking provisions need to be good, maybe parking shared with office space and adequate public transport? Special consideration needs to be given to road congestion factors from a possible 1400 cars/ morning and evening school runs and whether the valley might be subject to flooding.

Within the city there is a considerable shortage of green space for public recreational purposes and councils have a requirement to provide adequate provision of Public Open Space (sports & dog walking facilities). Therefore every effort should be made to keep as much as possible from disappearing under concrete! Ecological assessment should be rigorously carried out with attention being paid to the naturally re-occurring downland flora and regenerating woodland. Wherever possible these trees should be viewed as a windfall and buildings of a high standard of design arranged around them. The retaining, protecting and enhancing the natural environment of the SNCI bank is welcomed and a management plan should include the dewpond at the top. It hopefully goes without saying that there is also a need to be mindful of the close proximity of the National Park and where the land sweeps up to Dyke Road the height of any development should not interfere with current views of the sea and the South Downs. The increasing population is a key issue and surely B&HCC should be reconsidering how many more people should be attracted to an already overcrowded city? This year's concerns on drought and then on flooding are a warning to us all about the fragility of our infrastructure.

Statement of Changes:

Any Other Comment:

Officer Response:

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.

The site is private property and is not available for public access at present.

The City Council consults with utilities and other service providers to ensure that the increased demand for such services can be met.

Due regard will be given to the impact of development on the setting of the South Downs National Park and it’s purposes.
Further Details:

I am quite happy to see the intention of developing the Toads Hole Valley with the following considerations/provisos:

1) That the site does not become overcrowded. 700 homes, a school, offices, a medical centre together with all the roads and services required to make the site viable would surely be extremely cramped and not allow for any green areas or play areas. Could this be so cramped and crowded that it becomes a slum of the future? Would local shops need to be included to supplement those already in the area to supply food and confectionary/news requirements? And a local ‘Pub’?

2) Transport infrastructure needs very careful attention. Unless some sort of (unacceptable) by-law is passed you cannot limit homes to one car and therefore unless there is adequate off street parking the roads will become totally cluttered - as are many in adjacent areas - with excess vehicles. This will, by nature, be a young/middle aged population who will own cars and more than likely have more than one per family especially as older children tend to stay on in the family home much longer nowadays. Additionally, being a hollow, the traffic fumes are likely to collect and remain there for some time in certain weather conditions. Do not overlook that all of the 'public' buildings and offices etc will need to be serviced by deliveries and maintenance vehicles of all description, altogether making the area ripe for congestion as there is likely to be just one point of entry/exit. It would be waste of money installing numbers of electric car charging points and vast number of cycle storage facilities as there would be few cyclists resident there and electric cars will remain unaffordable for most people for many years to come. Bus services and access to the 'estate' will need very carefully consideration as will the possibility of widening King George 6th Ave to accommodate the additional traffic accessing the Brighton by-pass or the central or eastern part of Brighton to avoid having to drive through Hove. Can the existing roads into Brighton and Hove cope with this possible amount of additional traffic without modification anyway?

3) As the school being proposed is secondary and for around 900 pupils, consideration MUST be given to where all these pupils are coming from and how they are going to travel to and from the site. There will need to be adequate parking for staff and visitors etc as well, including any out of school hours uses that the buildings may attract.

4) Given the proposed uses of the area and the number of people who are likely to be present there at any given time, although the water companies have the technology and capability for supplying and draining water from the area, can they cope with the enormous additional demand on the water supplies to the Brighton and Hove area without compromising existing supply? Supplies have been stretched recently owing to drought etc even with the existing number of users. Can the sewage system cope with the additions that would arise? Whilst I am very much in favour of eco-friendly housing, will consideration be given to requiring all new buildings there.. domestic and commercial, to include facilities for collecting rainwater via, say, roof run-off drainage, and storing and using this as grey water for outside hosepipes, toilet flushing etc etc. (I understand some councils do this). Such requirements could also ease the pressure on supplies and disposal of waste water.

5) This whole scheme appears to be aimed at the young and middle aged. Is any consideration being given to older or less mobile people?

6) Given that the Council will require the housing to be ecologically sound and meet ‘green’ requirements, this will inevitably put quite a premium on the prices of the houses. ‘Going Green’ does not come cheaply in the building world and adds significantly to the cost of a house, however much prices for some components reduce as their use increases. The council needs to be aware of the fact that the end prices of houses for private occupation could make many of them unsalable, as people wishing to spend that much on a house would not be inclined to move into such a cramped area and right next to a by-pass, particularly if there are small or no gardens and restrictions on car usage and keeping etc etc. In summary, my main concern about this scheme given the City Plan proposals, is overcrowding and over use of the land. I would be happier to see fewer houses or fewer commercial/social premises. Whatever goes there MUST fit in with the surrounding areas which are predominantly private housing and must be sustainable in terms of services. To reiterate an earlier comment of mine, we do not wish this to become a slum of the future. The Council has an opportunity to turn this area into something really attractive and help solve it’s current housing problems and make this a ‘showpiece’ example to other Councils. Don’t waste that chance by doggedly adhering to figures that have been dreamed up, and DO listen to local concerns.

Statement of Changes:

Any Other Comment:

Officer Response:
The City Council is aware that transport is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

The wider impact of the development, including the effect of the school, will be addressed through discussion with the Highways Agency and through a Transport Assessment of the City Plan. Development of the site provides an opportunity to secure better bus services to area that we hope will benefit local residents.

The proposals are not considered to constitute overdevelopment of the site. 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed. 2ha of public open space is proposed, and school playing fields would be available for use by the local community. There will be provision for some local retail provision on site.

Southern Water would be involved at all stages of the development to ensure that the water and waste water infrastructure is sufficient to meet demand from the site.

Viability will be assessed as part of the consideration of a future development scheme - there will be some flexibility as what is required to ensure the development is viable.
Very pleased about new homes. Q: will allocation/sale of these be initially to B+H people who are currently struggling to find homes? Should be.

Very concerned about loss of green area, damage "real" + psychological.
- do not agree with more office space/work units. No argument would persuade me otherwise.

School provision is interesting - would like more facts. Blatch 6 + Hove Park 6th not full, + not predicted to be by 2018 - so new 6th form would be unnecessary competition.

Q: Would new school result in reduced class sizes across other nearby secondary schools? Need more info about how numbers in all local secondary schools would be managed.

- Need to bring in a ruling about driveways/parking - keep as much green space as possible around housing areas.

- Why need for 3/4 bedroom properties? - feel green space should encourage smaller families, 2 - bedroom more than 3-bed, + no 4-bed. Population growth should not be encouraged by building for it!

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support for new homes welcomed. Sale of homes on the open market cannot be restricted to Brighton & Hove residents only, however allocation of social housing will be subject to the usual arrangements.

The site is not publically accessible open space and is no longer protected by a national environmental designation. Part of the site is locally designated as a Site of Nature Conservation Importance and this will be protected from development. Development would be likely whether the site was allocated in the City Plan or not. The allocation enables the City Council to have more control of the nature of development to ensure it best meets the city's needs.

A new school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry.

Most of the city’s urban sites are relatively small in terms of site area
and more suited to flatted forms of development. The evidence base indicates that over the course of the plan period, an estimated 53 per cent of overall housing need and demand is likely to be for larger (3 and 4 bedroom) properties and in terms of house types demand/need is likely to be greater for houses (68 per cent) than for flats (32 per cent). In reality, the likelihood of delivering this mix of housing in the city is restricted by the types of sites likely to be brought forward for development. Planned development at Toads Hole Valley allows for a better housing mix to be integrated within the overall development. For this reason the policy requires at least 50 per cent of the new housing to be family-sized.
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**Further Details:**

I am not against good quality development of this site, as I understand the need and this is not land currently used for food production. It is potentially 'green lung' space for the city, but is dramatically under used at present. I support the plan for reasonably low-density housing - this is the edge of town and should retain a semirural appearance. Too high a density would also increase the problem of traffic generation, which is the main problem in any case. Minimal dependence on the car must be a major factor in planning this, as congestion at the top and bottom of King George IV Avenue is already bad at rush hour.

I support the plan for mixed housing. We do not want it all to be large houses for large families. There is a big need for small, good quality dwellings for small households as well. The key is good quality, good architecture, good appearance, designed as my wife would say by a woman to be convenient to live in. Sound environmentally, using minimum energy and water; it goes without saying.

I am less keen on your plans for new office space. Not everyone works, or wants to work, in an office! What about small well designed workshops, a mini high tech or science park or modern factory space. We all need plumbers, electricians, carpenter etc and I feel some thought could be given to space for these businesses rather than just say 'office space' which can be difficult to get into use.

Apart from the need to diversify the working activities I feel more emphasis should be given to green space. Perhaps some 'office space' should instead be green open space such as a nature park, allotments or green walks. In any case I want to see generous playing field space attached to the new secondary school planned.

Finally, as a Christian, I want every opportunity given to parent groups wanting a new Church of England secondary school in the area, if they propose such a Free School on this site. We will need a new secondary school soon and I strongly support the principle of a parent driven school with a C of E ethos.

I would like to be kept in touch with your plans as they unfold. I will 'watch this space' carefully. I am with you at the moment, but this has got to be done with love for what I regard as a precious space. As a quid pro quo I want to see the opposite steep slope passed to a responsible group who will lovingly restore it to grass downland and to nature, as it was about 20 years ago when I was first involved!

The Toads Hole Valleyside Group worked hard producing a wonderful space for people and nature, of which I have a full record if needed.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

The proposals for 50-75 dwellings per hectare is an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment - this density level is only slightly above that of the surrounding area of Hangleton. No tall buildings or tower blocks are proposed.
The City Council’s updated Employment Land Study indicates that there is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.

A priority for the site is to ensure that development is of an exemplary standard in terms of environmental, social and economic sustainability, achieving One Planet Living principles and promotes the city’s UNESCO Biosphere objectives. The Site of Nature Conservation Importance will be conserved and enhanced.

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**Section/Supporting Doc/Annexes**  Part Three: Development and Special Area policies

**Further Details:**

It is noted that the council's approach to the development of the site identifies provision for 25-30,000 sq m office space including 'incubation space linked to the universities' (Paragraph 3.80). The University can confirm that it has had some dialogue with the promoters of the land and is willing to continue this dialogue regarding the proposed incubation space linked to the University.

Nevertheless, the University's position is that this provision should not result in any dilution of commitment to the Lewes Road academic corridor identified in the Plan under DA3.

**Statement of Changes:**

Revise draft DA7 to indicate that this potential provision of incubation space at DA7 should be identified as being addition to future development identified within Policy DA3.

**Any Other Comment:**

**Officer Response:**

Comments noted.
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**Section/Supporting Doc/Annexes**

**Further Details:**

Any development here should be to the highest quality, support the Biosphere bid and One Planet Living, be zero carbon, zero carbon and neutral in its water impact. In addition, maximum use of the site should be made, while minimising any impact on the setting of the South Downs National Park. This might mean looking at different ways of developing the site including having car free areas with a central car park, different urban forms, green roofs, etc. Given the proximity of the site to the National Park and the SNCI which is Access Land, new open space should be restricted to play areas and sports pitches, including all-weather, while creating biodiversity rich streets. This will help maximise the use of this site for providing homes.

Should include range of services, e.g. shops to make it self-sustaining. Recognise need for new secondary school but question whether this is the best location.

Concerned that a large car park will be built for office which will serve as minature park and ride. As such believe it will have little impact on city traffic levels and waste precious development land. Like to see more imaginative parking solutions such as shared spaces between residential and commercial uses, to minimise land take.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed. It is the City Council's intention for the site to be developed to an exemplar standard in terms of environmental, social and economic sustainability.

There is the potential for providing some retail space on the site.

A Transport Assessment will be drawn up as detailed plans for the site emerge.
Further Details:

Any development here should be to the highest quality, support the Biosphere bid and One Planet Living, be zero carbon, zero waste and neutral in its water impact. In addition, maximum use of the site should be made, while minimising any impact on the setting of the South Downs National Park. This might mean looking at different ways of developing the site including having car free areas with a central car park, different urban forms, green roofs, etc. Given the proximity of the site to the National Park and the SNCI which is Access Land, new open space should be restricted to play areas and sports pitches, including all-weather, while creating biodiversity rich streets. This will help maximise the use of this site for providing homes. Other community needs should also be provided on site to make it a self-sustaining community with a variety of housing, local shops, indoor sports and other facilities. I recognise the need for more schools in the city but questions whether this is the best location for a new secondary school. It also doubts whether the communal use of school playing fields will satisfy the demand for more pitches alone. One area I am particularly concerned about is the residual and informal park & ride policy which could lead to a large car park being built in association with the office development to serve as a miniature park & ride. I believe that this will be too small to have much impact on city traffic levels but could have a significant detrimental impact on the Toads Hole Valley site and waste precious development land. It would like to see this dropped and replaced by more imaginative thinking such as the offices sharing parking with residents to minimise the land take for car parking.

Statement of Changes:

Please strengthen this policy to ensure the highest quality, environmentally and socially sustainable development is achieved.

Any Other Comment:

Officer Response:

It is intended that the development is of an exemplary standard in terms of environmental, social and economic sustainability.

Detailed consideration of individual aspects of the design will be considered through the Planning Brief and once a detailed scheme is drawn up by a developer.
Further Details:
The new site at Toads Hole Valley is located adjacent to the A27 and in close proximity to the A27/King George VI Avenue junction. Given its location this is likely to impact on the operation of the strategic road network particularly if the site becomes a destination for out of town residents.

In terms of the transport assessment required by part j of the policy - this should take place at the earliest possible opportunity and considers the development in the context of the wider city plan proposals. At present the HA is unclear whether or not the site is deliverable in transport terms and this should be understood before working up detailed proposals.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments noted.
Toad’s Hole Valley represents one of the few opportunities for the provision of park and ride facilities. It is well located given its accessibility to the A27. Given the position of the site and the alternative sites identified within the City, it is not justified how 25,000 sq m of B1a and b office space has been allocated particularly where there are sites which are more accessible by public transport. There is no justification how the site complies with the sequential approach.

C.I.e
It is unreasonable to set a target to meet Code for Sustainability Homes Level 6. Even Level 5 is a major challenge. This needs to be justified not least in terms of the joint aspiration for affordable housing. Where Level 6 homes have been delivered in the past, it is often at the expense of affordable housing because of the additional costs associated with Level 6. We welcome the confirmation that parking provision is in connection with a future office use should be considered for informal weekend park and ride (cross-reference to CP8 Sustainable Transport). However the need is for permanent park and ride.

We consider that there is a need for an additional specific SP Policy for park and ride which shall set a framework for the determining proposals for informal park and ride on the DA7 site as well as for determining the appropriateness of other potential informal park and ride sites.

Statement of Changes:

Any Other Comment:

Officer Response:

The City Council’s updated Employment Land Study indicates that there will be a shortfall of office and B1c floorspace in the city to 2030. There is a lower than average vacancy rate for offices, and additional office space provision is necessary to enable the market to function effectively.

Park and Ride has been discounted as an option for Brighton & Hove given the lack of development sites in the city and the pressing need for land for housing, employment and schools that outweigh the need for formal Park and Ride. As an alternative the city council proposes informal park and ride utilising existing car parks on the periphery of the city. As indicated in paragraph 3.80 of the supporting text of the policy the car park linked to the office may have potential for this purpose. Informal park and ride is intended to be a business-led initiative and support of Standard Life for this approach would be welcome.

In terms of sustainable building standards it is considered that Code level 6 and BREEAM Outstanding should be the target for sustainable building on this greenfield site. It is agreed that this target needs to be weighed up against other priorities for the sites including affordable housing. A sentence has been added to the supporting text to allow for mitigation measures where standards cannot be met on site. The sustainable building policy (CP8) also allows for viability considerations.
Further Details:

DA7 – Toads Hole Valley: We support the principle of development on the site and the wide range of requirements laid down, including the proposed housing mix. We would however suggest that some imagery rather than just principles is suggested in the plan. This could then be further developed in a planning brief. This potential development represents a major addition to the city and is unique in its potential. It should be built to some stated urban design principles. We would suggest that the land use arrangements on site should follow Garden City principles whilst clearly meeting all the requirements of one planet living to bring the concept into the 21st century. This should focus on comfortable, good sized dwellings with at least small gardens, or outdoor space for flats, and access to communal gardens, the scope, facilitated by design, for home working, possibly with small office suites or studios available on site and local shopping. We believe this site represents major opportunities for car sharing and that it should be supplied with good public transport from the outset. We also believe that the site should be designed in such a way that it becomes a net exporter of energy to the rest of the City. There are examples of this already for example in Freiburg. We particularly welcome the reference to Energy infrastructure such as district cooling, heating and power networks. In Para 3.79 we would like to see a commitment to dwelling standards, including those of LifeTime Homes so that residents might expect to live there if and when they require support for living and in para 3.85 we would like to see a reference to public arts.

Statement of Changes:

Any Other Comment:

Officer Response:

It is intended to produce a Planning Brief to provide detailed guidance for the future development of the site.

The development is intended to be of an exemplary standard in terms of environmental, social and economic sustainability, achieving One Planet Living principles and promotes the city’s UNESCO Biosphere objectives.

Detailed proposals for the characteristics of the dwellings have not been drawn up at this stage.
Further Details:

1. The principle: The development of Toads Hole Valley is the 'least worst' option if the delivery of 11,300 dwellings is to be achieved by 2030, and if the alternatives of town cramming, tall buildings in the wrong place, and the loss of open space and employment land are to be avoided. However the release of Toads Hole Valley must be contingent on the identification of the potential impacts on surrounding neighbourhoods, the production of clear proposals to mitigate such impacts, and the creation of strong policies to require their implementation within a reasonable timeframe before or during development. Therefore I consider that additional wording is required in the policy and the supporting text.

2. The delivery of the overall concept: The mix of housing, education, commercial, community, and employment uses proposed will be essential to create Toads Hole Valley as a '21st century sustainable suburb' or a 'sustainable new urban village' on the principles described in the policy. However there were too many instances in the 20th century of housing development in Sussex being carried out long before the schools, open spaces, work and community facilities were provided, if they ever were. Therefore people need to be assured that the means and timing for delivering the whole package will be identified and agreed before the development of any part proceeds.

3. Creating a good new urban edge: In the 20th century the Sussex coast, including the city, has seen developments create raw, inappropriate urban edges. The traditional downland settlements tend to be characterised by strong belts of trees and hedgerows on the boundaries and threading through the settlements. The new urban edge seen from the Bypass and King George V Avenue will be as important as will be the views of buildings from the National Park. In the interests of landscape, ecology and sustainability, the provision and long term maintenance of strategic landscape features on the new urban edge needs to be clearly identified as a strategic requirement.

4. Sustainable transport: It is essential that the layout of roads in such a peripheral area facilitates the economic, safe and practical operation of buses in order to link the new area to important destinations in the city. In my experience, at the later detailed stage, developers and designers tend to design layouts which result in many homes not having reasonable access to a road useable as a bus route, for example because roads are dead ends rather than through routes, roads are too narrow, or the routes too tortuous for economic bus operation etc. Therefore there needs to be a strategic peg on which to hang the design requirements to be contained the future supplementary planning guidance to ensure that, throughout the Toads Hole Valley development, public transport will be an easy means of vehicular access to other parts of the city.

5. The role of downland links: The downland will provide an important recreation and exercise resource for people living in the new development, as it is already for existing residents of north Hove. Securing safe and attractive pedestrian and cycle links and routes to the National Park should be required as a thread running through the new area that also facilitates access from the existing neighbourhoods adjoining the Valley.

Statement of Changes:

In policy DA7 C n) add the following words:
"Supplementary Planning Document which will include identification of the potential impacts on adjacent neighbourhoods, contain clear requirements for mitigating problems, and for their implementation within a reasonable timeframe before or during development.

To policy DA7 C add a new criterion:
o) The means and timing for delivering the whole development package will be identified and agreed before the development of any part proceeds.

To policy DA7 C add a new criterion after (d):
The overall design of the area should provide for the provision and long term maintenance of a coherent strong green edge to the developed area where it adjoins the Bypass and King George V Avenue.

To policy DA7 C k) add the following words:
To paragraph 3.84 add:
The creation of safe and attractive pedestrian and cycle links and routes to the National Park will be required as a thread running through the layout of new area.

Any Other Comment:
This comment is based on many years of experience of planning in the City and in the adjoining part of Sussex, including the preparation of seven development plans which necessitated the release of greenfield housing sites in order to meet housing requirements.

Officer Response:
Policies in the City Plan will ensure that there are no unacceptable impacts on surrounding neighbourhoods resulting from development of the site.

The timing of the development will become clearer once a detailed scheme is submitted by a developer.

Development will make provision for improved pedestrian and cycle links to the South Downs National Park.

The City Council is aware that transport, including bus provision, is a key issue that needs to be carefully considered in drawing up plans for the development of the site. Any proposals for development would need to ensure that there are no unacceptable negative impacts on the local road network. The City Council will liaise closely with the Highways Agency on this issue.

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<td>/</td>
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Further Details:
The main change is really about parking spaces about which nothing is contained in the plan at present. Homes should be designed to limit road side parking as much as possible. Community parking spaces should be incorporated into the plan.

Statement of Changes:

Any Other Comment:

Officer Response:
This issue would be considered when a detailed proposal for development of the site is submitted.
Further Details:

The Brighton Society welcomes the opportunity to develop Toads Hole Valley with much needed housing, a school, small offices/workshops and a well landscaped park & ride site at Court Farm.

One Planet Living principles are admirable from a sustainability point of view, but there are many other principles, which should be incorporated into this opportunity to create an inspiring development on this site. One Planet Living schemes do not have to be ugly like the one in the New England Quarter.

Statement of Changes:

Before any plans are drawn up we need to study existing residential developments to understand which ones work well in creating neighbourly schemes. We need to include a variety of solutions in order to attract a variety of residents of varying ages. We should not automatically include peppering the development with social housing before testing existing peppered places to find out whether they work as intended.

On the other hand we do not want to include recognizable social housing ghettoes. Elderly residents should not be hidden away in quiet corners, or in high buildings, away from passers by, they need to be able to observe, and feel part of, the outside world.

We must avoid a developer led hack housing scheme. Toad’s Hole Valley provides a wonderful opportunity to create a pleasing and worthwhile plan. We also need to design a memorable street pattern, something that we have failed to achieve in Whitehawk. We need a street pattern where people can avoid other people if they want to, yet we should avoid streets or pathways where people can hide. Streets and pathways should be overlooked for safety reasons.

Any Other Comment:

Background research into neighbourliness needs to start now. A detailed planning brief should be prepared without delay and the Council should make it clear that proposals that do not comply will not be considered.

Officer Response:

Comments noted. The intention is to create an exemplar development with a high quality public realm
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<td>Part Three: Development and Special Area policies</td>
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**Further Details:**

DA7 Toads Hole Valley

Overall, the consensus within the CSP and the Sustainable Cities working group was for Toads Hole Valley to be developed. It offers the city an opportunity to develop a One Planet Living development, although how this would be achieved needs to be spelt out more clearly. This also needs to be done sensitively and respect the needs of the local communities in the area and the setting of the South Downs National Park.

There has been the suggestion of putting the development of the site up for design competition, to really put the place on the map and give the city the best possible opportunity for a high quality sustainable development. This would be more likely to lead to innovative solutions for developing the site which could change the way that development is approached in the future.

While it is welcome that the SNCI will be protected and enhanced, more focus and detail should be provided around pedestrian and cycle linkages both to the National Park and the city to the south. Suggestions include looking at the possibility of green bridges for pedestrian and cyclists.

Other thoughts are that the proposed 700 residential units should not be seen as a limit necessarily as this could be one of the last opportunities for substantial development on a greenfield site in the city. While respecting its surroundings, its use also needs to be maximised.

Given the pressures on land, again is having a school on site the best use of the site when other nearby schools could be expanded? One area which is underprovided for is open space, particularly sports pitches, a situation which will be exacerbated by the Football Association's new standards for youth football. This site could help provide more in the way of sports facilities both outdoor and indoor to what is currently proposed.

Finally, there was concern about using car parking associated with the office development for informal park & ride. This might not only result in a larger car park than would otherwise be allowed, but could waste valuable space and prevent more innovative and land efficient ways of using the site. For example, sharing the car parking between the office development and the housing could reduce the overall amount of car parking required on site saving land and allowing 'car free' developments to be built in a way not seen before in this country.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed.

700 dwellings is considered to be an appropriate balance between the need to provide additional housing and the need to avoid overdevelopment and respect the site's location on the edge of the National Park.

More detail on how links to the National Park will be created and consideration of parking issues will be produced once a detailed scheme for the site is drawn up. A Supplementary Planning Document will be produced to provide further detailed guidance to a developer.

It is intended that the sport facilities at the school will be made available for community use.
The text on Woollards Field South and on Toad’s Hole Valley makes reference to adverse impacts on the setting of the South Downs National Park. Whilst this is a key consideration, landscape character and impact are important considerations in other situations if enhancements are to be delivered.

(The use of landscape character assessments and of Landscape and Visual Impact Assessment, need to be considered where appropriate.)

It is assumed that all allocations and subsequent windfalls will be tested against a range of policies and criteria (particularly relating landscape and biodiversity) to ensure that development takes place in the right location and that the natural environment in and around the city are protected and enhanced.

Statement of Changes:

Any Other Comment:

Officer Response:

Comments noted.
Further Details:

Broadly support Policy DA7 as drafted and consider it to be the right decision of the Council to allocate the site as a Development Area in order to help with, in particular, the delivery of new housing for the City.

Toads Hole Valley (THV) should be brought forward early in the plan period due to the complexity of developing many of the other Development Area sites and the City’s acute housing needs. We have been working collaboratively with the City Council on developing the concept masterplan and the deliverability of the development and the various land use requirements. The matters that we raise in relation to Policy DA7 relate to the issue of soundness of the City Plan at this stage.

