

City Plan Part Two Scoping Paper

Statement of Consultation

Appendix 7 -

Original Responses Received



**Brighton & Hove
City Council**

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	1
Response Date	12/09/16 18:24
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Heritage
- . Community facilities

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

Yes, I think they need to be looked at separately as some of them may generate direct income to help them be maintained eg the Pavilion.

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

The arches area. What kind of signal does it send that half of the mid-level walkways are closed? The beautiful seafront is a draw for many tourists and needs to be maintained to a good standard of safety AND needs to lookd attractive again.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

I definitely think the seafront needs to be specifically singled out in the policies as it is in danger and should be a high priority.

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

I'm not sure that you understand how many people living in Brighton live here because it is quirky and unique. Stop sanitising everything and destroying one-off buildings and facades.

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

I don't know what the national policy is, but locally it certainly seems to be inadequate.

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

I think a 'Heritage at Risk' policy is an excellent idea.

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

Lack of maintenance over the years is the greatest threat. Money is wasted on vanity projects and not put into important existing structures.

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

Flood protection will be a major future issue so let's get ahead of the curve and start now.

B. Site Allocations for Community Facilities

CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

A city the size of Brighton and Hove is desperately in need of a state of the art Olympic-sized swimming pool complex. The Prince Regent pool is very small, grubby and over-crowded. I don't know what the current plans for the King Alfred are but that's a perfect site as is the area at Black Rock.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	2
Response Date	30/06/16 21:30
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Housing
- . Biodiversity and Open Spaces
- . Community facilities
- . Sustainability Appraisal Scoping Report
- . General comment

Individual Name

Individual Address

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Allotments should not be built upon. They are important community facilities, as they support physical and mental health, general well being and quality of life. They bring together brightonians from all walks of life, improving community cohesion. They provide healthy food not only to allotmenters, but to their friends, families and neighbours. They are such a positive feature in so many people's lives and in the life of the city that they should under no circumstances be built upon. They cannot simply be moved as so much time and energy has gone into each plot, particularly in slowly improving the quality of our notoriously poor soil. This has taken generations. They are also a valuable resource for wildlife and plant diversity.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

How exactly is the market capable of deciding what is best for our city and community? The market only knows about how to make someone profit. The council should decide.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Protect hmos. Given what is happening to house prices relative to city wages, buying a house is not an option for many. If we do not want our city to become an enclave for the wealthy, and support all the creativity and energy that makes our city what it is, we need a vibrant rental sector. Hmo legislation has not helped this. It has made us feel persecuted in our communities, caused rent increases and diminished available rental housing, please consider introducing rent controls as historically these have been proved to better protect tenants whilst stopping the conversion of more houses into buy to lets.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No, why privilege families? In a city that prides itself on diversity, those who choose to live in non conventional households should not be discriminated against.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Rent controls

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Allotments. They support a real diversity of plants and wildlife.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Protect allotments!

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

Allotments! They contribute to health, well being and quality of life and are important social spaces

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Please do not build on allotments for all the reasons stated above!

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	3
Response Date	30/06/16 23:00
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Housing
- . Biodiversity and Open Spaces
- . Community facilities
- . General comment

Individual Name

Individual Email

Individual Tel

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Allotments should not be considered for housing development because they have a multitude of benefits: Health benefits (encourage people to exercise through gardening, eat more fruit and veg), the diversity of wildlife and plants they support, the contribution they make to a community encouraging people to work together to sustain nature, and the fact that given the effort over generations to improve soil quality they cannot simply be moved.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Allotments should not be developed on because they are good habitats and promote biodiversity.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

I suggest allotments come under community facilities allocation because they are important social and cultural spaces that support health, well being and quality of life.

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

I want to reiterate that allotments are a valuable, precious and critical environment not only for the nature but vital to people to let them be in touch with nature, be part of a community and cope with city life.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	4
Response Date	01/07/16 10:29
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Biodiversity and Open Spaces . Community facilities

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

each site has to be judged individually to achieve the best long term outcome. So long as Brown is brown and not community space like allotments.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

each site has to be judged individually to achieve the best long term outcome. Allotments are proven productive, active community assets that give humanity in dense urban environments. There are other examples of this type of site and they should not be included.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

underused and redundant council offices, military sites, and government sites.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

prescription has been proved to deliver a monotone inhuman environment that has no long term benefit.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

each site has to be judged individually to achieve the best long term outcome.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Private spaces are as important as community spaces like allotments and play parks, they put humanity into dense urban environments. These spaces are productive and have many wider social benefits.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

The overall policy should prescribe that each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Like any concentration there are benefits and negative effects, encompassing social, security and material issues.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

the overall policy should prescribe that each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

B2: If you think a policy is needed, what types of development should be included?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome there are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today.

B5: Should there be a specific policy to address the general protection and enhancement of species?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome there are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome there are proven spaces that have an active community involvement like allotments add to

the diversity within the urban environment, are productive and add to food knowledge that is lacking today.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance)).

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome there are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

each site has to be judged on solid locally obtained evidence to achieve the best long term outcome.

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome there are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today.

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome there are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today.

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome. Evidence should include the active use over a long period that is community driven. There are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today.

CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome. Evidence should include the active use over a long period that is community driven. There are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

There are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today

B. Site Allocations for Community Facilities

CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

There are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

There are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today

C: Are there any other issues that relate to Community Facilities?

CF7: Can you think of any other policy issues relating to community facilities that City Plan Part Two should address?

While each site has to be judged on solid locally obtained evidence to achieve the best long term outcome There are proven spaces that have an active community involvement like allotments add to the diversity within the urban environment, are productive and add to food knowledge that is lacking today

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	5
Response Date	03/07/16 13:14
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Retail and town centre uses
	. Transport and Travel
	. Biodiversity and Open Spaces
	. Community facilities
	. Student accommodation
	. General comment

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

I absolutely do so long as brownfield sites do not include allotments or other green areas and areas of biodiversity.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

No the city shouldn't be building on the urban fringe sites unless they are ex-industrial sites, such as the old bakery at Woodingdean - places like that could be converted to housing, but not other areas - basically nowhere that is green, or an allotment.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

yes there should be a good range of affordable housing, for families, older people and young people in the city.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

yes, but with the points above taken into consideration, and adequate access to transport, schools etc

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Converting brownfield sites seems to be the best bet, and ensuring there is enough affordable housing for the city.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Make sure that nature is protected, that there are good public transport and cycling links and access to GPs schools, playgrounds etc

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

No it should be managed and the city should ensure that any new housing is a mix of accommodation for different groups, not ghettos for the old, young etc.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes that's a great idea.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

yes of course

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

all

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

yes, both private and shared

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

make sure people have enough space

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

We need a good mix of housing and that includes some HMOs

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

perhaps, not sure. maybe in some areas where there are a lot, eg Lewes Road, Hanover etc

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

better responses to complaints and faster acting management of these

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

no

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

yes

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

more independent shops there as at the moment its like legoland. better public transport and trying to keep the bike lanes free at weekends

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

probably all of them outside of the centre

H: Markets

R15: What are the key criteria that should be taken into account when assessing proposals for additional permanent markets?

public transport, cycling and walking making these accessible

R16: Are there any sites that might be considered for allocation for a permanent market use?

the seafront, near the new tower?

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes we need a coherent policy on these

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

make it clear what the targets for air quality are, and make them achievable and high!

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

you need to make sure that our green spaces are protected. these include allotments

B2: If you think a policy is needed, what types of development should be included?

one that protects all of our green spaces and encourages biodiversity. id like to see more wild seeds being sown along roadsides, as they were a few years ago.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

yes - joined up thinking is usually good!

B5: Should there be a specific policy to address the general protection and enhancement of species?

yes of course there should, and we need to plant to encourgae bees and other pollinators in the city

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

allotments - good for wildlife, foe health and for biodiversity. they need to be protects alongside our woodlands and all other sites

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

yes

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

yes

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

yes

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

what about the Amex site where they are knocking down the old building? is that spoken for? otherwise the new building at the Marina?

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

yes

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Make sure that you protect and increase biodiversity in the city, keep our allotments, they are vital for health, community, wildlife and wellbeing. More wildflower planting please

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	6
Response Date	05/07/16 18:54
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Biodiversity and Open Spaces
	. Community facilities
	. General comment

Individual Name

Individual Address

Individual Email

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

It is essential that urban fringe sites which contain allotments should not be developed. Allotments are a valuable community resource which have been developed collectively over generations and ought to be preserved for future generations to benefit from. Given that soil quality and rich bio-diverse habitats have been developed over many years, they cannot simply be moved. Quite apart from the obvious mental and physical health benefits for communities, organisations and families which allotments provide, people have developed strong social and emotional attachments to them. For these reasons, allotment sites should not be considered for housing development.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Allotments (e.g. those at Whitehawk hill) are important habitats in terms of biodiversity and they ought to be protected through planning policy.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

Allotments are important social and cultural spaces which support and enhance the health, well-being and quality of life of individuals, families and communities and they ought to be put forward as "community facilities".

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Allotments are a valuable community resource which have been developed collectively over generations and ought to be preserved for future generations to benefit from. Given that soil quality and rich bio-diverse habitats have been developed over many years, they cannot simply be moved. Quite apart from the obvious mental and physical health benefits for communities, organisations and families which allotments provide, people have developed strong social and emotional attachments to them. They are fundamental in supporting the health, well-being and quality of life of local people. For these reasons, allotment sites should not be considered for housing development but should be protected under the City Plan.

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 7
Response Date 14/07/16 19:29
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Transport and Travel
- . Call for sites

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes. The Council is significantly behind on its planned delivery for new housing. The new City Plan also sets targets below those recommended for growth.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Transport infrastructure needs to be carefully considered in the selection of sites if they are to be of interest to developers. Planning policy also needs to be reviewed to make sites attractive for investment.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

There should be more demand driven housing rather than imposed planning allocations where possible. Where high density schemes are allocated there is greater opportunity for target allocations to be identified.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Through liaison with Housing Associations and larger housing developers

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

This is unlikely

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes all groups need to be considered, but policy which enables integration would be preferred

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

This should be considered within planning decisions to enable integration of different needs.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Not specifically.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Not where housing stock is in poor repair and standards and densities can be improved.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

This should be demand driven

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

no

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

District heating, CHP,

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Left to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No. HMO's are an essential part of the housing mix

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

no

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Transport infrastructure and policy

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Sufficient

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Planning Guidance

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

Policy to be contained in City Plan 2

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

A central strategy plan needs to be generated.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Yes, but this should be a balanced approach. i.e. Why include multiple disabled parking bays nobody ever uses?

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

new general policy

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Primarily matters should be addressed and decided through planning

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

City bike scheme similar to Boris Bikes should be considered.

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes. Need to link Shoreham to Saltdean

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

Removal of unused cycle lanes

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

YOUR LONDON AIRPORT
Gatwick

14 JULY 2016

Planning Policy Team
Brighton & Hove City Council
Room 201
Kings House
Grand Avenue
Hove
BN3 2LS

Dear Sir/Madam

Re: City Plan Part Two – Scoping Consultation

Our Ref: LGW3247

Thank you for your email dated 30 June 2016 regarding the above mentioned consultation.

Brighton City is outside of our 15km 'physical' safeguarding zone and only a very small part of the northern most part of the city is within our 30km 'Wind Turbine' safeguarding zone, therefore we have no comments in relation to aerodrome safeguarding requirements.

Should any wind turbines be proposed in the northern most part of the city which is located within the 30km wind turbine circle, we would need to be consulted to enable us to assess as to whether there could be any impact on radar utilised by the airport. Our wind turbine safeguarding map has been lodged with you previously.

Please be advised that the comments given are without prejudice to the consideration of any planning application which may be referred to us pursuant to Planning Circular 01/2003 in consultation under the safeguarding procedure.

Thank you for giving us the opportunity to comment on this document. If you have any queries please do not hesitate to contact me.

Yours sincerely

Aerodrome Safeguarding For and on behalf
of Gatwick Airport Limited Email:

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	9
Response Date	19/07/16 20:59
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Transport and Travel

Individual Name

Individual Address

Individual Email

Individual Tel

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

No

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

N/A

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes developers bring more traffic both during and after so they should contribute to the management of the higher traffic volumes

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes. The plans should be better scrutinised and appropriate time allowed for this

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

The city plan is well placed to take this on as it will offer direction and guidance to all not just planning. The city will only succeed at managing its transport issues if everyone works in a joined up and cohesive manner towards agreed targets and principles.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

Definitely. Again to manage this solely within planning will limit the overall effect of any policy.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

The policy needs supplementing and updating to ensure it continues to meet the changing needs of our city

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

I don't think this is best placed in the city plan as it is too involved as the city grows to be fixed in the plan long term.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

yes this is a suitable way to address this need

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

yes this is a suitable way to address this need

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

yes

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

no

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

yes

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

When will park and ride be seriously considered and implemented? The city will slowly become so congested it will loose visitors without it

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 10
Response Date 23/07/16 09:09
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Economy & Employment
- . Retail and town centre uses
- . Tourism
- . Transport and Travel
- . Community facilities
- . Student accommodation
- . Traveller accommodation
- . Call for sites

Individual Name

Individual Address

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

yes

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

social housing and affordable housing are essential. landlords and developers who not just about profit should be used. make them sign up to a "respect the values of our city" agreement.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

yes, but it must be affordable and for local young families

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

housing for people in poverty, housing for people who need means led support

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

"The market" benefits the rich and privileged, and those who look to exploit the poorest in society. Prioritise housing for people in poverty, housing for people who need means led support

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

yes, as long as they are for local families in housing need

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

A one off deep clean of the town centre should be imposed.

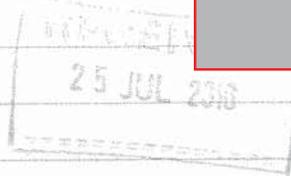
TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

20TH JULY 2016.

RE: DOCUMENT PLANNING
POLICY



DEAR SIR'S

HAVING READ THE ARTICLE
'CITY PLAN: HAVE YOUR SAY ON DEVELOPMENT
IN THE BRIGHTON AND HOVE INDEPENDENT
NEWSPAPER I, WRITE AS FOLLOWS, MY
OPINION AND VIEW IS, WITHIN THE
BRIGHTON AND HOVE AREA AND CONURBATION
THERE IS SO MUCH SPARE LAND THAT
IS JUST SITTING THERE DOING NOTHING
HECTARE AFTER HECTARE OF GREEN
FIELDS AND WASTE LAND THAT IS JUST
BEING LEFT TO FESTER AND DOING
NOTHING BUT JUST TO STAND THERE
ALL THIS LAND COULD AND SHOULD
BE BUILT ON, BRIGHTON AND HOVE
HAS A VERY SERIOUS HOUSING
SHORTAGE, THIS SPARE LAND COULD
BE AND SHOULD BE USED TO BUILD
HOUSES AND FLATS ON TO COMBAT
BRIGHTON AND HOVE'S ACUTE HOUSING
SHORTAGE. IT COULD ALSO BE USED
TO BUILD PLACES OF EMPLOYMENT
AND WORK, THIS WOULD CREATE
EMPLOYMENT, AND JOBS.

(1)

WHAT IS THE POINT IN JUST HAVING LAND JUST SITTING THERE DOING NOTHING. WHEN IT SHOULD BE BUILT ON, FOR REASONS THAT I HAVE JUST COMMENTED ON. IF BRIGHTON AND HOVE IS TO PROGRESS AS A PLACE, THINGS HAVE TO BE BUILT I.E. HOUSES AND FLATS FOR PEOPLE TO LIVE IN. AND BUSINESSES AND FACTORIES AND PLACES OF EMPLOYMENT FOR PEOPLE TO WORK IN, WHY IS THERE THIS RETICENT WITHIN BRIGHTON AND HOVE, TO BUILD ANYTHING, ESPECIALLY ON SPARE LAND THAT IS JUST SITTING THERE DOING NOTHING. WITHIN MY AREA HOLLINGDEAN THERE IS AMPLE SPARE LAND JUST SITTING THERE DOING NOTHING FIELD AFTER FIELD WHICH REALLY SHOULD HAVE BEEN BUILT ON YEARS AGO SPARE LAND WHICH COULD BE USED FOR BUILDING HOUSES, FLATS, AND PLACES OF EMPLOYMENT, WHY IT HAS NOT BEEN BUILT ON Baffles me THE SAME APPLIES TO AREAS SUCH AS MOULSECOMBE, BEVENDEN WOODINGDEAN, Ovingdean ALL THESE AREAS HAVE MASSIVE SPARE LAND FIELDS JUST SITTING THERE DOING NOTHING WHICH COULD BE BUILT ON FOR REASONS I HAVE MENTIONED ABOVE

AREAS SUCH AS HANGLETON, PATCHAM
HOLLINGBURY WESTDENE, FALMER
ALL HAVE SPARE LAND, FIELDS
JUST SITTING THERE DOING NOTHING
WHICH COULD BE BUILT ON, SO BUILD
ON IT. ALL THIS SPARE LAND COULD
BE DEVELOPED FOR THE GOOD, WELL
BEING, AND DEVELOPMENT OF BRIGHTON AND
HOVE.

THE DEVELOPMENT OF BRIGHTON AND HOVE
IS CRUCIAL, IN ORDER TO KEEP
UP WITH OTHER CITIES ACROSS THE
COUNTRY. IF BRIGHTON AND HOVE
LACKS ENOUGH DEVELOPMENT
IT WILL FALL BEHIND OTHER
CITIES AND PLACES ACROSS THE
COUNTRY, IN HOUSING, AMENITIES
PLACES OF EMPLOYMENT AND WORK
TRADE FACILITIES, ETC, ETC.

PLEASE TAKE INTO CONSIDERATION ALL
THE POINTS I HAVE RAISED

YOURS SINCERELY

(3)

25 JUL 2016

Spatial Policy Team
Brighton and Hove City Council
Bartholomew House
Bartholomew Square,
Brighton,
BN1 1JE

Consultant Town Planner

Tel: 01926 439078
n.grid@amecfw.com

Sent by email to:
planningpolicy@brighton-hove.gov.uk

19 July 2016

Dear Sir / Madam

**Brighton and Hove City Council: City Plan Part Two Scoping Paper Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Consultant Town Planner

n.grid@amecfw.com

Amec Foster Wheeler E&I UK
Gables House
Kenilworth Road
Leamington Spa
CV32 6JX

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Yours faithfully

[via email]
**Consultant Town
Planner**

Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
amecfw.com

Amec Foster Wheeler Environment
& Infrastructure UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074



Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	13
Response Date	05/08/16 09:37
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes, I would like to see more affordable housing built to allow first time buyers who are born in Brighton to actually be able to buy a property in the city.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Historic rights of public continued access, if there is none, then a site should be made available for housing.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

St Aubyns playing field, Saltdean Vale (by Saltdean FC)

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Affordable housing such as flats.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Young professionals, families

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

no

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Depends, if the new housing development offers a greater number of houses, urban spaces and recreation areas, then yes.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

no, that's why there are city parks and the beach

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

yes

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	14
Response Date	05/08/16 17:17
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Tourism . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Community facilities . Student accommodation . Traveller accommodation . Sustainability Appraisal Scoping Report . Call for sites . General comment
---	---

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

yes as long as associated services and road usage is similarly provided for.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

should be left

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

no

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

No

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

No

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

No

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

No

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

No

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Leave to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

NO

A: Offices

E1: Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

Use the space in the city above the shops and offices. Mixed spaces make for better communities and safer streets.

E3: In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

No

E6: Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

No

E7: Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

No

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

No

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

No

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

Yes

D: Local Centres and Parades

R9: Is there a need for a separate policy for assessing changes of use in local centres and parades?

no

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

yes

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

no

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

no

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

yes

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

no

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

no

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

no

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

yes

B10: Do you consider the following green spaces should be designated Local Green Spaces?

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

no

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

in one

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

dont

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

yes

P6: Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

no

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

no

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

no

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

yes

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

no

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

no

P17: Should a renewable energy policy be explored for City Plan Part 2?

no

P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

no

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

no

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

no

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

no

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

no

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

no

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

let the market sort it out

Traveller Accomodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

If we must do anything then make it one large site

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	15
Response Date	06/08/16 09:02
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Biodiversity and Open Spaces . Addressing pollution, water and energy resources

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

don't build on current or former playing fields and leave st aubyns field, rottingdean intact in its entirety as it is a green lung in a village suffocated by traffic and vehicle pollution.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

the entirety of st aubyns field, rottingdean should be designated as local green space.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

st aubyns field, rottingdean: former playfields used by locals; important views; green lung in village which is suffocating with excessive traffic and pollution.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

yes

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

get the trough traffic out of rottingdean as it is killing the village and endangering the health of residents

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

seperately

P7: Are there other pollution issues that the City Plan should address?

air pollution from traffic

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 16
Response Date 06/08/16 15:50
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Addressing pollution, water and energy resources

Individual Name

Individual Address

Individual Email

Individual Tel

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

YesYes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Do not build on parks or recreational green spaces

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

P7: Are there other pollution issues that the City Plan should address?

It should address the fact that Rottingdean High Street is amongst the most polluted roads in the country

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 17
Response Date 07/08/16 18:59
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Transport and Travel
- . Biodiversity and Open Spaces
- . Heritage
- . Traveller accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Most of the urban fringe sites are greenfield, not brownfield, and, hence, should not be built upon.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

It should not be left to developers to decide on the type of housing.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes but no building please on greenfield sites.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

If it is left to the market, we will only have large up-market houses being built. Different housing needs must be addressed.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes. Breaches of air quality and noise standards must be addressed. To mention just one example: it has been known for several years that air pollution in High Street, Rottingdean is well above legal requirements; why are these requirements not enforced?

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Air pollution which is not being addressed in a serious and committed way.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes. New developments only make the already bad air quality and noise situations worse.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

For years Transport Assessments, Statements and Travel Plans have been developed but no improvements are ever implemented.

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

We don't want more policies, we want enforceable requirements.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

See TR6.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

See TR6.

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

Yes

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

See TR6.

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

It is evident that there is a need to convert Volks Railway into a tramway running from the Palace Pier into the Marina; this tramway could include the existing VR heritage rolling stock.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes. Also, St Aubyns Field in Rottingdean must be retained as a green space.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SSCI technical review and rename them Local Wildlife Sites?

Yes

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Yes, all of those including St Aubyns Field, Rottingdean.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

St Aubyns Field, Rottingdean which should be used as public park.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

St Aubyns Field, Rottingdean which provides a green buffer zone between Rottingdean conservation area and the housing of east Rottingdean and Saltdean.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

Yes and where properties in conservation zones fall into disrepair BHCC must act to ensure the repair of such properties.

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

See HR1

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

Yes, certainly the Royal Pavilion site.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

Again we do not need more policies, we need enforcement of existing requirements; eg the enforcement of repairs to run-down properties in conservation zones.

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

See HR4.

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

The greatest threat is lack of action by BHCC in enforcing existing requirements.

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

No

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

See HR9

Traveller Accommodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

Smaller

TA2: Should new site provision be public site provision, or private or both?

This is not the issue; the issue is to prevent travellers using public parks and green spaces.

TA3: Should future pitch requirements for Traveller Accommodation be addressed through City Plan Part 2 or would this matter be better addressed through a separate Development Plan Document?

See TA2

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	18
Response Date	11/08/16 17:04
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Transport and Travel
	. Biodiversity and Open Spaces
	. Addressing pollution, water and energy resources
	. Call for sites

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Cumulative Impact, Infrastructure including school places and NPPF 74 must be considered, which is not currently the case. B&HCC should also follow the lead given by Greenwich Council whereby a non redacted, open viability report is an essential requirement for every proposed development. Planning should be transparent, not hidden

<http://www.out-law.com/en/articles/2016/february/greenwich-council-adopts-new-viability-assessment-requirements/>

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

City Plan 2 should clearly specify the range of properties required to satisfy housing needs and any development that falls outside these parameters (especially larger properties) should be refused

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Given that most families require 3 bed houses, yes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Build sufficient public sector housing on brownfield sites

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

I do not believe it should be policy to maximise site potential as this could lead to serious over crowding and excessive density. However, the city's housing balance should be considered rather than developers' profits

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes, designation is better than developer led market forces based on the profit to the developer

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Most definitely

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

No

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No, the city should not protect HMOs. The city should seek to make all units individual dwelling places

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

No

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

For a development to be considered, the relevant number of school places to cover ALL proposed developments (cumulative impact) in the local area MUST exist or the development should be refused at source, not mitigated

as this does not create the required local school places. NPPF 74 must be adhered to and it must be acknowledged in ALL relevant planning applications that Sport England is a Statutory Consultee who upon request MUST be kept informed at all stages. CP16 MUST be adhered to fully. The Cumulative Impact that ALL potential developments within the area will have on Air Quality, especially the impact on an AQMA MUST be realised as a reason for Refusal of a planning application. ANY planning application that FAILS to REDUCE POLLUTION in an AQMA MUST be refused.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

More detailed policy is required and existing polict MUST be adhered to. This is not happening currently.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

A full Transport Assessment must be demanded by B&HCC for every planning application over 9 units. The effect of ALL proposed developments (cumulative impact) in the local area MUST be taken into account as if they were a single planning application. This is a statutory requirement which has been ignored by B&HCC. The Cumulative Impact that ALL potential developments within the area will have on Air Quality, especially the impact on an AQMA MUST be realised as a reason for Refusal of a planning application. ANY planning application that FAILS to REDUCE POLLUTION in an AQMA MUST be refused.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

No. THis currently causes so many problems with developers which leads to numerous refusals

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

YES

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

This needs to be very clearly enshrined in City Plan Part 2 so it is fully enforceable

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

No

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Yes

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

No

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

No

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

No

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

No

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

No

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

No

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

No

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes

B2: If you think a policy is needed, what types of development should be included?

Any development on a Greenfield Site

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

The Oval, Saltdean. This is a long established public park and is the only public park / recreational area in the whole of Saltdean. It should be acknowledged as an Open Space and protected from any residential development, enabling it to be retained forever as a public Open Space available for recreational pursuits by all.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

St Aubyns School Playing Field, Rottingdean This site is an established playing field protected by NPPF 74 with a pending designation as a LOCAL GREEN SPACE through both the Neighbourhood Plan and City Plan Part 2. This Local Green Space Designation for this field IN ITS ENTIRETY must be recognised in City Plan 2. It has twice been backed by a petition of some 1,800 signatures and has been endorsed by Rottingdean Parish Council. It is due before the EDC Committee in September 2016 to be fully endorsed IN ITS ENTIRETY by this committee upon the unanimous agreement of all 52 City Councillors. The second petition was needed due to a council officer amending the wording and hence the meaning of the first petition prior to its presentation to the EDC committee. It has already been already been acknowledged that this site meets all the required criteria to be designated as a Local Green Space.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Combined Policy

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 19
Response Date 12/08/16 11:14
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Organisation Name (If Applicable) BHAF (Brighton & Hove Allotment Federation)

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

I'm not certain.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes, this seems like a sensible idea and the role of allotments in supporting the protection and enhancement of species should be central to such a policy. As well being 'green corridors' there is an enormous amount of wildlife found on and supported by allotments and 'allotmenters' growing food. Roedale Valley - with its dedicated Butterfly Plot - now supports the rare 'White-Letter Harebreast' and Craven Vale are now home to a rare beetle that hasn't been seen since 1979.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

All the city's allotment sites should be included/ specifically addressed through planning policy. University studies have concluded that the soils within allotments are comparable with those found in ancient woodland. Furthermore allotments are a unique wildlife habitat within the city. As well being 'green corridors' there is an enormous amount of wildlife found on and supported by allotments and 'allotmenters' growing food. Roedale Valley - with its dedicated Butterfly Plot - now supports the rare 'White-Letter Harestreak' and Craven Vale are now home to a rare beetle that hasn't been seen since 1979.

- B10: Do you consider the following green spaces should be designated Local Green Spaces?**
- . Benfield Valley
 - . Three Cornered Copse
 - . Ladies' Mile Open Space
 - . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes, that seems like a good idea.

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Allotments are unsuitable for housing development because of their benefits to mental and physical health, their contribution to biodiversity and their role in providing sustainable, cheap, healthy, locally-produced food. We believe that every effort should be made to preserve our existing allotment portfolio in its entirety. Allotments are almost completely a cost neutral service for the council to run and will be entirely self sustaining by 2018. A huge number of volunteers - 60 plus individuals - give their time and energy freely to ensure that sites continue to flourish. Their beneficial impact on mental and physical wellbeing has extensively researched in recent years and the amount of wildlife found in allotments dwarfs almost every other equivalent green space in the city.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	20
Response Date	19/08/16 15:14
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Transport and Travel

Individual Name

Individual Address

Individual Email

Individual Tel

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Please see TR5/6 re the principles involved

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example: . A single focused policy on air quality and noise - Introduce a new sustainable transport policy with a set of criteria against which new development (by size/scale of development) should be assessed?

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

At low congestion levels a 2% increase in traffic volume may have no measurable impact on delays or on NO2 air pollution. When roads are over congested, this same 2% increase may cause a 100% increase in delays and a 50% increase in NO2 emissions! So there are congestion and pollution thresholds at which quite small increases in traffic volumes will have impacts that should be assessed. The issue here is whether CP9 needs more clarity and specific thresholds to ensure officials set the correct level of assessment for developments, taking into account such local factors. Without clear

thresholds, officials must rely on their expert knowledge of nearby congestion hotspots and of current levels of congestion (and the congestion predicted for 3 years time taking into account the cumulative impacts of other developments in and beyond the City boundary) and also need specific technical expertise to assess the likely impacts of the developments at that time. This can ask too much of officials, who in practice often lack this detailed information, may not be traffic analysis specialists and may be under pressure from the developer's consultants using their influencing skills to divert focus from the areas where the development has its worst impacts. Thresholds in CP9 plus improved clarity are a vital safety net to ensure the level and focus of assessments are sufficient to inform the council's decisions on mitigations, severity of impact and managing the cumulative impacts of local developments, as per their statutory duties. They also help ensure key determinations can be audited, better protecting the council and individual council officials from the influence that unscrupulous consultants may seek to apply. As an example of clear thresholds, the Local Plan (TR1) made it mandatory to submit a Transport Assessment if the generated traffic exceeded government advisory limits (such as 100 trips per day or 30 trips in the peak hour) so we could be sure major developments were assessed properly. Since this was diluted by NPPF and later withdrawn (Oct 2014), Transport Assessments have not been requested for developments close to congestion and pollution hotspots & generating twice that amount of traffic. Without clear thresholds a claimed "no material impact" was hard to challenge. To the east of Brighton no assessments have been requested since October 2014 for the impacts on two of the four main bottlenecks (Rottingdean High Street's two-way narrow channel and the single lane A259 flow from Rottingdean to Saltdean Lido) suggesting either these bottlenecks were not known or that in the absence of thresholds, the need for assessment was not recognised. Assessments for the other main bottlenecks (Woodingdean Junction and the A259 East entry to Rottingdean Junction) were also so inaccurate as to cast doubts on whether council officials have the up to date information on local congestion levels that is needed check developers' assessments. Without the safety net of clear thresholds, this absurd situation will continue.

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

The health of our Transport Infrastructure is fundamental to the City's economic and social health, including our ability to support new businesses and new homes and to make services accessible to local people, so this must be reflected by a clear City Plan policy. It is also important to our physical health, as increased air pollution due to increased congestion and increased accidents through insufficient attention to highways safety, are threats to public health. The danger of the City Plan referencing a document holding further planning guidance was illustrated by the failure of the old Local Plan (TR1). This referenced Government Advisory thresholds (rather than specifying the values of the thresholds), leaving a partial void when NPPF weakened the advice and a full void some years later when the advisory thresholds were withdrawn (October 2014). As far as possible keep the most important policies in one place – don't spread them over multiple documents as failure to keep them synchronised may undermine the effectiveness of the City Plan. For example, quantitative thresholds such as (A) to (C) below are not too cumbersome for the City Plan. A Transport Statement is required if a development generates 2-way vehicle trips meeting any of (A) 100 per day or 30 during its busiest hour. (B) 30 per day or 10 during the busiest hour passing through a major congestion point (A road or junction greater than 85% saturated). (C) 30 per day through one or more local AQMAs. (An Air Quality Assessment AQA will be required). (A,B & C) will require a Traffic Model to assess the residual cumulative impacts (D) 30 per day on local roads with a poor accident record. (A Safety report will be required) (E) The above thresholds should be reduced by 30% if the development does not have good (flat) pedestrian access to public transport (as the effectiveness of any Travel Plan will need extra scrutiny). If guidance on Qualitative considerations (what is meant by poor public transport or a poor accident record) is needed, that could be expanded elsewhere without diluting simple and clear Quantitative thresholds. Addendum NPPF's use of qualitative terms such as "sustainable development" (NPPF 14) and "severe residual cumulative impacts" (NPPF 32) without quantifying what is "severe" or how much damage to public transport services is needed before a development is not "sustainable", opened the door to clever barristers appealing councils' determinations, as they can usually find an expert or some clever wriggle room to say that in these special circumstances the impact is not severe etc. Use of quantitative thresholds at the start of the planning process, to set the level and focus of assessments, will make it harder for assessed mitigations and refusals to be appealed as more of the critical information will be sourced from the developer, rather than deduced from vaguer data in a way

that might be contested. It may seem absurd that a Travel Plan that subsidises bus travel for some residents for a few years is enough to make a development sustainable, even if its impact on the transport infrastructure seriously delays public transport, increasing costs and discouraging thousands of people from using the buses ... but showing it is not sustainable is difficult given the lack of clarity in NPPF and is virtually impossible unless the evidence comes from the developer's own assessment rather than being the conclusion of a competing expert.