NEXT STAGES

Our work on developing options for the site that allow for the various uses to be adequately accommodated within the site, technical issues and the concept masterplan will continue through the summer. Including:

# Work on drainage and impact on ground water.
# Viability and deliverability testing.
# Ecology surveys and working with the City’s Ecologist on options for SNCL.
# Work with the Highways Agency and technical work to underpin access options.
# Further work on design and landscape.

This work is currently being fed into a Vision Document and considers access, the location of housing and employment, the siting of a school and community uses and open space/nature conservation land. The work we have undertaken to date has informed the various ideas, concepts and proposals for the site and therefore has assisted in our representations to draft Policy DA7.

A CONCEPT MASTERPLAN FOR THV

We have not identified a final scheme for the site but we are working towards producing a concept masterplan that encapsulates the preferred outline of the various uses and access arrangements at this stage. The masterplan will evolve as further assessment and consultation is undertaken on technical matters and through community involvement. This will take place during the rest of the summer and autumn.

The Vision is to create a new and integrated mixed use community at THV that is an exemplar of sustainable development and sustainable living, working, learning and enjoyment for the City’s residents both present and future. The constraints and opportunities to developing THV are key to setting out the concept masterplan. The most obvious issue to address is the topography. The others are the existing road network, integration with neighbouring communities, landscape & visual impact and accessibility. A range of urban typologies and designs have been produced in response to the site constraints. A considered approach to design, layout and visual impact of any development at THV is important. This is likely to mean that buildings will be bespoke for the site.

Having regard to the constraints, the need for integration and delivering a high quality sustainable development, we are developing three options for the layout comprising the range of uses set out in draft Policy DA7.

RESPONSE TO POLICY DA7 – TOADS HOLE VALLEY

The work undertaken to date has informed our response to Policy DA7. We are in general support of the Policy and the overall approach taken in the draft City Plan to strategic development and addressing the needs of the city. We have set out below our comments on the key elements of Policy DA7. We have commented on the Policy using the numbering and format of the Policy text and start with some general comments.

General Comments and Context
Our comments on the Policy have focussed on the elements within the text that we feel may not be considered sound at an Examination. In particular where detailed and/or over-prescriptive and unnecessary information has been set out in the Policy. We note relevant sections in the National Planning Policy Framework (NPPF) 2012 and refer to paragraph 154 which states that only policies that provide a clear indication of how a decision maker should react to a development should be included in a plan. We therefore feel the THV policy needs to be more concise, shorter and simpler to understand.

We support the inclusion of Court Farm within the DA7 policy but we have excluded it from our masterplan work due to it not being within the ownership of our clients.

A The local priorities to achieve the strategy
1. We agree that the site needs to be used efficiently and effectively but this needs to be balanced with the need for high quality development, the requirement for open space and its visual impact of the site on the surrounding area.
2. We support the priority that the development is of high quality standard in terms of environmental, social and economic sustainability. However, in terms of achieving the One Planet Living Principles, we consider this should be an on-going objective of the development in terms of its design, completion and future management. We question whether the principles can be achieved which implies there is an absolute end to aim for. The wording should relate to them being a framework for guiding the development and the use of the site when completed by visitors, residents and employers. We also consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text.

3. We agree with this policy. It is likely the ‘link’ to the National Park will be a combination of education/raising awareness information and enhancement of the existing walking/cycling route to the National Park via the Dyke Railway Trail.

4. We agree with this point.
5. We agree with this point.
6. We agree with this point.
7. We understand the objective to seek to conserve and enhance the SNCI. However, we will need to consider a number of options for the SNCI in consultation with the City Ecologist. We will need to take into account the possible impact on the SNCI of a new access into the site and the future use and management of the SNCI. We will therefore need to reconsider the wording of this priority in the future. Accordingly some flexibility is required in terms of the future long term management of the SNCI.

8. We agree with this point. Technical work will be undertaken on the impact of development on drainage and the groundwater source.

B Amounts of development
We do not feel it is necessary to include the date 2030 in the policy. We consider that some elements of this policy are over prescriptive and not required – in particular with reference to the amount of land allocated for some uses and would make the following comments.

A minimum of 700 residential units is acceptable.

As part of the masterplan we have considered the quantum of employment floorspace and consider the policy should state ‘approximately 25,000 sqm’.

Agree that the site can make a contribution towards the educational needs of the City but remove specific reference to land area required as this is not needed in the policy.

The open space reference should simply read as ‘public open space’ as it is over prescriptive in the draft Plan. Take out reference to 2 hectares.

Combine ‘supporting uses’ and ‘multi-use community facility’ bullets to read – ‘provision of neighbourhood centre to include shops, medical centre, community building and food growing space’.

C The strategic allocation for Toads Hole Valley
1. Whilst the policy states that the strategic allocation for THV is to the east of the SNCI, it is agreed that the development boundary includes this area. The SNCI will form an integral part of the proposed masterplan and perform an important pedestrian/cycle link between the site and the Hangleton community and opportunities for public ownership.

a) We consider there will be a range of densities for the residential development across the site however we do not consider the density range suggested be included within the policy. Accordingly, we suggest the reference to 50-75 dwellings per hectare be removed.

b) We support the provision of a mix of housing on the site and in particular family housing. However, we do not consider there is adequate evidence to underpin the reference to a ‘minimum of 50% of the houses to be 3+ bedroom family sized dwellings’. We would recommend this reference is removed.

c) We support this point.

d) We consider that this point is negative. As the reference to ‘adversely affected’ is subjective and would be difficult to assess, we suggest that the reference to height and massing is removed and the point is re-worded to read ‘any development should respect the setting of the South Downs National Park’.

e) We support the principle of this point but feel the first sentence is unclear. For example how will the development at THV help reduce the ecological footprint of the city and how will this be measured?

f) Again, we consider this point is not clear. If it is simply that an energy strategy is required to accompany a planning application, then please see our comment at (j) below.

g) We do not consider the reference to 5 hectares is required.
h). We support this point.

i). We support this point.

j). A Transport Assessment does not usually consider issues relating to noise. This is a noise assessment. However, we do not consider it relevant to list in the policy, the various documents that will need to be submitted with a planning application. The documents that will be submitted will extend far beyond the transport assessment and energy strategy and will include an Environmental Statement. Accordingly, we recommend that (j) is deleted.

k). We support this point.

l). We recommend that the hectares are removed from this point.

m). We recommend that this policy is worded to focus on the future use, ownership and management of the SNCI rather than focussing on how it can be funded in the future. Furthermore, contributions will be identified through the City's Community Infrastructure Levy (CIL) and accordingly the policy should make reference to CIL.

n). This point should be deleted. The NPPF states in paragraph 153 that any additional development plans should only be used where clearly justified. We do not consider this is the case for THV and in terms of bringing sites forward early in the plan period, we consider a SPD is an additional layer of development plan policy that is not required.

Supporting Text
References to land area allocations and references to the SPD should be removed. The information contained within the supporting text should reflect our recommendation for amending the policy as set out above.

We have no comments to make on any of the other policies contained within the Draft City Plan other than to support the provision of a minimum housing target of 11,300 new homes during the Plan period (CP1) - (Officer insert - and those made above relating to one planet living.)

Statement of Changes:

Any Other Comment:

Officer Response:

Your general support for the policy and positive approach to helping to deliver the city council's priorities and embracing a sustainable approach are all welcomed.

You raise a number of detailed concern regarding the level of detail set out in the policy. These will be responded to in order:

A.  
1. Comments noted.
2. Your comments relating to achieving One Planet Living principles are noted and agreed. The policy has been amended to refer to achieving a One Planet approach.
3. Comments noted.
4. Support noted.
5. Support noted.
6. Support noted.
7. Your concerns that point 7 may be over-constraining for future development are noted. At this stage it would be inappropriate to amend this priority. A case will need to be made to justify flexibility.
8. Support noted.

B.  
Bullet 1 - support noted
Bullet 2 - comments noted - as evidenced by the findings of the Employment Land Study, it is important that a minimum of 25,000sqm employment floorspace is provided on the site to help meet the city's shortfall.
Bullet 3 - support for provision of a school welcomed. Request to remove the site area specification is considered unacceptable. This is considered the minimum site area needed for a new secondary school to provide a satisfactory level of playing fields.
Bullet 4 - comment noted. The minimum area of public open space is to be retained. This is considered the minimum amount essential to meet the needs of the new residents.
Bullet 5 - comments noted. The separate uses identified are considered distinctive and important and should be retained as separate bullets.

C.
1. Comments noted. It is considered appropriate that the strategic allocation boundary should continue to exclude the SNCI which should continue to be protected from development.

A. comment noted. It is appropriate to retain a density range in the policy to ensure that the best use is made of the site while allowing for lower densities than the other development areas. Development across the will be expected to fall within this range as an average.

B. Objection to b. noted. It is considered there is sufficient evidence to justify the requirement for a higher proportion of family housing on this site.

C. support welcomed

d. comments noted and reference to the National Park amended accordingly.

E. comments noted and first paragraph of point removed.

F. point f. replaced with a priority to consider district heating networks as part of the development in response to the findings of the Energy Study.

G see bullet three response above.

H. support noted

I. Support noted

j. comment noted. Point amended to remove reference to TA and instead to identify general issues relating to the site.

K. support noted.

L. see response to section B above.

M. comment noted. CIL is still being considered by the city council. Securing improvements to the SNCI is considered an important benefit of the scheme and the wording of this point should not constrain how this is taken forward.

N. Comment noted. It is agreed that a supplementary planning document will not be necessary for the area however it is important that the city council sets out priorities in more detail and that local residents and stakeholders are consulted. SPD is replaced by planning brief.

Supporting Text

Amended in accordance with the changes agreed above.
Further Details:

There is a requirement for particular care over development proposed on the urban fringe of the city. As these proposals could have a significant impact on the surrounding landscape of the South Downs National Park careful consideration must be given to the impact of any proposals on the setting of the South Downs National Park and its two Purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA supports the overall aim of the spatial distribution of development to minimise transport impacts and the continued protection of the South Downs National Park.

As the adjoining authority, the SDNPA would wish the policy to highlight the potential impact of any development on the setting of the National Park as recognised in policy DA7, criteria d). Careful consideration must be given to views into and out of the SDNP, both the long views through the valley to the north and from the high ground along Devil’s Dyke Road to the east and Round Hill to the west and this overall rolling hill and valley landscape setting.

It is vital that due regard is given to the impact of any development at Toad’s Hole Valley on the setting of the NP, and it’s purposes, in accordance with Section 62 of the Environment Act 1995.

The SDNPA supports the aim to improve the quality of the Site of Nature Conservation Importance on the south-west boundary of the site and improving the quality of walking and cycling links with the SDNP. The SDNPA also welcomes the aim of protecting the sensitive groundwater from pollution, the reduction of flood risk and surface water run-off (para DA7 A.8. pg 67). The National Park Authority would wish to commend the City Council for requiring zero carbon development attaining Code for Sustainable Homes Level 6 and BREEAM Outstanding. It also supports the suggested mix of size and tenure of housing on the site, with an emphasis on a significant amount of affordable housing. At paragraph 3.76 of the Draft City Plan it states that a future Supplementary Planning Document will be developed for the area and the National Park Authority would wish to support this, with particular support of the design framework proposed, design and landscape being of the utmost importance in relation to potential impact on the SDNP, and would therefore wish to propose a joint working arrangement to produce a joint Supplementary Planning Document for Toad’s Hole Valley. There is also a need to ensure any mitigation measures seek to fulfill the National park’s Purposes and Duty.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments noted.

The Policy includes criteria to protect views both to and from the National Park.
Further Details:

We refer to Tim Ridgeway's article in the Evening Argus of 10th July. As residents of Brighton for the past 70 years, we have seen plans come and go for this area of Brighton.

Development of this area is urgent and critical to Brighton & Hove, an unused space to provide affordable homes. It does not add or impinge on the Downs, with the boundary of the bypass to the north. Nor will it prevent sea views from Toads Hole in the valley.

One has one question - with the pressure re. Infant schools' provision in West Hove and Portslade, it seems that there will be provision for a new secondary school. Why not provide for a Primary school too?

So we strongly support this development on a site which currently looks run down, neither park or farm land, but just waste land.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry, however provision of additional primary school capacity has not been ruled out.

The allocation of Toad's Hole Valley (DA7) is supported. The site provides the opportunity to achieve a balance of objectives including new family sized housing, in particular affordable housing, together with a range of complementary uses including significant community infrastructure. Hyde notes that the area is also expected to deliver a very high amount of office space (25,000m2). Whilst the plan to deliver high tech, modern office space is supported, Hyde would urge the Council to consider further the evidence to support the deliverability of such a high level of demand for office space in this development area given the ambition to deliver a minimum of 50% of three and more bedroom family sized dwellings as part of the residential scheme.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed.

Details of viability will be assessed as part of a future development scheme - there is some flexibility as to what is required to be provided on the site.
Further Details:

DA7: Toads Hole Valley

We support the proposal to develop this site. Careful consideration needs to be given to infrastructure

We applaud the idea that any development should be framed to create a viable and sustainable community with its own educational, social and retail facilities and an improved transport infrastructure. However, we would urge the Council to learn lessons from earlier peripheral developments such as Bevendean and Coldean where the density was too low to achieve a necessary critical mass and large areas of land were wasted.

We support the proposal that at least half of the dwellings should be for families and that net residential densities should be between 50 and 80 dwellings per hectare. However, given that the designated area extends to 47 hectares, we believe that the proposed minimum dwelling target of 700 dwellings is too conservative. The figures below suggest that if just over half the site were to be developed for housing at the lower density suggested, the dwelling total could be in the realm of 1,300, while still leaving more than 10 hectares unallocated:

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<td>Public open space / play area 2.0</td>
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<td>Food growing space 0.5</td>
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<td>1,300 dwellings @ 50 dph 26.0</td>
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Total space allocated 36.0

Inspiration for the new development could be drawn from Brighton’s successful Victorian suburbs such as the Stanford Estate or from the seafront squares in with their communal gardens.

We question whether a primary school might not be preferable to a secondary school, given the close proximity of two existing secondaries.

We are concerned that the area of woodland between the development site and Downland Drive could become a focus for anti-social behaviour. We suggest that the Plan should call for it to be adopted as carefully managed parkland.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed. The density of development is considered to strike an appropriate balance between preventing overdevelopment of the site and ensuring a significant contribution towards meeting the city’s housing need.

A new secondary school is necessary as the city will have a significant shortfall of school places by 2018, estimated to be 11.5 forms of entry, however provision of additional primary school capacity has not been ruled out. Although there are already secondary schools in this area, finding a suitable site for a new school is problematic, and opportunities must be taken where they arise.
Further Details:
The allocation of Toad’s Hole Valley (DA7) is supported. The site provides the opportunity to achieve a balance of objectives including new family sized housing, in particular affordable housing, together with a range of complementary uses including significant community infrastructure.

Statement of Changes:

Any Other Comment:

Officer Response:

Comments noted and support welcomed.

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Further Details:
5. New strategic site- Toad’s Hole Valley (DA7)

We have no objection to the inclusion of this site. However, as you have identified, it lies within a very sensitive groundwater protection area for a public water supply. Any potentially polluting activities / uses proposed for this area should be assessed against our Groundwater Protection Policy 3 (GP3) guidance. We would advise that appropriate pollution control measures will have to be considered at the detailed design stage and any potential sources of contamination investigated.

Statement of Changes:

Any Other Comment:

Officer Response:

Comments noted.
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<th>Customer No:</th>
<th>227</th>
<th>Customer Name:</th>
<th>Mrs Rachel Travers</th>
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<tr>
<td>Policy:</td>
<td>DA7 - Toads Hole Valley</td>
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### Further Details:

Agree this is an ideal site to develop much needed affordable family housing for Hove. I also strongly agree with the need for a new secondary school site and this would be ideal place. However, would urge the council to get on with this ASAP as surge in primary school places are going to need new secondary by 2018 and this sort of development will take a long time!

### Statement of Changes:

Any Other Comment:

### Officer Response:

Support welcomed.

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<th>Customer No:</th>
<th>222</th>
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<th>Miss Emma Parnaby</th>
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<td>DA7 - Toads Hole Valley</td>
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### Further Details:

Support is given to residential development at Toads Hole Valley as this is a largely inaccessible green space, and development in this location will go some way to addressing the much needed demand for housing in the city. Provided development follows the principles of One Planet Living to minimise environmental impact, the area could become an attractive and successful new addition to the city.

### Statement of Changes:

Any Other Comment:

### Officer Response:

Support welcomed.
Further Details:

I attended the consultation yesterday at West Blatchington Mill - I thought that your officers did very well in a mainly hostile environment!

May I suggest that, in future, you make it clearer, particularly in the initial flier, that you are dealing solely with a matter of policy and not implementation - if this had been made clear in the written documents then you may have had a less aggressive reaction over the details of access etc.. It might help your case if you emphasised that you were providing the policy to which a developer would respond to and not suggesting densities etc..

applicationnot dealing with implementation by giving the content and residential density as an expected response by a developer.

I do not object to the principle of a mix of residential, commercial and education uses but a detailed application should reflect the over population of the city, generally, and the limited infrastructure locally.

Statement of Changes:

Any Other Comment:

Officer Response:

Comments noted, thank you.

Further Details:

We welcome a modern, high quality and sustainable mixed use development with school, open space and supporting facilities.

Statement of Changes:

Any Other Comment:

The NLCA (and other groups) dreamed of a mixed use development site on the Station Site (NEQ) on the principles of One Planet Living. Over the years this dream withered away to result in just one building being built – and it is ugly. This must not happen again.

Officer Response:

Support welcomed.
Further Details:
We really need more housing in the city - the shortage makes it too expensive for young people & people on low incomes.

While I'd rather not see green space built on, Toads Hole Valley is basically a piece of scrub wasteland, and this kind of development would be a good use of that land - especially as there seem to be few, if any, better options.

There is also a great need for another secondary school, and while it would be better to have one near the sea-front rather than building yet another on the edge of the city, again - lack of available land probably makes this the only realistic option.

Statement of Changes:

Any Other Comment:

Officer Response:
Support welcomed.
Further Details:

Because of its steep contours, 60m drop from valley ridge to valley floor and the possible need for realignment of road infrastructure, this site will not be easy to develop. Until further detailed work is completed it is not certain that One Planet Living principles can be delivered on-site although the owner’s willingness to try is clear. The wording should relate to the principles being a guiding framework for the development and subsequent use of the site.

The developer should be afforded a reasonable degree of flexibility with reference to the space allocated to the mix of uses. Such specific space allocation at this early stage in planning for the development of the site is not helpful and, at the very least, the Plan could make clear that the allocations are approximations not rigid conditions.

The reference to height and massing [DA7d] ‘not adversely affecting’ views to and from the national park is clumsy and vague and leaves the development vulnerable to objection from those who feel that any development at all in the valley will adversely affect the visual amenity to and from the national park.

Apart from converting the valley into a forest, it is difficult to envisage how its development can reduce the city’s carbon footprint [DA7e] even if the buildings are zero carbon in construction and operation. Impressive environmental credentials will be delivered via the requirement for Code 6 homes and BREEAM outstanding office accommodation; the reference to reducing carbon footprint should be removed.

Toads Hole Valley is a development site that should be brought forward early in the Plan period, which will enhance the city’s reputation for environmental sustainability and being ‘open for business’.

In the light of NPPF guidance against adding extra policy layers we would question whether the site needs to be the subject of a separate Supplementary Planning Document [DA7n]. This may add little in terms of detail in addition to technical assessment that will be required in any event but could delay the development by 12 to 18 months.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments noted and welcome.

You raise concerns about the deliverability of One Planet Living Principles on the site. This has been noted and concerns recognised. References to One Planet Living have been amended to ‘achieving a One Planet Approach’.

Your concerns about the policy being over specific about site areas for different uses are noted. It is considered important by the City Council that a minimum site area is identified for both the school and for public open space. The site are identified for the school is at the very minimum level for a new secondary school whilst the provision of 2ha of public open space with the development is again considered a minimum when weighed against the number of new dwellings identified for the site. In practice a future developer can make the case for some flexibility in applying these figures.

Reference to the impact of development on the National Park have been amended in response to comments to ‘due regard will be given to the impact of development on the setting of the South Downs National Park and it’s setting.’

Reference to the need for a supplementary planning document has been amended to a planning brief in response to comments raised.
Further Details:

Because of its steep contours, 60m drop from valley ridge to valley floor and the possible need for realignment of road infrastructure, this site will not be easy to develop. Until further detailed work is completed it is not certain that One Planet Living principles can be delivered on-site although the owner’s willingness to try is clear. The wording should relate to the principles being a guiding framework for the development and subsequent use of the site.

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Statement of Changes:

Any Other Comment:

Officer Response:

Your comments noted and welcome.

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<th>Mr Andrew Coleman</th>
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**Section/Supporting Doc/Annexes**: Part Three: Development and Special Area policies

**Further Details:**
This is a bold proposal. I particularly support policies to build to Code for Sustainable Homes level 6 and to improve sustainable transport links to the area. An extension of cycle lanes should be a priority. The new development should also be a model of climate change resilience that Code for Sustainable Homes and BREEAM do not necessarily guarantee.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
support welcomed. It is intended that the development is of an exemplary standard in terms of environmental, social and economic sustainability.

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<th>Michael Johnson</th>
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**Section/Supporting Doc/Annexes**: Part Three: Development and Special Area policies

**Further Details:**
I would like to see a new entrance for HGVs entering Shoreham Harbour away from the leisure facilities of Hove lagoon.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Within the policy there is already provision for a new access road (within the port boundary) in line with the Port Masterplan. This would result in some improvement to Hove Lagoon compared to the current situation.
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<th>Kevin Barkey</th>
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<td>Part Three: Development and Special Area policies</td>
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**Further Details:**

I support the detailed objection to Policy DA8 which has been submitted by the Kingsway and West Hove Residents Association, and their proposed additional wording to policy DA8 subsection B ii) Aldrington Basin - Area Priorities as follows:

F) TO RESPECT AND COMPLEMENT THE DISTINCTIVE CHARACTER AND AMENITY OF THE EXISTING RESIDENTIAL AND RECREATIONAL AREAS ADJOINING THE NORTH, SOUTH AND EAST SIDES OF ALDRINGTON BASIN.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Comments acknowledged. The policy already makes provision for improvements to townscape in the North Quayside/South Portslade area. The issue applies to all development areas and is dealt with by other policies in the Plan particularly SA1 - The Seafront and CP12 - Urban Design.
Further Details:
The policy does not recognise the significant constraint on the development of Shoreham Harbour - the capacity of road network and the impact on amenity and air quality. All traffic to the port has to go through Brighton and Hove through areas already with poor air quality which leads to health problems and shortened lives. This issue cannot be ducked.

Although not in Brighton and Hove, the Southwick beaches, areas between the eastern harbour arms and 2 places on the western side of the River Adur are all of local and regional importance as surf 'breaks'. (DA8 B (v). These should be protected in plan policies.

Statement of Changes:

Any Other Comment:

Officer Response:

Adur District Council has commissioned a transport study which will inform the consideration of sustainable transport options to adequately mitigate the impact of strategic development. This study will inform the emerging Shoreham Harbour Transport Strategy, which is currently being prepared by West Sussex County Council and will include the area within Brighton & Hove. The strategy will contain a set of integrated transport measures that will guide the provision of transport infrastructure in the area for the next 15 years. Whilst development at Shoreham Harbour will require some investment in the road network, substantial new road building is unlikely to be deliverable on both environmental and cost grounds. The Shoreham Harbour Transport Strategy will include improvements to the existing road network and measures to encourage the use of sustainable modes of transport. These measures will be comprised of infrastructure and behaviour change initiatives where these would be considered effective and appropriate.

Importance of air quality is acknowledged. The requirement to take account of the impact on local air quality and to seek improvements is already one of the area priorities for North Quayside/South Portslede.

Policy Subsection iv .a - "beach environment" has been added to the policy.
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<th>Ian and Jo Campbell</th>
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**Section/Supporting Doc/Annexes**  Part Three: Development and Special Area policies

**Further Details:**

We support the detailed objection to Policy DA8 which has been submitted by the Kingsway and West Hove Residents Association, and their proposed additional wording to policy DA8 subsection B ii) Aldrington Basin - Area Priorities as follows:

F) To respect and compliment the distinctive character and amenity of the existing residential and recreational areas adjoining the North, South and East sides of Aldrington Basin.

**Statement of Changes:**

See above

**Any Other Comment:**

**Officer Response:**

Comments acknowledged. The policy already makes provision for improvements to townscape in the North Quayside/South Portslade area. The issue applies to all development areas and is dealt with by other policies in the Plan particularly SA1 - The Seafront and CP12 - Urban Design.
Further Details:

The City Council will be aware of a previous application for a mixed use redevelopment of the PortZed site (land at 9-16 Aldrington Basin/south of Kingsway, Hove) for 67 residential units, storage, restaurant, retail, B1 and D1 uses (Ref BH2010/03739). Whilst this application was refused in March 2012 for reasons relating to overdevelopment and noise disturbance, a revised scheme is currently being prepared with the aim of submitting a further application later this year.

Whilst the revised scheme is yet to be considered, it is important that the draft City Plan does not introduce onerous restrictions on the site which are not currently in place.

The PortZed site is currently located outside all of the Shoreham Harbour land use allocations as shown on the Local Plan Proposals Map.

The Shoreham Harbour Development Area boundary has been amended since the adopted Local Plan and the PortZed site is now located within the DA8 designation. Whilst the overall objectives of the Shoreham Harbour policy are supported, there is a realistic possibility that they could limit housing numbers or restrict proposals for the PortZed site from being delivered. Furthermore, the approval of forthcoming proposals for the site could be delayed by the preparation of the Joint Area Action Plan (or other Masterplans for the Harbour).

Importantly, there is no significant interdependency between PortZed and the rest of the Harbour. As such the PortZed development would not impact on the delivery of the Harbour objectives.

In determining the recent application to develop the site, the Planning Committee report states the following:

"Whilst the application site is part of the Shoreham Harbour regeneration area, and specifically Aldrington Basin, it is not by itself essential to achieving successful redevelopment of the area. The proposal should not therefore be seen as premature in the context of the emerging policy framework for Shoreham Harbour, and development of the site would not necessarily prejudice more comprehensive regeneration of Aldrington Basin or the wider harbour area. The application should therefore be considered on its own merits having regard to adopted planning policy and all other material considerations."

Statement of Changes:

We therefore object to the inclusion of the site within the Development Area and request that the boundary is amended to exclude the land accordingly.

Any Other Comment:

Officer Response:

It is quite correct that the adopted (July 2005) Local Plan policy for Shoreham Harbour covers only the Port operational area. Policy DA8 has a wider remit including the regeneration of a larger area and the need to tie developments at the harbour into the surrounding area. It is noted that the development site in question is also covered by the Port Masterplan. Given this and that the site is located between the Port and Kingsway (A259) it would not be appropriate to exclude the site from DA8.

The City Plan is part of the emerging framework for Shoreham Harbour and can propose changes to the adopted planning framework. It is not accepted that the emerging revised framework places restrictions on this site. In fact, the opposite could equally be true. For example, the policy allows for appropriately located mixed-use residential developments.
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<th>Customer Name: Mr Roger Lightbown</th>
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**Section/Supporting Doc/Annexes** | Part Three: Development and Special Area policies

**Further Details:**

I object to the fact that there is no recognition of the recreation use of the Shoreham Harbour area for surfing, and that the policy does not recognise the local and regional importance of surfing. Surfing should be protected and improved as part of any redevelopments. Specifically, there are very few surf spots on the south coast of England which could be considered to offer a good quality wave, and Shoreham Harbour is one of those. This fact should be supported and seen as an opportunity for development. If this use is not recognised at this stage, then there will be no protection of this valuable local activity during future development of the area.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Comments acknowledged. Policy Subsection iv .a - "beach environment" has been added to the policy.

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<th>Customer No: 116</th>
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**Section/Supporting Doc/Annexes** | Part Three: Development and Special Area policies

**Further Details:**

Shoreham Harbour – The redevelopment of Shoreham Harbour as described in policy DA8 is entirely unrealistic unless a practical transport access solution is found.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Adur District Council has commissioned a transport study which will inform the consideration of sustainable transport options to adequately mitigate the impact of proposed strategic development in its Core Strategy. This study will also inform the emerging Shoreham Harbour Transport Strategy, which is currently being prepared jointly by Adur District Council, Brighton & Hove City Council and West Sussex County Council and includes proposals within Brighton & Hove. The transport strategy will contain a set of integrated measures that will guide the provision of transport infrastructure and interventions for the next 15 years that will enable the sustainable regeneration of the local area. The proposed strategy will include a range of measures including improvements to the existing road network and measures to encourage and provide for the use of sustainable and healthy forms of transport, i.e. public transport, cycling and walking, and car clubs. Substantial new road building is unlikely to be deliverable, as any potential transport benefits that could be achieved through the provision of a new link road are likely to be significantly outweighed by cost and environmental consequences.
We acknowledge that the options for the area are not yet finalised. We also recognise that the majority of the development area falls within Adur’s district. However, there are significant water and sewerage infrastructure constraints that need to be addressed to enable this development.

Southern Water looks to planning policy documents to ensure that the local infrastructure required to serve new development is delivered. In principle, the development must connect to the water distribution and sewerage systems off-site at the nearest point of capacity. This is the mechanism by which the necessary infrastructure can be delivered, as Southern Water is not fully funded through the price setting mechanism.

This issue can be dealt with in detail in the Joint Area Action Plan but it would be helpful to include a hook in the City Plan to recognise this issue.

Finally, Wastewater treatment for the Shoreham and Portslade areas is provided at Shoreham Wastewater Treatment Works (WTW) on the eastern arm of Shoreham Harbour. Changes to environmental regulation requirements may have implications for future land take and an alternative site may need to be identified. The possible need for site expansion in the vicinity of Shoreham Harbour should be explored through the emerging Joint Area Action Plan.

Statement of Changes:

We propose the following additional text to the second paragraph of policy DA8 to recognise that the Joint Area Action Plan will address provision of infrastructure:

The District Council will work with Brighton & Hove City Council, West Sussex County Council, Shoreham Port Authority and other key partners to support the long term regeneration of Shoreham Harbour and immediately surrounding areas. A Joint Area Action Plan is currently being prepared that will contain detailed policies for the harbour area to address a range of issues, including provision of infrastructure.

Under i) South Quayside/Port Operational, in order to make the policy consistent with that proposed in Adur’s Local Plan, we propose addition of a new bullet point to read:

To identify and where appropriate accommodate the future capacity requirements for the wastewater treatment works.

Any Other Comment:

Officer Response:

Comments acknowledged. Possible expansion of the Shoreham Harbour Waste Water Treatment Works although located currently in Adur District was already identified in the Infrastructure Delivery Plan. However, suitable wording has now been added to the Policy and supporting text to indicate the importance attached to the issue.
Further Details:

DA8 – Shoreham harbour. We believe that a planning brief on Shoreham Harbour cannot avoid examining the role of the power station in terms of energy supply and the potential for piped heat. The energy dispersed into the sea for the benefit of surfers must be better used and represents a major opportunity for the city and adjoining local authorities to move a big step towards decarbonising energy use in the city. We believe that the energy dispersed into the sea is similar to the energy to be generated by the Rampion offshore wind farm. DA8 should make a commitment that the scope of converting Shoreham power station to CHP will be carefully studied and ways of using the waste heat for the City as a whole investigated.

Statement of Changes:

Any Other Comment:

Officer Response:

Comment acknowledged. DA8 already makes reference under South Quayside/Port Operational to exploring opportunities for sustainable energy generation and a reference to the Strategic Energy Study has been added to the supporting text. More detailed examination of the potential for CHP will be carried out in the preparation of the JAAP.

Further Details:

The proposal at Shoreham Harbour cannot be delivered without a ‘transport solution’ to enable the extra traffic from the A27 into the Harbour. The scheme will fail without this link.

Statement of Changes:

Any Other Comment:

Officer Response:

Adur District Council has commissioned a transport study which will inform the consideration of sustainable transport options to adequately mitigate the impact of proposed strategic development in its Core Strategy. This study will also inform the emerging Shoreham Harbour Transport Strategy, which is currently being prepared jointly by Adur District Council, Brighton & Hove City Council and West Sussex County Council and includes proposals within Brighton & Hove. The transport strategy will contain a set of integrated measures that will guide the provision of transport infrastructure and interventions for the next 15 years that will enable the sustainable regeneration of the local area. The proposed strategy will include a range of measures including improvements to the existing road network and measures to encourage and provide for the use of sustainable and healthy forms of transport, i.e. public transport, cycling and walking, and car clubs. Substantial new road building is unlikely to be deliverable, as any potential transport benefits that could be achieved through the provision of a new link road are likely to be significantly outweighed by cost and environmental consequences.
### Further Details:

The development of Shoreham Harbour has the potential to create an environment for increased employment and as a location for a sizeable quantity of new residential units. The Joint Area Action plan which is referred to in the Draft City Plan, will be a critical document in developing the harbour but this plan will depend on agreement between three local authorities and the Harbour Board will take some time to finalise.

### Statement of Changes:

Developers have already put forward proposals for the south side of Kingsway (Portzed) so it would appear to be essential for the City Plan to at least include a strategy for the area within the Brighton and Hove boundary, particularly along the coast road from Hove Lagoon to Boundary road – the important “gateway” into the city as referred to in the Draft document, (clause 3.89). Any new developments within this area should have a relationship with the West Hove Estate, the housing to the north of the coast road between Boundary Road and Hove Lagoon. The draft plan should therefore include an aim for new developments to be sympathetic to the setting and scale of the existing West Hove housing.

The coast road also rises significantly towards the west with many stretches of the road running along the old cliff line. These areas have excellent views across the harbour to the sea, an asset that should be protected by planning strategy. How the developed harbour relates to the coast road and the existing housing to the north of the road is critical and we would suggest that the Draft City Plan should include strategic statements on positioning and scale of new developments along the northern boundary of the harbour.

### Any Other Comment:

Such policy statements should be included in the “Character Areas” that fall within the Brighton and Hove part of the harbour (page 73). The exact locations of these “Character Areas” do not appear to be shown on any maps or illustrations in the draft. This should be rectified.

### Officer Response:

Comments are acknowledged. The issue is dealt with by other policies in the Plan particularly SA1 - The Seafront and CP12 - Urban Design, although improvements to the townscape are already covered by the policy.

The character areas can now be identified as requested.
Further Details:
We partly object. We partly support.

We subscribe to KAWHRA’s objections and support.

We live in a garden suburb of distinctive layout which as already being ruined (a) by a plethora of cars, and by the hopeless inadequate exit from Aldington Basin South into Kingsway and into Boundary Road and to the West.
The Policy contains only bland ideas for long term regeneration which couldn’t be implemented unlike the road strategy agreed. Policy DA8 and Policy SA1-B.
We also object to Urban Design Policy CP12 and believe that taller buildings between Welbeck Road (sic) and Boundary Road would not only be out of place but would spoil the well planned garden city area to the South, as well as adding to the traffic queues on the main road and to parking in the garden city area.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments acknowledged. The policy already makes provision for improvements to townscape in the North Quayside/South Portslade area. The issue applies to all development areas and is dealt with by other policies in the Plan particularly SA1 - The Seafront and CP12 - Urban Design.

Adur District Council has commissioned a transport study which will inform the consideration of sustainable transport options to adequately mitigate the impact of proposed strategic development in its Core Strategy. This study will also inform the emerging Shoreham Harbour Transport Strategy, which is currently being prepared jointly by Adur District Council, Brighton & Hove City Council and West Sussex County Council and includes proposals within Brighton & Hove. The transport strategy will contain a set of integrated measures that will guide the provision of transport infrastructure and interventions for the next 15 years that will enable the sustainable regeneration of the local area. The proposed strategy will include a range of measures including improvements to the existing road network and measures to encourage and provide for the use of sustainable and healthy forms of transport, i.e. public transport, cycling and walking, and car clubs. Substantial new road building is unlikely to be deliverable, as any potential transport benefits that could be achieved through the provision of a new link road are likely to be significantly outweighed by cost and environmental consequences.
Overall policy DA8 provides a well thought out set of high level strategic policies for the part of Shoreham Harbour which lies within the city’s boundaries. These policies will be interpreted in greater detail in the forthcoming Joint Area Action Plan and the accompanying Development Briefs.

However we consider that there should be an addition to the wording of policy DA8 subsection B (ii) in relation to the area priorities for Aldrington Basin, in order to recognise the need to respect the context of the high quality areas which adjoin the Basin on three of its four sides. In this aspect, Aldrington Basin is different to the other parts of the Shoreham Harbour regeneration area that lie within the City.

The northern edge of Aldrington Basin adjoins the southern edge of West Hove, a suburb of Hove which was built in the late 1920s and early 1930s. The area was planned on garden city lines, with mostly two-storey houses set out along a grid of light and airy tree-lined streets which run southwards down to Kingsway. The location, layout, scale, materials, detailing and natural landscaping give this neighbourhood overall a distinctive character and pleasant quality of life which has made it a consistently popular place to live for the past 80 years. For over half a kilometre Kingsway forms the junction between West Hove and Aldrington Basin. Also, there is a sharp difference of height of over 4 metres between Kingsway and the lower lying land in the Basin. This provides both a satisfactory buffer between the residential area in Hove and business uses in the Basin, whilst retaining the opportunity for people living and travelling along Kingsway to get interesting glimpses over the harbour towards the sea.

To the east of Aldrington Basin lies Hove Lagoon, which was opened in 1930. It was created out of a saltmarsh at the same time as the adjoining West Hove garden suburb was being developed. The shape of the Lagoon has a something of a 1930s Deco feel, although its buildings are more in the style of the 1920s. The new housing and the Lagoon recreation area were linked by the stylish flight of steps adjoining the accompanying 1930s public house and hotel (now called the Blue Lagoon) that fronts both the upper Kingsway and the lower Lagoon levels.

On the southern edge of Aldrington Basin stands Western Esplanade, built on the beach that separates the Basin from the sea. This iconic row of secluded white beachfront houses, originally developed in the early 1900’s, is distinctive seaside architecture that still has the air of stylish pre-war Mediterranean living.

West Hove, Hove Lagoon and Western Esplanade are individually different, but overall they demonstrate the distinctive qualities, scale and character of the growth of Hove in the early 20th century, which still provides for a very satisfying quality of life in the 21st century. Aldrington Basin’s regeneration will provide the opportunity to create a distinctively different 21st century new quarter for the city. However this should not be at the expense of the character and good quality of life enjoyed in the early 20th century neighbourhood that wraps around three sides of the Basin. In particular there will need to be care and respect in the design of the interface between new development in the Basin and the existing development that adjoins the Basin.

Residents consider that in the regeneration of Aldrington Basin there need to be a distinctive difference, but a respect of its context. We suggest therefore that the challenge of the need to respect the special context of the area surrounding three quarters of Aldrington Basin should be acknowledged as a priority in the high level strategic city plan policies that will inform the more detailed policies to be developed in the JAAP and the Development Brief.

Therefore we suggest the addition of an additional sub-paragraph F (as shown below) to policy DA8 subsection ‘B ii) Aldrington Basin - Area Priorities’ in order to recognise the need to respect Aldrington Basin’s sensitive surrounding context.

We suggest the addition of the following words to policy DA8 subsection B ii)

Aldrington Basin - Area Priorities:
F) TO RESPECT AND COMPLEMENT THE DISTINCTIVE CHARACTER AND AMENITY OF THE EXISTING RESIDENTIAL AND RECREATIONAL AREAS ADJOINING THE NORTH, SOUTH AND EAST SIDES OF ALDRINGTON BASIN.

Any Other Comment:

Officer Response:

Comments acknowledged. The policy already makes provision for improvements to townscape in the North Quayside/South Portslade area. The issue applies to all development areas and is dealt with by other policies in the Plan particularly SA1 - The Seafront and CP12 - Urban Design.

Further Details:

We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted. It is considered that Toads Hole Valley is different to the other seven development areas as it is greenfield site. However reference to the policy contributing to delivering the One Planet approach has been added to supporting text.
Further Details:

1. Overall policy DA8 provides a well thought out set of high level strategic policies for the part of Shoreham Harbour which lies within the city’s boundaries. These policies will be interpreted in greater detail in the forthcoming Joint Area Action Plan and the accompanying Development Briefs.

2. However we consider that there should be an addition to the wording of policy DA8 subsection B (ii) in relation to the area priorities for Aldrington Basin, in order to recognise the need to respect the context of the high quality areas which adjoin the Basin on three of its four sides. In this aspect, Aldrington Basin is different to the other parts of the Shoreham Harbour regeneration area that lie within the City.

3. The northern edge of Aldrington Basin adjoins the southern edge of West Hove, a suburb of Hove which was built in the late 1920s and early 1930s. The area was planned on garden city lines, with mostly two-storey houses set out along a grid of light and airy tree-lined streets which run southwards down to Kingsway. The location, layout, scale, materials, detailing and natural landscaping give this neighbourhood overall a distinctive character and pleasant quality of life which has made it a consistently popular place to live for the past 80 years. For over half a kilometre Kingsway forms the junction between West Hove and Aldrington Basin. Also, there is a sharp difference of height of over 4 metres between Kingsway and the lower lying land in the Basin. This provides both a satisfactory buffer between the residential area in Hove and business uses in the Basin, whilst retaining the opportunity for people living and travelling along Kingsway to get interesting glimpses over the harbour towards the sea.

4. To the east of Aldrington Basin lies Hove Lagoon, which was opened in 1930. It was created out of a saltmarsh at the same time as the adjoining West Hove garden suburb was being developed. The shape of the Lagoon has a something of a 1930s Deco feel, although its buildings are more in the style of the 1920s. The new housing and the Lagoon recreation area were linked by the stylish flight of steps adjoining the accompanying 1930s public house and hotel (now called the Blue Lagoon) that fronts both the upper Kingsway and the lower Lagoon levels.

5. On the southern edge of Aldrington Basin stands Western Esplanade, built on the beach that separates the Basin from the sea. This iconic row of secluded white beachfront houses, originally developed in the early 1900’s, is distinctive seaside architecture that still has the air of stylish pre-war Mediterranean living.

6. West Hove, Hove Lagoon and Western Esplanade are individually different, but overall they demonstrate the distinctive qualities, scale and character of the growth of Hove in the early 20th century, which still provides for a very satisfying quality of life in the 21st century. Aldrington Basin’s regeneration will provide the opportunity to create a distinctively different 21st century new quarter for the city. However this should not be at the expense of the character and good quality of life enjoyed in the early 20th century neighbourhood that wraps around three sides of the Basin. In particular there will need to be care and respect in the design of the interface between new development in the Basin and the existing development that adjoins the Basin.

7. Residents consider that in the regeneration of Aldrington Basin there need to be a distinctive difference, but a respect of its context. We suggest therefore that the challenge of the need to respect the special context of the area surrounding three quarters of Aldrington Basin should be acknowledged as a priority in the high level strategic city plan policies that will inform the more detailed policies to be developed in the JAAP and the Development Brief.

Therefore we suggest the addition of an additional sub-paragraph F (as shown below) to policy DA8 subsection ‘B ii) Aldrington Basin - Area Priorities’ in order to recognise the need to respect Aldrington Basin’s sensitive surrounding context.

Statement of Changes:

We suggest the addition of the following words to policy DA8 subsection B ii)
Aldrington Basin - Area Priorities:

F) TO RESPECT AND COMPLEMENT THE DISTINCTIVE CHARACTER AND AMENITY OF THE EXISTING RESIDENTIAL AND RECREATIONAL AREAS ADJOINING
THE NORTH, SOUTH AND EAST SIDES OF ALDRINGTON BASIN.

Any Other Comment:
These comments and suggestions have been circulated by email to members of the Kingsway and West Hove Residents Association and have been given strong support by local residents, with no opposition.

Officer Response:
Comments acknowledged. The policy already makes provision for improvements to townscape in the North Quayside/South Portslade area. The issue applies to all development areas and is dealt with by other policies in the Plan particularly SA1 - The Seafront and CP12 - Urban Design.

Customer No: 165  Customer Name: Chris Todd
Organisation: City Sustainability Partnership  Support Status: Partly Object
Rep Number: 16  Page/Para: Part Three: Development and Special Area policies
Policy: DA8 - Shoreham Harbour

Further Details:
DA8 Shoreham Harbour
It is disappointing that the City Plan makes no mention of the role that renewable energy generation on a larger scale (solar, wind, biodiesel, marine, thermal/heat exchange) could play at the port. The Shoreham Port Masterplan which is referenced in the City Plan states, as one of its main issues, that the port offers a unique opportunity for renewable energy projects. Given the lack of renewable energy generation opportunities elsewhere, more attention should be given to this issue here, if only to ensure consistency with the Port’s Masterplan.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments acknowledged. The policy does make reference to exploring opportunities for sustainable energy generation at South Quayside/Port Operational, in line with the adopted Port Masterplan. The supporting text has been amended to refer to Harbour being identified as a potential suitable location for a district heating network in a recently produced Strategic Energy Study.

Customer No: 234  Customer Name: John Lister
Organisation: Natural England  Support Status: Partly Support
Rep Number: 4  Page/Para: Part Three: Development and Special Area policies
Policy: DA8 - Shoreham Harbour

Further Details:
DA8 - Shoreham Harbour - we look forward to being consulted on the Joint Area Action Plan, in particular in respect of the area’s capacity to generate Green Infrastructure to support the significant levels of development envisaged, improve the biodiversity of the area and provide encouragement and opportunities for sustainable travel (inter alia). If there are issues relating to the European Habitats to the west of the area, you can consult Natural England informally prior to publication.

Statement of Changes:

Any Other Comment:

Officer Response:
Comments acknowledged.
### Customer No: 175  Customer Name: Chris Todd

**Organisation:** Brighton and Hove Friends of the Earth  
**Support Status:** Partly Support

**Rep Number:** 9  
**Page/Para:** /  
**Policy:** DA8 - Shoreham Harbour

**Section/SUPPORTING DOC/ANNEXES**

**Further Details:**

BHFOE would like to see more emphasis on renewable energy generation on this site. There are few places where larger scale renewable energy can go in the city and this is one of them, so its use must be maximised.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Comments acknowledged. The policy does make reference to exploring opportunities for sustainable energy generation at South Quayside/Port Operational, in line with the adopted Port Masterplan. The supporting text has been amended to refer to the Harbour being identified as a potential suitable location for a district heating network in a recently produced Strategic Energy Study.

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### Customer No: 192  Customer Name: Tesco Stores Ltd

**Organisation:** Tesco Stores Ltd  
**Support Status:** Partly Support

**Rep Number:** 8  
**Page/Para:** /  
**Policy:** DA8 - Shoreham Harbour

**Section/SUPPORTING DOC/ANNEXES** Part Three: Development and Special Area policies

**Further Details:**

The range of uses identified should include (or maintain) support for appropriate provision of new retail floorspace to meet local needs and encourage sustainable shopping patterns.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Any significant new retail development should be located in the existing district shopping centre of Boundary Road/Station Road. Some limited retail development to support the niche roles of Aldrington Basin and North Quayside/ South Portslade might be identified through the Development Brief and Joint Area Action Plan. No change to policy proposed.
Further Details:

We consider that Royal Mail’s Portslade DO falls within the development area boundary for Shoreham Harbour. However, it is not possible to ascertain conclusively whether or not it does from the map provided on page 72 of the draft City Plan document. Therefore, we would be grateful if the Council would confirm the position; further whether it falls within a specific area in the development boundary i.e. South Quayside, Aldrington Basin, North Quayside / South Portslade or Portslade and Southwick Beaches as the boundaries for these areas are not identified on the map provided.

The map for Shoreham Harbour identifies key employment and protected employment sites for the area. Notwithstanding the above, Royal Mail’s Portslade DO is not identified as a key employment or protected employment site.

Note the quantity of development expected to come forward within the Development Area.

Royal Mail’s Portslade DO is operational and Royal Mail has no plans to vacate the site. Notwithstanding this, given the site’s high street location; surrounding mix of uses and the site’s close proximity to Portslade Station it is our opinion that the Portslade DO site presents a good opportunity for redevelopment. We note here that Royal Mail promoted the site for alternative uses in September 2010 as part of the Council’s SHLAA.

Statement of Changes:

Royal Mail does not object to the inclusion of their site within the Shoreham Harbour development area boundary however, we request that the supporting policy or text to this allocation explicitly states that the re-provision / relocation of Royal Mail’s Portslade DO operations will be required prior to redevelopment of their site.

This will ensure that Royal Mail’s operations will not be prejudiced and they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000.

Furthermore, should Royal Mail’s site be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of their site will need to yield both sufficient value to fund the purchase and fit-out of a new site and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate their operations. In addition, it would be essential that any new facility is provided prior to the demolition of the existing and / or that suitable temporary accommodation is provided, if necessary, to ensure the continuity of service.

Any Other Comment:

Our requests as detailed in representations on DA6, DA8, SA2 and CP3 accord with the Government’s National Planning Policy Framework (NPPF) (published March 2012) which ‘provides a presumption in favour of sustainable development' and from which we consider paragraphs 14, 19-20, 21,35,47, 50, 161 to be of particular relevance.

Further, Royal Mail would welcome the opportunity to meet with the Council to discuss the inclusion of their sites in the emerging Brighton & Hove Draft City Plan Part 2 which we understand will include the Council’s Site Allocations and Detailed Policies:

Hove Delivery Office (DO), 88 Denmark Villas, Hove, BN3 3UG;
Portslade Delivery Office (DO), 39-41 Boundary Road, Brighton, BN41 1AA;
Rottingdean Delivery Office (DO), Nevill Road, Brighton, BN2 7JQ; and
Brighton Delivery Office (DO), Office (OFF) / Industrial (IND), 62 North Road, Brighton, BN1 1AA.
- all of which are strategically important to Royal Mail

Officer Response:
The definitive boundary will emerge through the Joint Area Action Plan. If Station Road/Boundary Road is included with the boundary this is likely to allow for improvements to connectivity/public realm leading to Portslade Station amongst other things. Its not at all likely that the JAAP will require the re-location of the Royal Mail facility.

Further Details:

We welcome the policy on Shoreham Harbour and the references to the Area Action Plan being prepared for the site jointly with Adur Council and West Sussex County Council. Such partnership working accords with the new NPPF and we welcome the references to Duty to Co-operate in the Plan in this regard. This Council is working with Brighton and Hove City Council on a number of joint issues including Shoreham Harbour, the Duty to Co-operate (e.g.on housing) and CIL. We look forward to continuing this partnership working on these and other strategic issues.

(Officer note : this comment also allotted to Part 2, para 1.10 and 4.5)

Waste Water Treatment

As you are aware, the capacity of the current waste water treatments works at Shoreham Harbour is limited and any enhancement/expansion needs will need to be addressed in the joint Area Action Plan for this site. The works serve Shoreham as well as the western parts of the City. The approximate limit is for a further 4000 dwellings and there is also a biological limit in terms of future population. This is an infrastructure constraint which needs to be taken into account and may impact on the timing of delivery of key developments not only in Shoreham but also in the western parts of the City. This may impact on the proposed development area of Toads Hole Valley if this is within the catchment area.

(Officer note : these representations allotted to SA1, CP7, DA7, DA8 and Annex 2 ‘Infrastructure Delivery Plan’)

Proposed Development Area - Shoreham Harbour - page 73

The development area boundary as shown on the map must be seen as indicative at this stage and will be determined through the joint Area Action Plan.