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

The issue of protecting "sustainable transport" and ensuring developments are sustainable rather than just claiming to be sustainable is covered in TR5 above - without tackling that issue any link to developers' contributions will be of limited value. The link between a development's impact on air quality (particularly in the AQMAs) and Public realm (e.g. pedestrian safety) and the information currently provided in Transport Statements/Assessments is too weak to inform a link with developer contributions - it is essential that the usual quality checking standards are applied to (in particular) Transport Assessments before believing a viable mitigation plan can be implemented.

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

See comment under TR5. Important policies should not be dispersed and should be quantitative rather than qualitative wherever possible.

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Absolutely. The traffic in the Urban Fringe is not just generated within the City - but also in Lewes, Peacehaven etc. and site specific solutions will be most effective when they start at the source of journeys.

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

A. I am concerned that the major growth in internet "fulfillment" traffic, mostly LGVs, is not being addressed by encouraging the logistics companies to share some routes (equivalent to car pooling).
B. With a number of congestion hotspots seriously delaying private and commercial traffic I believe more could be done to make available real time information on route congestion and suggest alternative routings. Particularly I am concerned that commercial traffic (including construction traffic) needs better protection from congestion or developments will overrun and further increase congestion. Could a new policy promote this?

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	21
Response Date	19/08/16 16:33
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Traveller accommodation

Organisation Name (If Applicable) Friends, Families and Travellers

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Traveller Accomodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

Research shows that Gypsies and Travellers prefer smaller sites, of up to 10 pitches. However, given the difficulties of finding land for sites we wouldn't want the policy to be too prescriptive, and either of the proposed site sizes would therefore be suitable.

TA2: Should new site provision be public site provision, or private or both?

The type of site provision should reflect the needs identified in the Gypsy and Traveller Accommodation Needs Assessment. Again given the difficulties in finding land for sites we wouldn't want to be too

prescriptive. However the high cost of land in Brighton and Hove may prove prohibitive to private site provision.

TA3: Should future pitch requirements for Traveller Accommodation be addressed through City Plan Part 2 or would this matter be better addressed through a separate Development Plan Document?

Future pitch requirements are best addressed through the City Plan Part 2, rather than through a separate Development Plan Document, together with all other site allocations for housing, employment, etc. This would be an inclusive approach where Gypsy and Traveller provision is given equal priority to other land uses, rather than being left to a separate document, which can mean further delays and additional spending for the local authority, and a possible limiting of the options for suitable sites.

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

In the interim, until the sites are delivered, negotiated stopping should be introduced, as committed to in the report of the Fairness Commission this year.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	22
Response Date	22/08/16 12:09
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Addressing pollution, water and energy resources
Organisation Name (If Applicable)	Brighton & Hove City Council

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Given Brighton & Hove has less renewable energy capacity installed than comparator areas, further policy should be developed to incentivise renewable energy. The energy study is expected to add 8% to the city's carbon footprint by 2030, therefore new development should lead the way on better energy performance now rather than having to upgrade these properties in the near future. Scottish Futures Trust, and standards in London are both ahead of much of the rest of England, but demonstrate that higher standards are achievable.

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

Would recommend more specific guidance on what technologies might be suitable, particularly relating to sites, using the AECOM Energy Study and possibly further studies, to give developers a clearer steer on solutions. There needs to be a plan that where technologies/systems are installed, there must be a plan/vision for these to be replaced by zero carbon solutions in future - as such a future proofing policy is needed. Policy also need to consider cooling needs. Community energy should be supported in the plan, in order that development meets the needs of local communities. Given the city coastal and low lying location there is potential for use of aquifer and sea sources of heat. This should be investigated.

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

It would be helpful for sites to be allocated through the plan - which references in particular land in public ownership. Energy storage must be explored further, referring to both power and thermal storage. The Cockroft Building is a good example of one specific approach - where aquifer thermal storage is in operation. Sites near substations are particularly appropriate for grid services (power storage) which could assist balancing city electricity demands and therefore the resilience of city energy into the future. CPP2 must investigate whether there is local quality and capacity for microgeneration capacity increase. This means working with UKPN. HRA's solar PV program had approximately 25% of DNO applications for solar PV refused on grounds of 'back-feeding'. Therefore planning policy must understand these issues and plan energy policy accordingly. The energy study is expected to add 8% to the city's carbon footprint by 2030, therefore new development in DAs should also lead the way on better energy performance now rather than having to upgrade these properties in the near future.

P16: If yes, what sites should be investigated for energy uses? (taking into account the areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study)

It would be helpful for sites to be allocated through the plan - which references in particular land in public ownership, and all of the DAs and SAs as a minimum.

P17: Should a renewable energy policy be explored for City Plan Part 2?

For reasons given in response to questions above - yes.

P18: What factors should be considered when exploring this approach?

Storage, grid capacity, heating and cooling networks, futureproofing, community energy, water source heat pump technology. Scottish Futures, London Energy Policy, Draft BHCC HRA Energy Strategy, West Sussex Energy Strategy, National Policy associated with the Carbon Plan.

P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

Yes. Housing is currently developing a high level heat network feasibility study for potential heat networks in two areas of the city: near Hove Station and near Eastern Road. These areas fall into CPP1 development areas DA6 and DA5 respectively. These may provide evidence for further site allocation policy. I would advocate both further policy development and also production of an SPD to clarify that policy and provide further information in deploying decentralized energy networks. In terms of the more general development management policy, the elements that are missing from the approach in CPP1 include: 1) recommendation to implement schemes to good quality standards, e.g. the CHPQA, CIBSE CP1, independent heat customer protection scheme, e.g. the Heat Trust. 2) it would be helpful to have an overarching district energy methodology that considers elements such private wire, cooling demands, potential for interconnection (compatibility). Although the heat network approach in Part L Building Regs is light (developers must submit evidence heat networks have been considered), the assessment should be robust, and an SPD could elaborate to strengthen local approaches. The Planning & Energy

Act allows local planning authority in England to impose imposing reasonable requirements for - (a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; (b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; Paragraphs (a) and (b) can be used to incentivise heat network delivery incorporating either low or zero carbon energy, but it would be valuable for this to be applied more strongly in the development areas.

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

In relation to housing standards as a minimum - yes. National Standards currently require: Private Sector landlords to achieve EPC band E by 2018 (Energy Efficiency Private Rented Sector Regs 2015) , and Fuel Poverty Regs 2014 require Band C by 2030 in all new or existing dwellings. These standards for Private sector landlords are relatively weak and could be strengthened. The fuel poverty requirements are very long term. Planning could incentivise higher performance levels now rather than delaying requirements for the higher standards later. Refer to Draft BHCC HRA Energy Strategy, BHCC/PH Affordable Warmth Strategy.

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

Water source energy from aquifer and sea should be explored as above. Further, as above, all potential technologies should be explored in order to have a resilient, diverse and secure supply for the city; and be in line with other environmental concerns (e.g. AQMA) and drive transition to a low carbon economy.

Please indicate which topic or topics you would like to comment on?

From: Tracey Hill
Sent: 18 August 2016 18:13
To:
Cc: FW: HMO licences and the part 2 scoping exercise on housing
Subject:

Follow Up Flag: Follow up
Flag Status: Flagged

Tracey Hill
Labour and Co-operative Councillor for Hollingdean and Stanmer ward
Deputy Chair of Housing & New Homes Committee
Lead Councillor for Private Rented Sector Housing
Brighton and Hove City Council

From:
Sent: 17 August 2016 9:50 PM
To: Tracey Hill
Subject: Re: HMO licences and the part 2 scoping exercise on housing

Dear Tracey,

I would be grateful if you would pass this on to City plan 2.

Many thanks,

On Wednesday, 17 August 2016, 16:58, Tracey Hill <Tracey.Hill@brighton-hove.gov.uk> wrote:

Dear

Thanks very much for this – some interesting ideas. Would you like me to send it in to Planning as a contribution to the input into the City Plan Part 2?

Tracey

Tracey Hill
Labour and Co-operative Councillor for Hollingdean and Stanmer ward
Deputy Chair of Housing & New Homes Committee
Lead Councillor for Private Rented Sector Housing

From:
Sent: 16 August 2016 3:55 PM
To: Tracey Hill
Cc:
Subject: Re: HMO licences and the part 2 scoping exercise on housing

Dear Tracey,

Below is a modified version of something I wrote before I saw this email in which you explain the difference between HMO Licences and planning permission. I think that for many of us the real point is that the permission to operate a property as an HMO should not carry over to new owners when property changes hands.

Thank you for engaging in consultation on this matter.

With regards,

Proposals Re HMOs

Planning permission for HMOs should not be “eternal”.

1. Permission to operate as an HMO should be not be “sold on” when houses with HMO licences come on the market for re-sale. Currently, sellers of properties with planning permission for HMOs can ask for significantly higher sale prices than would be appropriate for similar properties without such permission and licences. Owners are thus profiting from permission granted by the council and prices of HMO houses are inflated.

If planning permission to operate as an HMO expired when a house with an HMO licence came up for sale the planning permission could be re-allocated to another applicant. Alternatively, (and this is very relevant in the Lewes Road Corridor) the revoking of licences/planning permission at the resale of a property could enable the overall number of HMO licences to be reduced in an area where the density of HMOs is too high.

2. Licences/planning permission should be dependent upon landlords taking responsibility for the reasonable upkeep of their property and upon the behaviour of their tenants. All too often landlords leave problems to be dealt with, or suffered, by residents in neighbouring properties. Regular reviewing of eligibility for an HMO licence/planning permission could help to ensure landlords take greater responsibility for both their properties and tenants.



University of Sussex
Registrar's Office

City Plan Part Two: Scoping Document,
Planning Policy
Brighton & Hove City Council
Room 201 King's House
Grand Avenue
Hove BN3 2LS

4th August 2016

Dear Sir/Madam

Brighton & Hove City Council City Plan Part Two: Scoping Document June 2016

Thank you for informing us of the recent publication of the above document.

The University is keen to maintain and strengthen its working relationship with the Council on all planning matters and it welcomes the opportunity to be actively involved in the preparation of this important document which will guide future decision-making on planning applications within the city.

In terms of City planning, the University wishes to emphasise the importance of being able to develop our Campus and, in particular, to exploit opportunities to increase our student housing portfolio, a point referenced in our response to the City Plan Part I.

To assist the Council, we have used the same topic headings to those used in the Scoping Document in our response to the document below.

Housing

Whilst the University is not involved in the delivery of market or affordable housing, it is a major employer of local people – many of whom live or would wish to live in the city. On this basis, the University would support and welcome Council policy that encourages the development of further housing within the city – including the approach identified in Question H1 of allocating suitable brownfield sites for housing through the City Plan Part Two. In response to Questions H4, H5 and H7, it also supports policy that helps to ensure a mix of housing types and sizes and that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites.

Questions H18 – H20 concern Houses in Multiple Occupation (HMOs) and the Council will be aware that a number of the University's students choose this form of accommodation during their time with us.

The Scoping Document primarily focuses on the negative impacts of concentrations of HMOs in the city but as paragraph 2.28 does at least recognise, not all HMOs accommodate students and the sector does play an important role by providing an alternative form of affordable housing – particularly

for younger people in employment. In this way, HMOs also help to ensure that many graduates remain in the city and make a valuable contribution to the city's economy. The value of HMOs should therefore be recognised by the Council as it prepares the City Plan Part Two. For the same reasons, the University supports the inclusion of a policy in the document that seeks to protect existing HMOs (Question 18) and likewise believes a policy that encourages the conversion of existing HMOs to family-sized dwellings (Question 19) would not be in the wider interest of the city and its economy.

Question H20 asks if there are any ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy. The Council will be aware that the University is making significant progress in limiting such impacts in locations where its students reside. In particular, the University operates under the UUK National Code of Conduct which is more stringent than that operated by the Council and is keen to continue to work with the Council on such issues.

Economy and Employment

The University welcomes the recognition of its important contribution to the city's economy in the Council's recently adopted City Plan Part One. This contribution includes significant links with local businesses through activities both on and off-campus. The University's recently approved campus masterplan identifies its commitment to further growth of its successful Sussex Innovation Centre as an illustration of these efforts and will be seeking support for extensions of this activity into the city.

In this context the University supports a policy approach in the emerging Part Two document that encourages further economic growth through the allocation of new employment sites in the city and retention of existing sites where these remain viable (Questions E1 – E3 and E8 – E10). The University also supports the use of a policy that identifies mixed use site allocations – including those that indicate the suitability of education and training uses alongside B1a office use (Question E4).

Tourism

The City Plan Part Two should recognise that the University makes an important contribution to the city's tourist industry through its own events held at its Falmer campus (Question T4). These include regular and well-attended summer schools and academic conferences that are entirely complementary to the city's tourist industry and result in further spending in the city by delegates.

Transport and Travel

The University supports Council initiatives to increase the use of public transport, cycling and walking within the city and is keen to continue to work with and support the Council and public transport operators on these actions. It considers that Council planning policy concerning transport and travel is adequately covered within Policy CP9 of the City Plan Part One and there does not seem to be a reason for more detailed policy to be provided in the Part Two document (Questions TR1 to TR10).

Heritage

The University of Sussex was the first of seven new post war universities and its initial development was guided by a masterplan prepared by Sir Basil Spence. The campus has a number of listed buildings, all of which are based around Fulton Court. The University signed a Heritage Partnership Agreement (HPA) with the Council and Historic England in 2015 and through this and recent major projects within its Estate such as the refurbishment of the Attenborough Centre for the Creative Arts and the Chichester 1 Building it has strengthened its working relationship with both organisations.

In the University's experience, this approach, rather than the development of specific policies for each type of heritage asset or site-specific policies in the City Plan Part Two is a more appropriate way of ensuring the long term protection and enhancement of heritage assets (Questions HR1, HR3 and HR4).

The University welcomes the opportunity to continue to collaborate with the Council and Historic England on all matters associated with the listed buildings within the campus as well as adjoining heritage assets such as Stanmer Park Historic Park and Garden and the Stanmer Conservation Area.

Community Facilities

The University supports the Council's commitment to supporting existing and delivering new community facilities in the city as it recognises these are an important part of the local infrastructure for its students and staff, local residents and those who work in the city.

As part of this support, the University has recently delivered enhanced childcare facilities within its campus whilst its recently approved campus masterplan will provide an improved range of on-campus facilities including health care and social spaces to support future growth. The University is fully committed to such provision as it considers this is essential if it is to retain and strengthen its position as a leading higher education institution.

In recognition of the benefits of better health, well-being and fitness for its staff and students and the wider population, the University will also continue to work with the Council and other partners to strengthen Falmer as a sports hub for the city. This involves the development of facilities both on and off the University campus. As part of this initiative the University considers that better use could also be made of Stanmer Park for sports activities and it would welcome recognition of this within the City Plan Part Two document (Questions CF4 – CF6).

Student Housing

The University welcomes the recognition at paragraph 12.1 of the Scoping Document to important contribution made by the city's two universities and other educational establishments to the economic and cultural life of the city. It also welcomes the Council's commitment to the delivery of purpose-built student housing through its policies within the City Plan Part One – particularly Policy DA3 and Policy CP21. The Council will be aware that these are assisting the University to deliver a significant increase in on-campus accommodation via its campus masterplan and recent planning approval for delivery of new development on its East Slope. The University has and is also working with private sector partners to deliver further off-campus purpose built student accommodation.

The University's response to the specific consultation questions raised in the Scoping Document are set out below.

Question SH1

Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

The University supports the introduction of a target in the City Plan Part Two for the amount of student housing need to be met through purpose built student accommodation. We have been discussing this issue with the University of Brighton with the aim of coming to a joint conclusion on the requirement for incorporation into proposed updated student housing strategy. The University has an ambition to deliver some 4000 additional rooms on campus and in the city. In this context it is worth reiterating that some 20% of our annual intake do not require University housing preferring to study from their home address.

Question SH2

Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Given the recognised need for further student housing in the city, the University supports the allocation of additional sites for purpose built student accommodation in the City Plan Part Two. Whilst the University's campus masterplan identifies the delivery of a significant increase in on-campus accommodation to meet its aspirations to grow to 18,000 students, it recognises that some of its students will always want to live off-campus and therefore a choice of purpose built student accommodation through the delivery of further off-campus accommodation would be beneficial to its students and the city as a whole.

In making this response, it should be noted by the Council that the University has no plans to grow to beyond its 18,000 students target.

Question SH3

Are there any locations/sites that could be considered for purpose built student housing development?

Off-campus locations for purpose built student accommodation would normally be delivered by specialist developers working in collaboration with the universities rather than by the universities themselves. The University will therefore leave it to these developers to identify such sites. These sites would have to be of sufficient size and scale to make them viable and affordable. Small piece meal developments (of which there had been a few of late) are not the best solution. It might be helpful to the Council to seek views of Student Housing developers and providers as part of this consultative exercise.

Question SH4

Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

The University supports a more dispersed delivery of purpose built student accommodation within the city. However, such an approach is dependent on potential locations for purpose built student accommodation being served by direct, reliable and reasonably priced public transport to its campus at Falmer. Where such transport links exist (for example the 25X bus route), the experience is that students will be prepared to choose accommodation beyond locations along the Lewes Road.

The Council should be aware that the University is proactively looking at encouraging the dispersal of its students and is currently examining a number of potential options through delivery of purpose built student accommodation and other initiatives to achieve this.

Question SH5

What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

As identified above, the absence of direct, reliable and reasonably priced public transport to the university sites in the city is a major barrier to locating purpose built student accommodation outside the Lewes Road academic corridor. The cost of accommodation is another key factor although this can be eased by the supply of more purpose built student accommodation.

Question SH6

How can the cumulative impacts of purpose-built student accommodation developments best be assessed and mitigated?

The University considers that existing policy within the City Plan Part One already assesses the cumulative impacts of purpose-built student accommodation developments.

Question SH7

Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

The potential allocation of purpose-built student housing in the City Plan Part 2 should seek to avoid mixed use developments involving social housing. In the University's experience and through its discussions with developers of purpose-built student housing, funding for such projects would not be forthcoming and therefore the developments would not be deliverable.

We hope that this response is of assistance to the City Council but would be pleased to provide further clarification of the University's position if this would be helpful.

Yours faithfully

[Redacted]

Registrar and Secretary

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Biodiversity and Open Space

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Biodiversity and Open Space Summary:

Key objective is conserving biodiversity and enhancing the natural environment's multi-functional offer. The section invites comments on relevant matters including: 'landscape-scale' approach; the setting of criteria and hierarchy of sites; species protection; and, identification of additional open space, Local Green Spaces and National Park Gateways.

This form has two parts: Part A – Personal Details
 Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title	Planning Coordinator	
Organisation	Southern Water	
Address	Southern House	
	Lewes Road	
	Brighton	
Postcode	BN1 9PY	
Email Address	planning.policy@southernwater.co.uk	
Telephone No.		
Mobile No.		

Part B: Your Comments

A. Landscape Scale Approach

Question B1

Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

-

Question B2

If you think a policy is needed, what types of development should be included?

Following our representations on CP16 in Part One of the plan, Southern Water considers any policy aimed at guiding types of development that may be appropriate within the NIA should include a provision allowing for essential utility infrastructure, where there is a locational need and no suitable alternative sites are available. This will help to ensure that, alongside planned levels of growth within the city, Southern Water can maintain its level of service to both new and existing customers throughout the City Plan period.

Question B3

Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

-

B: Nature Conservation, Geodiversity and Landscape Sites:

Question B4

How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

-

Question B5

Should there be a specific policy to address the general protection and enhancement of species?

-

-

Question B6

Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

-

Question B7

Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

-

C: Open Space, Local Green Space and Gateways to the National Park:

Question B8

Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

-

Question B9

Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

-

Question B10

Do you consider the following green spaces should be designated Local Green Spaces?

- **Benfield Valley;**
- **Three Cornered Copse**
- **Ladies' Mile Open Space**
- **Hollingbury Park.**

Southern Water has no objection in principle to the designation of Local Green Space. However we would point out that Southern Water have an area of operational land in the vicinity of Hollingbury Park, and would therefore welcome any discussion the Council may wish to have regarding the boundary of such a designation were it to go ahead.

Question B11

Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

-

D: Are there any other biodiversity and open space issues?

Question B12

Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

-

Signed/typed*:	
Dated*:	24 August 2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Addressing Pollution, Water and Energy Resources

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Addressing Pollution, Water and Energy Resources Summary:

Key objective is conserving and enhancing the natural environment and reducing pollution. The section invites comments on relevant matters including: pollution and nuisance; land stability; water and drainage infrastructure; coastal and marine planning; low carbon / renewable energy and identification of sites; and, energy efficiency.

This form has two parts: Part A – Personal Details
 Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title	Planning Coordinator	
Organisation	Southern Water	
Address	Southern House	
	Lewes Road	
	Brighton	
Postcode	BN1 9PY	
Email Address	Planning.policy@southernwater.co.uk	
Telephone No.	01273 663742	
Mobile No.		

Part B: Your Comments

A: Polluted Land and Buildings

Question P1

Are there any planning issues that you consider a Polluted Land and Buildings policy should address?

-

B. Land Stability

Question P2

Should the City Plan Part Two include a development management policy regarding unstable land or is this sufficiently addressed by national planning policy guidance and through Building Regulations?

-

C. Pollution and Nuisance Control

Question P3

Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

-

Question P4

How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

-

Question P5

Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

In Brighton & Hove, 100% of drinking water supply comes from groundwater contained in underground aquifers (<https://www.southernwater.co.uk/where-our-water-comes-from>). Southern Water therefore consider it important that groundwater source protection zones (SPZs) are protected via local plan policies in order to prevent any potential unacceptable impacts on the quality and yield of groundwater caused by new development.

Question P6

Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

-

Question P7

Are there other pollution issues that the City Plan should address?

-

D. Water and Waste Water Infrastructure

Question P8

Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Southern Water fully support such policy provision. Generally we would seek a policy that supports the provision of strategic water and wastewater infrastructure (such as additions or improvements at treatment and abstraction works). Furthermore we would look for support within individual site specific policies for the provision of local sewerage and/or water infrastructure to be delivered in tandem with new development, and where capacity assessments show there to be a requirement at a given site, we would seek provision for development to connect to the sewerage/water network at the nearest point of adequate capacity.

E. Sustainable Drainage

Question P9

Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

-

F. Coastal/ Marine Planning

Question P10

Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

-

Question P11

Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

-

Question P12

Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

-

G. Low carbon and renewable energy

Question P13

Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

-

Question P14

Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

-

Question P15

Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

-

Question P16

If yes, what sites should be investigated for energy uses? (taking into account the areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study)

-

Question P17

Should a renewable energy policy be explored for City Plan Part 2?

-

Question P18

What factors should be considered when exploring this approach?

-

Question P19

Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

-

Question P20

Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

-

H. Are there any other issues that relate to this topic area?

Question P21

Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

-

Signed/typed*:	
Dated*:	24 August 2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	26
Response Date	25/08/16 15:47
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Individual Name

Individual Address

Individual Email

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

I would like to see the thrust of the present retained policy on allotments incorporated into the City Plan Part 2 i.e that they should be protected from development while they are in use or in demand.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	27
Response Date	27/08/16 14:19
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Student accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes - Both universities should be obliged to provide accommodation on campus for 2nd year students as well as 1st.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes - Every effort should be made by the universities to build them on campus.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Lewes Road between B&Q and existing Brighton Uni buildings. Sussex Uni campus. Falmer campus behind Amex Stadium and Falmer School.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes - Falmer and Lewes.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

Sussex Uni seems to have the attitude that it is OK to dump its 2nd/3rd year students on the local population thereby 1) Saving itself the bother and cost 2) enriching Buy To Let landlords 3) depriving local people, young families of properties that they could rent or buy 4) depriving B&H council of council tax to the detriment of us all.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

I don't know but keeping them on campus would help.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Could they be educated as to how to sort rubbish and look after black boxes. Is it it too much to expect landlords and agents to take any interest in the rubbish that students generate. In our road some cannot be bothered to flatten a cornflake box or wash a food container before throwing it out.

Please indicate which topic or topics you would like to comment on?

2 Port Hall Road Brighton BN1 5PD

T 01273 413700

E admin@lewisplanning.co.ukW www.lewisplanning.co.uk

Planning Policy Team
Brighton & Hove City Council
Room 201 King's House
Grand Avenue
Hove
BN3 2LS

18th August 2016

Dear Sir/Madam

**Brighton & Hove Draft City Plan Part 2 – Scoping Document
Land at Falmer Avenue Saltdean – Proposed Housing Allocation**

Further to receiving notification of the City Plan Part Two Scoping Document, we write to respond on behalf of The Hyde Group (Hyde). These representations specifically request that the land at 6 Falmer Avenue, Saltdean is allocated in the City Plan for future housing development. Hyde is the prospective purchaser of the land subject to contract.

Proposal Site

The site incorporates No.6 Falmer Avenue together with the paddock land and stables to the rear (a total site area of 1.35 ha). The appearance of the property is predominantly of grassland with a variety of fencing and walls which form the rear boundaries of the adjoining residential gardens. As with the majority of urban fringe sites, the land is outside the current settlement boundary but also outside the South Downs National Park.

**RTPI**

mediation of space · making of place

Chartered Town Planners

Lewis and Co Planning South East Limited
Company Number 05809390
Registered Office: Preston Park House, South Road,
Brighton, BN1 6SB
Registered in England and Wales

Planning Policy History

The land was originally assessed in the Brighton & Hove Urban Fringe Assessment (June 2014) and the eastern part of the site was considered to be suitable for 12 new dwellings on the following basis:

“There are no significant ecological, heritage, open space or other environmental constraints to residential development. Therefore low density residential development is deemed appropriate for the site”.

City Plan Policy SA4 allows for development within urban fringe locations where a site has been allocated for development in a development plan document. The policy goes on to state that should proposals for development come forward prior to adoption of Part 2 of the City Plan, the 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development.

Policy CP1 (Housing Delivery) includes an allowance for 1060 new dwellings to be built in urban fringe locations. This allowance forms part the City Plan Housing Delivery Strategy to provide at least 13,200 new homes before 2030.

The whole site is now identified by the City Council as being suitable for the construction of 32 dwellings in the 2016 Strategic Housing Land Availability Assessment (site reference 1001).

Planning Application History

Planning consent to construct 32 new dwellings together with public open space, landscaping and the creation of a new pedestrian link to the South Downs was refused on 29th January 2016 (BH2014/03394) for the following reason:

“The proposed development by reason if its design is out of keeping with the prevailing character of the urban fringe area and does not emphasize its positive characteristics in terms of prevailing style and material, would result in an incongruous development of detriment to the character of the local area and fails to enhance the local landscape. These demonstrable and significant adverse impacts are considered to outweigh any benefits of the proposed scheme. As such, the proposal is contrary to policies QD1, QD2, NC5 and NC8 of the Brighton & Hove Local Plan 2005 and policies SA4 and SA5 of the emerging City Plan Part One”.

This decision is the subject of a planning appeal which is due to be determined at a three day public inquiry on 29th November 2016 (APP/Q1445/W/16/3147426). Whilst the application was resisted on design grounds, the City Council did not object to the principle of residential development across the whole site or to the proposed number of dwellings (32).

The Planning Committee report for BH2014/03394 confirms the acceptability of 32 dwellings on the site as follows:

“The revised proposal for 32 residential units would have a density of approximately 23.5dph. This proposed density is considered appropriate for this location with regards to policy HO4 in the adopted Local Plan and CP14 of the City Plan Part One (as modified). This proposed relatively low density of development is

supported by the 2014 UFA which suggests that a density of 25pdh would be appropriate for the site”.



Conclusion

Whilst matters relating to building design are yet to be resolved through the development control system, the principle of constructing 32 residential units on the land at Falmer Avenue has been thoroughly tested and accepted by the City Council through the Urban Fringe Assessment, SHLAA and planning application processes. In order to maximise the prospects of delivering the anticipated number of units on the site, we hereby request that the land is allocated in the City Part 2 for housing accordingly.

If you would like to discuss the merits of the site further, please contact on 01273 413700.

Yours faithfully

Lewis & Co Planning

2 Port Hall Road Brighton BN1 5PD

T 01273 413700

E admin@lewisplanning.co.ukW www.lewisplanning.co.uk

Planning Policy Team
Brighton & Hove City Council
Room 201
Kings House
Grand Avenue
Hove
BN3 2LS

18th August 2016

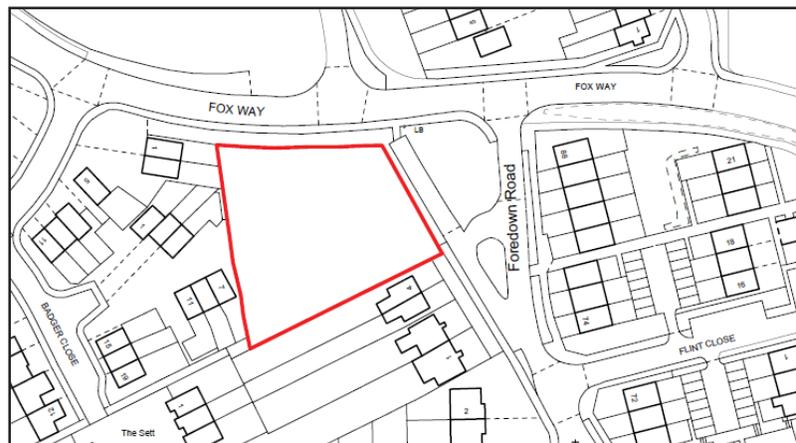
Dear Sir/Madam

**Brighton & Hove Draft City Plan Part 2 – Scoping Document
Land at Foredown Hill Portslade – Proposed Housing Allocation**

Further to receiving notification of the City Plan Part Two Scoping Document, we write to respond on behalf of Mr Mike Stimpson who owns the land at the junction of Foredown Road and Fox Way, Portslade. These representations specifically request that the land is allocated in the City Plan for future housing development.

Proposal Site

The site comprises approximately 0.07 hectares of scrubland and is located on the corner of Fox Way and Foredown Road (see Site Location Plan below). The land is not located within a conservation area or a flood risk zone. The site is surrounded by housing to the north-east, east, south and west and is within the built up area boundary of Brighton & Hove.



Site Location Plan

**RTPI**

mediation of space · making of place

Chartered Town Planners

Lewis and Co Planning South East Limited

Company Number 05809390

Registered Office: Preston Park House, South Road,

Brighton, BN1 6SB

Registered in England and Wales

Planning Application History

The land at Fox Way previously formed part of proposals for 370 dwellings on Foredown Hill (Application Ref 3/89/1008) and is subject to a Section 52 Agreement under the Town & Country Planning Act 1971 which reserves the land for community facilities (defined as a shop, public house, doctor's surgery or similar development) under paragraphs 5.1, 5.2 and 5.3.

Outline consent for the erection of two retail shops and a meeting hall on the site was granted in August 1996 (3/94/014). Full consent for the erection of two retail units with associated parking was also granted in January 1997 (3/96/0508). Neither of these permissions have been implemented and both have since lapsed.

Outline consent for the residential development of the 'Reserved Site' was sought in 2001 (BH2001/02551/OA). This application was refused in June 2002 for two reasons. The first reason related to the site being reserved for community use under Policy H5 of the Hove Borough Local Plan which required the use of the land to comply with the 'Land at Foredown Hill' development brief. The second reason for refusal was due to the land not being allocated for housing in the Brighton & Hove Local Plan 2nd Deposit Draft or qualifying as a windfall site. This decision was the subject of an appeal which was dismissed on 10th February 2003 (APP/Q1445/A/02/1101477).