(Officer note : these representations allotted to DA8, Key Diagram and Proposals Map booklet)

Statement of Changes:

Any Other Comment:

Officer Response:

Support for policy and joint working acknowledged.

Comments on waste water treatment acknowledged. Policy and supporting text has been amended to show importance attached to this issue.

Agree that the proposed policy area boundary is indicative at this time and will be determined through the Joint Area Action Plan. Text will be amended to clarify this point.
The Economic Partnership welcomes the recognition of the Shoreham Port Masterplan in the City Plan.

The draft City Plan states, 'with the exception of the existing Power Station, and the Waste Water Treatment Plant, non-port operations will not be permitted in the [South Quayside]'. Should the proposed Edgeley Green bio-mass power station also be included?

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Wording has been amended to show that it is only uses requiring a port location that will be permitted in this location. The proposed Edgeley Green bio-mass power station (although in Adur District) if permitted would accord with this policy by making use of materials imported by sea.
Customer No: 224  Customer Name: Maritime Atlantic Limited
Rep Number: 3  Page/Para: /  Policy: DA8 - Shoreham Harbour

Further Details:
The aims of the plan to maximise the potential of Shoreham Harbour through a long term regeneration strategy is supported. We also support the proposed delivery mechanism which seeks to provide a series of appropriate located mixed use developments including new housing, employment space and leisure opportunities. The identification of Shoreham Harbour including land within the Aldrington Basin Character Area as a broad location for future development (DA8 - Shoreham Harbour) is also supported.

It is noted that the Development Capacity Assessment has identified DA8 has the capacity to accommodate 400 new residential units within the city area of DA8 together with 7500sq m of net additional employment floor space. It is also noted that the plan on page 72 identifies no strategic residential led site within the DA8 boundary. Therefore it can be deduced that the provision of new residential units as envisaged in the city plan is to be achieved by the allocation of smaller sites within the development area for either wholly residential redevelopment or residential led mixed use schemes.

There are a number of sites to the south of Basin Road North which have a waterfront to the Aldrington Basin. This area has been identified in the adopted Shoreham Port Master Plan for as Non-Port Operational Business and Leisure and referred to in this plan as a development opportunity.

The Port Master Plan has been subject to public consultation and endorsed by the city council. Therefore its provisions form a credible foundation on which to build the regeneration of Shoreham Harbour through the city plan. It is also noted that this is the only area within DA8 which is identified as a development opportunity in the Port Master Plan within the City boundary. The local priorities to achieve the strategy for DA8 is set out in Section B of DA8. In respect of ii) Aldrington Basin. The area priorities are generally supported subject to the determination of the outcome of a future development brief that forms part of the JAAP. In particular we support the area priorities to accommodate and maximise the intensification and redevelopment opportunities of existing lower grade, vacant and under used spaces.

In addition we also support the priority to accommodate carefully located residential developments as part of mixed use redevelopment schemes. The sites referred to previously in this support statement ie those to the south of Basin Road North fronting Aldrington Basin are ideally located to accommodate development to achieve the Aldrington Basin Area priorities as set out in the city plan.

Statement of Changes:

Any Other Comment:

Officer Response:
Support for policy welcomed.
Further Details:
Mackley’s Wharf, Aldrington Basin Road North
Hopegar Properties Ltd own Mackley’s Wharf, between the Port access road Basin Road North and in Aldrington Basin. Their total site area is approximately 5,300m² with a factory (1050m²) on the north (against the road), to the south the wharf itself (2,800m²) and between them ancillary open storage (1,080m²). Access is on the western side of the site (350m²)

Clearly this is a substantial landholding and constitutes a significant interest in the Port and surroundings

Consent was granted in 2002 for B2 use of the factory for 10 years (BH/2002/01978) and this was renewed in September 2010 to extend the expiry date to 30/9/2015 (BH2010/02484)

My clients interest in the City Plan proposals is in their longer term implications, and based on awareness of the Port of Shoreham Masterplan which envisions significant change in Aldrington Basin.

Plans for the Port remain formative and have not progressed as originally expected. Nevertheless and importantly the Masterplan has the overall aim of regenerating the Port and as part of that, indicates that the preferred option for Aldrington Basin will be employment uses with priority to Port Use and Non-Port employment.

The Council intends to produce (with its neighbouring authorities) a Joint Area Action Plan (JAAP) for Shoreham Harbour in 2013. My clients consider that this should be the main focus of future planning policy discussion for the Harbour.

My clients broadly support DA8 and the text at 3.91 which set out the policy for Shoreham Harbour regeneration and its objectives.

My clients also support the Area Priorities for ii) Aldrington Basin which summarise the intentions for the area in which Mackley’s Wharf lies.

They have concerns about other policies in the draft which, in their view, could bring into statutory force provisions restricting (re-) development at Shoreham Harbour prematurely. That would tend to constrain, unhelpfully, the future provisions of the JAAP which, as you know, is due to be published in 2013.

(My clients object to CP3 Employment Land, see the next section. They also object to CP12 Urban Design as at present set out, for the reasons set out for those policies respectively. Therefore you are asked to alter the draft policies to allow the JAAP fuller scope to meet the objectives set out in DA8 and supporting text.)

Statement of Changes:

Any Other Comment:

Officer Response:
Support for DA8 welcomed. However, disagree with the comment that the Joint Area Action Plan should be the main focus of future planning policy discussion for the Harbour. The strategic principles need to be set out in the City Plan with the JAAP concerned with detailed implementation. That said, its is not considered that there is anything in the City Plan that would constrain the JAAP unduly. No changes to policy proposed.
Further Details:

I hope the proposed Shoreham Harbour plan will respect the style of the current architecture in the area surrounding Aldrington basin area.

3. Improved public transport facilities are to be welcomed. I suggested that part of the land used in the Shoreham harbour project should be set aside for a park and ride area, with a ground level bus station and car-park built above it. The route could perhaps link Portscliffe, Hove and Brighton stations, with extra stops in Western and London Roads during shop hours, and finish at the existing park and ride at Withdean. Why not allow the bus drivers to select from a number of agreed routes, depending on traffic? Shopping centre systems could be flexible. For example, if London Road is suffering from congestion, the bus could travel from Brighton station via New England Hill and drop passengers at Preston Circus, rather than Baker Street.

Statement of Changes:

Any Other Comment:

4. There have been a number of Parking consultations recently involving meetings between local residents and council representatives. Why was the same approach not taken with the City Plan which seems a much more important matter? The Plan document is large complicated and scattered with technical jargon. Meetings with residents to explain how proposals would affect their area would have produced a much better informed community.

Officer Response:

The comment concerning respecting the style of the current architecture in the area is acknowledged and is dealt with by other policies in the Plan notably CP12.

The City Plan is not pursuing formal Park and Ride through the Plan. In any event there is insufficient land available at Shoreham Harbour to provide a site for Park and Ride.

The Economic Partnership welcomes the recognition of the Shoreham Port Masterplan in the City Plan.

The draft City Plan states, 'with the exception of the existing Power Station, and the Waste Water Treatment Plant, non-port operations will not be permitted in the [South Quayside]'. Should the proposed Edgeley Green bio-mass power station also be included?

Statement of Changes:

Any Other Comment:

Officer Response:

Wording has been amended to show that it is only uses requiring a port location that will be permitted in this location. The proposed Edgeley Green bio-mass power station (although in Adur District) if permitted would accord with this policy by making use of materials imported by sea.
**Customer No:** 140  
**Customer Name:** Jill Sewell  
**Organisation:** Kemp Town Society  
**Rep Number:** 2  
**Page/Para:** /  
**Policy:** SA1 - The Seafront  
**Support Status:** Object  
**Section/Supporting Doc/Annexes**  
Part Three: Development and Special Area policies

**Further Details:**

Context  
Supporting Text 3.99

We feel this section is open to misinterpretation and that while improvement and enhancement within this area are desirable and well protected by the requirement 'to complement the outstanding historic setting and natural landscape value of the seafront', there should be a general prohibition of development south of the Coast Road. We understand that this was recommended as a firm policy by the Conservation Advisory Group of the City.

We would question whether there are any development opportunities, save in areas previously identified, and within the "East of palace Pier to the Marina" section should certainly be limited to the DA2 area and should be required to do nothing to prejudice surrounding conservation areas, their setting, or diminish the use and enjoyment of the beach.

**Statement of Changes:**

Any Other Comment:

Officer Response:

Objections noted and comments welcomed. The last sentence in paragraph 3.102 has been amended to reflect concerns regarding development south of the the A259. The development proposals related to the Seafront are set out in the supporting text at paragraph 3.102.

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**Further Details:**

We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

**Statement of Changes:**

Any Other Comment:

Officer Response:

Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
### Further Details:

We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

### Statement of Changes:

Any Other Comment:

Officer Response:

SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.

### Further Details:

We wish to object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. We support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

### Statement of Changes:

Any Other Comment:

Officer Response:

Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
Further Details:

We want you to note our objection to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we wholeheartedly support the detailed objections to Policy SA1 and Policy CP12’s supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.

Further Details:

We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12’s supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
We support the detailed objection to Policy DA8 which has been submitted by the Kingsway and West Hove Residents Association (KAWHRA), and their proposed additional wording to policy DA8 subsection B ii) Aldrington Basin - Area Priorities as follows:

F) TO RESPECT AND COMPLEMENT THE DISTINCTIVE CHARACTER AND AMENITY OF THE EXISTING RESIDENTIAL AND RECREATIONAL AREAS ADJOINING THE NORTH, SOUTH AND EAST SIDES OF ALDRINGTON BASIN.

I object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove.

Therefore I support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.
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<td>Part Three: Development and Special Area policies</td>
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**Further Details:**

Suggested new paragraph to replace existing paragraph on page 79 relating to 'East of Palace Pier to the Marina': We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

I am of the view that this area of Hove was well conceived in the 1920’s-30s to provide pleasant family living. Any increase in population density will negatively impact this suburb. It is also clear to existing residents that local resources such as schools, doctors, dentists etc are under pressure and a further increase in population would exacerbate the problems of parking and traffic volumes.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
Further Details:

1. I object to the proposal to increase the possible building height on Kingsway, especially the area from the start of Hove Lagoon to Boundary Road. Whole some of the buildings to the east of this area have heights that are about the new proposal, houses to the west are mostly standard two storey building and many of the new four floor building are obtrusive and incongruous. This is an area that in future may serve as a fine example of an early twentieth century housing development and could be considered a potential conservation area. It would be sad to see the council repeat the misdeeds of the 1960’s architecture which destroyed much of the city centre and replace it with concrete block or land used as temporary car parks. The proposal also seems to contradict the plan’s comments in paragraph 4.153 “Higher densities may not be achievable in those parts of suburban and village neighbourhoods where existing low density developments contributes to a positive sense of place and community.” I do not understand the point of the objective “To enhance and improve the public realm and create a more coherent townscape through greater consistency of scale, height and roofline along the north side of Kingsway.” Surely one of the charms of the City is the diversity of its neighbourhoods. The idea of a standardised Kingsway of six storey building is repugnant. There also appears to be very little scope for building of increase height to be built without demolishing good quality existing houses and replacing them with greater density of flats. This surely is retrograde step offering the new residents more cramped and less attractive housing. The probable costs of planning objections and appeals from existing residents should also be considered. I hope the proposed Shoreham Harbour plan will respect the style of the current architecture in the area surrounding Aldrington basin area.

Statement of Changes:

Any Other Comment:

4. There have been a number of Parking consultations recently involving meetings between local residents and council representatives. Why was the same approach not taken with the City Plan which seems a much more important matter? The Plan document is large complicated and scattered with technical jargon. Meetings with residents to explain how proposals would affect their area would have produced a much better informed community.

Officer Response:

Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.

Your comments regarding consultation on the City Plan are noted and we appreciate your concerns. There have been a number of previous consultations on the City Plan (formerly called the Core Strategy) and there will be a final consultation on the City Plan in February-March 2013. As with previous consultation we publicised details of the City Plan consultation through various means including press releases and made the document available at local libraries and council customer service centres as well as online. It would not be possible to notify all residents in the city on the City Plan but we did contact over 700 consultees including amenity and residents groups on our consultation database. We do try to ensure that technical jargon is kept to a minimum and where used explain this and provide a glossary of terms. A quick guide to the City Plan was produced as we appreciated it is a large document.
### Customer No: 21  Customer Name: H Marbach  
**Organisation:**  
**Support Status:** Object  
**Rep Number:** 1  **Page/Para:** /  
**Policy:** SA1 - The Seafront  
**Section/Supporting Doc/Annexes** Part Three: Development and Special Area policies  

**Further Details:**
I object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore I support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.  

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.

### Customer No: 221  Customer Name: Mr Roger Lightbown  
**Organisation:**  
**Support Status:** Object  
**Rep Number:** 3  **Page/Para:** /  
**Policy:** SA1 - The Seafront  
**Section/Supporting Doc/Annexes** Part Three: Development and Special Area policies  

**Further Details:**
I object to the fact that there is no recognition of the recreation use of the the West Pier area for surfing, and that the policy does not recognise the local and regional importance of surfing. Surfing should be protected and improved as part of any redevelopments. Specifically, there are very few surf spots on the south coast of England which could be considered to offer a good quality wave, and the West Pier area is one of those and has been recognised as such for around 50 years. This fact should be supported and seen as an opportunity for development. If this use is not recognised at this stage, then there will be no protection of this valuable local activity during future development of the area.  

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**
Your objection is noted. However it is considered that recognition of the recreational use of the West Pier area for surfing would be more appropriately addressed in the council's emerging Seafront Strategy (due to be adopted Spring 2013), rather than in Policy SA1.
Customer No: 155  Customer Name: Mr and Mrs M L Holbrook
Organisation:  
Rep Number: 1  Page/Para:  
Policy: SA1 - The Seafront
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies
Support Status: Object

Further Details:
Object to the idea of our nice neighbourhood of mainly 2 storey houses overshadowed by tall buildings on either side of the Kingsway.

Other towns and cities are normally consisting of ordinary sized houses when you drive into them.

Tall and ugly buildings don't enhance anything and spoil the landscape for those unfortunate to live in their site and shadow.

Brighton in the past has allowed some very ugly buildings (tall) to be built amongst the lovely older buildings.

Statement of Changes:

Any Other Comment:

Officer Response:

Objection noted and comments welcomed. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
Further Details:

Further to the recent publicity and invitation to make comments on the draft Local Development Plan, I would like to make the following with regards to one specific item, the redevelopment of the King Alfred leisure centre.

The proposals include a new development of 400 residential properties. I do not think that the site is strategically well placed enough for the local infrastructure (roads) to cope with this increase in resident numbers. Sackville Rd being the main artery to the site is already very busy at peak and other times.

I am also very concerned with what the proposals may bring in terms of heights of any new buildings. The LDP states (in section) SA1 p.77:

“Proposals should support the year-round sport, leisure and cultural role of the seafront for residents and visitors whilst complementing its outstanding historic and natural landscape value“.

With regards to the second part of the sentence, it is imperative that any new buildings are no higher than the existing buildings that are currently opposite the site. By allowing any high rise buildings this would certainly impact on the current landscape value and not be in keeping with such an important area of Brighton and Hove.

Statement of Changes:

Any Other Comment:

Officer Response:

The proposals for the King Alfred/RNR site reflects the adopted Local Plan policy for the site that considered and indicative figures of 200-400 units would be appropriate for the site.

Part d) of the allocation requires that the development provide for sustainable means of transport to and from the site.

The site is located within a tall building corridor as identified in CP12 Urban Design where potential for taller buildings has been identified. CP12 sets out the policy framework for assessing tall building proposals. Which states that all new development must respect the diverse character and urban grain of the city’s identified neighbourhoods. Further SA1.C.1a) sets out that development will be expected to achieve a high quality of design and sustainability which preserves and where possible enhances the setting for the 3 adjacent Conservation Areas, adjacent Listed Buildings, the character of the seafront and strategic views.
<table>
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<tr>
<th>Customer No:</th>
<th>129</th>
<th>Customer Name:</th>
<th>Michael Johnson</th>
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<tr>
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<td>Page/Para:</td>
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<td>Section/Supporting Doc/Annexes</td>
<td>Part Three: Development and Special Area policies</td>
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<td>Policy:</td>
<td>SA1 - The Seafront</td>
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**Further Details:**

Smarten up run down areas such as London Rd and Lewes Rd, areas around Hove station and Sackville Road. The old Sackville hotel site as a vacant site should be allowed to develop a contemporary design and not a pastiche design of the Sackville Gardens conservation area, and this should be the same on vacant sites throughout the city’s conservation areas.

More energy efficiency schemes using the power of the tides and intelligent attractive lighting particularly along the seafront nice led floor lighting would help stop trouble spots and would give drivers a better view of pedestrians. less harsh street lighting. More appropriate street and seafront planting.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Objection and comments noted.

An emerging Seafront Strategy is being prepared by the Council for consultation in early 2013. This will address issues of appropriate lighting along the seafront.

Supporting text at 3.106 does refer to the potential for small scale renewable energy provision along the seafront. The council considers greater potential exists to prioritise opportunities for land based renewables through the City Plan.

SA1 The Seafront supports enhanced biodiversity along the seafront which would include appropriate planting.

<table>
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<tr>
<th>Customer No:</th>
<th>74</th>
<th>Customer Name:</th>
<th>Peter and Brenda Reeves</th>
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<td>Policy:</td>
<td>SA1 - The Seafront</td>
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**Further Details:**

We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12’s supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
<table>
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<tr>
<th>Customer No:</th>
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<th>Customer Name:</th>
<th>Mr Andrew Coleman</th>
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<td>Part Three: Development and Special Area policies</td>
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**Support Status:** Object

**Further Details:**
The West Pier is of local significance as a surf 'break'. It was one of the first places surfed in Brighton and retains its value, despite being affected by the removal of a section that has made longshore drift worse.

**Statement of Changes:**
Value of West Pier for surfing should be protected and enhanced as part of any redevelopment.

**Any Other Comment:**

**Officer Response:**
Your objection is noted. However it is considered that recognition of the value of the West Pier area for surfing would be more appropriately addressed in the council's emerging Seafront Strategy (due to be adopted Spring 2013), rather than in Policy SA1.
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<tr>
<th>Customer No: 172</th>
<th>Customer Name: Richard J Taylor</th>
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<tr>
<td>Organisation:</td>
<td>Support Status: Object</td>
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<td>Rep Number: 6</td>
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<td>Page/Para:</td>
<td>Section/SUPPORTING Doc/Annexes</td>
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<tr>
<td>Part Three: Development and Special Area policies</td>
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**Further Details:**

I am NOT in agreement for major housing development at Toads Hole Valley, Brighton Marina, the Seafront and New England Quarter.

I gather you hope to plan for over 11,300 new homes over the next few years.

1. How are you going to supply water for all these homes. We already do not have enough water to supply the area with the present population. We will have continual drought restrictions if you go ahead with these proposals.

2. The city is congested at the moment. With another say 25,000 population and additional cars, the city will become even more congested.

3. I know a number of people from surrounding areas are not shopping or visiting Brighton any more because of high parking charges and congestion on the roads.

4. People like and come to Brighton because it is not overcrowded at the moment, but will be if you plan to build another 11,000 homes.

5. Why do you have to plan to increase in size all the time. Big is not always beautiful, as we have seen with the banks. Stand up to the government and say you only want limited new housing development. Do not let them dictate how many new homes should be built. We are already one of the most densely populated countries in Europe. Enough is enough.

6. Why are you not planning for a park and ride facility on the outskirts of brighton. What about the football stadium with existing car parking spaces unused in the week, and most Saturdays and Sundays.

7. If Brighton becomes to large it will loose a lot of its appeal, and become another urban sprawl.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Objection and comments noted.

The City Plan must address how it will be meet its identified housing needs of 16,000 new homes over the Plan period. The City Plan recognises that it is not possible due to the physically constraints of the city to meet its full housing need alongside the need to meet other land requirements (for health, education facilities, employment sites etc.) and the need to respect the historic built and natural environment of the city.

The City Plan 11,300 housing target is considered to be a realistic local housing target based on the capacity exercise undertaken of potential housing sites (Strategic Housing Land Availability Assessment). The City Plan recognises a key challenge to the city is water resource consumption. The City Plan sets out in CP8 Sustainable Buildings requirements for new developments to meet high water efficiency standards and incorporate facilities to recycle, harvest and conserve water resources.

The City Plan sets out in CP9 Sustainable Transport, how traffic congestion will be addressed including provisions for informal park and ride.
Customer No: 46   Customer Name: Mrs A Ginnings
Organisation:   Support Status: Object
Rep Number: 1   Page/Para: /   Policy: SA1 - The Seafront
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
OBJECTION. I do not agree with the suggestion that there should be buildings of six or more storeys on the north side of the Kingsway in West Hove. I therefore support the detailed objections to Policy SA1 and Policy CP12’s supporting text paragraph 4.134, which have been submitted by the Kingsway and West Hove Residents Association.

Statement of Changes:
I also support KWHRA’S proposed amendments.

Any Other Comment:

Officer Response:
Objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.

Customer No: 233   Customer Name: Colette Blackett
Organisation: Adur and Worthing Councils   Support Status: Partly Object
Rep Number: 10   Page/Para: /   Policy: SA1 - The Seafront
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
Waste Water Treatment
As you are aware, the capacity of the current waste water treatments works at Shoreham Harbour is limited and any enhancement/expansion needs will need to be addressed in the joint Area Action Plan for this site. The works serve Shoreham as well as the western parts of the City. The approximate limit is for a further 4000 dwellings and there is also a biological limit in terms of future population. This is an infrastructure constraint which needs to be taken into account and may impact on the timing of delivery of key developments not only in Shoreham but also in the western parts of the City. This may impact on the proposed development area of Toads Hole Valley if this is within the catchment area.
(Officer note: these representations allotted to SA1, CP7, DA8, DA7 and Annex 2 ‘Infrastructure Delivery Plan’

Statement of Changes:

Any Other Comment:

Officer Response:
Comments noted. The policy has been amended at SA1.c.1 to include a new criterion (d) that highlights that the development must connect to the sewerage system off-site at the nearest point of adequate capacity to accord with Southern Water’s representation.
Southern Water has assessed the sewerage system in the vicinity of this strategic site (please see spreadsheet submitted). The results show that the existing capacity is insufficient to accommodate the anticipated demand.

The development will therefore need to provide the local infrastructure required to connect to the sewerage system at the nearest point of adequate capacity. The location of this point will need to be determined when the development comes forward.

Ofwat, the water industry's economic regulator, takes the view that the local infrastructure required to serve new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increased general charges.

Connection off-site is the mechanism by which developers can provide the local infrastructure required to service their sites. However, Southern Water has limited powers to enforce such connection. We therefore look to the planning authority to support this approach in planning policies.

It is important to give early warning to prospective developers regarding the need to connect off-site, as it will add to the cost of the development. Early warning will facilitate delivery of the necessary infrastructure. If the infrastructure is not delivered the sewers will become overloaded, leading to foul water flooding and pollution of the environment.

We therefore propose an additional bullet point in policy SA1.C.1 to recognise the need for local sewerage infrastructure.

Statement of Changes:

We propose the following text is included in policy SA1.C.1 to recognise the requirement for adequate utility infrastructure to serve the proposed development:
e) The development must connect to the sewerage system off-site at the nearest point of adequate capacity.

Any Other Comment:

Officer Response:

Partial Objection noted and comments welcomed. The policy has been amended at SA1.c.1 to include a new criterion (d) that highlights that the development must connect to the sewerage system off-site at the nearest point of adequate capacity to accord with Southern Water's representation.
Further Details:

The scene-setting and contextual paragraphs, and the statements of overall priority, correctly stress the ‘outstanding historic setting and natural landscape value’ of the seafront; and the reference to ensuring maintenance is welcomed. We particularly support the second of the listed priorities under A.

We believe that the sea front is one of the city’s greatest assets. For this reason we strongly recommend that the Plan should indicate an intention not to allow general development on the south side of the seafront roadways between Black Rock and the Hove Lagoon. There may of course need to be some exceptions to this policy. For example on the King Alfred site is already developed and there are proposals for re-development. In other places small scale, low rise development may be permitted to enhance the use of the beach for recreation.

Statement of Changes:

Central Seafront
We question the wisdom, in a long-term city plan, of committing the Council to finding a “solution” for the West Pier. The West Pier site is owned by the Brighton West Pier Trust as a charitable asset for the public good. The Trust has a long history of failure in its attempts to develop the site. This has resulted in local blight.

We believe that the City Plan should recognise that while the public interest may be well served by a new development on the site (such as a new pier), it may equally be served by leaving the site (or part of it, if the i360 is built) undeveloped. The Plan should leave both of these possibilities open.

Any Other Comment:

We approve of the respect for tranquillity west of the Peace Statue, and would like to see the same for aspects of the area between the Palace Pier and Black Rock.

East of Palace Pier
Owing to the beauty and character of the ornamental ironwork, we would want:
a. to avoid, in a “public art strategy” for Madeira Drive, a perpetuation of the low standard of some precedents in this area, and
b. to seek public consultation on the strategy and on individual items of art.

We recommend demolition of the worst of the Aquarium development and major restoration of the former listed terraces; and we recommend endeavours to fund an extension of the iconic line of lamp-standards beyond Peter Pan to Black Rock.

Officer Response:

Partial Objection noted.

The last sentence in paragraph 3.102 has been amended to reflect concerns regarding development south of the A259. The development proposals related to the Seafront are set out in the supporting text at paragraph 3.102.

Comments noted regarded future proposals for the West Pier, minor amendments have been made to that particular bullet point in the policy. Technically West Pier is still considered by English Heritage to be a building at risk and therefore the council is required to give consideration to any future proposals for the Pier.

Comments noted regarding tranquility issues east of Palace Pier. However considering the priority for Madeira Drive reflected in the first bullet point, the emerging Seafront Strategy objectives for Madeira Drive and and the council’s Outdoor Events Programme of sporting, heritage and cultural events which draw thousands of people to the area, it would be difficult to reconcile the inclusion of tranquility in this section of the policy.

The Seafront Policy sets out the overarching requirements for the on-going maintenance of the Seafront in an integrated and coordinated manner. With regards to the
preservation of listed seafront ironwork, detailed issues and programmes of future maintenance will more appropriately be addressed in the emerging Seafront Strategy the council is preparing and will be consulting on in early 2013.

Whilst the emerging Seafront Strategy will address issues of lighting along the seafront it is not considered appropriate to extend the listed lantern lampposts to Black Rock as there is no historic precedent for this. It is not considered appropriate to include in the policy a detailed reference to alterations to the current Aquarium building.

Customer No: 2  Customer Name: Mr Alan Randall
Organisation: Yellowave  Support Status: Partly Object
Rep Number: 1  Page/Para: 79/
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
Amendment sought to SA1 in respect of section relating to East of Palace Pier to the Marina

Regenerate Madeira Drive by making it a centre for healthy sporting activities; as an open air display of the city’s arts talent; as a celebration of the unique historic features of the area and an area to educate about the environmental fragility of the beach and sea.

These aims will be encouraged by, for example, promoting sporting provision, establishing a sculpture trail and open air arts exhibitions, providing information boards about the historic structures in Madeira Drive and establishing a Volk’s Museum, and erecting information boards about the beach vegetation and environment.

The beach and seafront access will be improved for pedestrians and cyclists by establishing a shared path along the south side of the Volk’s railway from the pier to Black Rock. The aim is to make access between the city centre, pier and Madeira Drive and the marina easier for pedestrians and cyclists.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial objection noted and comments welcomed. Many of the detailed suggestions set out in your comments will be addressed in the Council's emerging Seafront Strategy. These comments have been passed onto the team preparing the Seafront Strategy for consideration.

Customer No: 81  Customer Name: John and Janet Welsh
Organisation:  Support Status: Partly Object
Rep Number: 1  Page/Para: 0/
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
We object to the suggestion that tall buildings of six floors or more would be acceptable on the northern side of Kingsway in West Hove. Therefore we support the detailed objections to Policy SA1 and Policy CP12's supporting text paragraph 4.134 which have been submitted by the Kingsway and West Hove Residents Association, and their proposed amendments.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
Further Details:
We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments are noted. It is considered that Toads Hole Valley is different to the other seven development areas as it is greenfield site. However reference to the policy contributing to delivering the One Planet approach has been added to supporting text.

Further Details:
We believe that a new state-of-the-art leisure centre with both wet and dry facilities should be built on the site of the current King Alfred Leisure Centre which is now past its shelf-life.
- However, the leisure centre should not be so ambitious as to require an unrealistic enabling development, as was the case with the previous Frank Gehry scheme.
- We believe that putting an arbitrary housing target in the policy is not necessary – the size of the enabling should be defined by the cost of the leisure facilities. However, we believe that local residents would probably consider an allocation of 400 homes on the King Alfred site still to be too many.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial objection and comments noted. The proposals for the King Alfred/RNR site reflects the adopted Local Plan policy for the site that considered and indicative figures of 200-400 residential units would be appropriate for the site.
### Customer No: 116  
**Customer Name:** Conservative Group Members (c/o Jonathan Bryant)  
**Organisation:** Brighton and Hove City Council  
**Rep Number:** 14  
**Page/Para:** /  
**Policy:** SA1 - The Seafront  
**Support Status:** Partly Object  
**Section/Supporting Doc/Annexes**: Part Three: Development and Special Area policies

#### Further Details:
Western Seafront – We would like clarification on the statement on page 78 To enhance and improve the public realm and create a more coherent townscape through greater consistency of scale, height and roofline along the north side of Kingsway.”

This statement is ambiguous and could mean ‘coherent’ and ‘consistent’ high rise will be encouraged.

#### Statement of Changes:

#### Any Other Comment:

#### Officer Response:
Object and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.

### Customer No: 240  
**Customer Name:** Graham Towers  
**Organisation:** Conservation Advisory Group  
**Rep Number:** 4  
**Page/Para:** /  
**Policy:** SA1 - The Seafront  
**Support Status:** Partly Object  
**Section/Supporting Doc/Annexes**: Part Three: Development and Special Area policies

#### Further Details:
Generally we believe there should be a presumption against development south of the coastal way from Black Rock to Hove Lagoon with the exception of the development areas already identified e.g. King Alfred.

SA1 B: Western Seafront: Rather than just focussing on scale, height and roofline we wonder whether the plan could not seek to highlight the opportunities for building along the seafront here that reflect the imagery of the prevalent Victorian and Georgian seafront elsewhere in the city. (In other words building on what is regarded as a major national asset)

#### Statement of Changes:

#### Any Other Comment:

#### Officer Response:
Comments noted. The last sentence in paragraph 3.102 has been amended to reflect concerns regarding development south of the A259. The development proposals related to the Seafront are set out in the supporting text at paragraph 3.102.
SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
Further Details:

We object to tall buildings along the North side of Kingsway, West Hove. It would totally ruin the current 'open plan' of normal residential houses, mixed with one or two buildings of varying, low heights. Low being up to about 10 metres maximum. High buildings along the North side of the Kingsway will also limit sunlight/daylight to those houses immediately behind these buildings. Obviously, with the increased number of residents, car parking will be drastically affected, even though some form of parking may well be planned for within the developments. You cannot prevent people from owning cars and this will put extra pressure on the surrounding streets.

Apart from the parking problem, the increased number of residents will put strain on the local amenities. With the plans for the future for residential housing/mixed use within the Aldrington Basin, (North side), the 'new' local population will explode, as will traffic, in an area which can never support such expansion, and will certainly be to the detriment of local residents.

It would be a bonus if some of these planners/architects put themselves in the position of the people whose lives are blighted by their planning/developments!

Under the circumstances we support the detailed objections to Policy SA1 and Policy CP12's supporting text para 4.134 which have been submitted by The Kingsway and West Hove Residents Association, and their proposed amendments.

Statement of Changes:

Any Other Comment:

Officer Response:

Partial objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
Further Details:

Policy SA1 derives from high level statements in earlier planning documents that have caused demonstrable problems in this area in recent years, and which now need clarification in the city plan in order to avoid further problems in future.

OBJECTIONS IN PRINCIPLE

1. We object strongly to the implications in this pair of policies that taller development could be appropriate for the north side of Kingsway anywhere between Welbeck Road and Boundary Road. Over the eight years since the Tall Buildings Study SPGBH15 was produced it has become clear through the planning application and the appeal process that tall buildings on Kingsway in West Hove would be out of place and damaging to residential amenity and the area’s domestic character. Redevelopment has been limited to four storeys. The City Plan now provides the appropriate opportunity to provide clarity and certainty by removing the strategic implication that taller development on this part of Kingsway in West Hove could be acceptable.

2. In outline our three reasons for saying this are:
   a) In this area the neighbourhood that lies between Kingsway and New Church Road overall comprises two storey houses. Such homes and gardens would be seriously overshadowed by the construction of taller buildings to their south. Hitherto the council and the Inspectorate have recognized this damage and have refused permission for several tall developments on Kingsway in this area for this reason. There now can be no justification for encouraging development in future that would have such demonstrably damaging and unsustainable effects on daylight and sunlight to adjacent homes. The implications in these policies therefore would be inconsistent with the plan’s overall aims for improving the sustainability of existing development.
   b) Kingsway in West Hove is an integral part of a very pleasant 1920s Hove garden suburb. Such taller development would seriously damage the distinctive character and amenity of this well-loved neighbourhood. This has been recognised by the council and the Inspectorate. The implications in these policies in the city plan therefore would be inconsistent with the plan’s overall strategy for safeguarding the distinctive sense of place in the individual parts of the city.
   c) The policy would be undeliverable because all the large pre-war workshop/showroom sites on Kingsway have now been redeveloped. Adequate sites for taller buildings could only be created by assembling and demolishing a number of small private house sites. The quality and condition of houses in the area is such that this would be very unlikely to happen by 2030. However the existence of this undeliverable policy potentially would create concern and uncertainty for residents. Also, it would continue to misguide developers about the area’s potential.

Each of these reasons is explained further below.

POLICY WOULD PROMOTE DAMAGING AND UNSUSTAINABLE DEVELOPMENT:

3. To the west of Welbeck Avenue the northern side of Kingsway comprises the southern edge of an area of predominantly two storey houses built in the 1920s and 30s as part of a planned garden suburb of Hove. The maritime location, the southwards street vistas, and the overall low heights of the buildings was designed to create a very light and sunny neighbourhood which still provides a high quality of life in its streets, its homes and their gardens.

4. For many years the Council and the Inspectorate has safeguarded this by ensuring redevelopment of former several extensive pre-war garage workshop sites on the north side of Kingsway did not seriously overshadow homes to their north. Saxon Court was developed on one such site in the 1990s and is now a block of four storey flats.

5. Proposals to develop another nearby garage site, Caffyns, with a six storey block of flats were rejected by the council in 2006. An appeal was dismissed by an Inspector, also in 2006, on the grounds of the proposal being out of scale and overshadowing homes to its north. (Appeal Ref: APP/Q1445/A/06/1198243 Land at 331 Kingsway). The Inspector found that 'Even though the overshadowing would occur at times when the gardens would not normally be used for recreational purposes, they would remain in shadow for a significant part of the winter season and result in dull and gloomy areas when viewed either from within the dwellings or in terms of any limited use'. This was a factor which was considered 'would detract from the standard of residential amenity that occupiers of these neighbouring properties can expect to enjoy in this particular location'. A four storey block was subsequently approved by the council and is now under construction.
6. Also, in 2012 the council refused an application to build five storey blocks of flats in this area on the south side of Kingsway. One of the reasons being that for 11 weeks in winter their shadows would extend across the road and overshadow the houses on the north side.

7. Therefore the evaluation of all these past proposals has clearly demonstrated that tall buildings anywhere on this part of Kingsway would seriously damage residential amenity of domestic scale homes, gardens and streets to their north by depriving them of daylight and sunlight, especially in winter when they would be overshadowed for much of the day. Not only would this be dreary and depressing but also would reduce the high levels of natural light and heat enjoyed in existing houses for the past 80 years.

8. National planning guidance has recognised siting tall buildings south of lower houses has been recognised as unsustainable development. Siting tall development on the north side of Kingsway, west of Welbeck Avenue, therefore would not be sustainable development because it would inevitably reduce the sustainability of existing houses.

POLICY WOULD DESTROY THE DISTINCTIVE SENSE OF PLACE OF THIS PART OF THE CITY

9. The area of west Hove between Kingsway and New Church road is a distinctive neighbourhood which was developed in the 1920s and 30s as a garden suburb that linked the grander Edwardian streets in Hove to the more modest Edwardian homes east of Boundary Road. The garden suburb included building attractive two storey semi-detached houses set out along a grid of tree-lined streets leading down to the seafront/harbour’s edge at Kingsway. It was developed in conjunction with the creation of Hove Lagoon and the western esplanade, and the provision of a Kingsway neighbourhood parade of shops, a pub, and car garages/showrooms.

10. The light sunny maritime character of this area derives from its scale, layout and location. The houses on the north side of Kingsway are an integral part of these, and tall buildings there would destroy the area’s character in the southwards outlook from homes, gardens and streets in the neighbourhood. For example in the Caffyns site appeal the Inspector said that a six storey block on Kingsway would loom large and appear overbearing in neighbours’ views from the existing modest sized gardens.

11. The area’s distinctive character is highly prized by its residents, and it has been popular as a place to live since it was built 80 years ago. At the time a large part of the area was described as the ‘West Hove Garden Estate...laid out on Garden City lines to provide ample light and air’. Now, at a time when the qualities of Garden Cities are being recognized once again as a model for development, it would be inappropriate to damage the character of this garden suburb of west Hove.

12. We cannot see any rationale for taller buildings on the north side of Kingsway in this part of west Hove as a contribution to the ‘greater consistency of scale, height and roofline along the north side of Kingsway’ in policy SA1. The policy could be interpreted as promoting a wall of tall development from central Hove to Boundary Road, regardless of the context of the adjoining development, as happened in the Caffyns appeal in relation to the similar statement in SPGBH15.

13. It is our view that the scale on the seafront should reflect and respect its adjacent context. Moving westwards from the centre the scale of development in Hove south of Church Road/New Church Road reduces from urban to suburban. We believe that the scale of development on Kingsway should reflect this and any future development at it western end should in terms of City Plan policy CP12 be ‘required to establish a strong sense of place by responding to the diverse character and urban grain’ of this neighbourhood by respecting its scale’. This would preclude development of six storeys or more in this area and maintain the consistency of roofline in this neighbourhood.

POLICY WOULD BE UNDELIVERABLE AND WOULD CREATE UNCERTAINTY

14. The three large pre-war garage/workshop/car showroom sites on this part of the north side of Kingsway have been redeveloped with four storey blocks of flats (Saxon Court, the Caffyns site, and Harbour Lodge). Apart from the modern filling station/convenience store site the remainder of the property on this part of Kingsway now comprises individually owned houses on small plots.

15. The houses are sound and well maintained and by 2030 they will be barely 100 years old. Houses in the area have been popular since they were built, and there is every reason to believe that they will remain so. They are individually owned and groups of these properties would need to be acquired to assemble sites of suitable depth and width to enable a satisfactory layout for tall buildings on the north side of Kingsway. The practical and financial implications of such land assembly in this area suggest that it is not realistic to expect this to be realistically feasible.

16. The Caffyns site appeal showed that the inclusion of this end of Kingsway as corridor suitable for taller buildings in the 2004 Tall Buildings study SPGBH15 promoted damaging development proposals. Despite being realistically undeliverable in future, the continued existence of a policy supporting tall buildings on the north side of this part of Kingsway would create uncertainty amongst residents about the risk of future development proposals that would damage their local amenity. Likewise the existence of the
17. The SPGBH15 clearly states not all sites within a corridor will necessarily suit a tall building. It goes on to say that, in assessing whether such a scheme would be acceptable regard should be paid to: the area's existing built form, massing; the requirement to respond positively to surrounding building heights and street frontages; the need to provide a building which is of a compatible scale and building alignment with its surroundings; and to ensure that the qualities of the immediate location and setting are enhanced. Events since 2004 show that NO part of the end of the corridor, in west Hove is suitable for taller buildings.

18. Therefore in the interests of certainty for residents and for developers there should be no reference to the possibility of taller buildings being built on the north side of Kingsway, west of Welbeck Avenue. In the light of the refining of the vision of the Kingsway corridor that was contained in 2004 in SPGBH15 by the subsequent planning process we now believe that it is indefensible to retain this threat in the City Plan Part One strategy, and that these strategic policies need to be appropriately amended.

19. We therefore consider that, to remove the damaging suggestion that tall buildings might be acceptable in the westernmost part of the north side of Kingsway, both Policy SA1 and CP12’s supporting text paragraph 4.134 should be amended by addition of the words IN CAPITALS as below.ale and townscape.

Statement of Changes:
Proposed amendment to Policy SA1 - The Seafront
The council will... (etc)
B: Priorities for specific parts of the seafront are:

Western Seafront (Medina Terrace to Boundary Road/Station Road)
To enhance and improve the public realm and create a more coherent townscape through greater consistency of scale, height and roofline along the north side of Kingsway, PROVIDING IT RESPECTS ITS ADJOINING CONTEXT (SEE ALSO POLICY CP12).

Any Other Comment:
These comments and suggestions have been circulated by email to members of the Kingsway and West Hove Residents Association and have been given strong support by local residents, with no opposition.

Officer Response:
Partial objection and comments noted. SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
Further Details:

SA1 The seafront: We would suggest that in A reference is also made to better access to the water. In point A, bullet point 2 we would suggest that the words ..‘and public art.’ are added.

We welcome the proposal for better public transport along the seafront; In para 3.110 we wonder if there have been any explorations of using heat pumps in connection with the stormwater drain or Peacehaven sewage works. We believe that substantial heat can be recovered from such installations as demonstrated in Stockholm— and this may become a part of the city’s renewable energy infrastructure.

Generally we believe there should be a presumption against development south of the coastal way from Black Rock to Hove Lagoon with the exception of the development areas already identified (eg King Alfred). We also believe that Hove lawns merit a special mention as one of the outstanding features along the seafront and that their good maintenance is an essential requirement.

16. SAB: Western Seafront: Rather than just focussing on scale, height and roofline we wonder whether the plan could not seek to highlight the opportunities for building along the seafront here that reflect the imagery of the prevalent Victorian and Georgian seafront elsewhere in the city. (In other words building on what is regarded as a major national asset)

Statement of Changes:

Any Other Comment:

Officer Response:

Partial support and comments noted.

Comments noted regarding access to water, however it is considered that access to the beach and shoreline is sufficient.

Reference to Public Art has been included within bullet point 2 under section A Priorities.

Amendments to the policy have been made to reflect the recommendations of the Energy Study 2012.

The last sentence in paragraph 3.102 has been amended to reflect concerns regarding development south of the A259. The development proposals related to the Seafront are set out in the supporting text at paragraph 3.102.

Hove Lawns has been included as requested.

SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.
Further Details:
Support the importance of respect for tranquility in parts of the seafront

Statement of Changes:
We request that Hove Lawns are identified in this section, because of the importance of the need for maintenance and a policy regarding use. These are part of the historic seafront and they need special protection.

Any Other Comment:

Officer Response:
Partial Support welcomed and comments noted. The first bullet point under Central Seafront (Medina Terrace to Palace Pier) has been amended to refer to Hove Lawns.

Further Details:
Strengthen the reference to the National Cycle Network in this policy and specifically state that National Cycle Route 2 needs improvement around the King Alfred area and west of Hove Lagoon.

Under the section titled ‘East of the marina’, as well as the conservation interest being conserved and promoted, this should also apply to the geological interest. Should include reference to conserving the setting of the National Park the SDNP boundary extends to the mean low water mark.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial Support Note and comments welcomed. SA1 The Seafront has been amended to include reference to strategic importance of the National Cycle Network and that the council will review and seek to improve areas of the route that are below national standards. Reference has also been made to geological interest in the East of the Marina and to the need to conserve the setting of the National Park.
Further Details:
The King Alfred/RNR site should include a targeted quantum of affordable units within the suggested overall provision of 400 units. Whilst Hyde supports the Council’s aspiration to re-provide an indoor public wet and dry sports facility on the King Alfred/RNR site, we would question whether this is an economically viable, deliverable option in the current financial climate, particularly so if the expectation is that the residential use will be enabling development and a source of project funding.

Statement of Changes:

Any Other Comment:

Officer Response:
Partial Support welcomed and comments noted. CP20 Affordable Housing would apply to this Strategic Allocation and provision of affordable housing would need to accord with the requirements of the policy.
SA1 The Seafront

We fully support the second and fourth of the priorities under A:

We appreciate recent improvements in the level of maintenance of the seafront ironwork, together with the major works on the Madeira Lift; and we welcome the mention in a word, in this section of the plan, of maintenance; but we consider the maintenance to merit more than a mere fleeting mention. We would also like to see a stated acknowledgement and approval of the fact that so much of the seafront ironwork is specifically listed as being of special interest warranting every effort of preservation.

East of Palace Pier

The Central Seafront item in this section of the plan promotes “tranquillity” west of the Peace Statue, and we would like to see the same term applied to the area between the Palace Pier and Black Rock. It should be possible to continue with the occasional traditional types of event associated with Madeira Drive, to construct more and better practical amenities related to the beaches, and to develop low-scale and family-orientated leisure facilities at the Peter Pan site, without damaging the essentially quiet pedestrian nature of Madeira Drive. Hard surfacing over the shingle spoils the grand geometry of the beaches and encourages disruption of open views of the sea. We recommend a general policy against it.

We would like to see the inclusion of a proposal for a continuation on Madeira Drive, extending to Black Rock, of street lighting conforming to the design of the listed lantern lampposts.

Between Marine Parade and Madeira Drive we recommend at least the removal of the corrugated roof and the underlying unit of the current Aquarium development, to enable a major restoration of the former listed terraces.

Statement of Changes:

Any Other Comment:

Officer Response:

Welcome partial support and comments noted.

The Seafront Policy sets out the overarching requirements for the on-going maintenance of the Seafront in an integrated and coordinated manner. With regards to the preservation of listed seafront ironwork, detailed issues and programmes of future maintenance will more appropriately be addressed in the emerging Seafront Strategy the council is preparing and will be consulting on.

Comments noted regarding tranquillity issues east of Palace Pier. However considering the priority for Madeira Drive reflected in the first bullet point, the emerging Seafront Strategy objectives for Madeira Drive and and the council's Outdoor Events Programme of sporting, heritage and cultural events which draw thousands of people to the area, it would be difficult to reconcile the inclusion of tranquillity in this section of the policy.

The supporting text at paragraph 3.106 has been amended to clarify the presumption against hard surfacing of the seafront at or in the vicinity of the sites of city-wide nature conservation importance.

Whilst the emerging Seafront Strategy will address issues of lighting along the seafront it is not considered appropriate to extend the listed lantern lampposts to Black Rock as there is no historic precedent for this. It is not considered appropriate to include in the policy a detailed reference to alterations to the current Aquarium building.
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**Further Details:**

Part C sets out number of planned residential units but does not identify likely delivery of affordable housing.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Partial Support Welcomed and comments noted. CP20 Affordable Housing would apply to this Strategic Allocation and provision of affordable housing would need to accord with the requirements of the policy.
Further Details:

SA1: the Seafront

There is reference to the need for ‘a high quality solution for the West Pier’. We question the assumption that development is required on the West Pier Site. The Trust, which owns it, has been seeking to develop it for several decades without success. The result has been an area of blight on the otherwise re-generated seafront.

We recognise that there is currently optimism that the i360 will be developed, but we feel that the City Plan should make no assumptions about the need to further develop this site, which is currently held as a charitable asset for the public benefit. It could be that the greatest public benefit would result from leaving it undeveloped.

In addition we would like to see an explicit presumption in the Plan against any further development on the south side of the full length of the seafront roadways between Black Rock and Hove Lagoon.

We welcome the commitment to the Saltdean Lido. However, we would suggest that paragraph 3.104 should make mention of the building’s heritage status; without this the plan could possibly be interpreted as allowing for demolition and replacement.

Statement of Changes:

Any Other Comment:

Officer Response:

Comments noted regarded future proposals for the West Pier, minor amendments have been made to that particular bullet point in the policy. Technically West Pier is still considered by English Heritage to be a building at risk and therefore the council is required to give consideration to any future proposals for the Pier.

SA1B Western Seafront has been amended to reflect concerns that development should respect its adjoining context.

Paragraph 3.104 has been amended to refer to the listed building status of Saltdean Lido.
Further Details:

We welcome proposals relating to the Central Seafront including:
* A commitment to high quality architecture and urban design to preserve and enhance the existing historic environment.
* Enhancing the natural environment through nature conservation measures

Statement of Changes:

Landscaping works around the i360 should aim to enhance the existing structures but should create as few new structures as possible that interfere with valued views along the seafront recognising that these unbroken views are a key element in the urban design of the Lower Promenade area. There is no need for structures on the Lower Promenade that rise above ground level on Kings Road.

Once the i360 has been completed there is no need for further so-called ‘regeneration’ of the part of the RSCA that adjoins the beach. We suggest that no more plans for the West Pier be considered. As the ruined pier itself has become a well-loved landmark benign neglect would be quite acceptable and would no doubt enhance the marine biodiversity of the area. The Regency Square area has been blighted by planning uncertainties for decades and we strongly suggest that the time has come to minimise further uncertainties.

Any Other Comment:

Officer Response:

Partial Support welcomed and comments noted. It is considered that the Council's emerging Seafront Strategy should address the detailed consideration of landscaping works/public realm improvements around the Lower Promenade area.

Comments noted regarded future proposals for the West Pier, minor amendments have been made to that particular bullet point in the policy. Technically West Pier is still considered by English Heritage to be a building at risk and therefore the council is required to give consideration to any future proposals for the Pier.
Further Details:

The wording could be amended slightly to make it clear that the redevelopment of the King Alfred site does not necessarily have to ensure the replacement of the sports facilities on-site. This seafront site is not ideal for year-round indoor sports facilities and its exposed location is off-putting to visit in winter.

The provision of sports facilities for Hove off-site should be encouraged albeit the enabling development[s] may be cited at the King Alfred.

With an off-site sports centre, King Alfred could accommodate more than 400 residential units.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted. It is considered that the wording of the Strategic Allocation SA1.c.1 King Alfred/RNR site would not preclude the consideration being given to the replacement of the sports facility off-site in an appropriate location.

Further Details:

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed.
Further Details:

The wording could be amended slightly to make it clear that the redevelopment of the King Alfred site does not necessarily have to ensure the replacement of the sports facilities on-site. This seafront site is not ideal for year-round indoor sports facilities and its exposed location is off-putting to visit in winter.

The provision of sports facilities for Hove off-site should be encouraged albeit the enabling development[s] may be cited at the King Alfred. With an off-site sports centre, King Alfred could accommodate more than 400 residential units.

Statement of Changes:

Any Other Comment:

Officer Response:

Support welcomed and comments noted. It is considered that the wording of the Strategic Allocation SA1.c.1 King Alfred/RNR site would not preclude the consideration being given to the replacement of the sports facility off-site in an appropriate location.
Further Details:

For King Alfred Leisure Centre to be successful, it must be a sustainable scheme with more than one use. Brighton seafront should be as remarkable as other successful seafronts around the world e.g. Malmo, Barcelona, Copenhagen, for which the King Alfred could be used as an exemplary project for seafront development.