Planning Policy

There have been a number of development plan changes since the 1990 Section 52 Agreement came into effect and since the 2003 appeal decision was made. As a result of the 2005 Local Plan and the 2016 City Plan Part 1 being adopted, there is no longer a development plan requirement to provide a community facility on the site.

Correspondence from the Head of Development Control dated 14th May 2014 (see enclosed) states that the Planning Authority will not seek to uphold the Section 52 restrictions as follows:

“In conclusion, there is no longer any development plan basis to require a community facility on the site therefore the Local Planning Authority would be prepared to vary clauses 5.1 & 5.2 of the Section 52 agreement signed in respect of planning permission 3/89/1008 to allow residential development on the site.”

The site has since been allocated in the City Plan under Policy CP16 which seeks to retain existing open space unless one or more of 5 exceptions criteria apply. The first of these allows for the loss of open space where:

“The loss results from a development allocation in a development plan and regard has been given to maintaining some open space (physically and visually).”

Policy CP14 therefore allows for new residential development on the site subject to achieving a housing allocation in the City Plan Part 2 and subsequent applications including the appropriate retention of open space.

Accordingly, the Strategic Housing Land Availability Assessment identifies the land at Fox Way as being suitable for nine new houses (site reference: 6052). The SHLAA also

concludes that although the site is private open space it is not utilised by anyone and is close to the South Downs National Park in any event.

Housing Potential

On behalf of the landowner we hereby request that the land be allocated for housing in the City Plan Part 2 for the following reasons:

- The site is already within the built up area of Portslade and surrounded by housing;
- The site is a leftover parcel of land that was identified for development under the original 1997 planning permission for the area;
- The land is disused private scrubland with no visual, recreational, heritage or ecological value;
- The grassed area immediately to the east of the site would continue to provide attractive informal open space;
- Children's play facilities are located within a short walking distance in Warrior Close;
- Public access to the National Park exists immediately opposite the site and provides significant opportunities for sports and leisure activities including walking, running, dog walking and cycling;
- The site is close to Peter Gladwin Primary School, the Mill Lane shops and other local services.

Conclusion

The land at Fox Way does not currently provide any meaningful contribution to the open space requirements of the city and the locality is already well served by informal and formal recreation facilities. Furthermore, there is a significant discrepancy between the housing target set out in City Plan Policy CP1 (13,200 new homes by 2030) and the objectively assessed housing need (30,120 dwellings). The use of the land for housing is therefore clearly more appropriate in planning terms given the balance of needs set out above.

In order to maximise the prospects of delivering housing units on the site, we hereby request that the land is allocated in the City Part 2 for housing accordingly.

If you would like to discuss the merits of the site further, please contact on 01273 413700.

Yours faithfully

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	30
Response Date	01/09/16 13:11
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Transport and Travel
	. Design

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

1. Yes - brownfield sites must take precedence over green spaces and/or urban fringe for development
2. The Brownfield Site Register, providing it only grants permission in principle, rather than the development plan status accompanying a formal site allocation, is a positive step forward
3. I believe the Council should have more powers to enforce sale or compulsory purchase of sites that are vacant or derelict for long periods of time.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

1. Strict adherence to any objections of the South Downs National Park Authority regarding potential development that would impact on the SDNP (whether the development is on the SDNP or adjacent to it), as per Environment Act 1995, Part III, Section 62 (2)
2. By reason of their location primarily on the edge of the city limits, all such developments should be subject to a full Transport Assessment

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

1. A more general criteria-based planning policy would invite more innovative approaches to development and also match the appropriateness of a planning application to specific sites.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

1. This must be done in line with the local infrastructure, e.g. schools, traffic

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

1. BHCC should be more vigorously defending the physical constraints of the city i.e. bordered by the sea and the SDNP. Ultimately, housing needs will only be met by looking at 'new town' developments' which incorporate schools, surgeries and retail - this will only be achieved by working collaboratively with neighbouring authorities to identify suitable sites.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

1. The danger is not in the under-development of sites, but overdevelopment! Too many sites are succumbing to rabbit-hutch designs, with below minimum space standards, inadequate storage etc.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

The 'market' will not be sympathetic to such accommodation because it will limit profit - as a generalisation, special needs/ older persons will not have the purchasing power to impact the market. If the Council were able to identify appropriate sites, they could be funded from developer contributions tied into market oriented planning applications.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes - this will encourage innovation and avoid the monotony of housing 'estates' - this model has been successfully used in the Netherlands

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

No necessarily - case by case basis - if the existing housing stock is substandard there should be leeway to accommodate alternative use,

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Yes, but protection could mean the replacement of such housing within a new development.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes, providing there is a provision for maintenance

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes, with provision for consultation by residents

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

YES. Cramped housing with inadequate storage has been linked to poor mental health

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Left to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Student housing should be addressed in collaboration with the Universities and more housing created within the campus areas

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

It is imperative that cumulative traffic effects are considered, particularly on routes into and out of the city, such as the A259

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Rigorous adherence to the requirement for a full Transport Assessment for new developments, and updated monitoring of traffic flows through existing bottlenecks

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example: . An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

The problem with developer contributions is that they are becoming a bribe to secure planning permission, and the contributions are not necessarily distributed (if at all) to the local community. For example, a contribution to education does not necessarily go to the local school, or a transport contribution does not fund a new bus route.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

In view of the traffic congestion in Brighton and Hove, these should be more stringent.

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

A policy, because guidance is open to interpretation.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

In theory, a policy would be good, but practically may not work e.g. the requirement to provide a certain percentage of cycle stands per development is ludicrous if the development is situated on a 1 in 4 gradient and only an Olympic athlete would consider cycling to and from home as a practical means of transport.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Developer contributions are in danger of becoming a way of paying for planning permission without any benefits accruing to local residents

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

See above

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Planning guidance would simplify the minefield of policies, but can guidance be enforced?

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Yes

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

Yes

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

Passive Design

D5: Are there any other design issues that this policy should provide guidance on?

1. Passive design 2. Water conservation

D7: Are there any further issues you consider an amenities policy should address?

Access and transport

D8: Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

yes

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	31
Response Date	06/09/16 12:24
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Retail and town centre uses . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Traveller accommodation . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes, I support this

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes. If there is a need to build additional homes and especially if this implies encroaching on the urban fringe, then the City Plan MUST resist the loss of existing stock. We need to include resisting loss of existing stock through change of use, as well as loss of buildings. In particular, consideration needs

to be given to prevention of homes being rented out as 'party houses'. Aside from the anti-social impact of party houses, they are clearly businesses, not dwellings.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

There is a growing problem in the town centre whereby retailers, pubs and restaurants are allowed to extend their premises onto pavements. While this is sometimes understandable (eg when a small business is in a side street with limited footfall and uses an A board to attract attention from the main thoroughfare) and even, to some extent desirable (where restaurants' and pubs' outside seating creates a continental atmosphere), it is having a detrimental effect on people's ability to negotiate the streets. Pavements are being completely blocked by outdoor seating, A boards, trade rubbish bins. There are many many examples of the ways in which commercial concerns are creating hazards through street clutter. Pedestrians using the lower western stretch of Queens Road are forced to step out onto the busy road because the pavement is blocked with A boards (why do businesses on a street with heavy footfall need A boards?). Mobility impaired pedestrians and people with pushchairs or laden with bags cannot access Cannon Place from Churchill Square because the Prince of Wales pub uses almost all of the step free access for its tables and chairs. The pavements of many city centre side streets - including those in heritage and copnservationa reas, including pavement access to people's homes - are completely blocked by huge trade bins. There is a need for the Retail and Town Centre Use policy to link with the Active Travel, Design and Heritage policies.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

I don't understand what you mean by a 'general mitigation' policy, but there is a need for pedestrian access and the better public realm within the Retail and Town Centre Use policies. Active walking and the public realm are currently under-mined by the loss of pavement space to business use, eg through excessive use of A boards (sometimes several A boards outside a single shop, sometimes A boards deliverately placed in the middle of pavements - see Queens Road and Western Road), and the apparent freedom with which pubs and take-aways can commandeer pavement space for customer seating and permanent storage of their kitchen waste.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Should be addressed by a wider policy on public realm, but not limited to 'developer' contributions - needs to incorporate use of the public realm by existing establishments.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

.	Three Cornered Copse
.	Ladies' Mile Open Space

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

Yes for rental properties. Landlords should be compelled to ensure that properties they are using for profit are energy efficient. No for owner-occupied properties. The difficulty is that so much of the city's existing buildings are very old, with many of them limited by their listed status from adopting energy efficient measures. However desirable it is to insulate walls, for example, it's difficult and disruptive to achieve in buildings with solid walls. Bungaroosh buildings can be damaged by insulation measures that prevent the walls from breathing. Double glazed windows and solar heating are ner impossible to emply in a listed building.

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Protection of amenity should not be limited to the impact of new developments, it should also encompass changes to activities in existing areas, especially in the City centre and mixed use areas. There is a continual loss of pedestrian access due to commercial encroachment onto public space. There is an ongoing tendency for pubs and restaurants in mixed use areas to overwhelm an entire street through (eg) excessively loud music. This can create an atmosphere of chaos and threat and destroys the ambience of an area. The city's licensing laws need to consider the impact of individual businesses on wider amenities in existing areas.

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

This is a rather daft question. It seems to have been answered already by paragraphs 10.10, 10.11 and 10.12. Beyond the knowledge gaps that you acknowledge in those paragraphs, how can we know what you don't know?

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

There is no single answer to this. Each historic area has a different key quality, eg grandeur in the case of Adelaide Crescent, Brunswick Square, Lewes Crescent; the exact opposite in the case of Hanover and the North Laine. The city's history doesn't have a single story. Some of it is rooted in industry, some of it in tourism.

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

Travellers have a right to a nomadic lifestyle and access to local services, but they need to contribute to the cost, just as permanent residents do, particularly in respect of use of land for pitches, disposal of rubbish, other costs that are met through local authority budgets. The resentment towards travellers who freely use - and sometimes spoil - amenities that permanent residents are funding does have some justification. The wider community has a responsibility to help and support people who are incapacitated or poor, but it can only meet that responsibility if everyone else pays their way.

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Many of my comments reiterate the same issues, because there are various ways in which elements of the plan overlap, eg Retail & Town Centre overlaps with Transport & Travel, which overlaps with Design & Amenity. While I realise that the planning task has to be broken down into elements, it does also need a holistic approach, to consider the impact of one policy area on another. I'm a little uncomfortable at the constant focus on 'new development'. Policy also needs to consider the impact of creeping change on what's already there.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	32
Response Date	06/09/16 17:04
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Community facilities

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

A single policy in general that recognises the threat rising property values cause to sustainable community facilities, where owners can make as much money through a sale for residences as they could through rents from community usage. Where a business is struggling, alternatives are not able to be developed as developers have greater cash flows, greater risk appetites and greater asset bases

to outbid other possible users, who in many cases are trying newer business models with inherent risks.

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

A policy in general that recognises the threat rising property values cause to sustainable community facilities, where owners can make as much money through a sale for residences as they could through rents from community usage. Where a business is struggling, alternatives are not able to be developed as developers have greater cash flows, greater risk appetites and greater asset bases to outbid other possible users, who in many cases are trying newer business models with inherent risks. The result will be an ever-decreasing level of community facilities and poorer communities as a result. Developers will buy units, and if unsuccessful in change of use, will hold onto them; they aren't able to get what they want but neither are communities. A policy framework which makes it clear what the risks for developers will be for 'elbowing' the community out of the way in the pursuit of capital gains from planning applications to change use will be helpful; not to deter proper conversion where there is a case, but to put the onus on the developer to make the case to prevent 'asset banking'.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Pubs are a very specific type of asset which are uniquely threatened by being owned in many cases outside the local community by pub management companies who have very specific financial pressures that lead to them making judgements about viability based on their own financial pressures, not the actual viability of a pub to the community in terms of being able to be sustainably operated. Unfortunately, many of these pub companies know that in a city like Brighton with ever-rising property values, developers will be prepared to take a chance on buying at an inflated price on the potential planning application being successful to covert to residences. Whilst the Localism Act 2011 gives some rights, in the area of pubs, it has been more often used as a 'poison pill' to trigger the removal of Permitted development rights. Unfortunately, this is unhelpful for three key reasons: 1) The process isn't as part of a journey to community ownership or right to bid, but as a planning policy protection. People will continue to use the process for pub protection, even though it wasn't specifically designed for this. 2) In the meantime, the Council will have to go through costly processes to manage 3) That in turn will create a poor reputation for the community rights, preventing their proper consideration and usage in exactly the circumstances the legislation envisages. The Wandsworth approach piloted by that Borough merits adoption. It removes permitted development rights from all pubs, meaning developers have to make a case for the removal, and increases the risks of failure. That in turn makes developers less likely to gamble, the result of which can be a perfectly usable community facility being closed on the back of a failed planning application for change of use to residences. It also provides every pub with the protection 'as if' it was designated an ACV, removing the lottery approach of pubs being protected where the local citizens were more aware of the legislation. Secondly, it saves the Council time and money in not having to risk appeals and tribunals from developers fighting an ACV, and frees up that process to be used for instances where the community are actively seeking the Right to Bid, not simply the right to frustrate developers seeking capital gains.

C: Are there any other issues that relate to Community Facilities?

CF7: Can you think of any other policy issues relating to community facilities that City Plan Part Two should address?

The residential character of much of Brighton is changing in response to housing values. Retail and community usage is falling away because property owners can achieve greater value from their properties in residential usage; this particularly applies to non-high street units. As a result, the kind of patient investment that underpinned the development of community facilities isn't taking place. Furthermore, the changing demographics of the city mean that whilst a particular building might not be as apposite to current community needs as it once was, instead of being repurposed, the site becomes sold for development. At this point, the community has lost the ability to use it, and it is a matter of the developer's appetite to hold a building in non-productive use that determines whether this changes. Given developers and landlords can have large estates, they are able to hold on to

properties in the hope that in a few years time, the community will prefer anything to nothing, even though they really wanted something specific. As a result, the Council needs to appreciate the peculiar nature of community facilities and how market values for property can prevent new uses coming to the fore. As a result, there will be a market failure in the sense of a homogenous residential landscape with fewer and fewer community facilities, which is an unattractive and ultimately self-defeating policy.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	33
Response Date	13/09/16 22:57
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Call for sites

Organisation Name (If Applicable) Bates Estate TRA

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Site 1

Site address / location Bates Estate

Site area - Hectares (ha) or square metres (m2) Vacant Housing land

Current use(s)

Green space and shrub land

Current ownership If known, please provide contacts details

BHCC Housing land

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	33
Response Date	07/09/16 00:49
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Call for sites

Organisation Name (If Applicable) Bates Estate TRA

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Site 1

Site address / location Bates Estate

Site area - Hectares (ha) or square metres (m2) Vacant Housing land

Current use(s)

Green space and shrub land

Current ownership If known, please provide contacts details

BHCC Housing land

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 34
Response Date 09/09/16 00:04
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Small sites with only a small number of houses and parking

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Please leave open spaces as open spaces

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

We have no room for any more traffic

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

We have no more room

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

It's not the numbers of houses it's the number of cars that go with the houses

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Look at the lack of roads

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes older people will need to be cared for

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

The council should take care of it's older folk

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

In sure of the question

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Any one that needs support should get that support

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Not sure what the question means

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

Any new home should have some where for the car to be parked

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Not sure of the question

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

As above

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Don't know

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Come up with a plan that will free Rottingdean village of traffic

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	35
Response Date	09/09/16 10:36
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Tourism . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Community facilities . Student accommodation . Traveller accommodation . Sustainability Appraisal Scoping Report . Call for sites
---	--

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes, this is the most logical approach to increasing housing. Empty existing properties should also be explored. In addition all developments should be considered carefully as all new large developments I am aware at focus on the higher end of the housing market. This does not free up properties elsewhere in the city as these are purchased by people not currently in the City by people from places like London on higher salaries who wish to move to Brighton - or Foreign Investors.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Brighton has very little green areas and very few trees. It is not appropriate to consider building on green spaces as there are so few left in the City. If it is deemed essential (it shouldn't be) to build on sites then the critical that access is considered. To the East of the city there are considerable issues with road access - to increase this is illogical. In Rottingdean there is considerable pollution - largely caused by backed up traffic. Any significant increase in housing East of Roedean would cause an increase in people needing to use the Falmer Road, increasing pollution and traffic issues. Do not underestimate the importance of trees to the health and wellbeing of the people that live in Brighton. There is much less information in the city plan about the urban fringe areas than there are about other areas of the city. There does not seem to have been full consideration about transport, pollution etc. I am confused about this as this should be the greatest considerations for this area. Public Transport in these areas is extremely poor unless you are on the sea road. I would recommend that somebody did an analysis of what the journey would be from my postcode should I wish to commute by train with a view to being in an office in London by 9.00. There simply isn't a logical solution with public transport.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

I am not qualified to respond to this.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

The need is for affordable housing, not housing that attracts foreign investors as selling to this audience does not 'free up' property elsewhere in the City.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

I do not think that urban fringe should be considered. However, if you are considering urban fringe it would need to be family housing to fit in with the areas where you show you are considering build. Any urban fringe east of Roedean (why do you never consider the Roedean area - this is so well served by local transport and roads) is not suitable for large numbers of properties due to the lack of public transport unless you are on the sea road.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Put rules into planning permissions about purchase from people who are currently outside the City. Largely considering Foreign Investors, make new builds properties for people to live in and purchase. There is also an issue with people buying to become landlords. What people are needing are properties that they can purchase to get onto the property ladder, this frees up rental properties for people not ready for this step.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No - Brighton housing is mainly packed out, with rows of terraces. This close proximity of housing comes with many issues (waste, mental health, physical health). To increase would be an error. I do

think that there is a need to consider some more tower blocks in Urban Areas (not urban fringe areas), where public transport and road systems can sustain the additional headcount.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes definitely, and this might be a reasonable consideration for the urban fringe areas East of Roedean where many with special needs already live because this is a more appropriate area of the city for people with special needs.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

It needs to be allocated as these considerations would need to be part of the physical build of the properties.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No, I think this should be down to the person that purchases the land for development.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Accommodation suitable for people with special needs is a key requirement. When people think about Brighton they tend to focus on the City Centre and not on the communities of elderly and disabled that live in the suburbs of Brighton. Increasingly these people are having to move outside of Brighton because suitable accommodation is not available within the city. This should also be considered in Transport, these people are more likely to require public transport - however, they tend to live in areas poorly served.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes, definitely.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Decisions should be made based on the area and how it is served by the road system and public transport.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Decisions should be made based on the area and how it is served by the road system and public transport.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Decisions should be made based on the area and how it is served by the road system and public transport.

E2: How can we better support the delivery of office sites in the city?

Encourage large businesses to consider the area. Open discussions with them about sites. There is so little 'business' in Brighton for many people it is necessary for them to commute outside of the City to progress in their career. With the loss of Amex to Burgess Hill this has got worse not better. This has been an issue in Brighton for many years. To encourage blue chip business into the City would support sustainability strategies as fewer people would need to commute. It would also mean that the average salary in Brighton increased because there was greater competition to employ the right people. Currently salaries in Brighton and Hove are extremely low - this is because there is so much competition for very few jobs within the City.

E3: In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

I do not agree with changing offices to residential properties. Please see response to E2.

B: Mixed Employment Areas and mixed use allocations

E4: Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

With an increase in population comes a need for increased education and healthcare services, so this would be a logical approach.

E6: Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

Encourage larger companies into Brighton. This is desperately needed. The types of business you mention in the E6 question can setup easily in most properties. The desperate need is to increase employment opportunities to increase salaries. Focussing on smaller businesses will only give salary opportunities to a small number of people.

E7: Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

Not qualified to respond.

C: Industrial

E8: Are there any opportunities to identify and safeguard land/site for a new industrial estate in the city? If yes, where?

Not qualified to respond.

E9: Are there opportunities to intensify existing industrial estates to bring forward new industrial floorspace? If so, which estates?

Not qualified to respond.

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

Yes

E11: Are there any other opportunities to bring forward new industrial floorspace in the city?

Not qualified to respond.

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Encourage large scale employers, do what you can to stop large scale employers leaving the City (eg. Amex).

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

too much of newer build jars with the older build. Brighton should look to cities like Glasgow to see how they have mixed the old with the new without losing the heart of the City.

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

Decision should be based on the specific area of the City.

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

Decision should be based on the specific area of the City.

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

Yes, give Brighton back an identify.

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

It is already difficult to encourage Retail to the Marina and to keep the Retail, I would encourage keeping policies as simple as possible.

R8: Alternatively, should changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

There is no consistent look and feel in the Marina. The new flats have made this even more disjointed, I feel it is a little late to consider this.

D: Local Centres and Parades

R9: Is there a need for a separate policy for assessing changes of use in local centres and parades?

Brighton needs an identity, any policy should consider and drive an identity for the city.

R10: Alternatively, could there be a general policy to assess changes of use in these and other retail areas in the city which fall outside of town/district centre designations? (e.g. the seafront)

Brighton needs an identity, any policy should consider and drive an identity for the city.

R11: Should Part 2 designate any additional local centre's coming out of large scale housing developments such as at Toads Hole Valley?

Where large numbers of properties are built it is essential that provision for the residents is considered. As the large scale developments are outside of the city centre if provision is not made then it will increase traffic.

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

Rottingdean High Street should be protected, it is the heart of the village and brings much needed tourism to the village where footfall for local shops needs to increase.

A: The Seafront

T1: Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

No, protect the seafront don't make it for the few - it is what brings tourism to the city and why people live in the City. If you block off the seafront or ruin the seafront the town will die.

T2: Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafront?

Protect the seafront don't make it for the few - it is what brings tourism to the city and why people live in the City. If you block off the seafront or ruin the seafront the town will die.

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

Brighton is losing it's identify. Whilst I don't recommend what this identity is - the council needs to work in partnership with the city of Brighton and Hove to decide what the identity of Brighton will be in the future. Newer blocks recently built are ugly and have no personality and are designed for cost rather than anything else. Having newer buildings is ok, but there needs to be a decision about what the legacy is to Brighton as a whole or it will become 'any town' by the sea.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Transport and Travel for those who do not live in central areas or within easy access to the seafront is a major issue in Brighton & Hove. This drives people into cars. When I lived in Poets Corner my car was used so infrequently I had to reboot the battery on the 15 occasions a year I needed it, as a family we went down to one car. Having moved to BN2 7FP we now have 2 cars that are used on a daily basis. This is entirely due to the poor Public Transport and Rail offering in this area.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

A consultancy with people outside of central areas to define the issues with public transport.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

- . A single focused policy on air quality and noise - Introduce a new sustainable transport policy with a set of criteria against which new development (by size/scale of development) should be assessed?
- . An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Absolutely - improve public transport - lower bus costs is essential. Ironically the public transport system really only successfully serves the areas where individuals can actually walk to where they need to be without using a bus!

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

We have so few roads into the city transport should be a critical consideration for everything.

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Both city plan and planning guidance: We have so few roads into the city transport should be a critical consideration for everything.

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Definitely - see previous responses.

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Absolutely, otherwise every developer will come with a different approach. As mentioned in other areas of this consultation Brighton is losing an identity. Once that has gone it become any town. A consistent design whether that be towards the old Regency Style in the Centre, flintstone in the outer areas or modern has to be consistent based on the area.

B2: If you think a policy is needed, what types of development should be included?

All - whether it is towers, shops or general housing. See response to B1

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Definitely - Once the Downs and the green spaces go - they can never come back. Respect all green spaces.

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

All nature conservation designations should be fully protected, regardless of their location in the City.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Not qualified to respond - protect diversity of nature, not just humans.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

All current woodland should be protected. There are so few trees in Brighton & Hove they must all be fully protected.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Beacon Hill should be fully protected along with the green space that used to be for Golf. All green fields that are the gateway to the Downs should also be protected.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Beacon Hill should be fully protected along with the green space that used to be for Golf. All green fields that are the gateway to the Downs should also be protected.

B10: Do you consider the following green spaces . Three Cornered Copse should be designated Local Green Spaces?

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

A: Polluted Land and Buildings

P1: Are there any planning issues that you consider a Polluted Land and Buildings policy should address?

Not qualified to respond

B: Land Stability

P2: Should the City Plan Part Two include a development management policy regarding unstable land or is this sufficiently addressed by national planning policy guidance and through Building Regulations?

Trees should be protected to avoid land slippage and potential flooding. We live in a City with steep inclines. Removing trees increases risk.

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Separate as they are both important and cannot be covered in the same way.

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Protect green spaces and the Downs - if these are built on it will increase light pollution.

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

Yes - or part of the planning requirements.

P6: Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

Detailed policy required.

P7: Are there other pollution issues that the City Plan should address?

There should be no new housing considered in the areas with Greatest Air pollution to protect the current residents. Approaches to actively reduce air pollution in these areas should be put in place.

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Not qualified to respond

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Not qualified to respond

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

Not qualified to respond

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

Not qualified to respond

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

ABSOLUTELY - THE BEACH SHOULD BE PROTECTED

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Not qualified to respond

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

Not qualified to respond

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

Not qualified to respond

P16: If yes, what sites should be investigated for energy uses? (taking into account the areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study)

Not qualified to respond

P17: Should a renewable energy policy be explored for City Plan Part 2?

Not qualified to respond

P18: What factors should be considered when exploring this approach?

Not qualified to respond

P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

Not qualified to respond

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

This should not be something set at a local council level.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

Heritage sites should be fully protected, it is these that make the city what it is.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

Yes, any Heritage sites that encourage tourism should have specific requirements.

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

New developments are all a different look and feel - the Council needs to work with the people of the City to agree what the 'look' of Brighton should be moving forward and all planning should reflect this. The 'look' could be at regional level eg. a single tied in look for city centre, a single 'look' for hove, Roedean, Rottingdean, Ovingdean, etc.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 36
Response Date 09/09/16 15:10
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Limit HMO's in the Bevendean/Moulscombe Ward.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to

specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes. Safe guard family homes by rejecting HMO applications in the Bevendean/Moulscombe Ward.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes. Safe guard family homes by rejecting HMO applications in the Bevendean/Moulscombe Ward.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Yes. Safe guard family homes by rejecting HMO applications in the Bevendean/Moulscombe Ward.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Loss left to market. Although in areas with a heavy proliferation of HMO's, council should work actively to limit them.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No, in areas where there are already a high % of HMOs, like Bevendean/Moulscombe Ward, absolutely not.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

More legislation to evict Anti Social tenants and enforce refuse collection, etc. Hold universitys and landlords to account when their tenants break the rules. When HMO proliferation within a certain Ward/Street/Area reaches a certain level (+10%) prevent any further HMO's being built. Work with local action groups to identify and shut down illegal HMO's.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 37
Response Date 09/09/16 20:32
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on? . Housing
 . Student accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes I do

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Urban fringes are fine but I don't support building on Green field sites.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Brighton is short of all types of housing. I would not support the building of only one type of housing.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

We should make a priority of housing for families. We really need housing for families both with and without children.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Housing should be available to all.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Left to the market.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No, self builds too often get sold on for large amounts of money.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes most definitely.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes. People need room to move and breathe. The building standard sizes are low enough.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Brighton does not need more HMOS. Parts of our city has reached saturation point and beyond.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes it should. HMOS have a knock on effect. Schools likely to close as families with children move out of areas where larger houses are HMOS.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

I understand that 10% is the amount of HMOS permitted in any one area. My Road has reached saturation. All that's happened is they owners go into the roof where planning permission is not required. These properties are now huge.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Student accommodation should be on campus or sites where they are not living in family homes.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Not if those sites could be used for family housing.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

At the moment most of the accommodation is located around the Lewes Road area. To the detriment of residents.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

The only Barrier is the will of this Council to refuse HMO licences.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Notice taken of the wishes of the resident and settled community. Noise. Rubbish and cars!

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	38
Response Date	10/09/16 08:43
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none">. Housing. Biodiversity and Open Spaces. Addressing pollution, water and energy resources. Design

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Design

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Smaller dwelling types e.g. flats

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

No. Brownfield or existing site re-development

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Look at any demographic force that

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

More mid rise developments

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

People with specialist housing needs.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Specialist housing needs. Otherwise left to the market.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Residential accommodation for those with various support needs.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

Disabled access is hugely important

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Left to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Cooperation with other councils

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Being wary of poor developments and poor development practices. Eg Brighton Marina

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

No

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

Air quality

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Local geodiversity sites and local woodland/green screening and long-established village boundaries

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Beacon Hill Happy Valley

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Beacon Hill, Rottingdean. It is an important space for local people and dog walkers. It is an interesting green space in regard to birdlife and butterflies.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Traffic that diverts along the Falmer Road to enter Brighton via Woodingdean is an issue. Air pollution is significant in the area.

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Separately.

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Incentives for businesses to switch off lights and hoarding lights overnight or when closed for business.

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

Yes

P6: Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

Yes

P7: Are there other pollution issues that the City Plan should address?

Air quality is terrible in Rottingdean and does not meet current EU guidelines. Traffic calming measures particularly with large diesel lorries should be considered and development curbed. The High Street is being destroyed.

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Yes

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Yes

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

No

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

Yes

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Yes

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

No

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

No

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

No

P17: Should a renewable energy policy be explored for City Plan Part 2?

Maybe

P18: What factors should be considered when exploring this approach?

Design and infrastructure

P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

In supplementary planning document

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

Yes

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

Air pollution and improving beach environments

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Yes

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

Yes

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

Yes

D5: Are there any other design issues that this policy should provide guidance on?

Preserving the character and sense of place that already exists

C: Protection of Residential Amenity

D6: Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

Yes

D8: Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

Yes

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	39
Response Date	12/09/16 08:55
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Register will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Using previously developed land is good - especially derelict building areas.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

These are good considerations. Sustainability and the potential of utilities and infrastructure need to be considered.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

I feel we need affordable housing for families, and professionals which would mean a range of sizes. Many areas are saturated already with student housing. The university should be responsible for housing students.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

By asking the university to provide housing for its students. This would free up other developments for families, professionals and people on low income.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Dont know.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes, it is appropriate.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

I cannot see how there will be a loss of HMOs given the increasing student population and the ability of Property Developers and Landlords to be granted permission to change dwellings to C3

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

I would draw your attention to this ;

http://www.oxfordmail.co.uk/news/10180615.Landlords_turn_HMOs_into_family_homes_as_new_licensing_laws_come_in/
Yes, it should. Communities such as mine - Bevendean, are at saturation point with the number of HMOs. Families can no longer afford to buy here. Purchasing by Property Developers has priced ordinary people/families out of the market. Assets of community value are weakened -(our school may have to close due falling numbers.)The 10% rule on HMOs has not contributed to the "creation of a mixed and sustainable community."

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Student numbers should not be increasing if the student population cannot be housed. The council should tell the universities to house the increasing student population. The council should ENFORCE the rules that already exist - Ref; Standards for Licensable Housing in Multiple Occupation. Disposal of Rubbish and Landlord and Tenant Rights and Obligations. There should be a Council official appointed to deal with the negative impacts associated with the concentration of HMOs. Regulation should be brought in to ensure that a Landlord can only own a certain number of properties in one area. Some Landlords in Bevendean own up to 8 or more houses. Regulation should be brought in (if it doesn't already exist) to fine Landlords who do not adhere to a basic standard of property management. - Keeping

hedges / lawns cut. Since these properties do not pay council tax (because it is felt the Landlords would push the cost onto the students) and the number of HMOs is increasing, the result must be a loss of revenue for the council. Fining bad Landlords would help with this revenue.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	40
Response Date	12/09/16 11:23
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes, within reason and with local consultation and regard to traffic and services which already seem full to bursting. Traffic and air pollution is a major issue in Brighton and will not be improved with more housing

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Central industrial areas where business and housing could be combined.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

This should be on a case by case basis.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

I disagree with some of the western urban fringe sites being used for housing. The traffic problem along Falmer Road and through Rottingdean and Ovingdean is awful and is already a major problem for local people. Any further developments around this area will only exacerbate this. Plus the village nature of the areas will be eroded more and the historical value lost. Environmental factors are also an issue to developing around that area and the green space should be protected not concreted over.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

When you build or convert on areas in the city, if you must build flats then build larger 3 bedroom flats, not just 1 or 2 bed ones.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Developing current older highrise blocks should be considered. Some of these are an eye sore.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

YES (by which I presume this corporate speak means gardens?) Speaking in English will help the consultation process possibly.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

No idea what this means. Why would you provide 'amenity' space without access or which cannot be used?