Advocate development to come forward as soon as possible which echoes forthcoming City Prospectus, part of which is focussed on BHCC willingness to enter into PPP’s on their sizable portfolio of assets and maximises potential for a geographically constrained but prosperous city.

Support by Centurion Group for King Alfred residential proposal is strong. Support the approach (below) which has been devised in consultation with other parties (Councillors, council officers, King Alfred Leisure Centre Project Panel, Hove Business Association, Brighton & Hove Economic Partnership, Local Strategic Partnership).

Approach must take account of the following:
* KA costs the council over £200,000 to maintain, not including operating costs.
* B&H Indoor Sports Facilities Plan 2012-2022 highlights the need for a replacement facility, potentially off site
* Site is not aesthetically pleasing and does not maximise the value of the site.
* Public pressure to see the site regenerated.

Statement of Changes:

Following approach best to meet the aspirations of policies CP1, CP8, CP17 and CP19.
Considered options release capital receipt for a new build leisure centre and a contribution towards education places (CP17 and CP7).

* Support residential led development for c. 400-450 homes.
* Minimum of 25% affordable housing which will be tenure blind
* Retail and public realm at ground floor level.
* Income from private residential sales help pay for 7,600 sq m leisure facility and part fund a primary school both of which would be in Hove.

Any Other Comment:
* Changes on the seafront are urgent and necessary.
* Other sites such as Black Rock can be incorporated into this development and provide a striking solution to both ends of the city whilst also providing a cohesive strategy for regeneration. This level of coordination will make the city attractive for inward investment

Officer Response:

Support welcome and comments noted. Policy SA1.C specifies the preferred mix of uses for the site. Provision of affordable housing would need to comply with the requirements of CP20 Affordable Housing. The Policy sets out the considerations that would be taken into account in terms of the amount of affordable housing provided. The Strategic Allocation does not preclude the offsite provision of the leisure facility in an appropriate location.
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**Further Details:**

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed.

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**Section/Supporting Doc/Annexes** Part Three: Development and Special Area policies

**Further Details:**

We support the priority for securing improvements to sustainable transport infrastructure along the A259, including a rapid / express bus-based service. This should provide links to other towns along the A259, and link up to East Sussex towns including Peacehaven.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Support welcomed and comments noted.
Further Details:

Draft Policy SA2 Central Brighton seeks 'to reinforce central Brighton's role as the city's vibrant, thriving regional centre for shopping, leisure, tourism, cultural, office and commercial uses'.

Part 3 of the policy states that 'within Central Brighton existing office accommodation will be protected and their refurbishment and upgrade encouraged' before setting out circumstances in which 'proposals that result in the loss of B1a office floorspace will be permitted'. These require applicants to demonstrate both that 'the site is inherently unsuitable for continued B1a office use' and 'that the redevelopment or reuse would make a positive contribution to the vitality and vibrancy of Central Brighton and create employment opportunities'.

Supporting paragraphs 3.118 and 3.119 then provide details of the tests against which such proposals would be subjected. It is noteworthy that no evidence is referred to in the Policy or supporting paragraphs to suggest that not specifically protecting existing B1a office uses in the Central Brighton area would prevent the Council achieving its overall strategic objective of reinforcing Brighton's role as a vibrant, thriving regional centre'. Moreover, the tests against which proposals for a change of use from a B1a Class use might be subjected are unusually detailed for a strategic planning policy and, without justification, set significantly disproportionate expectations in terms of information that existing and prospective landlords and tenants would be expected to provide to the Council (particularly in terms of the length of the period expected for site marketing which would be 18 months or 2 years).

Statement of Changes:

Draft Policy SA2 does not therefore currently meet the tests of soundness as it is not justified.

It is also not consistent with national policy as the National Planning Policy Framework (NPPF) states under paragraph 22 that 'where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities'.

The NPPF does not therefore support blanket protection for Class B1a office uses, as Draft Policy SA2 does. We therefore recommend Part 3 of this policy and supporting paragraphs 3.118 and 3.119 are revisited.

Any Other Comment:

Officer Response:

The National Planning Policy Framework states that local planning authorities should identify and meet development needs for uses including business. The council has carried out an Employment Land Study. The Study confirms that there is a need to secure new floorspace and to protect existing sites in the period up to 2030 in order to address business and employment requirements. The tests set out in policy SA2 support the protection and improvement of existing office sites, whilst allowing for change if reasonable criteria are met. The policy is not unsound in this respect and fully complies with the National Planning Policy Framework.
Encourage a more balanced night time economy away from cheap alcohol establishments and shops to more cultural activities such as London’s theatre land more tailored to older or cultured visitors.

Statement of Changes:

Any Other Comment:

Officer Response:

Policy SA2 seeks to promote a variety of cultural activities, whilst recognising too that the city's pubs, bars and clubs contribute significantly to its vitality and character. The City Plan seeks to achieve an appropriate balance between these activities, rather than prioritising them. The policy does recognise that there are alcohol related issues in the city centre and the council has done much to tackle these in recent years. Policy SA2 will address public safety, crime and alcohol related issues and ensure that uses operate in a complementary way, rather than being in conflict.

Further Details:

Given the significance of Culture and therefore the Cultural quarter to the city's prosperity and future this should be clearly signalled in a policy area title and we would suggest that as the Cultural Quarter includes Valley Gardens that SA3 is called The Cultural Quarter and Valley Gardens.

Statement of Changes:

Alter the geography of the cultural quarter to match that re-drawn under SA3 and include only a brief reference.

Any Other Comment:

Officer Response:

Your comments about the importance of culture to Brighton and Hove are noted and recognised. The 'cultural quarter' is broadly defined in the footnote to policy SA2 on page 84 of the City Plan as "the area centred on Church Street, Jubilee Street, the Royal Pavilion Estate and the Theatres." Policy SA2 seeks enhancement to many aspects of the quarter, including public realm, mix of cultural activities and maintenance of historic buildings. The area includes many uses, such as theatres, that would generally be considered city centre uses. The area covered by policy SA3 does also contain many heritage buildings that form part of the city's cultural assets.

The current policy titles "Central Brighton" and "Valley Gardens" identify geographical locations that would be easily identified by most residents. Overall, it is not felt that there would be significant benefits from changing the boundaries or renaming either policy. Both policies should help to support and encourage cultural and heritage assets within the city.
**Further Details:**
Alter the geography of the cultural quarter to match that described below under comments on SA3 and include only a brief reference here.

**Statement of Changes:**
See comments on SA3

**Any Other Comment:**

**Officer Response:**

Your comments about the importance of culture to Brighton and Hove are noted and recognised. The ‘cultural quarter’ is broadly defined in the footnote to policy SA2 on page 84 of the City Plan as “the area centred on Church Street, Jubilee Street, the Royal Pavilion Estate and the Theatres.” Policy SA2 seeks enhancement to many aspects of the quarter, including public realm, mix of cultural activities and maintenance of historic buildings. The area includes many uses, such as theatres, that would generally be considered city centre uses. The area covered by policy SA3 does also contain many heritage buildings that form part of the city’s cultural assets.

The current policy titles “Central Brighton” and “Valley Gardens” identify geographical locations that would be easily identified by most residents. Overall, it is not felt that there would be significant benefits from changing the boundaries or renaming either policy. Both policies should help to support and encourage cultural and heritage assets within the city.
As ward councillors for the North Laine, we are concerned that a large building on the current City College site or car park may be over-development and highly inappropriate. We totally support local residents' concerns and those of the NLCA (North Laine Community Association) regarding the impact that proposals for an overly large development would have with its immediate proximity to a conservation area. Pelham Tower, as it currently stands, is an imposing structure that dominates the northern skyline from the North Laine, in particular from this historic, Regency period Pelham Square. Should proposals be put forward to build on the car park, we are also very concerned at its proximity to and impact on the surrounding area, particularly Trafalgar Street and Whitecross Buildings, both during construction works and thereafter.

It is stated within the City Plan that City College has planning permission for 300 students. This is not the case. Like the NLCA, we believe that this site is an entirely inappropriate location for a large number of students. The site is immediately adjacent to the North Laine where residents already suffer from the negative impact of Brighton's late night economy. Late night noise and anti-social behaviour continue to have a detrimental impact on residents' quality of life, particularly at weekends. Most of this behaviour is from drinkers walking through the area to get home or to go to another venue in or near to North Laine. It is inevitable that putting a larger number of students just north of North Laine would further adversely affect their quality of life.

While we appreciate there is a need to find or create student accommodation away from residential streets such as Hanover, we do not believe the solution lies in student accommodation blocks in such a central location with its proximity to the narrow residential streets of the North Laine conservation area, and we are concerned that no management plan that might be promised could alleviate the situation.

We note that the application for the former Co-op Building on nearby London Road was refused on the grounds of over-development and the unsuitability of the area for large student numbers, and believe the situation with regard to City College is much the same.

Councillors Lizzie Deane, Ian Davey and Pete West

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments on the redevelopment of City College's Pelham Street site are noted. The views expressed will be considered more fully under policy CP21. However, the City College site is not within the area covered by policy SA2 and is not referred to in the policy or supporting text. No change is therefore proposed to policy SA2 regarding City College.
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**Further Details:**  
We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**  
Your comments are noted and a reference to One Planet Living has been added.

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<th>Customer Name: John McLean</th>
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<td>Section/Supporting Doc/Annexes</td>
<td>Part Three: Development and Special Area policies</td>
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**Further Details:**  
SA2, Central Brighton:  
The definition of the Cultural Quarter must include the Old Town; which is likely to require the greatest level of regeneration and investment in the next 20 years in order to prosper. Central Brighton must have joined-up thinking with infrastructure planning from Gateways (i.e. Brighton Station) and way-finding initiatives to help to open up the Old Town to greater footfall; issues in relation to North Street and the bus congestion need to be addressed as it prohibits footfall from the north at present. Central Brighton (SA2), being the CBD, should have a bold strategy and attitude, attracting high rise, landmark development to come forward.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**  
The Cultural Quarter is a broad term that highlights the primary cultural area of the city, which includes the main theatres, museum and art gallery and the Royal Pavilion. Whilst of considerable historic importance to the city and its development history, Old Town does not have the same concentration of arts and cultural venues. We note and recognise your views that wayfinding initiatives could improve the city centre, including Old Town. Issues of legibility, signage, congestion and accessibility are addressed positively by other City Plan policies and by the Local Transport Plan.

The City Plan sets out a clear strategic vision for central Brighton. A high quality of design and public realm will always be sought. The council's policies on tall buildings are set out in the City Plan and in the adopted Supplementary Planning Guidance note on Tall Buildings.
Further Details:

SA2 Central Brighton
Supporting Text
3.114
The Brighton Centre and Churchill Square development area (DA1) has already been investigated. It is the only major retail site capable of accommodating a significant proportion of the identified need to reinforce Brighton’s position as a regional centre.

Therefore the new Brighton Centre and expansion of Churchill Square referred to in DA1(1) should be referred explicitly as an allocated site to accommodate that need. We suggest the following amended wording
‘... development area (see DA1) is the preferred location to accommodate new comparison floorspace in the City. The precise quantum of retail floorspace will be determined through negotiations with the landowners.’

Statement of Changes:

Any Other Comment:

Officer Response:

The potential for Churchill Square to make a major contribution towards meeting the city’s retail needs to 2030 is recognised in both the policy and the supporting text. Paragraph 3.114 states that new comparison floorspace, potentially including a department store, should be investigated at Churchill Square. The policy also cross refers to policy DA1, which allocates Churchill Square for a minimum 20,000 sq m additional floorspace. It is not considered that further clarification of Churchill Square’s potential is required in policy SA2.

Further Details:

Policy SA2 identifies a strategy to reinforce central Brighton’s role as the city’s vibrant, thriving regional centre for shopping, leisure, tourism, cultural, office and commercial uses. Whilst the National Planning Policy Framework does not include housing as a ‘main town centre use’, residential accommodation can make a significant contribution to the vitality of town centres and can improve the level of public surveillance and the perception of safety in an area. For these reasons, SA2 should be amended to include reference to the provision of residential units and particularly affordable housing.

Statement of Changes:

Any Other Comment:

Officer Response:

The Hyde Group’s comments about the role that residential use, including affordable housing, can play within city centres are noted. Policy SA2 has been amended to make reference to the acceptability of mixed use schemes that incorporate residential uses and to support flats over the shop. The supporting text has similarly been amended.
Further Details:

Royal Mail’s Brighton Delivery Office (DO), Office (OFF) / Industrial (IND), 62 North Road (DO/OFF/IND) is located within the boundary for the ‘Special Area 2 Central Brighton’ area. The site does not fall within the designated prime retail frontage area.

The Central Brighton allocation states that 'mixed use developments will be promoted which retain active ground floor uses and accord with a range of appropriate city centre uses'.

Royal Mail’s Brighton DO/IND/OFF is operational and given the site’s town centre location and surrounding mix of uses, it is our opinion that the Brighton DO/OFF/IND site presents a good opportunity for redevelopment. We note here that Royal Mail promoted the site for alternative uses in September 2010 as part of the Council’s SHLAA.

Statement of Changes:

Royal Mail does not object to the inclusion of their site within the Central Brighton development boundary, however we request that the supporting policy or text to this allocation explicitly states that the re-provision / relocation of Royal Mail’s Brighton DO/OFF/IND operations will be required prior to redevelopment of their site. This will ensure that Royal Mail’s operations will not be prejudiced and they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000.

Furthermore, should Royal Mail’s site be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of their site will need to yield both sufficient value to fund the purchase and fit-out of a new site and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate their operations.

In addition, it would be essential that any new facility is provided prior to the demolition of the existing and / or that suitable temporary accommodation is provided, if necessary, to ensure the continuity of service.

Any Other Comment:

Our requests as detailed in representations on DA6, DA8, SA2 and CP3 accord with the Government’s National Planning Policy Framework (NPPF) (published March 2012) which 'provides a presumption in favour of sustainable development' and from which we consider paragraphs 14, 19-20, 21,35,47, 50, 161 to be of particular relevance.

Further, Royal Mail would welcome the opportunity to meet with the Council to discuss the inclusion of their sites in the emerging Brighton & Hove Draft City Plan Part 2 which we understand will include the Council’s Site Allocations and Detailed Policies:

Hove Delivery Office (DO), 88 Denmark Villas, Hove, BN3 3UG;
Portslade Delivery Office (DO), 39-41 Boundary Road, Brighton, BN41 1AA;
Rottingdean Delivery Office (DO), Nevill Road, Brighton, BN2 7JQ; and
Brighton Delivery Office (DO), Office (OFF) / Industrial (IND), 62 North Road, Brighton, BN1 1AA.
- all of which are strategically important to Royal Mail

Officer Response:

Royal Mail has full control of this site as landowner. The site will only come forward for redevelopment with the agreement of the landowner. Whilst the council accepts the need for the Royal Mail to continue to provide its services, these issues can be fully addressed by the landowner and it is not considered necessary to amend the policy.
Further Details:

Careful consideration should be applied with regard to reinforcing and expanding the City’s role as a thriving regional shopping centre. Shopping habits have changed due to online shopping, which is on the increase.

We support the protection of existing and the provision of new small unit independent retail space and that they should be carefully monitored and maintained. It is imperative that rents and business rates are affordable to support the amendment to protect offices within the Central Brighton Area.

Strengthening the Empty Property Strategy should be encouraged to bring flats above shops back into use.

It is unclear as to how the Council will ‘seek to improve safety by encouraging a more balanced range of complementary evening and night-time economy uses’.

The late night economy costs the city £106.4 million. Alcohol abuse is a cause of physical and mental health, accidents, risks and harm to children and young people and crime and disorder. 9,200 local people are likely to be heavy drinkers. This is a heavy burden for the city to bear. Should Brighton and Hove be encouraging an industry that causes so much harm. There should be a statement in the Plan which acknowledges the harm that alcohol does and that the Council wishes to reduce the dependency of the city on alcohol by encouraging other industries to flourish. The city should do all it can to negate the view that Brighton is Party Town UK.

Statement of Changes:
Remove the word ‘vibrant’ from the plan. It is a euphemism for ‘party town’.

Any Other Comment:
Brighton and Hove has the largest Cumulative Impact Area (CIA) in the country. Binge drinking is not a myth (contrary to what is documented by the Licensees Association). A lot of the problems are due to pre-loading, however, whereby people buy very cheap alcohol from supermarkets and small licensed premises and get drunk (in an hotel) before they go out to pubs and clubs. Unfortunately, this has changed the nature of hotels in the city as many are virtually taken over by young people who come to Brighton to party until late in the night. People who wish to stay in Brighton for a few days or more are forced to pay high prices for a room, or decide not to visit the city at all.

Officer Response:
We note your comments about ongoing changes to shopping habits and the possible implications for retail premises. Regular monitoring of the city's retail areas is carried out. The 2011 Retail Study update did not suggest amendments to the boundaries of the city's shopping areas. However, it is recognised that, on occasion, retail premises become redundant. Proposals for resulting changes of use can be brought forward through existing Local Plan policies. These will be updated by City Plan Part Two in due course. Given the more strategic nature of policy SA2, it is not felt necessary to amend it to reflect this detailed issue.

Your support for independent retailers, flats above shops, protection of offices and pedestrian areas is welcomed. As a result of your comments, the policy has been strengthened by the addition of a reference to creating flats over shops and commercial premises. The planning system cannot though be used to control rents and rates.

Policy SA2 seeks to promote a variety of cultural activities, whilst recognising that the city’s pubs, bars and clubs also contribute significantly to its vitality and character. The City Plan seeks an appropriate balance between these activities, rather than prioritising them. The policy does recognise that there are alcohol related issues in the city centre and the council and its partners have done much to tackle these in recent years, for instance by forming the Cumulative Impact Zone and Special Stress Area. Policy SA2 will address public safety, crime and alcohol related issues and ensure that uses operate in a complementary way, rather than being in conflict.
### Customer No: 147

**Customer Name:**

**Organisation:** The Guinness Partnership

**Rep Number:** 4  
**Policy:** SA2 - Central Brighton

**Support Status:** Partly Support

### Further Details:

For mixed use developments, affordable housing provision should be encouraged and made priority objective.

### Statement of Changes:

### Officer Response:

The Guinness Partnership's comments about the role that housing can play within city centres are noted. Policy SA2 has been amended to make reference to the acceptability of mixed use schemes that incorporate residential uses and to support flats over the shop. The supporting text has similarly been amended.

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### Customer No: 162

**Customer Name:** Duncan Cameron

**Organisation:** Regency Square Area Society

**Rep Number:** 3  
**Policy:** SA2 - Central Brighton

**Support Status:** Partly Support

### Further Details:

We welcome proposals relating to the Central Area that impact upon our area notably those relating to Western Road -

* Described as a secondary retail frontage in which the Council will support proposals to improve and refurbish shop frontages

### Statement of Changes:

We would like to point out the following:

* Part of the South side of Western Road is in the Regency Square Conservation Area and is of great heritage value as a more or less complete example of a late Victorian shopping street. The RSAS urges the council put in place effective measures to restore and improve frontages.

* We would welcome policies aimed at making Western Road a more distinctive and vibrant shopping area.

* Many art deco buildings along the Northern side of Western Road are of great heritage interest yet enjoy no planning protection. As part of the raising of the profile of this part of the Central area we suggest that the council acknowledge the value of this Art Deco Quarter - and cooperate in protecting and enhancing the architectural values of the area.

### Any Other Comment:

### Officer Response:

The Regency Square Area Society's support for improvements to Western Road, in terms of the shopping environment, the historic environment and individual shop frontages, is welcomed. Policy SA2 and other City Plan Part One policies offer support on these issues at a strategic level. Further detail on enhancement of specific areas, such as Western Road, will be considered in preparing City Plan Part 2.

Your specific comments about the heritage value of the art deco buildings are also noted. Any protection, whether for individual buildings or a conservation area, would need to be in place before a policy could be adopted to support it. Existing detailed heritage policies are within the Brighton and Hove Local Plan and these will be updated in due course by the City Plan Part Two. No change is proposed to policy SA2, but the need for further heritage designations in this area will be given careful consideration.
Further Details:

We agree that there could be opportunities to attract new retailers to the city (3.114) but caution should be applied as shopping habits have changed whereby many people buy online and it is expected that numbers will increase.

We support the protection of existing and provision of new small unit independent retail space and that they should be carefully monitored and maintained (3.115).

We support the amendment to protect offices within the Central Brighton Area. It is imperative that rents and business rates are affordable to support this amendment (3.117).

We would encourage any strengthening of the Empty Property Strategy to bring flats above shops back into use.

We support pedestrian precincts in the Old Town.

Statement of Changes:

It is not clear (3.1222) how the Council will seek to improve safety by encouraging a more balanced range of complementary evening and night-time economy uses. Brighton and Hove has the largest Cumulative Impact Area in the country. Binge drinking is not a myth (contrary to what is documented by the Licensees Association) but we acknowledge that the some of the problems are due to pre-loading. Visitors to the city are reluctant to stay in cheaper priced hotels in the city because these hotels have a reputation for customers who are young and book rooms for stag/hen weekends. This problem exacerbates the issues whereby people who want to come and stay for a period of time are either forced to pay high hotel charges or not visit the city at all.

Any Other Comment:

Officer Response:

We note your comments about ongoing changes to shopping habits and the possible implications for retail premises. Regular monitoring of the city's retail areas is carried out and the 2011 Retail Study update did not suggest amendments to the boundaries of the city's shopping areas. However, it is recognised that, on occasion, retail premises become redundant. Proposals for changes of use as a result can be brought forward through existing Local Plan policies. The will be updated by City Plan Part Two in due course. Given the more strategic nature of policy SA2, it is not felt necessary to amend it to reflect this detailed issue.

Your support for flats above shops, protection of offices and for pedestrian areas is welcomed. The policy has been strengthened by the addition of a reference to creating flats over shops and commercial premises. The planning system cannot be used to control rents and rates.

Policy SA2 seeks to promote a variety of cultural activities, whilst recognising that the city’s pubs, bars and clubs also contribute significantly to its vitality and character. The City Plan seeks an appropriate balance between these activities, rather than prioritising them. The policy does recognise that there are alcohol related issues in the city centre and the council and its partners have done much to tackle these in recent years. Policy SA2 will address public safety, crime and alcohol related issues and ensure that uses operate in a complementary way, rather than being in conflict.
The Kingscliffe Society's concerns about changes in the St James's Street shopping area are noted. As the Society states though, St James's Street does not fall within the geographical area covered by policy SA2. The policy does recognise North Street as a sub-area of the regional shopping centre. We also note your comments about short term commercial interests and residential/employment issues.

The planning system has no control over where individual retailers choose to locate or the location of chain stores. Part One of the City Plan sets out an overall strategic vision for development. City Plan Part Two would be the appropriate document to address detailed development management issues affecting the character of particular shopping areas within the city and any conflict between short and long term residential and commercial uses.

We support the council's policy to focus significant new retail development in Brighton Regional Centre (SA2.2)

The boundary of the regional shopping centre should be extended southwards to include Ship Street.

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The boundary of the regional shopping centre should be extended southwards to include Ship Street.
Further Details:
We also support this policy which provides guidance for night-time economy uses.

Theatres are an important community asset, providing jobs, skills, learning and educational opportunities, and offer vital secondary spend to tourism, retail and leisure sectors. The document supports the continued success of these venues and will support new spaces for theatre within community centres and schools throughout the community, as well as in the town centres.

Theatres can be a main town centre use, an element in a town’s evening economy, a heritage asset, a tourist attraction, a business unit, a leisure facility, a cultural component or a community facility. They have been included within all these headings in various local authority LDF planning policy documents over the last seven years and we welcome Brighton’s acknowledgment of their importance to the city.

Statement of Changes:

Any Other Comment:

Officer Response:
Support noted and welcomed
Further Details:

There have been several attempts to define the 'cultural quarter' going back over a decade but none have ever gained official recognition. Perhaps the publication of the City Plan is an opportunity to ascribe clear boundaries to this mythical domain.

In policy SA2 [4] reference should be made to the city centre Cumulative Impact Zone and the Special Stress Areas designed to safeguard against an unwarranted increase in licensed premises.

The use of the term 'reasonable' e.g. [SA2 [3][a] “marketed for B1a office use at a reasonable price and for a reasonable time” has made many lawyers very rich. The Economic Partnership appreciates that the decision to allow the loss of B1a office space must be taken on a case-by-case basis and applauds the wording in the City Plan that promotes considerable flexibility but 'reasonable' is a very grey area.

Our concern is more with the 'reasonable price' than with the 'reasonable time'. Perhaps it would be expedient to make some reference to a reasonable price compared to prevailing market conditions so that an assessment can be based on robust evidence rather than a debate about the definition of 'reasonable'.

SA2 [5] Note later comments [CP4 page 32] about retail frontages in locations that lack sufficient footfall or are already over -subscribed with poorly performing retail units.

Statement of Changes:

Any Other Comment:

Officer Response:

The 'cultural quarter' is broadly defined in the footnote on page 84 as "the area centred on Church Street, Jubilee Street, the Royal Pavilion Estate and the Theatres.” The policy seeks enhancement to many aspects of the quarter, including public realm, mix of cultural activities and maintenance of historic buildings. It is not felt that a more specific boundary would be helpful, as this may actually exclude adjoining parts of the city with cultural interest and, in doing so, could inhibit overall improvements.

The Local Enterprise Partnership's views about licensed premises are noted. Recognising these issues, the policy does seek to address alcohol related problems in the city centre. Reference to the Special Stress Area has now been added to the policy's supporting text, alongside the existing reference to the Cumulative Impact Zone (para. 3.122).

Paragraph 3.118 gives clear guidance on the requirements with regard to marketing of office space. The text states that the marketing price should be "realistic.” It is felt that the wording of this text addresses the Economic Partnership's concerns and no change to the policy is proposed.

The Partnership's view that certain areas may have too many shops that are poorly located or have insufficient footfall is noted. However, the 2011 Retail Study update did not identify a need to change the boundaries of the city's defined shopping areas. Part One of the City Plan sets out an overall strategic vision for development across the city and existing Local Plan policies set out detailed criteria against which proposals involving the loss of a shop unit can be assessed. City Plan Part Two would be the appropriate document to address more detailed development management issues affecting the location of individual shops. No change is therefore proposed to policy SA2.
Further Details:

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Statement of Changes:

Any Other Comment:

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Further Details:

We strongly welcome the plans to create a vibrant open space which references its historic and cultural character. As the original promenading area for Brighton and where the Prince Regent choose to locate his seaside palace, it is essential that all the improvements to the Valley Garden are mindful of their potential visual impacts on the historic Royal Pavilion Estate and are not developed in isolation. In making improvements and creating a park any developments need to ensure that the Royal Pavilion Estate doesn’t become a space for even further anti-social behaviour than it is used for now.

Should our recommendation for the policy area of Valley gardens to include the Cultural Quarter be adopted, then an additional point on the priority of the Royal Pavilion Estate should be added.

1) re-establish the Royal Pavilion Estate as the cultural iconic landmark in the city of Brighton & Hove and the South East
2) Recreate the Royal Pavilion Estate as a world class heritage site - re-unify the Royal Pavilion, the Dome and Corn Exchange with their gardens historic setting.
3) Provide a sense of arrival/orientation to the Royal Pavilion Estate
4) Clarify the Estate as the ‘gateway’ to the rest of the City’s Cultural Quarter
5) Make the gardens a setting for international significant performances which enhance the cultural and heritage experience provided by BDFL & RPM
6) Use design and art to design out anti-social behaviour in the gardens in particularly at night

Statement of Changes:

Any Other Comment:

Officer Response:

It is not considered appropriate to include the Cultural Quarter with the Valley Gardens Special Area. It will remain within SA2 Central Brighton. This is because the Cultural Quarter is a large area which includes a significant number of commercial businesses which sit alongside, and complement, the cultural attractions and it is considered that the success of Cultural Quarter derives from this mix of uses that attracts visitors. It would be inappropriate to split the commercial and retail core of the city between two Special Areas. To include the Cultural Quarter within SA3 would also dilute the focus of this policy, which is on the much-needed improvements to the green spaces and public realm.
Further Details:

We would suggest that this section becomes The Cultural Quarter and Valley Gardens. This would re-draw the map – the Valley Gardens map would need to expand to take in the creative and cultural experience; expanding the boundaries to the east and west. East to include Circus St and the University of Brighton arts faculty buildings and west as far as West St. We would suggest a brief reference to the cultural quarter in Central Brighton and an alignment of the updated geography – but a fuller articulation here to incorporate Valley Gardens.

Statement of Changes:

This re-drawn geography would better represent the hierarchy and importance of the spaces described. Valley Gardens is a green lung running through the centre and length of the Cultural Quarter. The importance of the overall coherence of this area in planning and policy terms is key.

Officer Response:

It is not considered appropriate to include the Cultural Quarter with the Valley Gardens Special Area. It will remain within SA2 Central Brighton. This is because the Cultural Quarter is a large area which includes a significant number of commercial businesses which sit alongside, and complement, the cultural attractions and it is considered that the success of Cultural Quarter derives from this mix of uses that attracts visitors. It would be inappropriate to spilt the commercial and retail core of the city between two Special Areas. To include the Cultural Quarter within SA3 would also dilute the focus of this policy, which is on the much-needed improvements to the green spaces and public realm.
Further Details:

Context, 3.124
We agree that this area is of “unique strategic and topographic significance” to the city.

Overall aims
The first of these, the notion of a new vibrant park, sets a tone that risks both a promotion of visual and aural loudness, and a skewed topography. Landscape and amenities here certainly need enhancement, but noise and gimmickry should be eschewed. The historic aspects of the area would benefit from being promoted fundamentally as a series of ancient fields, throughout which the basic east-west symmetry of the landscape needs to be preserved.

This essential symmetry and rhythm, along with many priceless mature trees, would be destroyed, for example, by the transfer of traffic to one side of the valley landscape, producing an enormous road along that side, with a bottle neck at the Pavilion and at St Peter's.

Statement of Changes:

The green spaces
The first of these, the notion of a new vibrant park, sets a tone that risks both a promotion of noise and garishness and a skewed topography. Landscape and amenities here certainly need enhancement, but noise and gimmickry should be eschewed. Vibrancy threatens the plan’s stated principle of preserving the special and graceful characteristics of the area. The historic aspects would benefit from the area being promoted fundamentally as a series of ancient fields, throughout which the basic east-west symmetry of the landscape needs to be preserved. We would like to see the addition, and not the loss, of trees.

Any Other Comment:

Officer Response:

In aiming for a ‘vibrant’ public space the intention is to increase the use of the green spaces throughout the year and to attract a broad cross-section of visitors. Public consultation has shown that this intention is widely supported. It is not considered that there is any inherent contradiction between this intention and conserving the distinct historic character of the green spaces. The existing spaces are already subject to significant noise pollution from surrounding traffic and the aim is to reduce the impact of the traffic noise through design, landscaping and planting. There is no intention of removing trees but rather to plant additional trees and this point is specifically made under the priorities for Victoria Gardens. Detailed designs for each space will be subject to public consultation.
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<td>SA3 - Valley Gardens</td>
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**Further Details:**

We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Thank you for your representation. Your comments have been noted. References to the One Planet approach have been added to the supporting text for all Development Area policies with the exception of DA7 to reflect that Toad Hole Valley is a greenfield site.

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**Further Details:**

SA3 - Valley Gardens - it is good to see that the 7th Aim is about enhancing biodiversity in the area. The contribution of the greens spaces themselves is valuable, even if the changes are about appropriate planting and management. In addition, the linear space should provide opportunities for wildlife movement to and from other green space in the valley, including private gardens.

**Statement of Changes:**

Any Other Comment:

**Officer Response:**

Thank you for your representation. Your comments have been considered and noted.
Conservative Group Members (c/o Jonathan Bryant)

Support Status: Partly Support

The current Valley Gardens set up is confusing and illogical and doesn’t work for pedestrians, cyclists or motorists. Therefore, we will look positively but carefully at any proposal that is put forward which makes the whole environment more attractive as it will ultimately be to the benefit of residents, visitors and businesses alike. In any proposals that are put forward for Valley Gardens, detailed traffic modelling must be carried out to improve the current flow of traffic in and out of the city and to ensure any changes would not have a detrimental impact on local traders and businesses.

Chris Todd

Support Status: Partly Support

Supportive of aspiration behind policy but it is weak and could lead to further traffic in the area. Should be focussed on reducing impact of ’motorised’ vehicular traffic. It should be focussing on creating safe and legible sustainable links with adjoining areas, not just any links, which if for cars could create further congestion and pollution. Emphasis on better cycle and pedestrian links to seafront from The Level. Prioritise removing public transport bottlenecks around St. Peter's Church and bottom of North Street which delay journeys and increase pollution.

Thank you for your representation. Your comments of partial support have been considered and noted. A reduction in vehicular traffic is reiterated throughout policy SA3 and this extends to motorised vehicular traffic. Sustainable links are implicit throughout the policy which reinforces the need for stronger pedestrian and cycle links within and between the area. The policy recognises the importance of stronger links between the seafront and The Level (paragraph 3.127).
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<td>Part Three: Development and Special Area policies</td>
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**Further Details:**
The historic road infrastructure isolates much of Valley Gardens from the surrounding shops, offices and homes. In an attempt to make better connections it may be tempting to remove a highway either to the east or west of the gardens but this could have catastrophic consequences for traffic management, especially for bus routes which currently benefit from dedicated lanes.

The Economic Partnership would warn against removal of north-south traffic routes but would not oppose better management particularly during week-end events when ‘normal’ city centre congestion is exacerbated by visiting traffic leaving Madeira Drive and the seafront. Further priority measures for buses would also be welcome.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Thank you for your representation. Your comments have been considered and noted. The policy recognises the area as a gateway to the city and proposes to enhance bus lanes which will be subject to traffic modelling (paragraph 3.127). Please also see responses to policy CP9.

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The Economic Partnership would warn against removal of north-south traffic routes but would not oppose better management particularly during week-end events when ‘normal’ city centre congestion is exacerbated by visiting traffic leaving Madeira Drive and the seafront. Further priority measures for buses would also be welcome.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

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<td>SA3 - Valley Gardens</td>
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**Further Details:**

We agree the area should emphasise its historic and cultural character, but gimmicky attractions should be avoided. More trees could be planted to improve air quality.

**Statement of Changes:**

Remove ‘vibrant’ from no. 1, bottom of p89.

**Any Other Comment:**

Thank you for your representation. Your comments have been considered and noted. The word ‘vibrant’ remains in the policy as there is no justification for its removal.

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<th>Customer Name:</th>
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<td>Policy:</td>
<td>SA3 - Valley Gardens</td>
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**Further Details:**

SA3: Valley Gardens

We welcome the recognition (paragraph 3.124) of the significance of this conservation area to the city’s historic and landscape character. We also appreciate in the accompanying paragraph the acknowledgement of the challenges presented by the complex combination of urban roles fulfilled by this area.

While accepting in principle the potential for a park (Overall Aim 1) or boulevard with a more pleasurable pedestrian experience through the length of the area, we would appreciate widespread consultation on any public art, and would argue for a minimum of new hard surfacing or built developments in the existing green spaces. Overall, the topography has a broad equilibrium that should be preserved, and in particular the expanse of grass and mature trees in the southern Victoria Gardens ("the cultural park", page 90) is essential to the character of the area.

We welcome the references to improvements for the historic buildings on Grand Parade (page 90), many of which are of the Regency era. We would like to see a comparable reference regarding the crucial historic architectural quality of the Old Steine ("the hub", page 90), together with a plan for a pedestrian-friendly transformation of the currently unappealing Palace Pier roundabout and its awkward surrounding pavements.

**Statement of Changes:**

**Any Other Comment:**

Thank you for your representation. Your comments of partial support have been noted and considered. With regard to consultation on public art, there is an existing commitment in the policy to work with public and private sector partners in the enhancement and regeneration of the area. In relation to the Old Steine ("the hub") the policy acknowledges the need to address buildings in visibly poor condition (paragraph 3.129). The policy has been amended to reflect the potential for improvements at the Palace Pier junction (paragraph 3.127). In addition, policy CP15 commits to the implementation of a Conservation Strategy for the future management of conservation areas and heritage assets.
Given the housing shortage, there is a need to reassess the housing potential of some of the urban fringe sites earmarked for protection. In May 2010 Senior Planning Inspector Roland Punshon made it clear that he did not think that the previous version of the Core Strategy would pass the an Examination in Public remarking that the local authority should have 'gone down every rabbit hole' to find land for housing.

With 160,000 hectares of national park within a few metres of the urban fringe and a housing shortfall well in excess of 7,000 homes, the City Plan may fail to convince the Inspectorate that greenfield fringe sites are worth saving to form part of the city’s green network.

Policy SA5[3] supports the role of the wider Downs in being the de facto major contributor to the city's green space requirements stating ‘. . . . . recognise the role of the Downs in the city's Green Network/Nature Improvement Area/open space framework’

Statement of Changes:

A clear, firm statement saying that the Urban Fringes are protected from development needs to be made with no reference to any contingency plans. Any weaker stance on the protection of our local countryside (statements on page 94 of the draft City Plan) is totally unacceptable.

Statement of Changes:

A clear, firm statement saying that the Urban Fringes are protected from development needs to be made with no reference to any contingency plans. Any weaker stance on the protection of our local countryside (statements on page 94 of the draft City Plan) is totally unacceptable.

Statement of Changes:

SA4 no longer makes reference to any 'contingency' plans. It is considered that SA4 sets out an appropriate framework against which to consider any proposals for development within the urban fringe.
Further Details:

In our objections to Policy CP1 we set out our case for increasing the Plan?d housing provision and for identifying additional housing locations. In this regard we refer to land south of Hangleton Lane, Hove where some limited housing development offers an opportunity to enhance the environmental quality of the site as a whole. A site plan showing the boundary of the land is enclosed with these representations. On the map accompanying Policy SA4 the land south of Hangleton Lane is identified as an Urban Fringe site and is therefore subject to the provisions of the policy and, in particular, the restrictive policy on development in the urban fringe set out in criteria a) to e) in the last paragraph. It is understood that the suitability of the urban fringe areas to accommodate development was assessed and the results contained in the Councils Urban Fringe Assessment. Toads Hole Valley is the only urban fringe area included in the draft Plan as a strategic development area (DA7). When assessing the suitability of the land south of Hangleton Lane for development the Urban Fringe Assessment identifies the following planning constraints / considerations (ref: 692): Open Space ? PPG17 Designated as countryside NC6 Designated Benfield Valley Site of Nature Conservation Importance NC4 Adopted Local Plan Policy NC9 identifies Benfield Valley as an important green wedge into the urban area much used by the general public for outdoor recreation and contains significant wildlife habitats so should remain free from further built development. It would appear therefore that the Councils assessment of the site has been heavily influenced by the application of current policies rather than by a critical re-examination of the site in the light of the need to meet the objectively assessed housing requirements. The suitability of the site has therefore been examined having regard to the constraints and considerations identified in the Councils assessment. Open Space PPG17 PPG 17 has been superseded by the National Planning Policy Framework although broadly similar policies apply. The land south of Hangleton Lane is not used for sport or any form of active recreation. It is private land that is only used informally mainly by walkers. The Benfield Valley public footpath runs along the eastern edge of the land but otherwise there are no public footpaths on the land. With some development the informal recreational use of much of the land could be retained and enhanced through appropriate management measures. Designation as countryside NC6 the land is designated as countryside by virtue of its location outside the built up area boundary in the adopted Brighton and Hove Local Plan. One of the key roles for the new City Plan is to re-examine the built up area boundary in the light of housing requirements and to revise it accordingly where appropriate. Therefore, the current designation of the land as countryside may be a starting point but should not be regarded as a constraint that would dictate its suitability for meeting housing requirements. Designated Benfield Valley Site of Nature Conservation Importance NC4 The SNCI designation is acknowledged to be an important factor in determining the appropriate future use of the land and, in particular, it suitability to accommodate development. The land is part of the wider Benfield Valley SNCI which extends from the Old Shoreham Road in the south to the by-pass in the north. The SNCI designation refers to nature conservation features including broad-leaved woodland, rough grassland, mature hedgerow, scrub, saxon hedegline and specially protected species. (ref: BH09) However, the designation covers a very large area and the nature conservation value is likely to differ across the area. In order to explore this and the extent to which the SNCI designation would be a constraint on development an ecological appraisal has been carried out by The Ash Partnership (UK) Ltd and a copy of their report is enclosed with these representations. The appraisal identifies the inherent nature conservation value of the land to be consistent with its designation as part of the Benfield Valley SNCI and its location within the Benfield to Hangleton Biodiversity Opportunity Area. The appraisal also considers the development potential of the land having regard to its nature conservation value. The appraisal considers it possible to develop a portion of the land provided that it is appropriately sited and that a suitable package of ecological mitigation and enhancement work is undertaken. The appraisal recommends that the perimeter woodland around the site should be retained together with other woodland compartments and that access should be taken at a point off Hangleton Lane at the northern end of the site between woodland compartments through a corridor of poor quality grassland and scrub. A potential development area is identified in the northern part of the site, as shown on Figure 2 of the ecological appraisal and separately enclosed with these representations. It is regarded as being of poor ecological quality with considerable evidence of past land disturbance and piles of tipped soil. The appraisal recommends that the remainder of the site would be suitable for ecological enhancement. Subject to further surveys appropriate mitigation measures may be required. The appraisal includes suggested measures regarding grassland, woodland and species enhancement. Benfield Valley Policy NC9 The Benfield Valley policy covers an extensive area of land between Old Shoreham Road and the bypass. The site of the superstore at its southern end was presumably part of the valley area prior to its development. A limited area of development as proposed on the land south of Hangleton Drive would be contained within well defined woodland boundaries and would not prejudice the role of Benfield Valley as a green wedge. The limited development would enable the larger area to be reserved for outdoor recreation and enhancement of wildlife habitats in accordance with Policy NC9. Development would also provide an Powered by Objective Online 4.0 - page 2 opportunity to improve access for pedestrians and cyclists as appropriate in accordance with Policy NC9. Proposed Development Area The potential development area that has been identified in the ecological appraisal, extends to around 1 hectare. At average densities of development it could accommodate around 40 dwellings subject to further design and layout considerations. It is an objective of the City Plan that new development is located in sustainable locations. The proposed development area is well located in relation to local bus services and rail stations; it is well located for the superstore to the south and the public right of way along the eastern boundary enables convenient
pedestrian access to the nearby recreation areas, other open spaces and the the National Park. The proposed development area would enable the boundary woodland to be retained and access could be taken off Hangleton Lane at the point where there is poor quality grassland and scrub. As recommended in the ecological appraisal appropriate mitigation may be required and measures to enhance the grassland, woodland and local species would be implemented. It is therefore appropriate to identify the land as a strategic location for development with the detailed allocation and associated policy criteria to be confirmed in Part 2 of the City Plan.

Statement of Changes:
The land south of Hangleton Lane, as shown on the plan enclosed with these representations, should be deleted from the Urban Fringe sites shown on the map accompanying Policy SA4 and on the Key Diagram in Appendix 2 of the draft Plan. Land south of Hangleton Lane should be identified on the Key Diagram as a development area. Policy SA4 should be amended by the addition of a paragraph at the end to read: "Land south of Hangleton Lane is identified as a location for housing, recreation and nature conservation enhancement and will be subject to the following criteria: 1. Provision should be made for around 40 dwellings 2. Access should be taken from Hangleton Lane which will be subject to ecological and highway considerations 3. The Benfield Valley right of way along the eastern boundary will be retained 4. Footpath and cycle routes will be enhanced where consistent with protection and enhancement of wildlife habitats 5. Informal recreational use will be enhanced where consistent with protection of wildlife habitats 6. A strategy to mitigate the impact of development and to enhance the nature conservation value will be implemented which should include retention and enhancement of the woodland areas, the grassland areas and measures to enhance local species?"

Any Other Comment:
These representations are supported by an Ecological Appraisal Report July 2012, Site Plan and Proposed Development Area Plan

Officer Response:
Your detailed objection to the policy and supporting evidence have been considered and noted.

As part of the urban fringe assessment (undertaken for Core Strategy submission version - April 2010), land south of Hangleton Lane was not considered suitable for housing as it forms part of the City's publicly accessible Open Space network and is a designated Site of Nature Conservation Importance. This area is not considered appropriate for housing development.

CPRE is alarmed by the weaker protection now given to protection of the countryside and the urban fringe. Gave reluctant support to Toads Hole Valley development in the options papers on the basis that the rest of the urban fringe would be protected. The statements made in the City Plan (page 94) are far removed from this earlier position and are totally unacceptable. The City Plan should contain a clear, firm statement that the urban fringe is protected from development.

Statement of Changes:
It is considered that SA4 sets out an appropriate framework for the use and management of land within the urban fringe including the consideration of appropriate development proposals where these might come forward. Earlier versions of the plan (Submission Core Strategy) did not give blanket protection to the urban fringe and contained similar policy wording.

Officer Response:
It is considered that SA4 sets out an appropriate framework for the use and management of land within the urban fringe including the consideration of appropriate development proposals where these might come forward. Earlier versions of the plan (Submission Core Strategy) did not give blanket protection to the urban fringe and contained similar policy wording.
Customer No: 190  Customer Name: Richard E Scott
Organisation:  
Rep Number: 2  Page/Para: /  Policy: SA4 - Urban Fringe
Section/Supporting Doc/Annexes  Part Three: Development and Special Area policies
Further Details:
The wording of SA4 is too loose and open-ended and should be redrafted containing more explicit site specific proposals and with exclusions and protections. This should be consulted upon.

Statement of Changes:

Any Other Comment:

Officer Response:
It is considered that SA4 sets an appropriate framework for the use and management of land within the urban fringe and for assessing any development proposals. Part 2 of the City Plan will enable sites to be put forward for consideration as site allocations.

Customer No: 182  Customer Name: Tony Mernagh
Organisation: Brighton and Hove Economic Partnership  Support Status: Object
Rep Number: 21  Page/Para: /  Policy: SA4 - Urban Fringe

Further Details:
Given the housing shortage, there is a need to reassess the housing potential of some of the urban fringe sites earmarked for protection. In May 2010 Senior Planning Inspector Roland Punshon made it clear that he did not think that the previous version of the Core Strategy would pass the an Examination in Public remarking that the local authority should have 'gone down every rabbit hole' to find land for housing.

With 160,000 hectares of national park within a few metres of the urban fringe and a housing shortfall well in excess of 7,000 homes, the City Plan may fail to convince the Inspectorate that greenfield fringe sites are worth saving to form part of the city’s green network.

Policy SA5[3] supports the role of the wider Downs in being the de facto major contributor to the city’s green space requirements stating ‘. . . . . recognise the role of the Downs in the city’s Green Network/Nature Improvement Area/open space framework’

Statement of Changes:

Any Other Comment:

Officer Response:
An assessment of the urban fringe undertaken as part of the work on the former draft Core Strategy (Submission April 2010) and SHLAA exercises indicate very little potential for housing within the urban fringe other than at Toads Hole Valley which is included within the City Plan. Any further potential could be considered under Part 2 of the City Plan which will make smaller scale site allocations.

Much of the urban fringe contains formal open space designations such as parks, playing fields, allotments and recreation grounds which are required to meet assessed open space requirements. The NPPF recognises the value of such resources and supports their protection.
Brighton Garden Centre, Warren Road, Brighton. This site was put forward as a potential housing site as part of the Council’s Strategic Housing Land Availability Assessment. Despite its highly developed nature, it was considered as part of the wider Brighton Racecourse site (ref: 712) and was deemed as unsuitable for housing purposes due to its Urban Fringe location. As such, any future development proposal at the site would be considered against Policy SA4 Urban Fringe of the emerging City Plan.

I am concerned, that as worded, this policy makes no accommodation for existing commercial sites which are located within the urban fringe. Such an approach is not consistent with the new National Planning Policy Framework (NPPF) which recognises the need to support economic growth in rural areas in order to create jobs and prosperity.

In particular, paragraph 28 of the NPPF states that in order to promote a strong rural economy local plans are required to support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings.

Failure to provide appropriate support for existing rural businesses would render the plan ‘unsound’ by virtue of its non-compliance with up to date national policy.

Statement of Changes:

Accordingly, I would request that the wording of Policy SA4 be expanded to state:
“Development within the urban fringe will only be permitted where:
a) a site has been allocated for development in a development plan document; or
b) a countryside location can be justified; or
c) the proposal is a sustainable form of development relating to an existing business or enterprise, and
d) the proposal has regard to the downland landscape setting of the city;
e) all adverse impacts of development are minimised and appropriately compensated for; and
f) where appropriate, the proposal helps to achieve one or more of the objectives set out above.

Any Other Comment:

Officer Response:

Disagree that the policy makes no provision for existing commercial sites which are located within the urban fringe. Criteria a) or b) could be used to support an appropriate expansion depending upon the nature of the use; the scale of proposed development and potential impacts.
Further Details:

A key reason for the council proposing to release Toad’s Hole Valley for development is that otherwise the plan would be judged to be ‘unsound’ on the grounds it would be making inadequate provision for new housing. The following representations address that dilemma.

1. Review the definition and application of Urban Fringe Policy SA4 In the summary, it is stated that this policy protects the land between the edge of the urban area and the South Downs National Park. That objective, which is laudable, is wholeheartedly supported, and is clearly reaffirmed by the opening lines of Policy SA4 which state:

"The council will promote and support the careful use and management of land within the urban fringe to achieve the following objectives:

"1. The protection and enhancement of the wider landscape role of land within the urban fringe, the setting of the South Downs National Park and the protection of strategic views into and out of the city."

But subsequent criteria in policy SA4 do not support this primary purpose, leading to large tracts of land being protected by the policy that are not urban fringe as described in the summary. Moreover, some of the land does not accord with the commonly understood meaning of urban fringe, which is more akin to a green belt.

As is explained in paragraph 3.134, the area being protected is now made up of ‘pockets’ of residual green space rather than any homogenous green ‘belt’ around the city.

All those ‘pockets’ do not warrant the same protection as the land that actually lies between the edge of the built up area and the South Downs National Park. It appears that policy SA4 has been specifically written to give protection to some large pockets of land (in east Brighton) that have no great landscape value, with one large area being almost entirely surrounded by development. Possibly some, but not all, of that land should be protected for other reasons, but it should not be lumped together with, or accorded the same protection as, land of high landscape value between the urban edge and the South Downs National Park.

The scope of Policy SA4 should be restricted to land that is genuinely urban fringe, and the intrinsic qualities of the land, not who owns or controls it, should influence its eligibility for protection as urban fringe. Much of the land currently protected by policy SA4, that does not lie between the built up area and the South Downs National Park, is council-owned and should be reassessed as part of systematic review of all council-owned land proposed in paragraph 4 below.

Toad’s Hole Valley clearly warrants protection as urban fringe in that it can be readily seen to be an area of rolling open downland lying between the urban area and the South Downs National Park. It should, therefore, be protected by policy SA4.

Statement of Changes:

Any Other Comment:

Officer Response:

Policy SA4 provides a framework for the careful use and management of land within the urban fringe and provides a further opportunity for considering any future development through Part 2 of the City Plan when site allocations can be considered. It recognises therefore that not all parts of the urban fringe warrant the same degree of protection. The designation of Toads Hole Valley as a new development area has had to weigh the benefits to the city from the proposed development against the adverse effects within the context of the NPPF which requires Local Planning Authorities to seek positive opportunities to help meet development needs.
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**Further Details:**

Whilst Policy SA4 seeks to protect urban fringe sites from development (unless a limited number of exceptions can be met), the substantial housing shortage in the city presents a serious problem which could be eased by the development of some sites for housing. The policy should therefore allow for 100% affordable housing schemes on suitable urban fringe sites. These sites could be reviewed in Part 2 of the City Plan and potentially included as site allocations.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

CP20 sets out requirements for affordable housing provision and provides the policy basis for considering all proposals for residential development. Should developers/registered providers wish to provide 100% affordable housing on any site then this would be welcomed.