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

????

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	41
Response Date	12/09/16 11:25
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

Individual Tel

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Your scope does not appear to include better use of existing housing stock/estates. For example, the current Queensway/Craven Vale estate consists of low rise properties which are largely sited in a natural 'valley' with a generous degree of green spaces between the existing blocks of what I guess contain, say, 20 dwellings per block. Google maps suggest some 5-6 blocks in the valley part of the estate. This suggests the current valley footprint contains some 120 dwellings on what I guess is a 1 acre plot. The naturally valley topography of the site would suggest that if a gradual decant, demolish and rebuild approach was adopted to the housing stock on a block by block basis that any new blocks of dwellings could be built on both a wider plot of land and also to a higher 'roof-top' level which because of the 'valley' location would have less visual impact than if it were a level site. I am sure that there are other existing BHCC housing stock 'brownfield' sites where an increase in both the volume and quality of properties could be achieved alongside any proposals within the outline Plan for commercial brownfield sites. This decant, demolish and develop approach was a key aspect of the successful LCC/GLC property development strategy in improving the availability(number of homes/dwellings) and quality of the housing stock in Greater London. Can you please confirm that the scope of the latest City Plan, particularly in relation to the critical 'Housing' aspect, has included and will include the maximisation of land usage for the existing 'HRA' estates and property portfolio as part of the overall review of Housing' futures?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	42
Response Date	12/09/16 11:25
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Tourism . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Community facilities . Student accommodation . Traveller accommodation . Sustainability Appraisal Scoping Report

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes. Brownfield sites must take priority over further development of greenfield sites

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there

other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

must also consider impact on traffic of extending housing development further from the centre

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Priority must be given to truly affordable housing for young people and families

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Pressure on private landlords to convert flats back in to houses and make them available on the market.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

surely sites with mixed accommodation are likely to create more sustainable communities

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Why not - it would broaden appeal and lead to less homogenous developments

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

of course

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

yes

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

pressure on landlords to maintain buildings to an appropriate standard

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

no

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

no - but redevelopment to provide alternative premises for smaller footprint businesses must be encouraged.

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

probably need to be treated as 'protected' areas but to be honest all other retail areas of Brighton could do with smartening up.

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

Encouragement of independent businesses rather than chains and discount stores

A: The Seafront

T1: Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

Would be wonderful to see better use of the area East of the Palace Pier and at Black Rock.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

yes

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

yes

Traveller Accomodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

I don't know - ask them!

TA2: Should new site provision be public site provision, or private or both?

Public

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	43
Response Date	12/09/16 12:22
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Tourism . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Community facilities . Student accommodation . Traveller accommodation . Sustainability Appraisal Scoping Report . Call for sites . General comment
Organisation Name (If Applicable)	NLCA

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Seek to specify a range of dwelling types and sizes and ensure affordable housing is actually affordable.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Seek to ensure a mix of housing sizes to ensure a mixture of rental types and ownership.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Student housing should be required to contribute towards affordable housing, reducing yields for developers and tilting the mix of properties developed. Developers are building housing but are building student housing.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

We feel that the policies regarding HMOs should be strengthened.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

We feel there should be adequate private space or privately shared space. Blocks of flats should have appropriate outdoor landscaped areas for the residents only. We have had a recent local decision on Appeal which allowed external space at the front of the property to be included as open space with the loss of rear space. We have used this SPD extensively as a guide to what is and what is not acceptable.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Habitable space should be of adequate space and size to meet so we agree any introduction of new nationally described space standards if these are considered adequate.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes, We feel that in certain areas in the city the concentration of HMOs is excessive and policies to reduce the level of HMOs should be implemented. This should include a quota system on an area-by-area basis rather than at present. The 10% limit is exceeded in some areas. Indeed, it is 80% in some streets. Families are being pushed out to outer areas by the proliferation of mainly student HMOs.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

See above (H19). Air B&B and party houses – This is a problem which we are well aware of and this is issue for the North Laine. We are aware that the present regulations such as the regulations on HMOs and environmental regulations do not cover them. We would appreciate investigations in this area and hope that a way of regulating this area of the economy is found.

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

The Article 4 permitted rights for change of use from office to residential already in existence should be retained.

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

We feel that the mix of properties in North Laine has already been changed enough - past a level where industrial and other uses should have been retained. Therefore aspects of EM10 (North Laine) should be retained. We do not want further erosion of the mix.

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

We support the idea of having separate policies for specific areas such as the North Laine and feel that this should incorporate your note in 4.15 of ensuring that units are not amalgamated so that we do not lose the small scale traders. We regret the fact that under current guidance we cannot resist the change of A1 to A3 as local units tend to be under the 200m2 limit under the permitted development regulations.

R6: Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

We support that large A3/A4 should be seating only to resist the development of large spaces which will possibly become bars and cause additional disruption and noise for the residents of North Laine. Noise and disruption from the late night economy is an issue for the residents of the North Laine.

R11: Should Part 2 designate any additional local centre's coming out of large scale housing developments such as at Toads Hole Valley?

Yes

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

With the current plans of the Royal Pavilion we would resist anything which reduces the amenity space for North Laine residents. North Laine residents have always considered that the Pavilion Gardens as amenity space and the only green usable space within the centre of the city. We consider that Pavilion Gardens should be included in Local Green Spaces.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Yes. Consideration should be given to the capability of present infrastructure in the city centre.

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Yes

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Yes. There are major developments, current and proposed, that encroach the beach, which is of concern.

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

We feel that the development of local assessments for the conservation areas and their special requirements is part of the place making process. Many of these are out of date and need updating. In the North Laine we still rely on the North Laine Conservation Area study 1995.

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

There should be further development in guidance to the planners regarding design and feel that this has reduced under financial pressure on the local authority with the reduction in the conservation team

and the effective downgrading of panels such as CAG. Standards for Design and Heritage should be raised to protect distinctive areas such as The Lanes and North Laine.

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

Yes

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

The development of Part 2 of the plan removes certain SPDs and SPGs which are useful in accessing development proposals. We are glad to hear that the policy regarding Extensions SPD12 will be incorporated and updated although we feel that certain aspects need dealing with. One of these is the provision of external open space and that extensions should not cover the whole rear area. We have had a recent local decision on Appeal which allowed external space at the front of the property to be included as open space with the loss of rear space. We have used this SPD extensively as a guide to what is and what is not acceptable although our objections are normally only on streetscape. We regret the fact that the design guidance on shopfronts and shutters will be deleted, although we acknowledge that these are long out of date. However, we believe that aspects of these SPDs should be incorporated in the current plan. We regret that many of the shutters in the North Laine do not comply with the existing guidance and provide a solid blank area at night. We also feel that there should also be guidance as to shopfront lighting as we suffer from a proliferation of lighted shopfronts so there should be provision in new guidance. We feel guidance should be given to ensure that satellite dishes remain restricted under Article 4 in North Laine. They should not be on the frontage of historic housing. More enforcement is needed.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

We feel that policies should be strengthened to ensure our heritage assets are retained.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

There should be guidance for specific properties. We have particular interest in the Royal Pavilion estate as it adjoins North Laine. We feel that we should be part of the process for guidance on policies for the estate.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

There should be guidance for what is suitable for works and repairs of historic buildings. Works done on historic buildings must be suitable with materials relevant to the property. There was at one time guidance on specific works although there were issues on the recommendation of contractors. Policies should be strengthened to support guidance on the treatment of local building materials, particularly bungarosh and lime render which is easily damaged by inappropriate repairs.

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

We have in the past had a strong Conservation team which has had a high degree of knowledge of the heritage assets in the city which has, unfortunately, been depeted due to financial constraints. Consideration should be given to ensure that this expertise is not lost.

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

We consider that the national policy puts heritage assets at risk.

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

There is a need to have a policy for heritage at risk

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

The greatest risk that we have in the North Laine has been small infill developments of poor design. The difficulty is that many developments rely on existing street schemes and provide badly designed pastiche. Policies should be be strengthened to protect the street scene and character of Conservation areas.

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

Plans for specific areas should reflect the studies carried out on those areas. There are 34 Conservation Areas within the city, each requiring different treatment.

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

Areas such as North Laine and Valley Gardens have major heritage assets adjoining - namely the Pavilion Estate. Policy regarding these should ensure that the surrounding area is taken into account.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

In finding suitable areas for student housing development consideration should be given of adjoining local authorities where there are suitable transport links. Suitable areaa would be Lewes and Newhaven, both with good transport links. Areas such as Rottingdean should be considered due to good public transport links and the ability to make it car free.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

The barriers are too many students located in a already high density area, such as North Laine and Hanover which upset the mix of residential housing. The other issue is transport links, and discussions should be made with the bus companies.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Targets for the provision of student places in purpose built accommodation should include existing and future provision for student housing in both purpose built developments and HMOs in the areas where student accommodation is recommended in the Local Plan.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

We do not understand why Student Housing is not included in the requirements of providing affordable housing. This makes the provision of student housing the current preferred development model as the yields are greater than normal development. We consider that there should be a requirement under S106 or other to provide affordable housing and also to reduce the yield on these properties to that obtained in the normal housing market. This will stop the provision of student housing which presently outweighs the provision of new properties for the rented housing market. We also consider that areas where student housing is considered also includes issues such as noise and disruption caused by late night movement of student groups.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	44
Response Date	12/09/16 15:47
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Only if it is for social housing.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Specify range of dwellings.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Affordable for people who live and work in Brighton. Not landlords/investors

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Yes

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

No. A real community, is a mixed community.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

Green spaces accessible to all

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Yes

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Good quality green spaces.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	45
Response Date	12/09/16 15:53
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing
 . Tourism
 . Student accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Fringe areas should be considered for student accommodation. This would free up HMO properties in residential areas for local families and move students away from these areas. I hope all students coming to Brighton have a wonderful time here, but that does not mix well with families who need to get up for work / school and they should not be mixed.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Put the students out there, you will automatically get the family housing back from the empty HMO properties.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes, of course. Stop family housing going to students and ban party houses. There are many decent family homes in this town that have been converted to party houses. These could be a valuable asset to the areas instead of the plague that party houses cause to the people living near them. This would also boost the hotel trade.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Family homes.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes, or we will be building the slums of the future.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

An HMO for local people and those working in town is fine, they tend to have a care for others as they are here long term. Short term student HMO's are a nightmare to live near and should not be allowed.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

YES, absolutely yes, yes, yes!

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

If the Brighton centre goes to Black rock, more hotel rooms will be needed on top of that planned. There is plenty of room to build on Dukes mound or the south side of Madeira drive, adding a bit of interest to a dull dead end.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes, stop using family homes it is just fuelling the housing shortage for families and local people are displaced because of it.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes, as far out of town as is practical for getting to university, on their campus where possible.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Falmer, plenty of fields around the existing campus so you should look to provide 100% of the housing need there.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes, as long as it is out of residential areas and in easy travel distance for the students to get to university,

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

No one wants to live next to a student block, locate them on campus. I have lived next to students before. When my kids teachers asked why they were falling asleep in class, I knew I had to do something decisive. The police didn't help, the council didn't help. So I dealt with it myself. I won't tell you what I did but the eternal noise stopped. It is an absolute disgrace that I was put in that situation and I have every sympathy for others that find a landlord has decided to make a bit more money by ruining there lives. Students and "normal people" don't mix so don't mix them.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	46
Response Date	12/09/16 17:02
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces
 . Traveller accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

St Aubyn's field should be a protected open space for use by the community. There should definitely be no building on this green lung of the village. Rottingdean already suffers from traffic pollution; to build on this green space would add immensely to the pollution.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance)).

St Aubyn's field: an essential green lung for the village. Many new housing developments in the village increase the housing density and add to the traffic pollution.

B10: Do you consider the following green spaces should be designated Local Green Spaces? . Benfield Valley
 . Three Cornered Copse

- . Ladies' Mile Open Space
- . Hollingbury Park

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

It has long been recognised that travellers repeatedly commit acts of trespass, vandalism and littering in and around Brighton. More should be done to prevent the travellers from desecrating one green site and simply moving on to desecrate another. Local citizens gain the impression that travellers are above the law and can desecrate with impunity. Of course travellers have their rights, which should be respected; but so do the local taxpayers, who too often have to pay for clearing up after the travellers have left a site.

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

See my previous comments on travellers in and around Brighton.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	47
Response Date	12/09/16 17:20
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Transport and Travel
	. Biodiversity and Open Spaces
	. Community facilities

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Brownfield sites can be used for sustainable housing. However the amount of additional traffic generated and the level of pollution should be a main consideration

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Not aware of any

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Should specify a range of dwellings

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes, for older people and families with particular housing needs

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Nothing which ghettoises any group. A variety of occupancy is desirable

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Residential accommodation for those with support needs should be catered for

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

The proposed development of St Aubyns Field in Rottingdean is highly undesirable for a number of reasons; level of air pollution is already above safe limits and the village contains a number of elderly people who are vulnerable. There are also two primary schools in the vicinity of the high street. As is well established polluted air is particularly harmful to children and affects both health and learning outcomes. There is also a lack of infrastructure in terms of doctors and dentists. Finally the field is the one remaining lung for the village and its loss would be tragic.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes. The bus-only lanes were a good idea but single lane for cars causes enormous congestion mornings and afternoons with long lines of stationary vehicles either standing or crawling along and pouring out pollution.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Active promotion of green power either electrical or hybrid vehicles.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

yes

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes Very much support this approach

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes, in particular the diversity of bird life should be protected. As we lose habitat we lose bird life and the life that supports birds,

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

St Aubyns Field in Rottingdean village centre has been a focus for village sporting and recreational activities as well as serving the needs of the school. Now that the school has closed the field could become a greater part of Rottingdean life. There is a crying need for space for games and residence focused activity. The field is large enough to accommodate games like football, rugby, cricket. There is also space for a much needed childrens playground and a small garden area with seats. I don't think the residents would object to an extra levy on council tax to cover this.

B10: Do you consider the following green spaces . . . Ladies' Mile Open Space should be designated Local Green Spaces?

C: Are there any other issues that relate to Community Facilities?

CF7: Can you think of any other policy issues relating to community facilities that City Plan Part Two should address?

There is a real shortage of childrens play areas in the dity and sorrounding villages.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	48
Response Date	12/09/16 17:39
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Transport and Travel

Individual Name

Individual Address

Individual Email

Individual Tel

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes not enough consideration has been given to new transport infrastructure

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

For example there is ongoing plan to build 800 new homes in Brighton Marina, with increased leisure facilities. As far as I can see no consideration has been given to how people will get to the marina. Given that most people will want to drive there, there needs to be consideration given to a new road network here. At the moment the only direct access is from the North via Wilson Avenue, and via the East on Marine Drive. There is no direct access from the city side, i.e. the West. The present way of

access is an unsuitable method via Arundel Road. Currently at weekends there are half mile tailbacks on Wilson Avenue which is unacceptable. There seems to be very little consideration given by the council to an efficient transport system, based on something other than public transport. Public transport in Brighton and Hove is also very expensive for what it delivers. Consideration should be given to how it operates in London, e.g. one fare covering all destinations

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	49
Response Date	12/09/16 17:45
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Biodiversity and Open Spaces . Addressing pollution, water and energy resources

Individual Name

Individual Address

Individual Email

Individual Tel

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

In evaluating planning applications for green spaces such as the playing field of St Aubyn's School in Rottingdean, full consideration should be given to current levels of pollution and traffic congestion in the area and, if these are unacceptably high - as they are in Rottingdean in the High Street bottleneck and Newlands Road used as a 'rat run' during rush hour to avoid the High Street) - then no further development which would exacerbate an already unacceptable situation should be granted. The pressure for additional housing should not be satisfied at the expense of the health of all residents. The St Aubyn's field provides a welcome 'lung' for a village centre which is being choked with toxic fumes and particulates.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

St Aubyn's Field in Rottingdean. This was the St Aubyn's school playing field, and was used by other local schools for cricket, rugby, football matches etc. The field should be kept as an open space with multiple uses to promote the health of all residents, but especially the young: - part should continue as tennis courts, football pitch, cricket nets for use by schools in the village and the surrounding area (payment for this facility could be used for the minimal upkeep needed) - part should be made into a high quality children's playground, much needed at the High Street end of the village, as the only current playground is run down, far away from the centre and has suffered from anti-social behaviour problems - part could be an arboretum, with newly planted trees helping to offset the excess carbon dioxide produced by the traffic congestion in the High Street and the A259, and this would be a point of interest for residents and visitors to the village - a small area could provide an open air exercise circuit, to encourage residents and visitors to keep fit and healthy - additional communal space for events

Managing the site - the local organisation, SAFE, already exists to save the field and these local volunteers have already proved themselves efficient and committed to the village welfare and the preservation of the field. Management could be effected largely by volunteers, perhaps under the auspices of the Parish Council. SAFE has also been engaged in active fund-raising and this could continue in order to contribute to maintenance costs.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

I think these should be addressed separately.

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

Traffic congestion and the resulting air pollution causing serious health issues. Steps should be taken urgently to reduce through-traffic and address the air pollution in Rottingdean High Street and the surrounding area. The level of particulates is many times over the legally allowed limit. Above all, there should be no more building in the heart of the village, as any additional development will worsen the traffic congestion and air pollution.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	50
Response Date	12/09/16 18:09
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Tourism . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Traveller accommodation . Sustainability Appraisal Scoping Report . Call for sites
---	---

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there

other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Don't know

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Left to a general criteria

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

It's over development of sites that can be a problem

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Important to provide suitable high quality accommodation for older people to free up family houses which they would otherwise continue to occupy.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Market should decide in most instances

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes to keep a variety of types of accommodation and to encourage innovative designs

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

If possible as it is often cheaper to retain housing stock than to build

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes most definitely

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

No

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Left to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes if in an appropriate area

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Spread student accommodation so it isn't concentrated in one area

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

Yes

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

Yes -Fiveways

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Hollingbury Park Surrenden Road verges

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Hollingbury Park Surrenden Road Verges

B10: Do you consider the following green spaces . Hollingbury Park should be designated Local Green Spaces?

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

HR7: What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

Question whether the council is the best guardian for the Royal Pavillion and Preston Manor. They should be given to the Natuonal Trust or English Heritage to operate

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

Too many bins out on the street. These include the large communal bins and individual household bins.

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

Yes

Traveller Accomodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

a larger site that can be managed, supervised and kept tidy would be the best solution. There can be more focus on one or two larger sites than if there were multiple smaller sites.

TA2: Should new site provision be public site provision, or private or both?

Public provision to allow proper liaison on the legal and social issues that these sites inevitably raise.

TA3: Should future pitch requirements for Traveller Accommodation be addressed through City Plan Part 2 or would this matter be better addressed through a separate Development Plan Document?

Members should decide this as its a technical local government issue.

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

Our council should press for national legislation to make it illegal for Travellers to break into public or private land so the matter becomes a criminal not a civil matter.

Please indicate which topic or topics you would like . 1. Biodiversity, Flora and Fauna to comment on?

- . 6. Cultural Heritage, Landscape and Open Space
- . 7. Population, Human Health & Inequalities
- . 8. Housing & Community

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	51
Response Date	12/09/16 18:16
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Student accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Seek to specify a range of dwelling types and sizes and ensure affordable housing is actually affordable.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Seek to ensure a mix of housing sizes to ensure a mixture of rental types and ownership.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Student housing should be required to contribute towards affordable housing, reducing yields for developers and tilting the mix of properties developed. Developers are building housing but are building student housing.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

I feel that the policies regarding HMOs should be strengthened.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

We feel there should be adequate private space or privately shared space. Blocks of flats should have appropriate outdoor landscaped areas for the residents only. In the North Laine we have had a recent local decision on Appeal which allowed external space at the front of the property to be included as open space with the loss of rear space. This is not what I consider the spirit of the SPD on extensions and this should be reviewed accordingly.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes, We feel that in certain areas in the city the concentration of HMOs is excessive and policies to reduce the level of HMOs should be implemented. This should include a quota system on an area-by-area basis rather than at present. The 10% limit is exceeded in some areas. Indeed, it is 80% in some streets. Families are being pushed out to outer areas by the proliferation of mainly student HMOs.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Air B&B and party houses – This is a problem which we are well aware of and this is issue for the North Laine. We are aware that the present regulations such as the regulations on HMOs and environmental regulations do not cover them. We would appreciate investigations in this area and hope that a way of regulating this area of the economy is found.

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

We feel that the mix of properties in North Laine has already been changed enough - past a level where industrial and other uses should have been retained. Therefore aspects of EM10 (North Laine) should be retained. We do not want further erosion of the mix.

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

I support the idea of having separate policies for specific areas such as the North Laine and feel that this should incorporate your note in 4.15 of ensuring that units are not amalgamated so that we do not lose the small scale traders. It is of regret that under current guidance we cannot resist the change of A1 to A3 as local units tend to be under the 200m2 limit under the permitted development regulations.

R6: Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

I support that large A3/A4 should be seating only to resist the development of large spaces which will possibly become bars and cause additional disruption and noise for the residents of North Laine. Noise and disruption from the late night economy is an issue for the residents of the North Laine.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

There have been plans by the Dome and Royal Pavilion to gate the area and remove it from public space. This space was bought by Brighton and is considered amenity space. I would resist anything which reduces the amenity space for North Laine residents. North Laine residents have always considered that the Pavilion Gardens as their amenity space and the only green usable space within the centre of the city. I consider that Pavilion Gardens should be included in Local Green Spaces.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Yes. There are major developments, current and proposed, that encroach the beach, which is of concern.

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Place making is a new name for something that has been carried out over several decades and that is the development of local assessments for the conservation areas and their special requirements is part of the place making process. Many of these are out of date and need updating. In the North Laine we still rely on the North Laine Conservation Area study 1995.

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

There should be further development in guidance to the planners regarding design and feel that this has reduced under financial pressure on the local authority with the reduction in the conservation team and the effective downgrading of panels such as CAG. Standards for Design and Heritage should be raised to protect distinctive areas such as The Lanes and North Laine as well as other conservation areas in the City.

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

Yes

C: Protection of Residential Amenity

D6: Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

The development of Part 2 of the plan removes certain SPDs and SPGs which are useful in accessing development proposals. I am glad to hear that the policy regarding Extensions SPD12 will be incorporated and updated although we feel that certain aspects need dealing with. One of these is the provision of external open space and that extensions should not cover the whole rear area. We have had a recent local decision on Appeal which allowed external space at the front of the property to be included as open space with the loss of rear space. This SPD has been extensively as a guide within the North Laine to what is and what is not acceptable. I regret the fact that the design guidance on shopfronts and shutters will be deleted, although we acknowledge that these are long out of date. However, we believe that aspects of these SPDs should be incorporated in the current plan. There are many shutters in the North Laine which unfortunately do not comply with the existing guidance and provide a solid blank area at night. We also feel that there should also be guidance as to shopfront lighting as we suffer from a proliferation of lighted shopfronts so there should be provision in new guidance. Another issue is guidance on satellite dishes which should remain restricted under Article 4 in North Laine. They should not be on the frontage of historic housing.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

We feel that policies should be strengthened to ensure our heritage assets are retained.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

There should be guidance for specific properties. I have particular interest in the Royal Pavilion estate as it adjoins North Laine. I feel that we should be part of the process for guidance on policies for the estate.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

There should be guidance for what is suitable for works and repairs of historic buildings. Works done on historic buildings must be suitable with materials relevant to the property. There was at one time guidance on specific works although there were issues on the recommendation of contractors. Policies should be strengthened to support guidance on the treatment of local building materials, particularly bungaroosh and lime render which is easily damaged by inappropriate repairs.

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

In the past there has been a strong Conservation team which has had a high degree of knowledge of the heritage assets in the city which has, unfortunately, been depleted due to financial constraints. Consideration should be given to ensure that this expertise is not lost.

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

I consider that the national policy puts heritage assets at risk.

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

The greatest risk that we have in the North Laine has been badly designed infill developments of poor design. Good design is a major issue and unfortunately conflicts with financial pressure. We have

adjoining the North Laine the so called "new England Quarter" which despite only being developed within the last few years looks terrible and does not live up to its hype of good quality architecture. Many developers seem to rely on poor quality pastiche. Policies should be strengthened to protect the street scene and character of Conservation areas.

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

Areas such as North Laine and Valley Gardens have major heritage assets adjoining - namely the Pavilion Estate. Policy regarding these should ensure that the surrounding area is taken into account.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

In finding suitable areas for student housing development consideration should be given of adjoining local authorities where there are suitable transport links. Suitable areas would be Lewes and Newhaven, both with good transport links. Areas such as Rottingdean should be considered due to good public transport links and the ability to make it car free.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

The barriers are too many students located in a already high density area, such as North Laine and Hanover which upset the mix of residential housing. The other issue is transport links, and discussions should be made with the bus companies.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Targets for the provision of student places in purpose built accommodation should include existing and future provision for student housing in both purpose built developments and HMOs in the areas where student accommodation is recommended in the Local Plan.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

I do not understand why Student Housing is not included in the requirements of providing affordable housing. This makes the provision of student housing the current preferred development model as the yields are greater than normal development. We consider that there should be a requirement under S106 or other to provide affordable housing and also to reduce the yield on these properties to that obtained in the normal housing market. This will stop the provision of student housing which presently outweighs the provision of new properties for the rented housing market. I also consider that areas where student housing is considered also includes issues such as noise and disruption caused by late night movement of student groups.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	52
Response Date	12/09/16 18:30
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Biodiversity and Open Spaces . Addressing pollution, water and energy resources

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes

B2: If you think a policy is needed, what types of development should be included?

Existing open spaces such as playing fields parks , national heritage sites village greens should be protected and excluded from consideration as housing development sites. There are ,any brownfield sites that are appropriate for development

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

St Aubyns playing field in Rottingdean

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

In considering any current green area for development of housing if this site is in a built up area with heavy traffic it is not suitable because it will only add to these problems. Also a green site, such as St Aubyns playing field in Rottingdean has the merit of providing space for dilution of chronic traffic pollution and drainage of excess rainwater which, when heavy, already floods the bottom of the High Street

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Separately

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

By enforcing it

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

Yes

P7: Are there other pollution issues that the City Plan should address?

Traffic pollution is of the utmost importance in Rottingdean and no doubt elsewhere. It's levels are some of the highest in the country, worse, I believe than in Brighton itself There has been some suggestion that the St Aubyns playing field just off the a high Street be covered in housing. How would this help traffic pollution and connection? It is ridiculous This is still a village and not a built up area like Brighton and Hove and any rural aspects should be preserved not destroyed by housing. Plenty of flats have, in any case been built in this. Village

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Yes

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Probably

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

Yes

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Yes

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

Traffic pollution, especially diesel is killing people. Water resources must be considered in conjunction with plan I g permission for housing, schools, hospitals etc.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	53
Response Date	12/09/16 21:04
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Biodiversity and Open Spaces
Organisation Name (If Applicable)	OUR LADY OF LOURDES CHURCH

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

More housing is needed, and more social housing, but where appropriate. St Aubyn's field in Rottingdean is not suitable for any major development as it is the main green space for the village. The South Downs national park is a drive away and the field has been used by local residents for many years by agreement with the school that was there. When the field was not in use by the school access was allowed. The gates were not locked. Groups could use it at such times and especially in the holidays. It is simply not true that it is irrelevant as a green space to the village as it was solely private.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

ROTTINGDEAN HAS HIGH CONGESTION ALREADY AND DOES NOT NEED MORE CARS ON THE ROAD. THE AIR POLLUTION LEVELS ARE TOO HIGH AND ALREADY ILLEGAL. IT IS IMPORTANT TO KEEP THE MAIN GREEN SPACE IN THE CENTRE OF THE VILLAGE.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

ST AUBYN'S SCHOOL COULD BE CONVERTED INTO FLATS WITH A SMALL AMOUNT OF HOUSING ON ITS SITE.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	54
Response Date	13/09/16 08:25
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Firstly I can't understand why so many affordable family homes in Bevendean, Moulscombe and Coldean have been allowed to be sold off to private landlords purely to make a profit by buying to rent, usually as student accommodation. This careless policy has reduced affordable family housing in areas where it is desperately needed, and in the case of Bevendean is having a devastating effect on local school intake. The whole character of these traditionally working class communities has been devastated. The council is culpable of short sightedness by allowing this to happen, and should be ashamed, now having to claw back sites to build "affordable" housing. I have examined the maps but I am still not clear on where the proposed new build areas are. How many of the new homes will be council housing? This seems to be the only way to stop what has happened in east Brighton areas outlined above.

From: T Pawsey
Sent: 08 September 2016 11:25
To: PlanningPolicy
Subject: city plan part two consultation

hello, i am writing as part of the consultation to the city plan part two. i tried to use the format provided but am not good with computers so have given up and decided to respond by email. sorry about the typing with no capitals but i have a wrist injury which means one handed typing and capitals take even longer. i did respond to part one and also contacted councillors then about my concerns for possible building on the 'urban fringe' but it seems i have to do it again for part two so here goes.

1. brighton and hove local plan 2005 retained on adoption of b&h city plan part one 2016. the section QD21 on allotments should be retained in part two. allotments are great communities and provide an important sense of belonging to a wider community of different ages and backgrounds. the friendships which build up through having an allotment mean that people support each other away from the allotment too through times of stress, ill health or redundancy etc. allotments also are very bio-diverse, often a last refuge for wild plants sprayed out of intense agricultural land and for a wide range of insects, some of them quite rare.
2. allotments are mainly away from the centre of the town but are used by many town centre residents who often have very little or no outside space where they live. i met a family with an eight year old child on saturday who had just been allocated an allotment plot on whitehawk hill allotment site and they said they live in a flat with no garden in the middle of the city and were so delighted at the chance to be able to start growing food with their child. i live just south of elm grove and look out onto buildings, tarmac and cars. my allotment keeps me sane.
3. our city is becoming even busier all year round so the beach and the city centre and the parks feel very crowded. being able to easily access wilder land by bus or by walking is very important for our mental and physical health. the wilder open areas of land such as that behind the race course over looking whitehawk provide real respite from the noise and intensity of the city. a place for children (and adults!) to roam safely with a feeling of being close to nature if they don't have a car to drive out to the countryside.

think that is as much typing as i can manage so thank you, tessa pawsey. 39 hampden road, brighton, bn2 9tn

2 Port Hall Road Brighton BN1 5PD

T 01273 413700

E admin@lewisplanning.co.ukW www.lewisplanning.co.uk

Planning Policy Team
Brighton & Hove City Council
Room 201
King's House
Grand Avenue
Hove
BN3 2LS

5th September 2016

Dear Sir/Madam

**Brighton & Hove Draft City Plan Part 2 – Scoping Document
Coombe Farm Saltdean – Proposed Housing Allocation**

Further to receiving notification of the City Plan Part Two Scoping Document, we write to respond on behalf of the WD Carr Partnership. These representations specifically request that the land at Coombe Farm is allocated in the City Plan for future housing development.

Proposal Site

The application site is located at the northern end of Westfield Avenue North, immediately adjacent to existing housing in Saltdean. The property is in a set down location in Coombe Bottom and includes 1.46 hectares of previously developed land. As with the majority of urban fringe sites, the land is outside the current settlement boundary but also outside the South Downs National Park.

The site covers 3.7 hectares and incorporates the following:

- Coombe Farm (including 4143m² of dairy and other farm buildings, 1091m² of concrete hardstanding, a mobile home and two shipping containers;
- A large slurry pit at the northern end of the site;
- The paddock adjacent to Coombe Bottom;
- The paddock adjacent to Coombe Meadow;
- The strip of land between the dwelling known as Jesmond and the new house currently under construction.