It is considered that SA4 provides the appropriate basis against which development proposals within the urban fringe can be assessed.

| Customer No: | 152 | Customer Name: | | Support Status: | Partly Object |
|-------------|-----|----------------|| Policy: | SA4 - Urban Fringe |
| Organisation: | The Hyde Group | | | |
| Rep Number: | 9 | Page/Para: | / | |
| Section/Supporting Doc/Annexes | | | | |

**Further Details:**

Whilst Policy SA4 seeks to protect urban fringe sites from development (unless a limited number of exceptions can be met), the substantial housing shortage in the city presents a serious problem which could be eased by the development of some sites for housing. The policy should therefore allow for 100% affordable housing schemes on suitable urban fringe sites. These sites could be reviewed in Part 2 of the City Plan and potentially included as site allocations.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

CP20 sets out requirements for affordable housing provision and provides the policy basis for considering all proposals for residential development. Should developers/registered providers wish to provide 100% affordable housing on any site then this would be welcomed.

It is considered that SA4 provides the appropriate basis against which development proposals within the urban fringe can be assessed.
Further Details:
SA4 Urban Fringe
Supporting Text
3.137
This paragraph considers uses for which sites are unlikely to be found within the existing built up area of the City. In addition to the listed uses, permanent park and ride should be added as this will provide a key facility for sustainable transport.

Statement of Changes:

Any Other Comment:

Officer Response:
The City Plan does not include formal Park & Ride as part of the overall Transport Strategy for the City.

Further Details:
Re : Proposals Map 13
Objection relating to the location of the Built Up Area boundary line indicated between land known as The Vale Ovingdean and the adjacent SA4 designated land

The Proposals Map indicates the boundary line between the SA4 (urban fringe) land and the adjacent established Built Up Area as being along the east edge of The Vale.

The north end of The Vale is a private street passing through an area of land in established residential use. The residential land extends up to the line of a public sewer running alongside and to the east of the private street.

There is an existing fence line forming a physical boundary between the urban fringe and the residential land. We object to the location of the Built Up Area boundary line and request that it is relocated along the line of the existing fence.

Statement of Changes:
We request the boundary indicated between the Built Up Area and the SA4 (urban fringe) land is relocated along the existing fence/public sewer line in accordance with the ownership boundary and established use of The Vale as residential land.

Any Other Comment:

Officer Response:
Thank you for your comments. In respect of this area the built up area boundary accords with that in the Local Plan. The City Plan Part 1 considers strategic allocations. Smaller site allocations and/or minor built up area boundary amendments will be considered through Part 2 of the City Plan. Proposed changes can be put forward as part of this work. For this reason it is not therefore felt appropriate to amend the built up area boundary in this area at this stage.
### Customer No: 65  Customer Name: Helmut Lusser  
**Organisation:** Hove Civic Society  
**Rep Number:** 11  
**Page/Para:** /  
**Policy:** SA4 - Urban Fringe  
**Support Status:** Partly Support  

**Further Details:**
SA4 Urban fringe: The supporting text (para 3.137) refers to energy crops we believe this should be highlighted in the policy as an essential use of the urban fringe.

**Statement of Changes:**

**Officer Response:**
Your comments of support are welcomed. Paragraph 3.137 refers to renewable energy generation which could reasonably include the production of energy crops. Objective 3 of the policy refers to multi-functional uses of the urban fringe which again could potentially include energy crop production. The decision to grow such crops would not require planning permission so it is considered that the policy allows sufficient scope for this but doesn't warrant specific citation.

### Customer No: 147  Customer Name:  
**Organisation:** The Guinness Partnership  
**Rep Number:** 5  
**Page/Para:** /  
**Policy:** SA4 - Urban Fringe  
**Support Status:** Partly Support  

**Further Details:**
Whilst we understand the council's objectives to protect the urban fringe, in addition to aspects set out where development will be permitted, the provision of affordable housing should also be a priority where residential is proposed.

**Statement of Changes:**

**Officer Response:**
The requirements for affordable housing set out in Policy CP20 will apply to all opportunities for residential development.
The SDNPA strongly supports the 5 objectives of policy SA4 and would want to work with BHCC to promote these aims and enable BHCC to achieve these goals. The SDNPA would raise a query about SA4 e), which only requires one or more of the 5 objectives to be achieved. The SDNPA would suggest the removal of the words “one or more of” from SA4 e).

We support the aims and objectives of the Brighton Biosphere Reserve which align with the Purposes and Duty of the South Downs National Park (SDNP) and the objectives of the Nature Improvement Area – ‘South Downs Way Ahead’.

There is a requirement for particular care over development proposed on the urban fringe of the city. As these proposals could have a significant impact on the surrounding landscape of the South Downs National Park careful consideration must be given to the impact of any proposals on the setting of the South Downs National Park and its two Purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA supports the overall aim of the spatial distribution of development to minimise transport impacts and the continued protection of the South Downs National Park.

**Statement of Changes:**

- Culture and heritage, in particular, local heritage have a key role to play in the design and legibility of the spaces where the city meets the downs and should be referenced here.

**Officer Response:**

Your support is welcomed.

SA4(e) states that, where appropriate, proposals for development should help to achieve one or more of the listed urban fringe objectives. This recognises that some types of development e.g. a small scale farm diversification scheme or an extension to an existing building will not be able to demonstrate that they meet all of the objectives set out but may be able to contribute towards one or more.

Culture and heritage, in particular, local heritage have a key role to play in the design and legibility of the spaces where the city meets the downs and should be referenced here.

**Statement of Changes:**

These issues are addressed in the Citywide policies CP12 and CP13.
Further Details:

In respect of this section of the City Plan the Society have confined comments to SA4 and SA5 after having regard to the approach taken in the City Plan to the spatial distribution of development and special policy areas for the management of development and change.

SA4 - In line with our response to the 2010 consultation we support the careful use and management of land within the urban fringe to achieve the objectives as set out. We did also observe that Development within the Urban Fringe will only be permitted where:

a) a site has been allocated for development in a development plan document or a countryside location can be justified;
b) the proposal has regard to the downland landscape setting of the city;
c) all adverse impacts of development are minimised and appropriately compensated for; and

e) where appropriate, the proposal helps to achieve one or more of the objectives as set out.

However, the 2010 Consultation contained a caveat whereby any future managed release of land within the Urban Fringe for residential development would only be considered on a “contingency” basis in the post 2020 plan period should this be required to help meet local needs. However, we understand that this caveat has now been removed and that the Urban Fringe will no longer be considered as “contingency” when other land for development to meet targets cannot be found. Given the strategic locations adjacent to the National Park, we would propose that development of any type within the Urban Fringe must be considered only as a “last resort”.

Statement of Changes:

Any Other Comment:

Officer Response:

The policy provides a robust framework for considering any further development within the urban fringe area; for which there are only very limited opportunities given the designated boundaries of the National Park. Given the NPPF, published in March 2012 and the city's assessed development needs, a 'last resort' blanket position on development within the urban fringe is no longer justifiable. As the policy makes clear any development should be the subject of a formal site allocation or justified through the need for a countryside location.
<table>
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<tr>
<th>Customer No:</th>
<th>234</th>
<th>Customer Name:</th>
<th>John Lister</th>
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<tr>
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**Further Details:**

We support the recognition of the quality of the natural environment within and surrounding the city, its biodiversity, and its value in terms of eco-services (notably the extensive chalk downland).

The principles and draft policy for the Urban Fringe (SA4) and the South Downs (SA5) are also welcomed. In the latter case, responding to the Duty to Cooperate with neighbouring authorities (particularly those within the National Park) should help to development of policies that work at the landscape scale and deliver a range of benefits such as access through the Downs (your bullet point 6)

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments of support are welcomed.

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<tr>
<th>Customer No:</th>
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<th>Roger Hinton</th>
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**Further Details:**

SA4, 5 and 6: Urban Fringe, South Downs and Sustainable Neighbourhoods

We positively support the policies outlined in these sections of the Plan.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your support is welcomed.
Further Details:
We particularly support the following aspects:
- Flood risk
- Water Efficiency in new development
- Groundwater quality
- Infrastructure, CIL and Planning Obligations

3. Groundwater quality
We support your inclusion of the identification and need to consider the protection and improvement of groundwater resources within the city as set out in your ‘challenges’ section (page 13).

In particular we support the wording of policy SA4 and its supporting text.
The Urban Fringe, together with the built up area of the city overlies a principal aquifer. There are also a number of Source Protection Zones present. We are pleased that the sustainable use of groundwater and the protection of these valuable resources are clearly set out in this policy.

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments of support are welcomed.
Further Details:

The South Downs National Park Authority appreciates the Council’s commitment to close partnership working with the SDNPA and the commitment to the protection and enhancement of the SDNP. However, as the two authorities are no-longer formally working to produce a joint document it seems inappropriate to have a policy for an area which is outside the plan area, and in an adjoining planning authority. The South Downs National Park Authority would request this policy be removed from the City Plan. With regard to the important discursive text supporting the policy, especially describing the role and aspirations of the City Council as landowners, it is suggested that this text be inserted elsewhere in the document to retain this important commentary.

(Overarching comments from SDNPA to City Plan - We support the aims and objectives of the Brighton Biosphere Reserve which align with the Purposes and Duty of the South Downs National Park (SDNP) and the objectives of the Nature Improvement Area – ‘South Downs Way Ahead’.

The SDNPA appreciate that the split in responsibility for planning within the administrative area of Brighton and Hove Unitary Authority can cause some confusion. However, it would be useful to make it clearer throughout the document how the division of responsibility for planning matters within the Unitary Authority operates and that all planning policy for the SDNP will be dealt with by the SDNP Local Plan. Notwithstanding, it is understood that Brighton and Hove City Council are substantial landowners of land which now falls within the South Downs National Park, and the National Park Authority would therefore seek to continue the close working relationship with the City Council when establishing a planning policy framework for this area (in the South Downs National Park Authority Local Plan).

There is a requirement for particular care over development proposed on the urban fringe of the city. As these proposals could have a significant impact on the surrounding landscape of the South Downs National Park careful consideration must be given to the impact of any proposals on the setting of the South Downs National Park and its two Purposes, in accordance with Section 62 of the Environment Act 1995. The SDNPA supports the overall aim of the spatial distribution of development to minimise transport impacts and the continued protection of the South Downs National Park.)

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted. Whilst this strategic policy has not been deleted, amendments to the policy and supporting text have been made. The amendments seek to address the key issue raised in your representation relating to clarity over the role of each authority within the administrative boundary of the city in respect of the South Downs. It is consider the merit in this approach is that it helps to provide a point of reference re the South Downs within the contents page.
| Customer No: | 125 | Customer Name: |  | Organisation: | Trustees of Toads Hole Valley and Pecla Investments Limited | Support Status: | Partly Object |
|-------------|-----|----------------|-----------------|------------------------------------------------|-----------------------------------------------|-----------------|
| Rep Number: | 14  | Page/Para: /   | Page/Para: /    | Policy: | SA5 - The South Downs | Section/Supporting Doc/Annexes | Part Three: Development and Special Area policies |

Further Details:

We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments have been noted. It is considered that Toads Hole Valley is different to the other seven development areas as it is a greenfield site. However, whilst not included within policy SA5 The South Downs, reference to the policy contributing to delivering the One Planet approach has been added to its supporting text.

| Customer No: | 70  | Customer Name: | Steve Ankers | Organisation: | South Downs Society | Support Status: | Partly Support |
|-------------|-----|----------------|--------------|------------------------------------------------|-----------------------------------------------|-----------------|
| Rep Number: | 8   | Page/Para: Page 96/ | Page/Para: Page 96/ | Policy: | SA5 - The South Downs | Section/Supporting Doc/Annexes | Part Three: Development and Special Area policies |

Further Details:

In respect of this section of the City Plan the Society have confined comments to SA4 and SA5 after having regard to the approach taken in the City Plan to the spatial distribution of development and special policy areas for the management of development and change.

SA5 - It is accepted that proposals within the National Park must have regard to the purposes of the National Park and in particular to conserve and enhance the South Downs. This also goes for any proposals within the setting of the National Park, for which the City Council is the local planning authority. We are pleased to read that the Council has acknowledged that these purposes must not be undermined and it will be expected to minimise any adverse impacts on the National Park created by any proposal. We believe that this should be further expanded to include "enhancement to the countryside/downland will result".

The Society will expect that any proposals are subject to robust testing and, where such development is permitted, it is with full consideration of the appropriate policies.

Statement of Changes:

Any Other Comment:

Officer Response:

Thank you for your comments which have been noted. As raised in the policy and its supporting text the South Downs National Park Authority has planning responsibilities for the land within the National Park, which will therefore be covered by a separate development plan. Acceptable proposals in the urban area of the city may fall within the setting of the National Park but may not be able to offer enhancements to the countryside/downland. It is not therefore considered appropriate to include the wording suggested. However, the policy has been amended to ensure adverse impacts are mitigated and/or compensated for and that any such measure, including proposed enhancements, have regard to landscape character and impact.
Customer No: 186   Customer Name: Jackie Lythell
Organisation: Arts and Creative Industries Commission   Support Status: Partly Support
Rep Number: 11   Page/Para: 96/
Policy: SA5 - The South Downs
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
Recognition of the role of arts and cultural partners in making the most of the SDNP and articulating the messages of the park implementing the ambitions of the park.

Statement of Changes:
Point 7 p97: strengthen that point with addition of the aspiration to have city centre natural history focused parallel visitor centre

Any Other Comment:

Officer Response:
The reference to a stronger visitor experience between the city and the South Downs is felt to appropriately cover all types of respective visitor provision. It is not therefore felt necessary to include such a specific reference indeed such a reference could negatively affect existing resources such as the Booth Museum.

Customer No: 234   Customer Name: John Lister
Organisation: Natural England   Support Status: Partly Support
Rep Number: 7   Page/Para: /
Policy: SA5 - The South Downs
Section/Supporting Doc/Annexes Part Three: Development and Special Area policies

Further Details:
We support the recognition of the quality of the natural environment within and surrounding the city, its biodiversity, and its value in terms of eco-services (notably the extensive chalk downland).

The principles and draft policy for the Urban Fringe (SA4) and the South Downs (SA5) are also welcomed. In the latter case, responding to the Duty to Cooperate with neighbouring authorities (particularly those within the National Park) should help to development of policies that work at the landscape scale and deliver a range of benefits such as access through the Downs (your bullet point 6)

The text on Woollards Field South and on Toad’s Hole Valley makes reference to adverse impacts on the setting of the South Downs National Park. Whilst this is a key consideration, landscape character and impact are important considerations in other situations if enhancements are to be delivered.

Statement of Changes:

Any Other Comment:

Officer Response:
Thank you for your comments. The policy has been amended to reference a need to give regard to landscape character and impact.
<table>
<thead>
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<th>Richard Allden</th>
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<td>Part Three: Development and Special Area policies</td>
<td>Policy:</td>
<td>SA5 - The South Downs</td>
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Further Details:

If the plan is to support and enhance the beauty of the South Downs then it cannot be right to allow additions to the built complex for the universities and the stadium. These built developments detract from the beauty of the South Downs.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed and your comments have been noted.

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<th>Customer No:</th>
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<th>Chris Todd</th>
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<td>Policy:</td>
<td>SA5 - The South Downs</td>
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Further Details:

It is no longer necessary to mention the Sussex Downs AONB in para 3.143 as it was revoked in 2010 and therefore does not exist.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed. The reference to the Area of Outstanding Natural Beauty has been amended.
<table>
<thead>
<tr>
<th>Customer No:</th>
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<th>Organisation:</th>
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Further Details:

Statement of Changes:

Any Other Comment:

Officer Response:

Your support is welcomed and noted.

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<tr>
<th>Customer No:</th>
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<td>Section/Supporting Doc/Annexes</td>
<td>Part Three: Development and Special Area policies</td>
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Further Details:

We welcome references throughout the document to working with neighbouring authorities for beneficial effect (such as in SA5, CP5 and CP10) and thus fully support such policies insofar as they have an impact on Lewes District. With that in mind, we would like to continue the ongoing liaison with yourselves, at both an officer and Lead Member level.

Statement of Changes:

Any Other Comment:

Officer Response:

Your support and comments are welcomed and noted.
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<tr>
<th>Customer No:</th>
<th>63</th>
<th>Customer Name:</th>
<th>Roger Hinton</th>
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**Further Details:**

SA4, 5 and 6: Urban Fringe, South Downs and Sustainable Neighbourhoods

We positively support the policies outlined in these sections of the Plan.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your support is welcomed and noted.

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<th>Customer No:</th>
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<tr>
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**Further Details:**

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your support is welcomed and noted.
Customer No: 115  
Customer Name: Tessa Sweet-Escott  
Support Status: Support  
Organisation: East Sussex County Council  
Rep Number: 3  
Page/Para: /  
Policy: SA5 - The South Downs  
Section/Supporting Doc/Annexes: Part Three: Development and Special Area policies

Further Details:
We welcome SA5 which outlines partnership working with the SDNPA and local authorities, and we fully support point 7. of this policy, in respect of providing gateway facilities to the SDNP, and to improving links between the SDNP and a sustainable transport system.

The text in paragraph 3.146 is also supported, which highlights the need to manage parking at gateway locations to reduce the risk of degradation of these areas, and to link them to a sustainable transport system.

Statement of Changes:

Any Other Comment:

Officer Response:
Your support and comments are welcomed and noted.

Customer No: 149  
Customer Name: Janita Bagshawe  
Support Status: Support  
Organisation: Brighton Dome Festival Ltd and the Royal Pavilion and Museums  
Rep Number: 9  
Page/Para: /  
Policy: SA5 - The South Downs

Further Details:
Heritage and cultural organisations can support the aspirations and work of the SDNP eg in relation to environmental sustainability both in relation to the area but also plays into the regional roles and connections that some of the larger cultural organisations have.

Point 7 p97: Strong opportunities through RPM (Royal Pavilion and Museums?) to create new experiences drawing on natural history and archaeological collections to interpret the national park environment and communicate messages about the relationship of city to the Downs.

Statement of Changes:

Any Other Comment:

Officer Response:
Your support and comments are welcomed and have been noted.
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<th>Customer No:</th>
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<th>Richard E Scott</th>
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**Further Details:**

A policy is required to discourage the creation of gated residential communities as these are socially divisive. Small cul-de-sacs could be allowed.

In terms of social cohesion all dwellings to have a letterbox accessible from the street to allow easier consultation.

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are noted and welcomed. Your comments related to detailed development and are not appropriate for incorporation in part 1 of the City Plan which addresses strategic matters.

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<th>Customer No:</th>
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**Further Details:**

We consider that all Development Areas in the City Plan should have the One Planet Living principles embedded within their Policy text. (BHCC Officer insert)

**Statement of Changes:**

**Any Other Comment:**

**Officer Response:**

Your comments are noted and welcomed.

As SA6 is a special area policy with no site allocations it is not considered appropriate to add a priority to the wording of the policy relating to OPL. However reference has been added to the supporting text to how the policy will help to deliver a One Planet approach.
Further Details:

1. We consider that this section of the City Plan sets out many admirable and desirable objectives, which we would fully support.

Statement of Changes:

We would make two points:

I. It does not set out in a clear statement what the Council sees as its overall role in creating and maintaining the sustainable neighbourhoods and how it can best play its part in achieving its policy aims.

We think that the role of the Council in relation to sustainable neighbourhoods should be to act as a catalyst and facilitator for individual community organisations to take on and develop with assistance where required – whether advisory, administrative or financial, and to create an environment within which individual or community initiatives are encouraged to grow and resolve the variety of problems which need to be tackled and overcome.

This should be set out clearly as prologue to this section of the City Plan

Any Other Comment:

ii. Many of the policies require expenditure, and we are doubtful that all the policies set out in the Plan are affordable. For example, para 3.159 states that work will be undertaken to...to improve public transport links. This is at a time when active measures are being taken by the Council to cut many bus services serving outlying areas - nor was there any community consultation about this beforehand or scope for any discussion with people likely to suffer as a result of the cuts. So much for encouraging sustainable communities…!

Officer Response:

Your support is welcome and comments noted. Paragraphs 3.148 (introduction) and 3.152 have been amended to clarify how the policy will be implemented. The city council will be acting as facilitator working with partners to deliver the aims of the policy and that applicants will be expected to set out how new developments address the priorities of the policy.

Your concerns about reduced bus subsidies are noted. In terms of the policy it is hoped that new development in neighbourhood areas can make improved bus services more viable for providers.
The members of our Housing Network discussed the City Plan at our recent meeting and viewed it with regard to the CVSF Housing Conference report (attached) which was held in April 2012. Equalities issues that we believe should be tackled at this level is accommodation for people with a disability (not just single people but families with a disabled child for example) and also, space for travellers to live in Brighton and Hove in line with strategies.

(Officer insert : comment also allotted to CP19)

Any Other Comment:

Officer Response:

In response to your comments reference to lifetime homes has been added to Part 8 of the policy and reference to travellers added to para 3.161 of the supporting text.

Support point 8. However, this should be applied with some flexibility to ensure it does not restrict delivery of new affordable housing.

Any Other Comment:

Officer Response:

Your comment is noted and welcomed. Part 8 will only have a limiting impact on provision of affordable housing in the case of areas will a very high proportion of affordable/social housing. For this reason it is considered that it should not have a significant impact on affordable housing delivery.
Further Details:

SA6 Sustainable neighbourhoods, policy 3 – we particularly support the policy referring to neighbourhood fora. In Para 3.149 we would like to see a reference to public art in the definition of sustainable communities. (E.g. with the reference to ‘pride in their community’ or a ‘healthy, safe and inspiring environment’). Para 3.156: A sustainable community should also have access to public arts. We also support point A9 and para 3.162: We would like to see specific mention of promotion/support of local arts and cultural initiatives and include reference to tree-planting.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are welcomed and noted. Paragraph 3.152 has been amended in response to your comments to add a bullet point to the aims that states ‘improve access to public art’. The definition of sustainable communities in paragraph provides only examples of what a sustainable community includes. It would be overlong if it included all measures of sustainability. Public arts are already considered to be sufficiently covered in paragraph 3.162. Tree planting has been added to part A9 of the policy.

Further Details:

The Partnership commends the Council for its ‘sustainable neighbourhoods’ approach to all development plans and the focus on effective partnership and collaborative working between all sectors (paragraphs 3.156 and 3.161).

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments are noted and welcomed.
Paragraphs 3.150 and 3.152 refer to reducing inequalities in health, employment, educational attainment, income, community safety and measures of child and family poverty. Hyde is fully committed to working with the Council to reduce inequalities, and has been an active partner locally increasing work and training opportunities. As part of Hyde’s regeneration of the Open Market site, Hyde has established a National Skills Academy accredited skills and training centre providing a substantial number of employment, training and apprenticeship opportunities for local people. As a committed long-term local landlord, Hyde employs a minimum percentage of local labour on all its development projects, and works with its partners to maximise training and apprenticeship opportunities for local residents. As noted elsewhere in this document, access to decent affordable housing appropriate to meet individual housing needs is one of the key influencing factors determining health, education and general wellbeing outcomes of residents in the city. A suitable supply of affordable housing to meet local needs is essential to deliver on the Council’s objective to reduce inequalities and create more sustainable communities. Hyde commends the Council for its ‘sustainable neighbourhoods’ approach to all development plans and the focus on effective partnership and collaborative working between all sectors (paragraphs 3.156 and 3.161). Hyde has been at the forefront of bringing together voluntary and public services locally, for example through its ownership and stewardship of the Phoenix Community Centre in the Tarner Area supporting the Phoenix Community to engage actively in local matters. In 2011/12, Hyde invested £2.3m in Hyde Plus, helping individuals, families and communities via a variety of value added services. Some 1700 residents received financial advice and support, 700 received employment support and a range of opportunities saw 7600 attendances by young people. Over £700,000 additional funding was secured from other sources to support Hyde Plus projects.

Statement of Changes:

Any Other Comment:

Officer Response:

Your comments and support for the aims of the strategy very welcome.
Further Details:
We welcome the pledged support in defining Neighbourhood Forums and support in developing neighbourhood plans, and would like to see a timescale on this given the number of planning applications, in particular infill, in our neighbourhood, which we believe are inappropriate. The existence of a neighbourhood plan would, we believe, save time and money for all in assessing inappropriate proposals.

Statement of Changes:
We would like to see a timescale on development of Neighbourhood Forums and Neighbourhood plans. 3.165 Given the adverse impact the infill development has had, and threatens to have on the biodiversity of some of our gardens (blocking sunlight and inhibiting ability to grow food and other plants), and taken with the acknowledged shortage of access to open space and commitment to improving health and access to local food, we would like to see recognition in this plan that private gardens as well as public spaces be respected in planning as a beneficial in biodiversity terms and as a source of local food.

Any Other Comment:

Officer Response:
Your comments are noted and support for Neighbourhood Planning welcomed. It would be inappropriate to set a timetable for neighbourhood planning as this will be driven by neighbourhood groups. In terms of suggested changes there are already references to the importance of biodiversity and promoting food growing within the policy. Policy CP16 Open Space addresses the issue of private open space and policy CP14 addresses housing density and allows for lower densities of development in recognition of the character of an area.

Further Details:
SA4, 5 and 6: Urban Fringe, South Downs and Sustainable Neighbourhoods
We positively support the policies outlined in these sections of the Plan.

Statement of Changes:

Any Other Comment:

Officer Response:
Your comments are welcomed and noted.