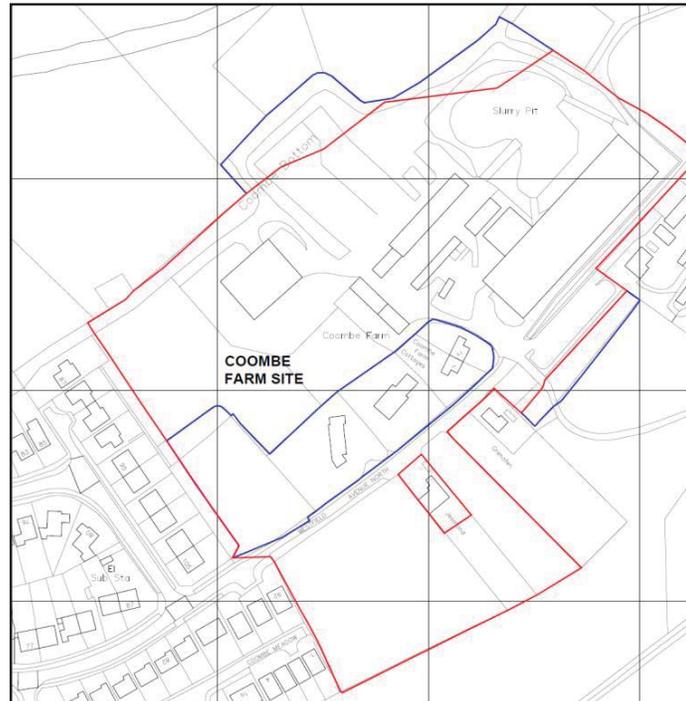
As a result of the decline in the dairy farming sector, the WD Carr Partnership has switched to crop farming (the arable land is farmed by contractors and the crop grain is stored in Shoreham). As such, there is no requirement to keep field machinery at Coombe Farm and the property is no longer required for its original use.

**RTPI**

mediation of space · making of place

Chartered Town Planners

Lewis and Co Planning South East Limited
Company Number 05809390
Registered Office: Preston Park House, South Road,
Brighton, BN1 6SB
Registered in England and Wales



Site Location Plan

Vehicular access to the site already exists from Westfield Avenue North. The property is well connected to the surrounding public footpath network. The property is not listed or located within a conservation area.

The application site is not within a flood risk zone as identified by the Environment Agency. Furthermore, it is not within a Local or National Nature Reserve, Site of Special Scientific Interest, Site of Nature Conservation Importance, Regionally Important Geological Site or Area of Outstanding Natural Beauty.

Planning Policy Overview

City Plan Policy SA4 allows for development within urban fringe locations where a site has been allocated for development in a development plan document. The policy goes on to state that should proposals for development come forward prior to adoption of Part 2 of the City Plan, the 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development.

Policy CP1 (Housing Delivery) includes an allowance for 1060 new dwellings to be built in urban fringe locations. This allowance forms part the City Plan Housing Delivery Strategy to provide at least 13,200 new homes before 2030.

Urban Fringe Assessment

The site was considered in the Brighton & Hove Urban Fringe Assessment (June 2014) as three separate parcels of land (sites 48, 48a & 48b) together with the adjacent dog kennels (48c). The UFA made the following conclusions for Coombe Farm:

“Apart from a high risk of surface water flooding on the site, there are no significant ecological, heritage, open space or landscape constraints to residential development. The whole site is potentially developable apart from the wooded area and two dwellings with gardens in the south east corner and the north west edge, where the land rises and buildings would start to dominate the surrounding landscape. On the assumption that appropriate drainage systems will be incorporated into any development, low density residential development is considered appropriate on the site.

Taken as a whole, sites 48, 48a, 48b and 48c represent a cluster of sites all of which have potential for development. However, in order to develop dwellings in some sites, mitigation and enhancement measures are required in others. If all the sites were developed there would be a significant loss of trees and greenspace with significant adverse ecological effects.

Therefore, the number of dwellings that could be developed across the cluster has been limited to 75% of the sum total of all the developable sites so that the necessary mitigation and enhancement measures required to develop dwellings within this area of the urban fringe can be accommodated. This limited total provides a more accurate estimate of the total capacity of this area of the urban fringe.”

Collectively, the 2014 UFA identified the sites as being suitable for 55 new residential units. Individually, the four sites were identified as being suitable for the following number of dwellings (based on a density of 25 dwellings per hectare):

- Site 48 (Coombe Farm) – 50 dwellings;
- Site 48a (Land north of Westfield Rise) – 12 dwellings;
- Site 48b (Land at Westfield Avenue North) – 2 dwellings;
- Site 48c (Saltdean Kennels (not within proposal site)) – 7 dwellings.

The 2015 Urban Fringe Assessment concluded as follows:

“In conclusion, it is considered that housing can be delivered at certain parts of the potential development areas within Study Area L18/E15 without significant impacts on landscape and ecology, on the assumption that

- ***New development is sensitively located, to avoid upper slopes of Sites 48a, 48b and 48c.***
- ***Avoidance of impacts on retained habitats within the Study Area and the adjacent SNCI including implementation of best construction practice and measures to address potential increases in recreational pressure.***
- ***Implementation of mitigation measures to address potential impacts on protected species.***

Given the existing nature of the study area, it may be possible to enhance the site for ecology through the incorporation of green infrastructure and wildlife habitat within proposals.”

Strategic Housing Land Availability Assessment

The 2016 SHLAA now identifies the sites as being suitable for 65 new dwellings.

Planning Application History

The landowners submitted an outline planning application for the demolition of the farm buildings and construction of 67 family dwellings on 24th May 2016 (BH2016/01903). The proposals also include public open space, landscaping and pedestrian links with the South Downs National Park. The application documents demonstrate that the proposed development can be accommodated on the site without creating any adverse impacts on the surrounding landscape, the local highway network, neighbouring residents or protected local habitats. The application is due for determination later this year.

Conclusion

Whilst matters relating to ecology are yet to be resolved through the development control system, the principle of new housing at Coombe Farm has been thoroughly tested and accepted by the City Council through the Urban Fringe Assessment and SHLAA processes. In order to maximise the prospects of delivering the anticipated number of units on the site, we hereby request that the land is allocated in the City Part 2 for housing accordingly.

If you would like to discuss the merits of the site further, please contact on 01273 413700.

Yours faithfully

Lewis & Co Planning

From:
Sent: 12 September 2016 12:49
To: PlanningPolicy
Subject: City Plan Part Two - Scoping Paper

Dear Sir/Madam,

Thank you for the opportunity to submit comments on Brighton & Hove CC's City Plan Part Two – Scoping Paper.

It is noted that policies such as CP17 in Part One protect and support new sport facilities and therefore do not need to be repeated in this document.

With regard to section 11 – Community Facilities, Sport England would strongly suggest reference is made to the Playing Pitch Strategy (which it is understood is in the process of being finalised) with regard to the retention of existing facilities and the creation of new ones, as this will form part of the evidence base for this document.

If you require any further information, please do not hesitate to contact me directly.

Kind regards,

Planner



1st Floor, Bloomsbury Street, London, WC1B 3HF



The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	58
Response Date	13/09/16 14:36
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Transport and Travel
	. Biodiversity and Open Spaces
	. Design
	. Heritage
	. Traveller accommodation

Individual Name

Individual Address

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Brown field sites should be the priority for any new building

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Provision of infrastructure eg schools, GP surgeries etc

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

N/A

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Range of dwelling types

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

If that is the biggest need

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

More provision of "affordable " housing and no selling off of existing or new social housing

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Yes

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

If land is available

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Definitely

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

All the above

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Ideally yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Don't know enough about them

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Need to control the number

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Ban "party houses"

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	59
Response Date	13/09/16 14:44
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Student accommodation

Individual Name

Individual Address

Individual Email

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes there should be not be any more student accomadation built and the existing HMO student accomadation must be reduced. The surrounding communitis are having their lives destroyed by the behaviour of the student population. The Univesities should be made responsible for the housing of students not the local community. We have lost over 900 family homes in the Moulsecrom/Bevendean ward that have been been developed into student accommodation. The local schools can no longer fill places due to the families being forced out of the housing market by HMO developers and we have lost our Drs as it is being developed into student acomadation.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No, the universities should house students on campus. The student population in the surrounding communities is not sustainable. Many residents are having their quality of lives greatly reduced by the actions of the student population.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Yes the whole of toads valley. Hangleton

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

The real effect of the damage done to our local communities from student HMOs is not recorded. Despite hundreds of complaints concerning Student behaviour not one has ever been registered these against the landlord or students for breaking the conditions of the HMO license. Sadly as I write yet another family has been forced out of their home after 3 years of continuous harrismet from students. This has been reported through the police etc but yet it continues. Again this is never registered against the breaking of the HMO licensing. We ring the council who tell us none is responsible for controlling HMOs only issuing them. There must not be any more student HMOs. The existing ones are completely out of control not controlled by the Council in any manner.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

At the moment Brighton and Hove City council do not monitor, control are bring legal requirements against any existing Student HMO. This is a fact given to us by the HMO private section department of Brighton and Hove council. The real situation at grass roots level is quite unrecognised by the council officers. The student population is having a massive detrimental effect on the lives of our communities. Families are being left with no alternatives but to move.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

The council should listen to the local communities. We are no longer tolerant of the student behaviour that we have and are subjected to. The council needs to listen to the community, unfortunately as can be seen by the exercise, eg changing the name of the Lewes Rd community to the academic corridor. the desions are made before anyone has even commented.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

1, There is a need to reduce student accommodation in the local surrounding communities. 2, the existing student accommodation needs to be controlled. 3, Legal enforcement needs to be taken against Students who break the conditions of their let. 4, legal enforcement needs to be taken against Landlords who break the conditions of the HMO licence. 5, The Accademic corridor should be known by its original title of The Lewes Rd community. 6, The existing Students need to be made to pay council tax. As it is they do not pay council tax, but the ever increasing amount of students mean more drain on the local resources but less people to pay for those reasorces. So there are more people using the reasorces that the council tax pay for but less income to pay for those recorces . We who do pay face a rise in our council tax or a cut in services. The current balance of student to resident is biase in favour of the student accommodation.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	60
Response Date	13/09/16 15:18
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Addressing pollution, water and energy resources . Design . Student accommodation . Traveller accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Should be left to the market

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

No

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

NO

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

NO

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Definitely

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

No

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

No - they are too small

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes - only for new properties

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Left to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No-Left to the market

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Sufficient

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

NO

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

No

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

No

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Yes

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

No

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

No

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Yes

B10: Do you consider the following green spaces should be designated Local Green Spaces?

B: Land Stability

P2: Should the City Plan Part Two include a development management policy regarding unstable land or is this sufficiently addressed by national planning policy guidance and through Building Regulations?

no

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

in one

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Dont, its waste of your time and my money

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

No

P6: Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

Sufficient

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

No

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

No

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

No

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

No

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

No

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

No

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

No

Traveller Accommodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

Larger

TA2: Should new site provision be public site provision, or private or both?

Private

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

Get them to pay for their own

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	61
Response Date	13/09/16 16:22
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Tourism . Transport and Travel . Biodiversity and Open Spaces . Design . Heritage . Community facilities . Student accommodation . Traveller accommodation . Sustainability Appraisal Scoping Report . Call for sites . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there

other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Transport considerations i.e. public transport provisions to proposed area / road capacity

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

high density terrace / low rise flats for outlying areas with elements of commercial below flats. Off street parking provision.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

This can have mixed results, family housing can just as easily be used as a HMO for a group as it can a family so initial allocation will have no bearing on its eventual use.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Good housing comes about through an area being desirable, many parts of town look shabby and so will attract shabby tenants / student housing - the planners need to find a pro-development ethos, they can currently be highly obstructive over small details and forget the bigger picture. While slightly left field, why not use the planners to say what can be built in particular zone (density / design vernacular) and then streamline planning in these areas for developers - who as long as they stick to the proposed scale / design outlines can get a plan through without the standard delays and cost?

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

A proposed density per capita for different parts of the city, why not reduce the cost for developers that manage to exceed this density through good design, and increase the cost for development that under develop

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

This runs the risk of some sites never being developed, a site allocated for elderly housing only will lose its land value and most probably not be built out, mixed use sites are always more healthy and result in a more cohesive society, it would be better to state that a site had to have a certain percentage for any particular need, i.e 50% of a site had to provide for elderly, as a whole this should increase the likelihood of the whole site being built.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

No, many suburban areas of the city could be greatly improved, and much more housing provided if existing housing stock was demolished, with better quality, higher density housing replacing it.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No. a lot of this housing could be rebuilt in the same sites, with private housing included to provide higher quality mixed use environments

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes, this will greatly improve the quality of any apartment dwellers life.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes, a generous minimum space requirement ie 2m x 2m would not cost developers much, but would be a first for Brighton and of huge importance to the quality of any future inhabitants life. This space must also be for the sole use of the individual dwelling ie a private balcony.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes, or use Londons if they are more generous

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

The current standards appear to be very good, so perhaps not

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

I think Brighton should seriously consider its unique building style from the past 200yrs and try to establish a new Brighton vernacular which could be used for all new developments - a modern nod to the cities Regency past would pay dividends for tourism and keeping the cities character intact, at the moment modern architecture in the city appears to be random in its styling and often jars with its surroundings.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Leave market forces to dictate whether HMO's are still required (these should naturally go down once new purpose built student accommodation starts coming onto the market)

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No, let market forces determine this

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Yes, by allowing purpose built student accommodation to be constructed - I have noticed that there appears to be resistance from Brighton planning for these developments - these are greatly needed, and in large scale high density sites - these blocks can then be properly managed and free up older housing stock for families to move into and maintain.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

It appears little though is being given to the cities council estates - these areas are looking neglected and have little diversity in their housing provision (just huge amounts of council housing lumped together) these areas hold the key to unlocking Brightons potential - new commercial enterprises, private housing, and student accommodation need to be infilled into these areas, combined with a smartened up streetscape they could become active, mixed, desirable locations which provide much needed housing, but also improve the areas for the existing local inhabitants.

A: Offices

E1: Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

Brighton Marina, Marina Gasworks, Whitehawk!

E2: How can we better support the delivery of office sites in the city?

By allowing mixed use development, ie first 3 stories office with residential above, developers do not like building offices speculatively, you either will need to offer to rent the space yourself or provide a better business environment for companies to stay / relocate

E3: In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

No - good quality offices will stay as offices, once the inadequate old offices have been converted to housing, office values will rise, which will enable new developments to become viable, there is no point insisting these old offices stay in their current use, no one will rent them (and many, esp. in the city centre were originally housing to begin with)

B: Mixed Employment Areas and mixed use allocations

E4: Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

No

E5: Are there any sites you are aware of that would be suitable for mixed use employment uses and that you would like to see considered for allocation through City Plan Part 2?

No

E6: Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

Yes

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

Separate policy

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

Yes, the Marina is suffering and always has, from having an oversized supermarket (ASDA) which sucks the life out of all the surrounding retail, with almost 1000 new residential units being build over the next 7 years, retail must stay within the Marina, left to market forces it will just become a never ending parade of chain restaurants which will ultimately damage it in the long run. You have to find a way to reduce the business rate, independent retailers seriously struggle with the rates in the Marina which have no reflection on how quiet it can be down there in the winter. The Marina not only needs retails but also offices, if it had employees there during the day, it would help create more life and assist the shops. (The Asda carpark would be perfect for this)

R8: Alternatively, should changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

The Marina should be treated as a mini city at the edge of Brighton, it needs active retail, high quality high density housing, and offices / employment - there is still a huge amount of space which could be developed. It needs more people and could still become the jewel in the cities crown is the council could get a grip of it and draft a sensible policy.

A: The Seafont

T1: Are there any further seafont development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

Dukes Mound - the gardens there are overgrown and dangerous, a cafe could bring life to the area and help encourage tourists / families to enjoy it. The last station on the Volks railway is under utilized, it needs to run into the Marina itself, or have something to mark it as a destination (even a cafe / bar would bring some life to the area) From the pier to the Marina, the seafont appears neglected - secure structures on the shingle which could be locked up when not in use, but then opened and contain bars / cafe's (I've seen this in Spain) would completely change the area and bring some much needed life / security to the area

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

current high HMO areas, Lewes Road, London Road etc

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

no

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

Local opposition, by clearly explaining to local residents that by building purpose built student accommodation, houses will be freed up for locals

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	62
Response Date	13/09/16 16:59
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. General comment

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Whilst I realise that B&H needs to accommodate more housing I feel that brownfield sites should be utilised. I do not agree with building on greenfield sites, particularly in the Rottingdean St Aubyns area or in-filling between Rottingdean, Ovingdean and Woodingdean. The latter maintains village differentiation as well as providing a corridor for wildlife. All these areas are currently blighted by high levels of traffic and air pollution, not just at peak times, and further housing would only increase this.



Hove Civic Society

Liz Hobden,
Planning Policy Team,
Brighton & Hove City Council,
Room 201
Kings House, Grand Avenue,
Hove BN3 2LS

43 Hove Park Villas

HOVE BN3 6HH

TEL +44 1273 884877

FAX +44 1273 884877

EMAIL helmut.lusser@globaltolocal.com

Date 14 September 2016

Your ref

Our ref

Dear Liz,

Comments Scoping Consultation – City Plan Part II

Our comments are set out on the following pages and I would welcome the opportunity to explain these in detail to you.

Best wishes

Chairman

Hove Civic Society encourages high standards of architecture and town planning and the conservation of buildings of historic interest throughout Hove.

Trustees 2016:

Helmut Lusser (Chairman), John Kapp (Hon Secretary), Clare Tikly (Vice-Chair Planning and Events), Andrew Haicalis (Hon Treasurer), Elaine Evans (Publicity and History), Karin Janzon (Convenor Public Sculpture), Helen Phillips (Fund Raising), Bob Ryder and Peter Suydam (Planning), Graham Cox, Patrick Lowe;

<http://www.hovecivicsociety.org/aboutus/>

COMMENTS BY HOVE CIVIC SOCIETY ON CITY PLAN PART II SCOPING CONSULTATION

1. Housing:

We believe the 13,200 aspiration of the plan needs to be seen as a minimum as the housing needs identified are now exceeding 31,000. The Council should speedily identify sites and adjust those policies which effectively hinder achieving more units on sites. This must include a revision of the high buildings policy and a close look is needed at conservation policies which should be applied more selectively in areas of lesser significance for example the listed buildings around Hove Station. We also believe that many buildings in the city especially those of the 60s and 70s can accommodate additional storeys, which could help improve the visual appearance of some of those buildings.

We believe that several built up areas in the city lend themselves to significant redevelopment (especially in the areas identified as development areas in the city plan) and believe a more pro-active stance is needed to facilitate such development. This may mean rationalising land uses and requires an active involvement by the council to make this possible.

We have a fundamental concern about 'salami-slicing' areas of the urban fringe for development. If nothing else this will lead to smaller sites being developed at below their capacity and without the necessary infrastructure in place. We would strongly suggest that the council takes a more fundamental approach and seeks to allocate an area of the size of Toads Hole Valley to the east of the City to create a new city quarter with all necessary infrastructure included. The council should look at its own land holdings to facilitate such an approach. We believe this would show the way for better town planning in the city.

2. Economy and Employment:

The city needs new, modern, employment facilities. Whilst there is an indication of new office supplies, we believe that other uses (workshops, industrial, warehousing) are under considerable pressure not least because of the housing needs. We would argue that many existing employment uses are in outdated locations, attracting heavy vehicles right into the central parts of the city. We believe the council should start thinking about new built industrial and warehousing complexes at the periphery of the city set in a high quality environment. The search for sites should be similar to that for peripheral housing sites that were undertaken by the council in 2015 and the council could look at its own land holdings to implement such an approach. With such locations inner city warehousing could be freed up for much needed high density urban redevelopment.

3. Biodiversity and Open Spaces:

With the council retreating from street tree planting from 2016, there is a genuine fear that our street environment will continue to deteriorate. Street trees are essential for visual, health and ecological reasons. We would therefore suggest that for each new dwelling built in the city during the plan period 1 new street tree is planted. In total this would allow the density of trees to be extended and street trees planted in areas which have hitherto not had the benefit of street trees. The trees would help absorb some of the CO2 emissions generated by new developments. The funding could be secured via S106 or CIL.

4. Design

We believe that more attention needs to be paid to the public realm around new developments including adjacent streets and spaces and that any opportunity should be taken to improve such areas in the context of new development.

5. Heritage

The large number of conservation areas and listed buildings are afforded a similarly high level of protection in the city. We believe that many conservation areas are drawn too widely which means that there is unnecessary protection around them including a too prescriptive approach in terms of visual impact from new surrounding developments. A case in point is the assembly of mediocre buildings in the Hove Station CA and the visual impact protection

that these are afforded. We believe that much higher protection should be given to say Brunswick Square than some of the minor conservation areas and their edges. We do concede that there are also several areas in the city that should be included in new conservation areas.

Conservation requires not only protection but also proactive intervention – hence enhancement statements, or as we would prefer to call them investment strategies. Strategies that could be drawn on to decide on S106 payments. Such strategies could be prepared by local groups and the council is urged to engage in more genuine partnership with local organisations to recognise such work. Whilst conservation in the city currently is directed at buildings we would like to see a strong emphasis also on the public realm enveloping those buildings.

6 Arts

Hove Civic Society has been granted planning permission for a plinth on the Hove seafront and permission for the first three sculptures to go onto the plinth for periods of 12-18 months each. It is the ambition of the Society to find places for the sculptures within the city once they have been on display on the seafront plinth. Locations could be major development sites or carefully chosen locations in the public realm. We believe this could become the beginning of a major tourist attraction and community asset for the city. We would ask the council to enshrine our concept of 'sculpture in the city' into Part II of the City Plan and allow developers to dedicate some of their S106 funding as contributions to new sculptures for the city. We can provide more details on the scheme.

Chairman Hove Civic Society

Comment

Consultee

Email Address

Address

Event Name

City Plan Part Two - Scoping Paper

Comment by

Comment ID

64

Response Date

12/09/16 21:53

Status

Submitted

Submission Type

Web

Version

0.1

Which section do you want to make comments on?

. Addressing pollution, water and energy resources

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

These are so very important, and all very different issues with very different solutions. These should certainly be viewed separately and each in detail to ensure they are addressed correctly and with the appropriate knowledge and input from specialists/experts

P7: Are there other pollution issues that the City Plan should address?

Rottingdean High St is one of the most polluted roads in the country, due to the narrowness/sea breezes and stationary traffic awaiting the lights. This needs to be monitored and a solution to the problem of so much traffic coming through the High Street needs to be discussed.

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

No, not enough detail or guidance has been given. The ocean and beaches are filthy, we volunteer to clean them and are shocked at the amount we collect. There are many specialists and organisations (surfers against sewage being just one) that should be consulted here

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Yes of course

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

Many countries now have batteries in local housing/there should be financial encouragement for household solar panels (we notice council houses getting them, however this is still very expensive for individuals) There is an ocean out there, and many ways to harness the energy of the waves we should look at this.

P17: Should a renewable energy policy be explored for City Plan Part 2?

Yes of course

P18: What factors should be considered when exploring this approach?

Wave energy/solar power for home owners

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

wave energy/tidal energy/solar panels for home owners

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	65
Response Date	14/09/16 12:30
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Economy & Employment . Retail and town centre uses . Tourism . Addressing pollution, water and energy resources . Design . Community facilities . Student accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

A: Offices

E1: Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

The Hippodrome The Astoria

E2: How can we better support the delivery of office sites in the city?

Cluster hubs/N/Abusiness parks

E3: In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

N/A

B: Mixed Employment Areas and mixed use allocations

E4: Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

Yes seems sensible -

E5: Are there any sites you are aware of that would be suitable for mixed use employment uses and that you would like to see considered for allocation through City Plan Part 2?

AS E1 above

E6: Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

N/A

E7: Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

N/A

C: Industrial

E8: Are there any opportunities to identify and safeguard land/site for a new industrial estate in the city? If yes, where?

No comment

E9: Are there opportunities to intensify existing industrial estates to bring forward new industrial floorspace? If so, which estates?

No comment

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

No comment

E11: Are there any other opportunities to bring forward new industrial floorspace in the city?

No comment

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Apprenticeship training - and volunteering credit schemes like Spice Time to encourage engagement and development of new skills

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

no comment

R2: Are there successful stretches of shops (not currently protected) that should be included in defined primary or secondary frontages of defined shopping centres?

no comment

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

no comment

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

no comment

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

no comment

R6: Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

no comment

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

Quasi self sufficient community structure - banks , schools, gp services

R8: Alternatively, should changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

no comment

D: Local Centres and Parades

R9: Is there a need for a separate policy for assessing changes of use in local centres and parades?

no comment

R10: Alternatively, could there be a general policy to assess changes of use in these and other retail areas in the city which fall outside of town/district centre designations? (e.g. the seafront)

no comment

R11: Should Part 2 designate any additional local centre's coming out of large scale housing developments such as at Toads Hole Valley?

Yes - these developments should include a basic model framework of permitted retail offers - gp surgery/advice hub including small community gym (25-40 stations) bank, convenience stores.

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

London Road

F: Individual Shops and Small Clusters of Shops outside Protected shopping centres and parades

R13: Given changes to the GDPO, is there a need for policy to protect shops and parades outside of existing centres? Should the City Plan Part 2 include a policy that covers larger shops over the 150sqm threshold of the GDPO?

no comment

G: Floorspace above shops and commercial premises

R14: Should the City Plan Part 2 include a policy to guide appropriate uses for floorspace above shops and commercial premises in shopping centres outside of the Central Brighton Area?

no comment

H: Markets

R15: What are the key criteria that should be taken into account when assessing proposals for additional permanent markets?

Sustainability - local products and produce

R16: Are there any sites that might be considered for allocation for a permanent market use?

no comment

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

no comment

A: The Seafront

T1: Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

no comment

T2: Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafront?

no comment

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

No new need but standards of existing to be raised

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

Car parking - perimeter parking outside of city to be developed - Water Hall /Patcham - bus and ride schemes please

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Polluted Land and Buildings

P1: Are there any planning issues that you consider a Polluted Land and Buildings policy should address?

Asbestos free city

B: Land Stability

P2: Should the City Plan Part Two include a development management policy regarding unstable land or is this sufficiently addressed by national planning policy guidance and through Building Regulations?

no comment

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Separate please as the issues are distinctly different

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Incentives via agreed joint grant funding (SDowns National Park and BHCC) for those properties close to (or within an agreed proximity) the AONB to upgrade and replace domestic and commercial lighting

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

Yes I think so - without decent water we are all doomed

P6: Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

no comment

P7: Are there other pollution issues that the City Plan should address?

Traffic pollution - please this is a real problem

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

no comment

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

no comment

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

no comment

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

no comment

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

no comment

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Yes -

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

Community energy initiatives like the Brighton Energy Company - agreed JV's with Council as majority partner in schemes

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

no comment

P16: If yes, what sites should be investigated for energy uses? (taking into account the areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study)

Community buildings. leisure centres, libraries housing stock. Private sector estates with shared heating services (e.g Furze Hill)

P17: Should a renewable energy policy be explored for City Plan Part 2?

Yes please

P18: What factors should be considered when exploring this approach?

energy from recycled products

P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

no comment

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

Yes - without targets there is no accountability and no way of tracking progress

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

no comment

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

yes

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

yes

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

Levels of personal activity/encouraging mobility through walking/cycling and less reliance on the car

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

no comment

D5: Are there any other design issues that this policy should provide guidance on?

no comment

C: Protection of Residential Amenity

D6: Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

no comment

D7: Are there any further issues you consider an amenities policy should address?

no comment

D8: Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

no comment

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

Clear definition of the split of responsibilities and obligations (community interest) where community facilities are operated by partners/third parties agencies/organisations. Clarity on the role of the Council to maintain the asset for the long term - or if this is not intended - clear policy on the short/medium term obligations on individuals/partners involved Community Asset transfers

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

Guidelines that recognise and support the need to expand and develop facilities to encourage more sustainable operations

CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

Population growth and housing projections over a 15-30 year period

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Libraries and Museums

B. Site Allocations for Community Facilities

CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

Dedicated Art Museum for the City

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

The Hippodrome

C: Are there any other issues that relate to Community Facilities?

CF7: Can you think of any other policy issues relating to community facilities that City Plan Part Two should address?

No comment

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes - this needs to be managed as the impact of HMO and demand for non University provided accommodation is severely affecting communities in parts of the city.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Falmer and Shoreham

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes as the concentration of accommodation on the Lewes Road corridor threatens to blight local communities

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

Unwillingness of Universities to recognise the social and environmental impact of their business on the city (e.g loss of Council tax revenues from student filled HMO;s)

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Economic test - are there a positive or negative contributor to the city Social test - are communities happy Environmental tests - noise and pollution tests/standards of cleanliness and housekeeping of areas)

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Local tax introduced on HMO landlords

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	66
Response Date	15/09/16 08:43
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Biodiversity and Open Spaces
Organisation Name (If Applicable)	Saltdean residents association

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes I do support brownfield deveoplment

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

The plan should look at infrastructure. Schools,Doctors,Day Centres etc. Public transport availability, the effect on local roads, quality of life and impact of such new developments on existing homes

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Not in Saltdean. Restricted by Downland setting, space within the urban built environment could be used better,

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

The City Plan should be specific re the needs of the locals within the City. Low cost quality design dwellings are required not just the squeeze them in designs coming from the developers. Neighbourhoods need to be built with room for the inhabitants to relax and enjoy quality of life

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

There should be a mix of housing in keeping with existing neighbourhoods

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

The Local Council needs to plan more thoroughly the neighbourhood with infrastructure for leisure and the services individuals need within a certain distance. Not build clusters of houses were to work p,at ,go to the Doctors or shop the residents have to travel to the City Centre

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

There should be a time frame that development takes place in or compulsory purchase and the Council steps in to develop There should be more Council provision of Social Housing. The 40% affordable housing should be adhered to Developers should be presented by law from selling enblock to investment companies as deposit boxes for wealth sheltering. Homes in the City should be for individual providing a main home

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes. The Elderly Affluent need to be catered for to support the. To vacate and free up larger homes they no longer fully use. Single adults with children should also be catered for.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

The Local Authority should look at the ice tied needs of the City and cater for them

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

If the demand is there and it is good use of scarce land within the city then yes.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

There should be no loss of housing . There should be like for like replacement it upgrading.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

All housing types need protection, diversity of dwellings makes for a vibrant City

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

This is a poor so,union. Outdoor amenity space should be public and maintenance co-ordinated through the Local Council. The Developers Nat set up a system of amenities but unless contracted to continue maintenance they we not be maintained.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes, definitely the provision can not be a cosmetic instant so,union. There needs to be roo. To run,kick a ball, shout and generally let off steam,

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes as a minimum

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

HMO's should not be protected, in certain areas there should be intervention to decrease the number. Such matters should not be left to market forces

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Planning Policy should set limits and standards for licensing of HMO's to protect beighbourhoods

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

The use of high rise should be carefully controlled to ensure that the City gas designs which enhance the future of the City with no return to the ugliness of the 1950's

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

There needs to be a policy covering cumulative impacts. The Developers at the moment are getting away with paying lip service to the plans and NPPF by putting forward Disable travel p, and and avoiding traffic assessments.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

The Developer should be made to take note if the size and quality if neighboring streets and for truck roads and junctions use rush hour statistics to show the impact of their proposed development on queues, timing of journeys and the impact on air quality.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes there should be a general mitigation policy but in areas which have pre-existing negative conditions there needs to be flexibility to impose stronger conditions and the authority to prevent further building.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

There has to be a verifiable base document with base figures for congestion, times and air quality. The Developers at the moment get away with producing transport information in the various guises without being Challenged. Buses that stop at 7pm, limited Sunday service, incorrect traffic and junction statistics. The Pkanners seem unwilling to challenge. A holistic approach linking housing numbers to quality and impacts on transport.

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

It would be better in a supplementary document as the needs and requirements are dynamic and will change Though the life span of City Pkan 2

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

There needs to be a definition of ' more active travel' Any travel arrangements need to take in to account; climate, terrain, demographic and reason for travel.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

The policies are there but not enforced, developers can claim unrealistic mitigation. The City centre is mainly flat and sheltered from the elements. The Deans, eastern fringe is hilly and exposed to wind and extreme weather conditions.

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

Yes there is but there also needs to be a recognition that there is also a need for private motor vehicles

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

This should be a separate policy. Taking into account the needs of the under 5s and 60 plus as well

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

Separate policy

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Care in this guidance seems to be easy to ignore. Policy is required

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

There is a need for Park and Ride as evidenced by the congestion and pollution in the City. East, West and North of the City

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes. A light railway, a by pass to the East , more bus lanes all needs co-operations with Neighboring authorities

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

Shared cycle and pedestrian space does not work, recording bike related accidents need to be recorded. Registration of cyclists, Tolls for taking vehicles into the City Centre. Greater enforcement of parking policies..

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Policies seen sufficient but planners must enforce them

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes, very important

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Yes Ancient Woodlands Chalk Dowland and others

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Yes Saltdean Oval should be designated a Local Green Space. As should the green strips through the amount Estate, Saltdean St Aubyns Field Rottingdean, should be designated A local Green Space, playing Field

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

As above Saltdean Oval and Mount Estate. These areas were laid out in the original planning in the 30's and 60's and are the green lungs and recreation areas for the 13,000 plus inhabitants. The Saltdean Oval is the one sports, play, social meeting area for Saltdean Rottingdean St Aubyns Field is in the Heart of Rottingdean village an AQMA, a flat existing playing field invaluable

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes As many sites as possible from all directions of the City Do not forget the Deans

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Wildlife Corridors and Tree Preservation, pathways through wildflower meadows, provision for all should be made in the City Plan 2

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	67
Response Date	15/09/16 15:59
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Organisation Name (If Applicable) RSPB

Individual Name

Individual Address

Individual Email

Individual Tel

Agent Name

Agent Address

Agent Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B5: Should there be a specific policy to address the general protection and enhancement of species?

Background In response to the City Plan 2 scoping document, the RSPB have several comments to make with specific relevance to the conservation of swifts with the City Plan area. Since 1995, the UK swift population has declined by 38 per cent and as a result is now on the amber-list of Birds of Conservation Concern and have since been placed on the RSPBs priority species list. Swifts are almost exclusively associated with buildings in the UK. Swifts tend to nest inside the roof space of older houses, searching out gaps in brickwork or soffit boards to gain access. Swifts were once a common breeding bird in Brighton and Hove but anecdotally have suffered a noticeable decline. One of the large factors is that older buildings have been refurbished, restricting their nesting opportunities

and most new buildings do not provide opportunities for swifts to nest. The RSPB has been working towards developing Swift Cities Plus, a project which will contribute to reversing the decline of swifts in the UK by stabilising the number of suitable nest sites across 10 cities which in turn will act as flagships for other areas across the UK. Brighton has been nominated as a Swift City due to evidence of a substantial swift population, opportunities for development and restoration activities including planned new housing developments and an existing volunteer interest in swifts and swift groups. Brighton also holds a diverse population which provides a range of audiences including ethnic and minority groups. It also holds many community groups and voluntary organisations. The drive for work on swifts can help to educate and engage with people and communities, connecting them to nature on their door step, one of the underpinning aims of the Brighton and Lewes Biosphere. The RSPB is a supporting partnership of the Biosphere and has been working closely with the Programme Manager, Rich Howath, who has expressed a particular interest in playing a role in the community and engagement of the RSPB's future swift project. As stated in the Brighton & Hove Biodiversity Action Plan swifts are one of the targeted species. Actions of which include:

- Locating nest sites
- Establish a monitoring programme
- Producing awareness material for householders and developers
- Council owned buildings to incorporate new nesting opportunities, including housing and farm buildings at appropriate locations
- Ensure developing planning policy protects the nest sites of House Martin, Swallow and Swift and creates new nest sites as a part of development

These actions mirror the RSPB's work objectives with swifts and will be covered in three main areas:

- Raising public awareness on the plight of swifts.
- Working in partnership with the construction industry, planners, developers, local authorities and businesses to protect and provide swift nesting sites during development and renovation projects.
- Monitor swift nest sites via citizen science and a swift inventory database

Specific comments

Question B5 Should there be a specific policy to address the general protection and enhancement of species?

Policy to include:

- The installation of swift boxes as a standard procedure in urban development.
- All new builds, refurbishments and renovations to benefit swifts. Update of Supplementary Planning Document to contain details and guidance on this (technical details to follow). Please see appended documents on the 'Manthorpe bricks'. The RSPB is committed to providing advice to developers with regards to swift conservation, for example, guidance when installing nest boxes for new and restored buildings and consideration during demolition of buildings of the needs of swifts. This policy, if implemented, will help to deliver a net gain in biodiversity as is consistent with guidance in the NPPF: Paragraph 117 - Protecting and recovery of priority species populations, linked to local and national targets. Paragraph 118 - Opportunities to incorporate biodiversity in and around developments should be encouraged. Thank you for taking our comments into consideration.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

swift nesting brick

providing a safe, habitable space for the UK's swifts

Modern building practices have greatly improved the quality of new homes in the UK, however not to the benefit of everyone. Bird species such as swifts have occupied cracks and crevices in our buildings for thousands of years, but the improved standard and style of modern construction has put their survival in our towns and cities at risk.

These popular birds come to the UK for three months during the summer to raise their young and can be seen on warm evenings giving spectacular displays. They eat large quantities of insect pests and spiders. They prefer nesting in small groups but the population has been dwindling for many years as suitable nest sites have become scarcer.

takes the place of
 a single brick

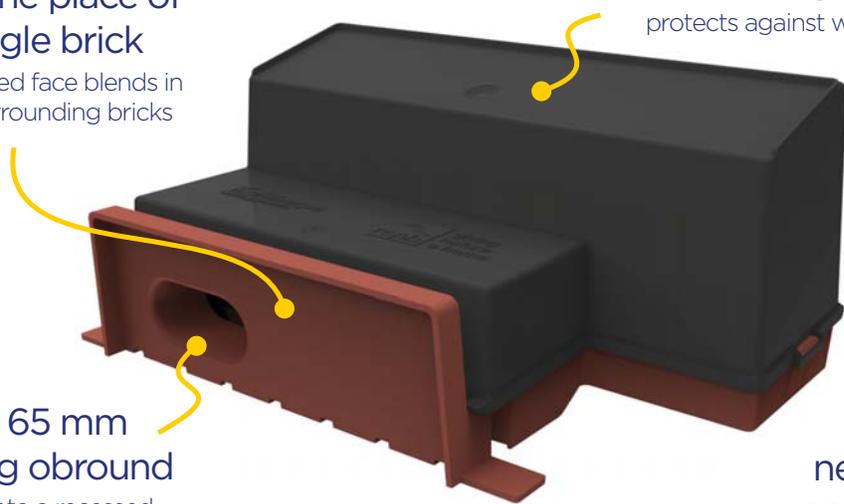
the coloured face blends in
 to the surrounding bricks

built in cavity tray detail

protects against water ingress

easy to
 install

can be fitted quickly
 during bricklaying



29 x 65 mm
 opening obround

leading into a recessed
 entry tunnel.

413cm² of floor area

gives the maximum habitable living
 space within the wall construction

integral
 nest concave

provides ideal starting
 point for nest building



The all new Manthorpe Swift Brick has been developed in conjunction with major house builders and conservation experts to provide a safe, spacious and habitable area to allow swifts to nest within the well built construction of modern houses.

Product Reference	Colour	Entrance Size	Box Qty
GSWB-TR	Terracotta	29mm x 65mm	2
GSWB-AR	Antique Red	29mm x 65mm	2
GSWB-BF	Buff	29mm x 65mm	2
GSWB-GR	Grey	29mm x 65mm	2
GSWB-BL	Black	29mm x 65mm	2
GSWB-WH	White	29mm x 65mm	2

Developed in partnership with



Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	68
Response Date	16/09/16 14:05
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Biodiversity and Open Spaces . Community facilities . Traveller accommodation . Call for sites . General comment
---	---

Organisation Name (If Applicable) Patcham CAT

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Apart from the obvious, like GP, Schools and the like, the impact on communities facilities for recreation.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

The priority should be for those most in need in the City.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

MOST DEFINATELY.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

The council should collaborate with developers to ensure that right mix is developed and not leave it to the developers along.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

That is hard to say as each site will be very different. It would be silly to try to get a 'one size fits all' approach. But a collaboration approach with the developer and council.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

I would have thought this to be the number one priority.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

A co-ordinated approach, again 'one size does not fit all approach' would be just silly.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Not really. But maybe a site would be made available for self-build.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Not if it hinders a better approach.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

YES, YES, YES AND YES.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

ABSOLUTELY AND HOW ABOUT A SWIMMING POOL FOR PATCHAM?

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

YES PLEASE, otherwise the council should all resign.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

That would be nice, but it would take time, too much time. We need to build houses. It has taken the council far to long to get this far.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

YES. But lets build the houses.

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

I think it would be a mistake to try to build the best houses possible. Lets build good houses and lots, lots of them.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

The market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes please

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Yes, limited the number in each area.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

The biggest problem is the council themselves. Taking far to long to do anything.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

How long is it going to take the council to complete Part Two?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	69
Response Date	17/09/16 15:31
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Housing
- . Student accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

All Brownfield sites should be for general housing use only. Developers must not be able to use these valuable sites for student accommodation. These sites must be for rented accommodation only where possible.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Rented homes only on urban fringe sites, could be student accommodation but must be for rent only. It may be practicable to put hostels or other accommodation on these sites to allow the rough sleepers strategy to work.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Dont know enough about the city to comment

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

It should state some Brownfield sites for older people accommodation so that they feel able to leave their large family homes and downsize to a smaller home closer to amenities. Otherwise it should all be general needs housing for rented accommodation only.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes but where this is not possible due to smaller sites then build hostels to support the rough sleeper strategy.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Prevent developers from taking the best sites for student accommodation. Students don't make any difference to the housing target in the city so those brownfield sites should not be used for anything other than rented general needs accommodation.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Developers, self builds and co-ops MUST be made to provide enough homes to reach the density the council has set for each site. Its the only way that the council will reach their housing target and it will support the general housing needs of the city's residents.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes of course it should and the density of the site must be applied too. But if it is not possible to allocate land in this fashion because it will not meet the general needs of the population then it can be more flexible but MUST be for affordable rented homes.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

See H8 - Yes of course it should and the density of the site must be applied too. But if it is not possible to allocate land in this fashion because it will not meet the general needs of the population then it can be more flexible but MUST be for affordable rented homes.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Only if they can find the funding and meet the density requirements. Why should co-ops be allowed to build large homes with very large spacious gardens without any thoughts of density and where others might live.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Absolutely. We should not allow any of our housing stock to be sold or transferred. We should be protecting our stock for future generations who may not be able to help themselves. We must help those in need and without housing stock we will be at the mercy of landlords and letting agents.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Family homes should be protected at all costs. Too many family homes are turned into HMO's which is detrimental to areas and communities.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

In the city centre it is not needed as so many amenities are on your doorstep. and in the urban fringe areas you have the National Park on your doorstep. This should no longer be a necessary requirement as more homes are desperately needed.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes there is no need for amenity space any more as you either have the city centre with all its amenities on your doorstep or you have easy access to the seafront and the National Park.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Only need space standards where it is appropriate for those with disabilities etc. Otherwise space standards will mean fewer homes being built in the city for those who need them.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Lifetime homes are great but their space standards are higher and mean less homes are available for those in housing need. For social housing it seems to be a good idea however I have noticed that those with a disability don't like to purchase homes from developers with wheelchair access as they are too expensive. This puts more pressure on the social sector.

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

More energy efficient homes do help to lower fuel bills and help people out of poverty. If they purchase a new home then it should also have these energy efficient measures as paying a mortgage can be tricky so they need all the help they can get to keep fuel bills down.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

In B&H there will be no loss of HMO's as there are too many already. Some areas in the city are totally dominated by HMO's to the detrimental effect on the communities, schools, shops etc.. We should force landlords to purchase properties across the city and not destroy too many local communities any more.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes more HMO's should be turned back into family homes. As developers build so many bed spaces landlords should be forced to sell their HMO's so they can be turned back into family sized rented accommodation.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

No unless you stop landlords purchasing more family homes to be turned into HMO's this will never happen. Only the government can change this but the council are losing thousands of pounds in lost council tax with all these HMO's occupied by students. Make landlords pay business rates then it might not be so bad for the local tax payers as it spreads the cost for clearing fly-tipping, rubbish strewn across the roads and verges and hedges can be cut back so people can reclaim the pavements.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Yes, stop the nimbyism of residents when they try to prevent more homes being built in the city. We need more homes and those already lucky enough to live here dictate to council officers and prevent valuable homes being built. We should also build up. We have tall building polices why aren't we using them . We also need more homes in the city.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

No we shouldn't accommodate any more student housing in the city. the Universities should take responsibility for that and they should build in neighbouring areas like Lewes or Newhaven. The Universities can then work with the bus company to provide direct access to the city.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No all sites should be outside the city limits so they do not take valuable land which could be used for general needs housing.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

NO

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

No if you mean to build in neighbouring authorities to help their economy then yes but otherwise we should reserve all sites for general needs housing or specialist housing for older people, learning disabilities etc. The universities should be providing the land to build student accommodation.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

As has already been demonstrated at the AMEX the trains and bus companies go where they have lots of passengers so by working closely with the bus and train companies student housing can be built across the Sussex area.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

There should be no student housing allowed in the city unless it is on University land. Otherwise it should all be outside the city limits.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Yes ban all family homes being turned into HMO's on the estates. Moulsecoomb & Bevendean should be exempt from nay more family homes homes being lost and all landlords who try that should be fined heavily. and have to turn the home back into family rented accommodation. Moulsecoomb & Bevendean ward already exceeds the 10% rule in Article 4 so no more homes should be allowed to be turned into HMO's.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	70
Response Date	17/09/16 16:29
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing
 . Student accommodation

Individual Name

Individual Address

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes, subject to scope of development

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Make sure that the immediate area has sufficient social infrastructure, ie local shops, social meeting areas

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No, communities need green spaces for local recreation.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes, limit HMO's. In addition to the current 10% rule to have an area rule to stop HMO's moving through a community like a tidal wave. Or stop future HMO's but encourage development to limited brownfield areas.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

All types of homes should be protected to stop HMO's.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes, although not sure on how this should be based.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes, as H13

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

HMO loss should be a matter for the market place.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes and once returned to a family home then it should remain as such

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

In addition to the current rule, to have a 10% of total housing area rule to stop HMO's moving through a community like a tidal wave.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes this will encourage HMO blocks rather than split residential areas into student ghettos

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes, student accommodation should be treated as one rather than converted homes and purpose built blocks.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

The university sites

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

No

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

The Lewes Road is unable to cope with private motor vehicles following the 'new' road 'improvements'.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Stop family homes being taken for HMO's

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	71
Response Date	17/09/16 18:28
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Tourism . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Heritage
Organisation Name (If Applicable)	Surfers Against Sewage

Individual Name

Individual Address

Individual Email

Individual Tel

T2: Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafront?

No, the regionally important surf break just to the east of Brighton Marina should be protected from development in and adjacent to the Marina and access to it via the ramp from the clifftop preserved. Access to the sea for watersports across the whole of the seafront should be protected and enhanced. There should be policies to restore the West Pier or build a new state of the art pier.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

No - there is a need for a landscape scale approach that recognises the seafront and routes to it as well.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

The beaches down to the low water mark should be allocated as open space.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance)).

The area of beach to the east of Brighton Marina up until the 3rd groyne towards Rottingdean forms a regionally and locally important surf break.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Encroachment onto the shingle beaches should be very strictly controlled because rising sea levels and 'coastal squeeze' will reduce the size of the beaches

A: Polluted Land and Buildings

P1: Are there any planning issues that you consider a Polluted Land and Buildings policy should address?

Run off from streets and buildings Contaminated land - particularly from Shoreham port

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Separately

P7: Are there other pollution issues that the City Plan should address?

In recent years there have been documented incidences of residue from the demolished Shoreham Harbour town gas plant leaking onto beaches and into the sea just west of 'Millionaires Row'. Shoreham Port erected notices to warn people and have carried out investigations with the co-operation of the Council. The Plan should contain a policy to proactively require the assessment, investigation and mitigation of this and other potentially contaminated land. The Council should put up more litter and recycling bins on the seafront to discourage beach litter that ends up on the beaches and in the sea.

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Yes. the wastewater infrastructure should not become overloaded by new development, nor the use of 'package sewage treatment plants' be allowed as they are more likely to result of pollution of groundwater.

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Yes, SuDS may not be the most appropriate solutions in some areas where ground water flooding or pollution is a problem. Also deep bored SuDS can lead to pollution of groundwater. SuDs should be encouraged on the Downs to prevent run-off from fields causing mudslides - as has happened in Bevendean and Rottingdean.

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

Clearer policies to protect areas used for marine recreation - off Rottingdean, Ovingdean, east of Brighton Marina (surfing), near Peter Pans playground (Kayaking), around the Palace Pier (surfing and sea swimming), between the piers (Stand up paddleboarding, kayaking, sailing), around West Pier (surfing and surf lifesaving), Hove Lawns (boat launching spot); King Alfred (kitesurfing), Hove Lagoon (various watersports), west of Millionaire's Row (surfing, kitesurfing).

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

Yes - and also that any changes to coastal defences should try to protect and enhance marine recreation.

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Yes.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

A stronger policy to encourage the restoration or rebuilding of the West Pier.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	72
Response Date	18/09/16 09:37
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Should not be left for the market to decide.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Family homes should only be used for families

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Not private outdoor space. Should be available for all to use

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No policy to protect hmos

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes definately

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Yes. Definately no more hmos. Landlords should be made to pay council tax and there should be a law to ensure they keep gardens and recycling tidy. Also less student cars on the street.

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 73
Response Date 10/09/16 22:01
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on? . Housing
 . Biodiversity and Open Spaces

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Preservation of distinct local communities (e.g. the Deans 'villages') - not running these communities together through 'urban sprawl'.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

The old gasworks site between Roedean and Kempton.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Many housing sites, especially those where family housing predominates, often seem to be over-developed, rather than the reverse. People need housing but they also need space - gardens, space between houses, etc.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Definitely not designated sites for specific groups. New housing should be built with a range of occupants in mind - e.g ensuring new builds can be easily adapted for disabled people. New developments, especially larger ones, should have the idea of 'community' in mind - the ways people mix and interact to lessen isolation and build communication and cooperation..

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

There should definitely be specific sites for self-build.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Definitely.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes.

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Definitely ancient woodland.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance)).

I'm interested in the concept of 'wildlife corridors' - links between areas of open space and woodland that allow wildlife to move and hunt - e.g. the possible 'corridor' linking the Beacon Hill reserve in Ovingdean/Rottingdean to the National Park.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

2 Port Hall Road Brighton BN1 5PD

T 01273 413700

E admin@lewisplanning.co.uk

W www.lewisplanning.co.uk

Planning Policy Team
Brighton & Hove City Council
Room 201 King's House
Grand Avenue
Hove
BN3 2LS

22 September 2016

And by email to planningpolicy@brighton-hove.gov.uk

Dear Sir/Madam

Brighton & Hove Draft City Plan Part 2 – Scoping Document

Land at 44-47 Cheapside, Brighton.

Further to receiving notification of the City Plan Part Two Scoping Document, we write to respond on behalf of Colin the owner of the above site.

These representations specifically request that the above site (Land to the North East of Longhill Close, Ovingdean) is allocated in the City Plan for future housing development.

Proposal Site

The site is located at the corner of Cheapside (A270), St Peter's Street and New England Street and the site boundary red line encompasses 44 to 47 Cheapside (see SK050).

44 to 47 Cheapside currently contains 10 No residential units (see fig 01) with consent for a further five units on additional floors secured into perpetuity by the material start on site made in 2011 in respect of full planning consent ref BH2008/03093.

The site is in a location extremely well served by local amenities and public transport, close to a number of existing tall buildings, close to the lowest point in a valley and in a location with few impacts on existing neighbouring residences.



RTPI

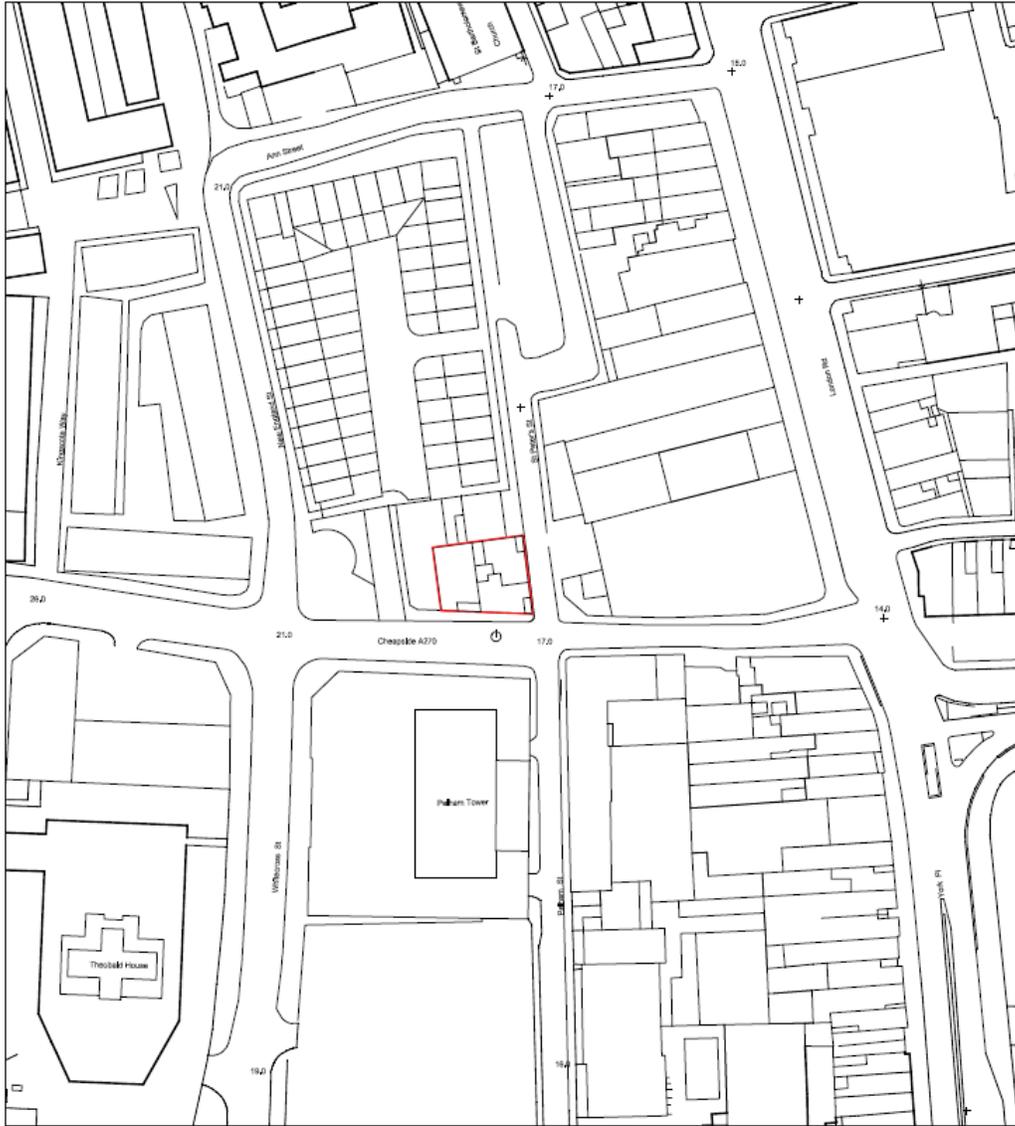
mediation of space · making of place

Chartered Town Planners

Lewis and Co Planning South East Limited
Company Number 05809390
Registered Office: Preston Park House, South Road,
Brighton, BN1 6SB
Registered in England and Wales

A site location plan is include overleaf. As can be seen, the site is surrounded by other development, and has street frontage on to Cheapside and St Peters Street.

Site Location Plan



NOT TO SCALE

Planning Policy History

The site is included in the Council's City Plan (Part One) Policy DA4 area.

DA4 – New England Quarter and London Road Area

The strategy for this development area is to revitalise the London Road

shopping area, create a major new business quarter for Brighton & Hove consisting of high quality business accommodation connecting London Road with the New England Quarter, and to maintain and enhance a green gateway to the city to the west of Preston Road.

A. The local priorities to achieve the strategy are:

1. Planning for a new business quarter for the city in the New England Quarter and London Road area to accommodate 20,000 sq m of additional new office floorspace post 2016.
2. Managing, enhancing and consolidating the existing retail provision within the defined prime frontage of London Road Town Centre, recognising the importance of retaining key retail sites to act as 'anchors' for the centre as well as recognising the role of small independent/local traders.
3. Working with landowners and traders to secure the redevelopment/refurbishment of key retail sites along London Road.
4. 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.
- 5 Working with Southern Rail, Network Rail and partners to enhance the environment and maximise use of space around Brighton Rail Station (Brighton Station Gateway) recognising its important role as a gateway to the city, a public space, a major transport interchange and the need to improve links to and from the station.
6. Ensure improvements to local air and noise quality through the implementation of the council's Air Quality Action Plan, through improvements to bus, pedestrian and cycle routes to achieve a modal shift and help reduce the impact of traffic and through the implementation of the council's Air Quality Action Plan. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.
7. Strengthening links between the New England Quarter, London Road shopping centre and the North Laine shopping area with high quality streetscapes and public spaces and a greater choice of routes and ease of movement through the area with an improved pedestrian and cyclist environment.
8. Maintaining and strengthening the significant creative digital and information technology cluster in the area through the delivery of ultrafast broadband and ensuring that workshops, office space, studios, storage and other premises remain affordable, appropriate and available for use.

9. Enhancing the social infrastructure to support any expansion in the residential population through the provision of, or contributions towards community, education and health services or facilities;

10. Ensuring redevelopment opportunities extend and strengthen green infrastructure including the connection between the existing open space and greenway network of The Level, Brighton Station Greenway and Preston Park and secure enhancements to open space and biodiversity in the area.

11. Development within this area will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability.

A Supplementary Planning Document (SPD) has been prepared by the council to assist the delivery of development and guide developers on the form and content of development and the provision of infrastructure in the London Road Central area.

B. Provision will be made by 2030 for the following minimum amounts of development through strategic allocations (below) and through allocations in the City Plan Part 2:

1,130 residential units;

20,000sq m B1a B1b floorspace; and

300 bed space student housing (see CP21 Student Accommodation)

C. The Strategic Allocations in the New England Quarter and London Road Area are:

1. Provision is made for 20,000 sq m net additional B1a, B1 b floorspace and 165 residential units through the implementation of extant commitments for B1 floorspace and the mixed use development of the following sites⁶¹:

a) Vantage Point, Elder Place (including Circus Parade) - no net loss of B1a floorspace;

b) Trade Warehousing (Longley Industrial Estate) 4-6 New England Street - 3,000 sq m;

c) Richardson's Scrapyard and Brewers Paint Merchant Site, New England Street - 3,000 sq m;

d) Cheapside (south between Blackman Street and Whitecross Street) - 2,000 sq m;

e) Blackman Street Site (land adjacent to Britannia House) - 2,000 sqm.

Proposals will be assessed against the citywide policies, the London Road Central SPD and the following specific criteria:

- i. Each site would be expected to deliver the minimum office/ research and development (B1a, B1b) floorspace indicated above through a range of offices and flexible workspaces including larger floorplate office stock and affordable business floorspace suitable for small business and the creative, digital and information technology industries;**
- ii. An appropriate mix of uses including residential (C3) and ground floor ancillary retail (A1) and restaurants and cafes (A3) will be permitted;**
- iii. Development will be expected to be of a high quality of design and incorporate active uses at ground floor level, contribute to an improved public realm and improved connectivity to the wider development area for pedestrians and cyclists;**
- iv. Development will be expected to contribute to green infrastructure improvements to increase green space connectivity and enhance biodiversity;**
- v. The developer will enter into a training place agreement to secure training for local people.**

The following sites within the DA4 area with extant planning permission for B1a office uses will not be granted planning permission for alternative uses:

- f) Block J Brighton Station Site**
- g) Block K Brighton Station Site**
- h) GB Liners site, Blackman Street**

2. New England House, New England Road

Safeguard and strengthen New England House as the city's creative digital and information technology hub through:

- a) the council working in partnership to deliver its upgrade and refurbishment;**
- b) the council as landowner ensuring the workspace remains competitively priced, appropriate and available to use;**
- c) Supporting proposals which provide a range of appropriate workspaces to support the creative digital and information technology sector;**
- d) Where it is necessary to make a refurbishment and upgrade of the building financially viable, appropriate enabling development around the building will be considered, providing it does not affect the operation and long term vision for the building.**

From this policy it is clear that the City Plan seeks to provide 1,130 new dwellings within the DA4 Area in the plan period. While 165 of these will be on the Allocated sites A-E, the

remaining minimum of 965 dwellings will be provided in the Policy area through allocations in the City Plan Part II.

Policy CP14 (Housing Density) confirms that

Within the Development Areas covered by policies DA1 to DA6 and DA8, the density of new residential development will be expected to achieve a minimum of 100 dph on major development sites, provided that all of the above criteria can be satisfactorily met.

Those criteria are:

- 1. Would be of a high standard of design and would help to maintain or create a coherent townscape;**
- 2. Would respect, reinforce or repair the character of the neighbourhood and contribute positively to its sense of place;**
- 3. Would include a mix of dwelling types, tenures and sizes that reflect identified local needs;**
- 4. Is easily accessible by sustainable transport or has the potential to be easily accessible;**
- 5. Is well served by local services and community facilities; and**
- 6. Provides for outdoor recreation space appropriate to the demand it would generate and contributes towards the 'green network' where an identified gap exists.**

Having considered the criteria above, it is our considered opinion that the site at Cheapside is capable of meeting all of the criteria in policy CP14. Given the site's location, provision for recreation space are likely to be met through off-site contributions to local open spaces.

Other Considerations

The site was presented to the Council's Design Review Panel in September 2016. While the formal written feedback of the panel has not yet been published, we are informed that the panel were generally supportive of a high density development of the site with the building of around 10 storeys being considered likely to be appropriate for the location. The presented scheme would provide:

- 224m² of Commercial space at ground floor level – it is hoped this could relate to the City College located next door and provide space for small start-up companies and commercial enterprises.
- 26 Dwellings on floors 01 to 09

Conclusion

On the basis of the information set out above, it is considered that this site should be allocated for residential led development at high density to provide up to 30 dwellings in a building of up to 10 storeys.

We trust that the information contained in this letter can be taken into account for the publication of future versions of the City Plan (Part Two).

If you would like to discuss the merits of the site further, please contact on 01273 413700.

Yours faithfully

LCP

Lewis & Co Planning

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	75
Response Date	12/09/16 22:37
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Addressing pollution, water and energy resources

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

We agree that due to the need for more housing in Brighton and Hove the Council should allocate more brownfield sites for future development of housing.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Yes . The large area of semi derelict land at the end of Eastern Road behind the Marina where the gas tower is situated. There are rumours that this land is too polluted!?

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

A range of size and price should be the priority enabling a social mix of residents.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Definitely.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

To only grant permission to those plans which offer a good mix.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

My experience has been the opposite in that developers try to cram too many houses on to a site in order to maximise profit. If by 'site potential' the meaning is to factor in recreational space for all age groups then this should only be encouraged. Surely Councils have learnt from the past that merely housing people is not what leads to building successful harmonious communities but what is provided within that community for leisure pursuits is vital.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

This should be a consideration when looking at all planning developments with minority groups being included in development policies.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

The market WILL decide..

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

YES

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

YES

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

residential accomm. for those with support needs.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Most Certainly.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

YES

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

YES

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

YES

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No, HMO's are never an ideal form of housing.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

YES

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

A limit on the number of adults and children living under one roof.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Levels of air pollution should be an essential consideration.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Definitely

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Actual measurements over a set period of time of traffic emission pollution.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

There is scope.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

YES

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Which ever system works best in achieving desired results.....cleaner safer air quality.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

Which ever brings the best outcome .

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

Yes. Plenty of scope.

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

YES

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

More Park and Ride schemes.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Separately.

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

YES

P7: Are there other pollution issues that the City Plan should address?

Traffic control where congestion is a contributory factor to unlawful levels of air pollution.

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

YES

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

YES

Please indicate which topic or topics you would like to comment on?

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Biodiversity and Open Space

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Biodiversity and Open Space Summary:

Key objective is conserving biodiversity and enhancing the natural environment's multi-functional offer. The section invites comments on relevant matters including: 'landscape-scale' approach; the setting of criteria and hierarchy of sites; species protection; and, identification of additional open space, Local Green Spaces and National Park Gateways.

This form has two parts: Part A – Personal Details
 Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title	Committee member	
Organisation	KTRG	
Address		
	Brighton	
Postcode		
Email Address		
Telephone No.		
Mobile No.		

Part B: Your Comments

A. Landscape Scale Approach

Question B1

Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes

Question B2

If you think a policy is needed, what types of development should be included?

Guidance will be necessary for Toads Hole Valley as this is currently a Greenfield site and therefore needs sympathetic treatment for all the wildlife present and for protection of the SNCI area – ie. make sure high buildings do not shade it. Presently it has regenerated with natural trees –can some of these be kept? Also at Anston House, buildings should not be too high as they will shade Preston Park and if elms are restored to the site they will need enough light to flourish – it should be remembered a previous potential developer destroyed numerous well established mature trees including elms illegally when the whole site was cleared .

Question B3

Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes

B: Nature Conservation, Geodiversity and Landscape Sites:

Question B4

How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

Be mindful of LBAP action plan requirements which BHCC has a duty to address. I am not certain how the new LGS designation fits in with those already in existence and if therefore a site can be LGS and an LNR? It is doubtful a single policy would fit all
--

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Question B5

Should there be a specific policy to address the general protection and enhancement of species?

Yes, but surely these are already in place within existing government guidelines and LBAPS

Question B6

Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes –The previous BHCC Ecologist Matthew Thomas worked hard to review and update these- with the assistance of many local environment experts selected to represent all aspects of Brighton & Hove Biodiversity, in order to ascertain a credible list of Local Wildlife sites. Great care should be taken to include all of these.

Question B7

Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Woodland is rare in this area and should obviously be favourably conserved, as should veteran trees. Mature hedgerows (both in large gardens and greenspace) should be recognised and protected for their value as wildlife corridors. Tree planting should again be prioritised to counter any losses caused by development generally.

C: Open Space, Local Green Space and Gateways to the National Park:

Question B8

Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Toads Hole Valley SNCI will be a greatly important greenspace for the new community once the rest of the site is developed. Management of all our public open green space should be given as much priority as possible and getting schools and universities on board wherever possible may be a way forward. Volunteers throughout this city have great knowledge of their sites and have already long been active in assisting BHCC with maintenance and in seeking grant money, but they are going to need more recognition and assistance from management as less paid help is forthcoming.

Question B9

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance)).

Again not sure if the Green Ridge Open Space (for example), which has long been valued as a local community asset and has had a local wildlife group, namely KTRG, assisting council rangers with its maintenance for the past 25 years -needs this further 'Local Green Space' protection? It is already part of the SDNP and was recommended as probably meeting the requirements to become a LNR in the 2013 review. The site is species rich and lucky enough to have two lengths of valuable hedgerows (including a Saxon boundary hedge which is also the SDNP boundary) & several copses in addition to Coney Wood and a dewpond

Question B10

Do you consider the following green spaces should be designated Local Green Spaces?

- **Benfield Valley;**
- **Three Cornered Copse**
- **Ladies' Mile Open Space**
- **Hollingbury Park.**

Yes – although Benfield and Hollingbury also have part of their site within the SDNP

Question B11

Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Only where this would still be advantageous to Biodiversity on the site concerned. Cycle ways are not always an advantage on footpaths and those using them should be monitored to make sure they do not cause disturbance to wildlife by straying from the through route or digging to provide jumps. Suggest liaising with the SDNP to obtain unobtrusive signage would be a good idea for relevant sites and there is an opportunity to promote access to the SDNP through provision of a wide 'green bridge' at Toads Hole Valley which if grassed over could assist as a wildlife passage- maybe section 106 monies could be used here or approach the Highways Agency?

D: Are there any other biodiversity and open space issues?

Question B12

Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Closely monitoring any development and paying attention to the provision of more habitats through S106 monies, especially where these have been destroyed. Where possible

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

developers should be encouraged to retain trees and hedges rather than cause destruction or disturbance which results in great biodiversity loss and even if replanted will then take years to provide the same value. This city situated between the Downs and the Sea, means there is a finite amount of development space available and 'urban fringe' sites already provide local access to nature on what is really 'the peoples' nearby downland countryside.

Signed/typed*:	
Dated*:	September 18th 2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	77
Response Date	18/09/16 18:29
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Housing
- . Student accommodation
- . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

No I believe you should be looking at the bigger picture. There are already over 800 HMO's in the ward of Mouscoomb & Bevendean. Whilst the 'cry' from BHCC is that we must 'find' affordable homes for our city families to ease the housing pressure. Why not consider a stop to any more HMO's being allowed in this area.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Housing should not be allowed on urban fringe sites.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Stop using all in the sites in the central city for student accommodation, the old Co-Op site London Road would have made an ideal site for local residential needs. All the vacant sites that come up are the snapped up for students. Enough is enough think of your council tax paying residents for a change.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Yes, of course, people are individual with individual needs. We have older people, young families, single people, people who may need assisted living help. You really must consider the permanent community not the transient.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Once again you have allowed 800 - 900 homes to be lost in the Ward of Bevendean & Moulsecomb. These were all affordable very nice family homes.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Talk to the residents !!!!

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

yes

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

yes

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Yes all those all ready mentioned

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

yes

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

NO MORE HMO's in our WARD

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Re consider the 50 meter rule take into consideration the geographical sites. For example larger properties with land will provide a different picture to terraced properties. Once a target has been met with in the area, the issuing should cease.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes, within the boundaries of the Universities only.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Within the boundaries of the Universities.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

No

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

These areas should be for families and the communities and not students.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Stop the issue of HMO licences and check for unlicensed properties. Think of the communities rather than students.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Stop granting HMO status to family homes.

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

I wish to express my view and for it to be added for consideration when formulating the City Plan. My concerns are the increasing number of HMO properties in the Moulsecoomb & Bevendean Ward of the City. There are already over 800 HMO's in the ward, this is infiltrating the community and having a detrimental effect on the local school and service provisions. The community must be listened too. We cannot afford to lose any more family homes. Local residents are being out priced of an area, traditionally affordable. The estates of Bevendean & Moulsecoomb were built with such vision and consideration on the ethos of Alderman Carden, open spaces, amenities, sustainable family units with a positive impact for the health & wellbeing of a community: the very essence of this concept has been thwarted as we become an extension of the university's campus and the amenities lost forever. Whilst the 'cry' from BHCC is that we must 'find' affordable homes for our city families to ease the housing pressure. Why not consider a stop to any more HMO's being allowed in this area. Retain the homes and communities that already exist, invest and build on what we already have; finally listen and learn from history.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	78
Response Date	19/09/16 10:33
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Individual Name

Individual Email

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces? . Hollingbury Park

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

I support the recommendation to remove Study Area L6/E5 Site 18 at Hollingbury Park.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	79
Response Date	19/09/16 10:37
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Individual Name

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces? . Hollingbury Park

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

I support the recommendation to delete Study Area L6 / E5 Site 18 at Hollingbury Park from the potential housing development sites. The whole surrounding area, especially Hollingbury Woods and the South Downs National Park, is a valued open space much used by the community.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	80
Response Date	19/09/16 10:51
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Organisation Name (If Applicable) Saltdean Swimmers

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

We note the inclusion of the Saltdean urban fringe sites in City Plan part 1 for possible housing development. We urge Brighton and Hove City Council (BHCC) to recognise that the cumulative effect that housing development to the east of Rottingdean will mean extra cars on the roads and, until a solution is found, a further deterioration of the already illegal air quality on Rottingdean High Street, due primarily, to diesel car engines and nitrogen dioxide contamination. We ask that all Councillors, Officers and Committes of BHCC take seriously the pollution issues on Rottingdean High Street when making recommendations and decisions. We alert you to National Planning Policy Framework NPPFno11-aim to minimise pollution and not to increase it. warns of unacceptable and cumulative effects on health. We also draw to your attention Environmental Protection UK-Development Control Planning for Air Quality, 2010 update 3.5 "In terms of air quality, particular attention should be paid to the potential for the development to give rise to breaches of the national air quality objectives and of EU limit values, to whether the development will materially affect any air quality action plan or strategy, and to the overall degradation in local air quality. It is also important to consider whether the development will introduce public exposure into an area of existing poor air quality." Major housing developments in Saltdean would require important improvements to the existing infrastructure: roads, schools, doctor provision, to ensure there is not a deterioration to living standards for existing residents. You will recognise the importance of BHCC planners working closely with those of neighbouring local authorities to consider the cumulative effect on Rottingdean High Street of housing developments to the east of the city boundary. For and on behalf of Saltdean Swimmers

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	81
Response Date	19/09/16 10:53
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

I support the recommendation to remove Study Area L6/E5 Site 18 at Hollingbury Park as a potential site for housing.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	81
Response Date	19/09/16 10:53
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

I support the recommendation to remove Study Area L6/E5 Site 18 at Hollingbury Park as a potential site for housing.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	82
Response Date	19/09/16 10:59
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

I write in support of the recommendation to remove Study Area L6/E5 Site 18 at Hollingbury Park from the urban fringe development site. The conclusions of the recent study state that urban development in this area would be detrimental to the habitat and ecosystems here. Any urban development would have significant landscape impacts. I urge the Brighton Planning Policy Team to continue to keep this area out of the revised City development plan, and keep to earlier recommendations in scoping consultations. It is crucial to Brighton landscape and environmental habitats that these established green corridors are maintained.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	93
Response Date	19/09/16 10:58
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Transport and Travel . Design . Heritage . Community facilities
Organisation Name (If Applicable)	Kingsway and West Hove Residents Association
Individual Name	(Chairman)
Individual Address	Hon Secretary, KAWHRA,
Individual Email	
Individual Tel	

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes; identification of sites that would be eventually likely to become windfall housing sites would reduce uncertainty and pressures to release unsuitable sites.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Yes. There is a strong need for 3+ bed family homes. This results not only from family creation, but is exacerbated by family breakup. Fragmented families may divide their time between living in mother's home, father's house, and often grandparents' house. Active older people also stay in family houses in order to have space for hobbies and friends and family to visit. However frailty or bereavement in their 80s creates a need to move to smaller/supported housing, which needs to be increased on suitable sites.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes; family housing is likely to be more difficult to achieve on inner city brownfield land.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

It will be important to emphasise that maximising site potential will not be an acceptable reason to justify bad development. It will be essential to unequivocally relate such a policy to the policies in the plan for avoidance of damage to townscape, to respect for the scale of its surroundings, avoidance of unneighbourly impact on neighbouring development, damage to heritage, damage to the seafront etc.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Preferences could be stated where there are sites or areas that are particularly appropriate.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes and also housing co-operatives.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes in order to reduce pressure for city cramming to achieve housing targets.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Yes, all of those, because during the plan period the greatest financial return for landlords could be for creating or converting other types of housing rather than providing such housing.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes. There is a risk of maximising development and squeezing out provision of an amenity that has been recognised as essential to quality of life and health in homes for over a century.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes, especially to ensure that it is pleasant to use e.g. not totally in shadow.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes in the interests of resisting substandard housing provision.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes – people are living longer and longer, and also younger people with disability are living in the community more than in the past.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

It should be emphasised that a) the housing supply requirement can be met through the policies in parts one and two whilst also maintaining/supplying the other land uses essential for a balanced urban area e.g. space for commerce, industry, culture, community and open space; and b) the maintenance of the individuality of the many and varied parts of the urban mosaic of the city will be the priority when considering housing proposals.

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

Yes – replacement sites for significant losses would be unlikely due to the huge difference in relative site value for industrial and business compared with housing, and due to the environmental constraints on finding further sites. Furthermore the introduction of residential use in industrial estates, including Aldrington Basin, could affect the operation of businesses if residents seek curbs on the operation of businesses that they consider to affect their amenity.

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Policies that relate to industry need, where appropriate, to refer to port and marine related activities to ensure that the unique resource of Aldrington Basin is recognised in CP Part Two.

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

There needs to be a review of the extent in the context of the changing nature of retailing, although care needs to be taken to protect a critical mass of shops in a centre.

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

Yes, in the interests of clarity it's desirable to avoid the repetition in existing policies, by stating what's common and indicating the difference applicable to the different types of frontage.

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

Yes Richardson Road in Hove – a distinctively different iconic parade.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Yes - a focused policy is essential because the evidence is that mobility and accessibility provision is still overlooked or disregarded unless it is brought to the fore as a necessary consideration.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Yes. Important considerations should be identified – to avoid the proliferation of policy documents referred to in our response to question D9.

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

Yes – – to avoid the proliferation of policy documents referred to in our response to question D9

D7: Are there any further issues you consider an amenities policy should address?

1. The plan needs to be unequivocal about the priorities between housing gain, and retaining / enhancing the existing good quality of life in area. 2 To avoid the submission of insufficient and misleading information about overshadowing the policy should spell out the requirements to be submitted relating to the impact of development on daylight and sunlight on residential property, i.e. graphical and numerical assessments of the total area affected at midsummer, midwinter and the equinoxes. 3. Policy should recognise the important residential amenity of residents' on street parking in suburban areas such as west Hove, and protect it from external pressures.

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

The opportunity should be taken to reduce the number of documents that it is necessary to wade through to establish the policies applicable to an area. For example for Hove Kingsway it is necessary to look at SA1, CP12, para4.146, and the Tall Buildings SPG15 to see that mid-rise buildings of 6 to 8 storeys in height are considered appropriate on Kingsway east of Wish Road. Furthermore this is not indicated on any map. The city plan should be the document containing concise statements and plan about all the place making policy considerations for areas. These could be explained in more detail in other documents only if really necessary. Wherever possible the aim should be to avoid the need to refer to other documents to find policy considerations. The present plethora is confusing to the layman, making it difficult for them to ascertain where the council stands on important planning considerations. Whilst applicants can exploit the differences to seek to undermine policies.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

The city plan should be the document containing concise statements and plan about all place making policy considerations for areas. These could be explained in more detail in other documents only if necessary. The aim should be to avoid the need to refer to other documents to find policy considerations.

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

A single policy

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

The alternative facilities available within walking distance/accessible by public transport. The needs of the local community and the options available for meeting them.

CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

Pressures on land supply mean that new uses need to be flexible and multipurpose.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Yes – redundant churches.

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

St Leonard's Church in New Church Road Hove if it's present status solely as a place of worship changes. Demand for space is increasing as the past availability of facilities has reduced.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 83
Response Date 19/09/16 10:58
Status Processed
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Economy & Employment
- . Retail and town centre uses
- . Transport and Travel
- . Design
- . Heritage
- . Community facilities

Organisation Name (If Applicable) Kingsway and West Hove Residents Association

Individual Name (Chairman)

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes; identification of sites that would be eventually likely to become windfall housing sites would reduce uncertainty and pressures to release unsuitable sites.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Yes. There is a strong need for 3+ bed family homes. This results not only from family creation, but is exacerbated by family breakup. Fragmented families may divide their time between living in mother's home, father's house, and often grandparents' house. Active older people also stay in family houses in order to have space for hobbies and friends and family to visit. However frailty or bereavement in their 80s creates a need to move to smaller/supported housing, which needs to be increased on suitable sites.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes; family housing is likely to be more difficult to achieve on inner city brownfield land.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

It will be important to emphasise that maximising site potential will not be an acceptable reason to justify bad development. It will be essential to unequivocally relate such a policy to the policies in the plan for avoidance of damage to townscape, to respect for the scale of its surroundings, avoidance of unneighbourly impact on neighbouring development, damage to heritage, damage to the seafront etc.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Preferences could be stated where there are sites or areas that are particularly appropriate.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes and also housing co-operatives.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes in order to reduce pressure for city cramming to achieve housing targets.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Yes, all of those, because during the plan period the greatest financial return for landlords could be for creating or converting other types of housing rather than providing such housing.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes. There is a risk of maximising development and squeezing out provision of an amenity that has been recognised as essential to quality of life and health in homes for over a century.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes, especially to ensure that it is pleasant to use e.g. not totally in shadow.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes in the interests of resisting substandard housing provision.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes – people are living longer and longer, and also younger people with disability are living in the community more than in the past.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

It should be emphasised that a) the housing supply requirement can be met through the policies in parts one and two whilst also maintaining/supplying the other land uses essential for a balanced urban area e.g. space for commerce, industry, culture, community and open space; and b) the maintenance of the individuality of the many and varied parts of the urban mosaic of the city will be the priority when considering housing proposals.

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

Yes – replacement sites for significant losses would be unlikely due to the huge difference in relative site value for industrial and business compared with housing, and due to the environmental constraints on finding further sites. Furthermore the introduction of residential use in industrial estates, including Aldrington Basin, could affect the operation of businesses if residents seek curbs on the operation of businesses that they consider to affect their amenity.

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Policies that relate to industry need, where appropriate, to refer to port and marine related activities to ensure that the unique resource of Aldrington Basin is recognised in CP Part Two.

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

There needs to be a review of the extent in the context of the changing nature of retailing, although care needs to be taken to protect a critical mass of shops in a centre.

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

Yes, in the interests of clarity it's desirable to avoid the repetition in existing policies, by stating what's common and indicating the difference applicable to the different types of frontage.

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

Yes Richardson Road in Hove – a distinctively different iconic parade.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Yes - a focused policy is essential because the evidence is that mobility and accessibility provision is still overlooked or disregarded unless it is brought to the fore as a necessary consideration.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Yes. Important considerations should be identified – to avoid the proliferation of policy documents referred to in our response to question D9.

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

Yes – – to avoid the proliferation of policy documents referred to in our response to question D9

D7: Are there any further issues you consider an amenities policy should address?

1. The plan needs to be unequivocal about the priorities between housing gain, and retaining / enhancing the existing good quality of life in area. 2 To avoid the submission of insufficient and misleading information about overshadowing the policy should spell out the requirements to be submitted relating to the impact of development on daylight and sunlight on residential property, i.e. graphical and numerical assessments of the total area affected at midsummer, midwinter and the equinoxes. 3. Policy should recognise the important residential amenity of residents' on street parking in suburban areas such as west Hove, and protect it from external pressures.

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

The opportunity should be taken to reduce the number of documents that it is necessary to wade through to establish the policies applicable to an area. For example for Hove Kingsway it is necessary to look at SA1, CP12, para4.146, and the Tall Buildings SPG15 to see that mid-rise buildings of 6 to 8 storeys in height are considered appropriate on Kingsway east of Wish Road. Furthermore this is not indicated on any map. The city plan should be the document containing concise statements and plan about all the place making policy considerations for areas. These could be explained in more detail in other documents only if really necessary. Wherever possible the aim should be to avoid the need to refer to other documents to find policy considerations. The present plethora is confusing to the layman, making it difficult for them to ascertain where the council stands on important planning considerations. Whilst applicants can exploit the differences to seek to undermine policies.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

The city plan should be the document containing concise statements and plan about all place making policy considerations for areas. These could be explained in more detail in other documents only if necessary. The aim should be to avoid the need to refer to other documents to find policy considerations.

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

A single policy

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

The alternative facilities available within walking distance/accessible by public transport. The needs of the local community and the options available for meeting them.

CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

Pressures on land supply mean that new uses need to be flexible and multipurpose.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Yes – redundant churches.

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

St Leonard's Church in New Church Road Hove if it's present status solely as a place of worship changes. Demand for space is increasing as the past availability of facilities has reduced.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	84
Response Date	19/09/16 14:39
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Tourism

Individual Name

Individual Address

Individual Email

Individual Tel

A: The Seafront

T1: Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

The successful parts of Marine Drive, from a users point of view are - the pitch and put course next to the Peter Pan playground; The Peter Pan playground; The Yellowwave sports project, children's facilities etc.; The Volks Railway - the additional temporary buildings e.g. Once Upon a Time on something Street should be taken down and not left to be squatted in/vandalised; the playground is well used and could be extended, see the - The Level, lottery funded project, highly successful. The Community value the environment here and the careless disregard of the Victorian terraces sees Brighton losing it's original identity and a reason for visitors to come here. N.B. Hastings seafront project/ Jerwood Gallery/ successful children and family play area/ redevelopment of Pier, that is free for all. Please, no more vanity projects here.

T2: Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafront?

Are the people who assess these projects sufficiently interested in long-term sympathetic developments or primarily in 'for Profit' projects. Are the community tax payers sufficiently informed about proposed developments and aware of where their money is going.

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

Unable to comment

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

Apart from money-making projects and parking issues, the community needs facilities e.g. a new swimming pool, a skateboard park for the Eastern part of the city; a secondary school for the Eastern part of the city and another primary school. The noticeable increase in housing developments e.g. the Marine blocks, small housing projects everywhere, makes community facilities a priority, not always putting tourism first.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	85
Response Date	19/09/16 15:47
Status	Submitted
Submission Type	Web
Version	0.2
Which section do you want to make comments on?	Housing
Organisation Name (If Applicable)	Friends of Hollingbury & Burstead Woods

Individual Name

Individual Address

Individual Email

Individual Tel

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

The value to health of ready access to open green space is well established, and should be taken into consideration. The calculations by the consultants of open space as a percentage of the area of each ward provide only a crude indication of the possible impact of housing on particular green spaces, so site-specific consideration should be given to this issue.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

2.6. This section refers in a footnote to the Further Assessment of Urban Fringe sites – Landscape and ecology. That document concludes: "it is considered that it would not be possible to avoid or mitigate significant landscape impacts if housing were delivered at study Area L6/E5 (although ecological impacts could be mitigated given the relatively small areas of habitat within the wider Study Area affected). It is therefore recommended that this Study Area is removed as an urban fringe site with potential for housing". The Friends of Hollingbury & Burstead Woods, some of whose work abuts the area, warmly welcomes this conclusion, and urges the Council to accept it. Study Area L6/E5 should

not be among the sources used to propose site allocations for housing at the draft Plan stage of City Plan Part Two.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	86
Response Date	19/09/16 17:17
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Tourism
- . Transport and Travel
- . Design
- . Community facilities

Individual Name

Individual Address

Individual Email

Individual Tel

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

The streets and open spaces of the City are a disgrace in terms of litter, uneven pavements, inconsiderate vehicle parking and general untidiness. Brighton & Hove appears to be a scruffy destination, especially when compared with other south coast destinations. In particular, Queens Road and West Street - major routes from railway station to seafront - are dingy and unpleasant.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

Much better Park & Ride services. In order to improve bus services and to improve traffic flow across the City, cash payments to bus drivers should be eliminated. If this can be done in London it should be possible in Brighton & Hove.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Library Services.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	87
Response Date	20/09/16 08:46
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Addressing pollution, water and energy resources
Organisation Name (If Applicable)	Aqualor Energi

Individual Name

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Yes

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

Large-scale heat pumps as these produce no on-site air emissions - they require a suitable source (typically of water at large-scale) and to deliver the heat (at up to 90degC) solely require power hence they are also low carbon. If the power comes solely from renewable sources such as wind and solar they are zero carbon. Because the heat can be stored until required off peak power can be used making them excellent value for money. Off gas grid a water source heat pump is better value than any alternative heat source and even on gas grid they can be better value than gas CHP (and better

value than gas boilers). Examples of water source heat pumps already exist in the UK, albeit generally at small scale still, but in mainland Europe they have been used since the 1940s with the largest being 160MW!

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

Yes - I note BEIS and until recently DECC provide grants for such studies.

P16: If yes, what sites should be investigated for energy uses? (taking into account the areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study)

The areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study should be investigated for use of water source heat pumps. Our company Aqualor Energi can quickly say (for free) whether a particular site has enough water to offer a viable scheme. We just need the post-code and size of heat load to be served.

P17: Should a renewable energy policy be explored for City Plan Part 2?

Yes, definitely.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	88
Response Date	20/09/16 09:03
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

As a local five ways resident who uses the park and this area daily I support the recommendation to remove Study Area L6/E5 site 18 at Hollingbury Park from the city plan2.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	89
Response Date	20/09/16 09:08
Status	Processed
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

I am writing with reference to Study Area L6/E6 site 18 and wish to support the recommendation that this site should be removed from the list of potential sites for urban housing. There should be no encroachment onto this important open area which is heavily used by local residents, and where there is at present no development on the east side of Ditchling Road apart from the golf course and the cottages by the allotments.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	90
Response Date	20/09/16 09:11
Status	Processed
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing
Organisation Name (If Applicable)	Surrenden Park Residents Association

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

As Secretary of the Surrenden Park Residents Association I am writing to support the recommendation that study area L6/E6 site 18 should be removed from the list of urban fringe sites with potential for housing development. There should be no building on the east side of the Ditchling Road, so that Hollingbury Park remains free of development. It is much used and valued by local residents.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	91
Response Date	20/09/16 09:17
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

I support the recommendation to remove Study Area L6/E5 Site 18 at Hollingbury Park.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	92
Response Date	20/09/16 09:20
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

I support the recommendation for the removal of Site 18 Study Area L6/E5 in that it will not be identified for housing in the City Plan.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	93
Response Date	20/09/16 09:24
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

I wish to support the removal of the above areas of Hollingbury Park from the list of potential housing sites. As a Hollingbury resident and supporter of the Friends group that care for that area I am pleased that these areas will not be considered for housing development.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	94
Response Date	20/09/16 10:27
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Individual Address

Individual Email

Individual Tel

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

There should be a statement as whether this plan when passed automatically allocates the URBAN FRINGE SITES finally included in the plan part 2. If not there is a need to inform the community if there is an opportunity to object on matter of ALLOCATION in advance of individual planning applications. Site 37: Urban Fringe. I strongly object to inclusion of this site. I believe the land was given to the Council for Recreational Use. Removal of even a part of it for housing is likely to lead to the eventual closure of the Pitch & Putt golf course which provides a good recreation past time and enhances the attraction of the City to visitors.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

From: Sent: 20 September 2016 1:14 PM
To: PlanningPolicy **Subject:** Urban Fringe Housing Plan

Dear Sir/Madam

I understand the latest recommendation to the Council is that sites above and below the Ditchling Road reservoir should be removed from the list of urban fringe sites deemed suitable for housing development.

I believe that the consultation period ends soon & I am therefore writing to support the recommendation to remove Study Area L6/E5, site 18, from the list of urban fringe sites with potential for housing development.

Please add my email to the list of those who would like to be kept informed of decisions made re. urban fringe housing and Study Area L6/E5, site 18 in particular.

Regards,

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	96
Response Date	20/09/16 15:35
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Biodiversity and Open Spaces . Community facilities . Sustainability Appraisal Scoping Report . General comment

Individual Name

Individual Address

Individual Email

Agent Name

Agent Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

I believe the Council should prioritise the brownfield sites and not look for green sites or open space until it's absolutely necessary. The development programme will take place over a number of years and new brownfield sites, that we don't currently know about, may become available before we need to use greenfield sites or open spaces

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there

other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

I believe the Council should prioritise the brownfield sites and not look for green sites or open space until it's absolutely necessary. The development programme will take place over a number of years and new brownfield sites, that we don't currently know about, may become available before we need to use greenfield sites or open spaces

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

I believe it is important to adhere to the limitations identified in City Plan 1

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Decision should be appropriate, based on the sensitivity of the site

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Decision should be appropriate, based on the sensitivity of the site

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Any development should take into account the infrastructure. Provision of the appropriate infrastructure should not be an afterthought

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No - the decision should be appropriate, based on the sensitivity of the site and I believe all sites should have a biodiversity and extensive landscaping plan to 'future proof' the ecology of the City and try to redress some of the damage that has already been done in less 'enlightened' times

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

I'm not sure B&H has the available land to be this specific, but Retirement Communities (not retirement homes) might be a good idea (possibly gated for security). This would allow people to live independently but with the appropriate facilities nearby, or wired into their property

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

I'm not sure B&H has the available land to be this specific, but Retirement Communities (not retirement homes) might be a good idea (possibly gated for security). This would allow people to live independently but with the appropriate facilities nearby, or wired into their property

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

As long as it's appropriate to the site, doesn't exacerbate the problem of 'infill' and doesn't damage the local ecology or biodiversity

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

It depends what it is being replaced with

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Whether they are old or new B&H should endeavour to retain (or develop) buildings which reflect the traditional character of the City

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

The decision should be appropriate, based on the sensitivity and size of the site and I believe all sites should have a biodiversity and extensive landscaping plan to 'future proof' the ecology of the City and try to redress some of the damage that has already been done in less 'enlightened' times

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

The decision should be appropriate, based on the sensitivity and size of the site and I believe all sites should have a biodiversity and extensive landscaping plan to 'future proof' the ecology of the City and try to redress some of the damage that has already been done in less 'enlightened' times

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Don't know what this means - but if you are referring to overdevelopment on sites, any decision should be appropriate, based on the sensitivity and size of the site

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Probably

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

Compulsory solar panels or ground source heat pumps included in the plans for the development of all new properties, domestic and commercial

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Don't know

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Don't know

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Don't know

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Infrastructure, Infrastructure, Infrastructure. Landscape, Ecology, Biodiversity. All these should be given equal attention to any development. Development to meet 'targets' can be self defeating and simply draw people into the area, so the target is never met.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

If the 'detailed policy' makes more demands

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Don't know what's in CP9

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

It's worth remembering that Developers have an ulterior motive - Development. If a development is to be considered, the associated Transport Policy should be based on the impact on the Public. Developers may have opinions (like everyone else) and, perhaps, suggestions, but ultimately Transport Policy should be a demand of them.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Does this mean do a survey?

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Some kind of guidance - possibly Divine

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

What is Active Travel? - by definition all travel is active. If you mean things like cycling, then some of the developments in recent years would suggest you may want to have a rethink - limited resources being wasted on projects (e.g. cycle lanes that are used sparingly at best) at the expense of infrastructure falling into disrepair.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

There may be enough existing policy, but is it any use? Look at the infrastructure, then have a complete rethink

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

It's worth remembering that Developers have an ulterior motive - Development. If a development is to be considered, the associated Transport Policy should be based on the impact on the Public. Developers may have opinions (like everyone else) and, perhaps, suggestions, but ultimately Transport Policy should be a demand of them.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Like cycle lanes, would the cost of the infrastructure be disproportionately large, relative to the gain?

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Planning guidance from who?

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

B&H has a very large boundary and encompasses a number of different types of communities with varying concerns and demands. FAR TOO MANY decisions in B&H are based on the requirements of the City Centre which are then replicated across the whole area, often inappropriately. FAR MORE decisions should take into account the knowledge of local residents, then actions can be adapted FOR THEM and reflect the different types of communities across the City

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

City Plan 2 should adhere to City Plan 1 and not erode it. If anything it should be tougher on conserving the biodiversity and enhancing the natural environment

B2: If you think a policy is needed, what types of development should be included?

We should make every attempt to protect and increase the 'greening' of B&H and the enhancement of the ecology and biodiversity. Under Parks and Green Spaces we believe there should be a NEW category WILDLIFE CORRIDORS. Ovingdean has identified one which runs along the ridge from NW to SE and has been widely supported. We would like to see this initiative officially recognised, hopefully acting as a blueprint for other wildlife corridors across the City.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Probably

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

I'm not sure there should be a hierarchy - if it's important, it's important. A small green area could be very important in a location with limited green areas. Larger areas are important for their local amenity, the biodiversity it brings to a much larger area beyond and linking other green areas to each other

B5: Should there be a specific policy to address the general protection and enhancement of species?

If the Ecology and Biodiversity experts feel it would help their work

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

SNCI status should be much more widely used. It should also be enhanced, in line with SSSIs so they are PERMANENTLY active. At the moment they are only relevant when used in conjunction with a Planning Application, so the SNCI has no power if land/habitat/ecology is damaged prior to a Planning Application. This gives Developers far too much leeway to downgrade a site, ahead of a future Planning App.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Probably. The status of trees and wooded areas should be such that the onus should be on the landowner/developer to make a case to remove them, rather than the local residents, or the Council having to make a case to keep them. They should all be protected unless a request is made to cut them and permission granted.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

The problem here is whether it is public or private land. SNCIs, TPOs and Woodland TPOs should be much more widely used. Wanderdown Road Open Space is on private land but significant, prominent site and should be protected permanently

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Wanderdown Road Open Space is a significant, prominent site and should be protected permanently. It is surrounded by Wanderdown Road, Wanderdown Way, Ovingdean Road and The Vale. It is partly protected by a Woodland TPO and the majority of the site has SINC status. It may be on private land but if given permanent protection would protect the local environment, ecology and biodiversity and prevent future speculation on whether it might be built on

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

Infrastructure, Infrastructure, Infrastructure. As a City we need more 'joined hop thinking' about Infrastructure, Planning and Natural Resources, with no one having priority over the others. Every action has consequences and consequences have consequences. We must stop making decisions, then deal with, what might have been, avoidable consequences.

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

More consideration should be taken to what happens if they are NOT retained

CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

Need, Demand, Level of use, User base - because of their circumstances, some people will need or prefer facilities to be more local to them

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Specialist medical

Please indicate which topic or topics you would like to comment on? . 1. Biodiversity, Flora and Fauna

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

There is a fundamental problem with the Brighton & Hove City boundary from when it was created. The fact that everything, particularly west of the Marina, is seen as part of a City puts all green space under threat because of the dominance of those with an urban mentality/perspective. I think it would be a mistake to assume that all of the targets for potential development need to be identified now. Although the Planning Department have said that the known brownfield sites won't meet the projected need, I believe we should still concentrate on them first, as more brownfield land could easily become available in the years to come, that we currently don't know about. Also, as far as I know, we still don't know whether other developments, outside B&H, like Shoreham Harbour and Mayfield, will reduce the pressure here. There should be more 'joined up thinking', not just housing, but landscape and infrastructure too. We know that the current amenities barely meet the current need and, in my view, it would be irresponsible to go ahead trying to meet Government housing targets without a proper plan for the infrastructure to serve it. Our campaign, in Ovingdean, trying to protect green space, the Wildlife Corridor and the biodiversity, seems to be an afterthought for too many of the 'decision-makers'. The defeatist approach is worrying, "We have to build" should be met with "No we don't", especially when the Government continues to talk about devolved decision making. Just because more people say they want to live here, doesn't mean it's our responsibility to encourage them to come, that would lead to exponential growth for the entire area, not just B&H - still the infrastructure won't meet the needs and green space will have been lost forever. We know from all the evidence, Worldwide, that more development means that green space actually becomes more important, not least as a 'green lung' to filter pollutants out of the air. The expected climate-change in years to come, coupled with increased development, is bound to exacerbate this situation.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	97
Response Date	20/09/16 17:08
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Tourism . Transport and Travel . Biodiversity and Open Spaces . Design . Heritage . Student accommodation . Traveller accommodation . Sustainability Appraisal Scoping Report . General comment
Organisation Name (If Applicable)	Ovingdean Residents & Preservation Society

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes, if managed effectively as a safe and sustainable redevelopment scheme.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there

other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Yes. Transport: With the exception of Toad Hole Valley there are no plans to improve public transport to urban fringe sites. For example, Ovingdean is currently served by one bus every one and a half hours with the last bus early evening. The Coast and Falmer roads are already congested with traffic at peak times resulting in a ten minute car journey taking up to one hour. This applies especially to sites 38, 38a and 39 where traffic will need to go through a conservation area, which has already been assessed as being unsuitable for any additional traffic, and to site 41 which is on a blind bend. Self build plots and custom build housing: The provision of better built, sustainable and more affordable housing by cutting out the developers' profits and providing homes that people actually want to live in and which will potentially meet their growing needs. Most houses devoted to 'affordable' housing in urban fringe sites are still outside the ability of low paid income earners. Infrastructure: The cumulative impact of large scale development on several Urban Fringe Sites in one small community, such as Ovingdean, has not been assessed. Assessments, although Urban Fringe assessments have taken into consideration open space, landscape, heritage, ecology and the environment, we strongly believe that some of these assessments have failed to fully address these issues. In fact the Meadow Vale (site 42) Inspector appeal validated this as does the current Wanderdown Road (site 41) Further detailed Landscape Impact Assessments need to be carried out on sensitive urban fringe sites, for example Sites 38, 38a, 39, 41, 42 and 43, before they go forward for designation for possible development. (This has not been done fully under the LUC 2015 study.) Conservation Areas: It is essential when assessing and allocating Urban Fringe Sites in particularly sensitive heritage and conservation areas, that the setting of the heritage asset is considered a priority, including proximity to the SDNP. Potential development within Conservation Areas must not conflict with existing Conservation Area Character Statements. We strongly believe that additional planning policy is required to take account of CACS. Student Accommodation Because of the special character of the Urban Fringe Sites they are not suitable for Student Accommodation

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

There needs to be a clear distinction between Class C3 and HMOs.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

There needs to be a long term, strategic City Development Plan

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Family sized housing is more appropriate to urban fringe sites resulting in less densely developed areas and more in keeping with the character of existing development, lack of public transport (allowing space for garages and parking several cars), space for private gardens and amenity space. However, no large scale development should take place within the urban fringe without expert review and integrated infrastructure design as part of the planning process. The current view that infrastructure will naturally occur is unsustainable. We strongly believe that adequate infrastructure should be covered in Design Place policy. We do not believe that the current approach to wide scale development in urban fringe areas results in affordable housing

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Brighton City is to expand by 13,200 homes by 2030 and subsequently to 31,000 homes then Planning Policy needs to ensure that our city of the future retains its distinctiveness within a cohesive, long term, strategic Development Plan. We strongly believe that the future of our city should not be developed in a haphazard reaction to development opportunity.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

We do not feel that there should be blanket criteria for assessing a site's potential i.e. urban fringe sites generally have a different character such as ecology than inner city sites. Focus should be placed on ensuring that every site is developed to its appropriate potential NOT to ensure it maximises site potential which implies trying to squeeze in as many houses as the developer wants. We would wish for better policies that restrict clearing of sites BEFORE planning permission is applied for. Currently developers have a free hand to clear sites thus negating the biodiversity statement as there is no life left!

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

If there is a way of managing this within a policy that is not too prescriptive or restrictive.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Depends how this is managed without being too prescriptive or restrictive.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes, we strongly believe that this is essential to provide better built, sustainable and more affordable housing that meets the current and future needs of residents. There is opportunity to incorporate more sustainable and eco-friendly building technology which developers fail to provide.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes. However, do we do believe that there are parts of the city where large houses could be redeveloped to provide more houses in their place. In addition, areas like Whitehawk have the potential to be developed more effectively for low cost housing.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No, each should be individually assessed

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes, because of the health and amenity benefits

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

We would need to see those standards as a one fit that suits all doesn't always work

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

so long as they do not constrain design

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

-

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

This appears to be too prescriptive for future development

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Improving and enforcing standards of conversion and increasing the supply of purpose built student accommodation within the Lewes academic corridor and on university campuses.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Yes. Absolutely no clearing of a site should be allowed before a planning application is placed. Developers are thumbing their noses up at the council by clearing land and then putting in a biodiversity statement which is nonsense, ie there is no life left to measure!

A: The Seafont

T1: Are there any further seafont development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

-

T2: Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafont?

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

There certainly appears to be a problem with, currently, unregulated Air B&Bs within the City. Perhaps BHCC could address this issue with Central Government?

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

Ovingdean Seafront plays an important role in the city's tourism industry providing a different seafront experience to that of Central Brighton and is visited by numerous local people and visitors, as is the village of Ovingdean with its ancient, listed church and gateway to the SDNP. It is vital to recognise urban fringe villages as important tourism assets which are becoming increasingly rare within modern city development and to provide adequate protection against such villages becoming part of the urban sprawl.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

More detail needed

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Baseline data for pollution levels are inadequate eg Rottingdean High Street levels are way too high but there seems to be no acceptance that EU pollution levels are being breached

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Definitely a need for more developer contributions to improve the infrastructure around a development. For example, in Ovingdean the bus service is abysmal and all of the sites identified in the Urban fringe study i.e. nos 38, 38a, 39, 41,42 and 43 have a totally inadequate public bus service which means all the new occupants of houses on those sites will drive and cycling will be impossible for most people because of steep inclines and inadequate roads.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Absolutely BUT more resources and expertise is need at the Council to police new policy guidelines. Highways authorities are over worked and reactive to planning applications. We also think that they do not necessarily have the same expertise as these outside experts and to challenge them on issues.

For example, we do not believe in the case of site 41 the Highways authority has any local knowledge of the topographical nature of the site in question

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Any further work that is placed on the planning dept. which is hugely overstretched does not seem an ideal approach. We would prefer an outside INDEPENDENT agency to be involved who would be given tight criteria by which they approved planning applications and which would be required to operate in the interest of consumers and not in the interest of the developers

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

No, planning guidance just conform to what is already required. With stronger penalties. New guidelines we suspect would not work as the existing guidelines are a nonsense in some cases. For example, on Site 42 the developers talked at length about accessing the local bus services in Ovingdean and the ability to cycle to Brighton from the development. Laudable but if (and the Government Inspector did this and was also not convinced!) you tried to do this you have to climb a huge hill on Ovingdean Road, beyond the capability of the people, young mums , older people to use the bus/cycle. IF the developer in this case had made a positive cash contribution to the Big Lemon bus service to extend its route by one mile to the new development it would have been a win win for everyone

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

More policy/stronger requirements on developers to make more contribution needed road infrastructure, traffic calming measures, improved local bus services etc

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

As per question TR7

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Yes, new transport policy needed

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

-

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Yes, new transport policy needed

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

Don't know

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes, if it involves from the A27 corridor to Brighton

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

We strongly believe that the old Town & County Planning approach has been forgotten in recent years with transport policy existing on a piece meal basis. There is also lack of innovation and acceptance of radical solutions (see below). For example travel from the A27 at Falmer is a crucial piece of alleviating congestion from Rottingdean towards Newhaven. For example years ago there was a plan to use Telscombe tye to connect to the A27. Resurrect that idea with a tunnel for example and make people pay to use it. Toll roads are acceptable in France and we have one in the Midlands. We don't complain about the Dartford river crossing etc etc Use that approach more to recoup investment with PFI type arrangements

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes. Development should only be allowed within the Nature Improvement Area if it can be proven to result in net gains in biodiversity. Some areas of the NIA e.g. some urban fringe sites are valued habitats and contain rare species. Any proposed development within the NIA must adhere to policy QD18 and should also take into account priority habitats and species listed in the B&H Local Biodiversity Action Plan

B2: If you think a policy is needed, what types of development should be included?

Any development within the NIA. Development should only be allowed after comprehensive ecological assessments i.e. in the case of sensitive urban fringe sites, more comprehensive assessment should be undertaken than has already been carried out.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes definitely.

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

Sites without a specific designation should have recognition if they contain species or habitats listed within the LBAP. LBAP was B&H Council's answer to meeting the obligations of the NERC and contributed to the biosphere reserve status of the city, therefore are hugely important and should be observed.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes definitely. Policy QD 18 has not been fully incorporated into CP10. Policy QD 18 on species protection should be adopted fully as policy. QD18 says "permission will not be granted for any development including changes of use that would be liable to cause demonstrable harm to such species and their habitats."

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes but new sites should be included where new information has become available. There should be a mechanism for putting forward and adopting new sites as happens with other councils.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Yes, Ovingdean's wildlife corridor for example, stepping stones and nature reserve areas, all of which are an important and integral part of the biosphere.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

No

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Yes, Urban Fringe Sites 38, 38a and 39 the 'farms' area of Ovingdean that back on to the SDNP., site 41 land at Wanderdpwn road which sits on the brow of the hill as entry into Ovingdean. This area is of outstanding natural beauty and part of our wildlife corridor and sites 42 and 43. Both these latter two sites are green space which is demonstrably special to the local community and hold particular significance because of their beauty, tranquillity and richness of their wildlife. They are local in character.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Yes, Urban Fringe Sites 38, 38a and 39 the 'farms' area of Ovingdean that back on to the SDNP., site 41 land at Wanderdpwn road which sits on the brow of the hill as entry into Ovingdean. This area is of outstanding natural beauty and part of our wildlife corridor and sites 42 and 43. Both these latter two sites are green space which is demonstrably special to the local community and hold particular significance because of their beauty, tranquillity and richness of their wildlife. They are local in character.

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Yes

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

Yes, BHCC now has the resources for expert review through Design South East for large scale developments and we believe that integrated infrastructure design is essential for successful development.

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

We believe that in some cases smaller developments would benefit from specific elements of expert review and integrated infrastructure design.

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

SPD12 is an excellent document and should be incorporated into an Extensions and Alterations Policy.

D5: Are there any other design issues that this policy should provide guidance on?

-

C: Protection of Residential Amenity

D6: Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

Yes

D7: Are there any further issues you consider an amenities policy should address?

-

D8: Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

It depends what you mean by 'effective use of sites', if this means maximising housing numbers on a site then no

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Yes, we believe that some smaller developments would benefit from expert review and an integrated infrastructure design.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

No, we believe that one robust policy can cover each type of heritage asset with special clauses for each type and any specific protection needs. There would be a lot of repetition in individual policies.

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

Ovingdean has a Conservation Area Character Statement which clearly highlights the unique significance of this rural agricultural hamlet within the City and its Conservation Area, including Grade I and Grade II listed buildings and is a designated heritage asset. Proposed Urban Fringe Development Sites within Ovingdean seek to increase the population by approximately 20%. Such an increase will alter the special characteristics of this community and the existing inadequate infrastructure will not support such an increase. The long term implication of more development in Ovingdean is that its unique character will be lost forever.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

Yes, the Royal Pavilion Estate because of its national and international significance together with Brunswick and other Squares but also Ovingdean Village because of its unique rural agricultural character within the city. There has already been inappropriate development, conversions and alterations within Ovingdean's Conservation Area (Conservation Area Character Statement page 17 some of the new build and conversions have 'diluted this character' and page 21 that later infill development is of 'generally limited architectural quality'). It is also to be noted that Ovingdean Village plays a special part as one of the gateways to the SDNP providing a significant amenity for local people and visitors. Ovingdean's historic agricultural development is still clearly defined and the Grade I listed 11th century church also attracts many visitors. A site specific policy for Ovingdean's Conservation Area will give protection from further inappropriate development.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

Whichever is the most effective

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

The financial value of heritage on the tourist industry is always underestimated.

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

By providing additional policy which protects Brighton & Hove's heritage assets. No, current national policy is not sufficient. NPPF diluted the protection of heritage assets in favour of new development.

HR7: What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

The City has such a diverse range of heritage assets, all within different settings, that it is impossible to suggest a generic approach. However, we are pleased to note that BHCC is now recognising the significance of the 'setting' of heritage assets and we strongly hope will develop additional policies to ensure appropriate protection

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

CP15 is adequate providing it is implemented and Article 4 directions applied and enforced where necessary

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

The greatest risks are change of use, inappropriate development, alterations and materials. All development within CA's should either protect or enhance the CA and should be a major factor when permitting change of use and development.

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

Yes

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

Yes, because there are so many varied historic areas and heritage settings within the City, a specific design policy would provide increased protection. However, design should seek to enhance local distinctiveness whilst not being prescriptive.

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

-

HR13: Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

-

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

Yes

E: Any there any other heritage issues?

HR15: Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Conservation Area Character Statements should be written into the heritage policy. These statements provide detailed and current analysis of each Conservation Area.

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes, as this is becoming more popular with students and releases HMOs to be converted back to more affordable family accommodation. However, the target needs to be regularly reassessed on a future needs basis.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

We firmly believe that student accommodation works best within the Lewes Road corridor. It works better for the students and other residents.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Lewes Road academic corridor already has the infrastructure to support large numbers of students. There are derelict sites within the area which could accommodate large blocks of new purpose built student accommodation with the added benefit that the area would be rejuvenated. In addition there may be opportunity for development on university campuses.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

No, because students prefer to live close to their friends, student facilities and universities. The Lewes Road corridor already has the infrastructure to support new purpose built student accommodation with excellent transport links. A more dispersed approach has the potential to cause disruption within the locality.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

Local disruption and this cannot be overcome. Why cause an insolvable problem?

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

It won't need to be mitigated if new purpose built student accommodation is confined to the Lewes Road academic corridor and university campuses.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

More new desirable purpose built student accommodation along the Lewes Road academic corridor and university campuses.

Traveller Accommodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

Smaller sites

TA2: Should new site provision be public site provision, or private or both?

Both

TA3: Should future pitch requirements for Traveller Accommodation be addressed through City Plan Part 2 or would this matter be better addressed through a separate Development Plan Document?

Separate plan. Don't confuse the issues

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

Communities like Ovingdean are frustrated in part by the inability of Traveller communities to recognise the mess they leave behind. We have personal experience on the land next to St Dunsatan's and on Beacon hill (which is a nature reserve, where is public conscience?). Animosity comes because they appear to have a total disregard/lack of consideration for other people's land. If they understood this better, ie cleared up behind them then they would meet far less resistance. Why do they not understand this basic point, that they should live by the same rules of personal conduct as settled communities? Traveller policies in Brighton should therefore seek to impose a code of conduct on Travellers , just like any other group in the community

Please indicate which topic or topics you would like to comment on? . 1. Biodiversity, Flora and Fauna

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Yes

Q1b

If 'Yes' please provide details

1. Transport infrastructure is not covered at all as part of the Transport section. There is no attempt to introduce a strategic long term approach to how we move traffic around the city. The result of which means that the response to individual planning applications are that the traffic levels and road system in the City are adequate for current needs. The City Plan is envisaged as a long term document but no consideration appears to have been taken for example on how we might address the congestion on the coast road and between that road and the A27. The park and ride facility at Withdean & Racecourse appears to be ill thought out and does nothing to persuade tourists to use it Traffic jams build up going out of Brighton at St Peters Church because visitors are unaware that two roads go down to one at that point. This is just poor planning 2. Council resources to meet consumer needs are totally inadequate but are not covered in the City Plan. Planning dept for example is constantly in a reaction mode rather than lead the drive for better design and better utilisation of space, housing stock etc. No questions are asked as to how we might address these issues 3. Housing . We see no attempt in this section to ask questions about the future direction of student accommodation. For example in other cities like Bournemouth they are building more blocks for second year students. This makes more money for the university as well as alleviating demand for flats etc which could be freed up to meet low income earners. It is questionable that student numbers will continue to rise in an age where technology, home working, on line learning etc is going to play a bigger part in our learning culture

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Yes

Q2b.

If 'Yes' please provide details

We have found in responding to planning applications that baseline data is not relevant where it uses for example for traffic measurement Sussex wide county averages versus a better baseline of Brighton average traffic movements. The same for pollution measures , use the right baseline.

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Yes

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Yes

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Yes

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? No

Q6b.

If 'No' please suggest changes

We have found with the City Plan 1 that once a site is considered for possible development that it is now 'in play', regardless of the fact that no planning application is being considered. We have said elsewhere that policies must be put in place to stop clearing of sites in advance of any planning application

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

1.0 City Plan Vision. We strongly believe that there should be a holistic approach to future planning in the City. If we are to increase the useable housing stock by 13,200 new homes by the 2030 and potentially up to 31,000 new homes, then we have to accept that the character of the City cannot stay as it is and will have to change. Now is the time to start planning for the future with a cohesive, strategic, long term Development Plan which will ensure that development is managed and guided by the City Council and not by opportunist developers. Such a plan must not only meet the housing and commercial needs of both residents and visitors it needs to provide protection for our heritage assets, regeneration of run down areas and set out an overall vision for a City to be proud of. In fact, City Planning in which the Council takes the lead in shaping and deciding development instead of reacting to planning applications. 2.0 Enforcement. The Scoping Document does not mention Enforcement. We can have a whole host of policies, plans, supplementary documents and conservation appraisals but, without a strong and sufficiently resourced enforcement department, the end goal is difficult to achieve. 3.0 Affordability. We realise that Central Government Policy requires some 45% of new development to be affordable homes but we fail to see how this can be achieved within the majority of expensive areas of the City. We understand that the criteria for affordability is 80% of market value which for many people is not attainable. We therefore believe that the City Council should initiate other measures to allow lower income households the opportunity of owning their own home by proactively supporting self build and custom build homes. This may mean releasing Council owned land, destined for private development, for sale in individual sites instead of large developments. The only way to provide truly

affordable new homes is to cut out the developers' profits. 4.0 Presentation. Brighton has the most fantastic and diverse architecture, a splendid seafront, wonderful entertainment and distinctive retail districts which attract over 8.5 million visitors a year and tourism contributes an estimated £780 million to the local economy (2014), yet the City Centre is marred by dirty, grease stained, litter strewn streets. There needs to be increased focus on maintaining a really high new standard of street cleaning and washing, which respects the City, its residents and visitors. Other countries manage to achieve this and we strongly believe that it has an important impact on the City Plan.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	98
Response Date	20/09/16 20:46
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Support the suggested removal of site 18, Study Area L6/E5 from the list of urban fringe sites with a potential for housing development. The area is very well used by hundreds of local people for recreation, dog walking and is adjacent to a broad stretch of woodland all of which would be damaged by development.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	99
Response Date	20/09/16 20:52
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

As a Ditchling Road resident, I would ask that you remove from the council list of urban fringe sites with potential for housing development, the areas above and below the Ditchling Rd reservoir - Study Area L6 / E5 / Site 18. I would like this area to be maintained as the valuable green space / ancient woodland and valuable park areas that currently exist. What we have are incredibly valuable spaces used by residents of all ages A housing development here will spoil the area in many ways and is not appropriate. Please pursue brownfield sites for a mixed housing plan.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	100
Response Date	20/09/16 20:56
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing

Individual Name

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Please be aware that i expect sites above and below the Ditchling Road reservoir should be removed from the list of urban fringe sites deemed suitable for housing development I wish to support the recommendation to remove Study Area L6/E5, site 18, from the list of urban fringe sites with potential for housing development. This is a treasured piece of open grassland enjoyed by many generations for exercise and relaxation and cannot be removed from our community.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	101
Response Date	20/09/16 20:55
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Before any more housing can be considered anywhere in this country, the infrastructure must be sorted out first, especially our NHS and after care. Too many mistakes are being made because everything is at dangerous breaking point. I know this from first hand experiences. If the university is allowed to expand, which is a good thing, then appropriate housing for all university students must also be built on campus for two main reasons. First, it will free up valuable affordable housing for families and smarten up badly delapidated areas. Then our valuable green belts can be saved. Secondly, housing students on campus will keep students safer. A proper village could be built with doctors, dentists and maybe a couple of shops. This makes a whole lot of sense for many reasons. Our valuable green belts must be preserved. We have a huge wealth of flora and fauna that depend on these areas. Once they're gone, they're gone forever. There will be no turning the clock back, and plenty of regrets if it is allowed!

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	102
Response Date	20/09/16 21:32
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

My remarks relate purely to the village of Rottingdean for it is incumbent for all residents to safeguard and protect the village at all costs. 1.- The infrastructure of Rottingdean cannot tolerate more housing as envisaged for the St Aubyns Playing Field for any number of reasons, pollution being already a major concern for the health of the people living in the vicinity especially around the High Street area. 2.- Traffic on the Falmer Road, morning and late afternoon, is usually gridlocked; the thought of an additional hundred or so houses is farcical if only for that reason. 3.- Already there are insufficient school places in the immediate vicinity let alone having to support a substantial increase in the population. In short the area cannot support additional housing without suffering dire consequences in the long term. Our beautiful village of Rottingdean would be destroyed forever unless the villagers stand firm and stand together. There are, of course, any number of other valid reasons why the

envisaged project should not be permitted but the three highlighted above should be reason enough to convince the Powers that be that this is a non starter and could never succeed.

ROEDEAN RESIDENTS ASSOCIATION

Resp 103

Brighton & Hove City Council
City Plan Part 2 Consultation,
Hove Town Hall,
Norton Road,
Hove,
BN3 3BQ



date: 13/09/2016 my ref: your ref:

Dear Sirs,

We are responding to the invitation to consult on the Brighton & Hove City Plan Part 2.

We are restricting our response to particular matters that concern our Members and for which we feel qualified to respond. We have not replied to questions where we are technically unqualified or are not sufficiently informed to sensibly comment.

CITY PLAN PART TWO SCOPING DOCUMENT

2 HOUSING

- H1 YES
- H2 NO
- H5 YES
- H10 YES
- H11 YES
- H12 YES
- H15 YES
- H16 YES
- H18 YES
- H19 NO
- H20 The Universities should be strongly encouraged by Central Government to provide student accommodation rather than using HMOs needed by the local population.
- H21 There seems to be little or no opportunity to consult on Urban Fringe Sites which have been identified. We refer in particular to Site 37 which if allocated and later granted planning approval could lead to the loss of the Roedean Pitch & Putt course. Only 1 of 17 hectares has been identified but there would be a need for safety measures precluding golf activity within the immediate adjacent area. This could cause the loss of viability to the whole course. In other parts of the city Plan there are references to the need to retain amenity and open spaces.

The City Plan should state how allocations will be made, so that sites are not simply allocated by inclusion in the City Plan Part 2

Policies should not be too detailed. Bearing in mind the Plan is to cover the period until 2030 there must be room for flexibility that takes account of changing situations which are inevitable.

6 TRANSPORT & TRAVEL

TR12 YES

TR13 YES

COACH PARKING

This has long been accepted by the Council as inadequate. If the Council had a will to solve it a solution would be found. **The Strategy Framework in LTP4 includes in a list of 7 goals:**

- **ECONOMY.** Coach parking would encourage more visitors if coach parking was easier as it is in places such as Eastbourne. The Council could charge a sensible rate and providing it has a proper parking area can prevent parking in other areas such as Roedean Road
- **CARBON EMISSIONS.** A proper parking facility where drivers could have small café would prevent excuses such as *"The engine is running so I can brew up a cup of tea"*. A bye-law to stop drivers running their engines while parked would assist meeting the objective.
- **SAFETY & SECURITY.** The use of Roedean Road as a council recommended coach park is dangerous for other vehicles and pedestrians. The nose to tail filling up of Roedean Road is dangerous for many reasons and this is highlighted by a report we have received from Planning Consultants which is to be sent to the Council shortly.
- **PUBLIC REALM.** The beauty of both the sea and inland is spoilt as visitors approach the City along the A259. It is hardly an inspiring welcome.
- **RESPECT & RESPONSIBILITY.** A proper parking facility would encourage better behavior with less drivers chucking their rubbish on the verge. Treat Coach drivers with more respect and it will be returned. The council could cease sending a cleaner each Monday to clear up the rubbish left by drivers over the weekend, and save money so back to the economy.

Sites such as Greenway Bottom opposite St Dunstons, Sheepcote Valley and the Marine Gate Gasworks (no need to decontaminate the land for parking) could be suitable with safe access to the road system and quick access to the seafront.

TR14 YES, if honestly it cannot sites within its boundaries.

Yours faithfully,

REDACTEDREDACTED

Chairman

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	104
Response Date	21/09/16 09:02
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Design . Sustainability Appraisal Scoping Report . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Greater emphasis should be put on maintaining the same density of housing to that of the surrounding development. There should also be design considerations to ensure any development is similar to those already there ie. no flat roofed terrace housing in an area of single storey pitch roofed detached properties. There should be greater protection of fringe sites adjacent to the SDNP especially along the major access routes. So that the entry and exit is not spoiled by inappropriate development.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

The dwelling types should be in keeping with the existing properties.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

The size and type of housing should be in keeping with the existing housing.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Greater emphasis should be put on developing urban brownfield sites before desecrating the countryside adjacent to the SDNP.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No. The development should be in-keeping with the existing properties, otherwise mini ghettos are likely to be built.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes. It would be inappropriate to develop sites for general housing where there are steep inclines that make it impossible to be accessed by the disabled. Thus discriminating against the old and infirm and those who depend on public transport for all their needs.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes it should. However the development itself must be accessible in the first place by those who use a wheelchair and depend on public transport

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

That the development itself should be accessible for disabled people that depend on public transport ie. where there is a gradient too steep for a wheelchair user to access a bus stop. If access to the development is denied because of this, then the development actively discriminates against the old, infirm, disabled and the development will solely exist for the young and fit.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

That any new development should reflect the character of the existing housing ie. no flat roofed terraced housing in an area of pitched roofed detached properties.

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

A new development should reflect the design of existing properties ie. if all around are brick built then the new development should have brick elements in them.

Please indicate which topic or topics you would like to comment on?

- . 4. Air Quality and Transportation
- . 5. Climatic Factors and Flooding

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? No

Q4b.

If 'No' please suggest changes

There is no agreed definition of "sustainability". At its most common use of the term is that "it should not do harm" to the environment. By placing development in remote corners of fringe sites, harm will be done to the SDNP and because of this siting additional vehicular traffic will be generated, and harm will be done to air quality .. particularly in housing canyons like Rottingdean High Street.

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? No

Q5b

If 'No' please suggest changes

More weight must be given to the views and comments of local communities.

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? No

Q6b.

If 'No' please suggest changes

More weight must be given to the views and comments of local communities.

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? No

Q6b.

If 'No' please suggest changes

More weight must be given to the views and comments of local communities.

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

The development of some of the fringe sites have all the ingredients of producing isolated ghettos at the edge of the urban limit. Just because something can be built on exposed land should not mean that it would be right to do it. Providing high density housing in a remote area far from a regular bus service, that by the topography discriminates against the old, elderly and disabled, is a recipe for long term social difficulty. Much more emphasis should be made to develop brownfield urban sites and only when these are used up, should greenfield countryside sites be considered.

Brighton and Hove City Plan Part 2
Scoping Consultation
Section 10. Heritage

Introduction

Members of the Brighton and Hove Archaeological Society committee met in August 2016 to discuss the Brighton and Hove City Plan and the policy with regard to Historic Buildings and Archaeology. The BHAS committee members were Dr David Rudling, the current President of the Society, and Mark Gillingham and John Funnell both past Presidents of the Society. This group was set up at the last Society committee meeting in July to represent the views of the Society. The following are the comments, views and recommendations of the Society towards the BHCC policy on Heritage.

HR1 Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

The Society believes that there should be separate policies for each section of our Heritage Assets:-

- a) **Listed Buildings** – The existing process should continue as at present, as there are a number of organisations interested in this subject, and the Conservation Advisory Group (CAG) should be maintained as an extremely useful supplement to the planning process. This should also apply to all ‘**conservation**’ areas
- b) **Scheduled Ancient Monuments (SAMs)** – such as Whitehawk Hill, Hollingbury Hill-Fort, the Patcham Medieval dovecote, Stanmer Medieval Village and other Scheduled Ancient Monuments which are protected by law should have their current panoramic aspects maintained. Any further encroachments onto their ancient landscapes should be discouraged. These ‘above ground’ monuments and other listed buildings should be protected and preserved in perpetuity.
- c) **Archaeologically Sensitive Areas (ASAs)** – The current system should be maintained within the planning process as it is providing adequate cover for creating an awareness of the potential areas for archaeology. An addition to this protection should be a clause making planners aware that areas at present lack evidence of an archaeological presence should not be taken for granted as ‘absence of evidence is not evidence of absence’. Archaeological sites should be conserved and preserved where possible, but where this is not achievable they should be fully recorded before destruction. The costs for the recording should be incurred by the developer or the owner.
- d) **The County Archaeologist and County Hall** – The Society would like to encourage and continue the present system of consultation about archaeological implications with regard to planning applications and the recommendations supplied by the County Archaeologist at County Hall, Lewes. The Society would also like to suggest that an alternative planning process be put in place for the consideration of archaeology and planning if

the Council is affected by the withdrawal or loss of the services of County Hall.

HR2 What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

The nationally important monuments and buildings, and their settings, should be protected in perpetuity

HR3 Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

Nationally important sites like the Royal Pavilion, the Whitehawk Hill Neolithic Causewayed Enclosure, the Iron Age Hill fort at Hollingbury should have site specific protection.

HR4 How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

An awareness of the potential for archaeology should be maintained within the city planning department. This should also include the potential for maritime archaeology. Vestiges of the old town of Brighton may still remain beneath the inter-tidal zone and even in deeper water. Important evidence from the Palaeolithic, Medieval and post medieval periods may still remain beneath 'Brighton Old Town' despite the area now being covered by later buildings. Any medium sized or large development outside the Old Town has the possibility of revealing unrecorded archaeology and should be considered as having such potential.

HR5 What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

The City of Brighton and Hove is a huge 'jigsaw' of archaeology with many pieces missing. The older the period the less is known. It is important that any evidence of these older sites and deposits, Palaeolithic, Neolithic, Bronze Age, Iron Age, Roman, Saxon and medieval are preserved where possible or, at least, fully recorded before destruction.

HR6 How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

The policy of PPG16 (and its later manifestations) appeared to be a sufficient guide line for conservation and preservation of archaeology in the past. A policy based upon these positive initiatives should be encouraged and maintained. The nationally important sites such as Whitehawk Hill and Hollingbury Hill-Fort could be utilised to encourage 'heritage tourism'. Brighton and Hove has a rich archaeological heritage with many important sites. The recording of sites revealed from future developments will add new information and provide new finds for display/archive in the city's museum.

HR7 What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

The City's Regency setting is well established but the older history and archaeology of the city needs to be investigated and promoted. Whitehawk Hill and Hollingbury have splendid views of the city and the South Downs beyond. They really need to be appreciated further. What is not to be encouraged are developments which blight the existing panoramic aspects (views of, views from) ancient locations.

HR8 Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

There is a need for a policy on 'at risk' factors in the city plan. Plough damage is a common cause of the destruction of archaeology and a 'set aside' policy should be encouraged where appropriate to do so. Metal detecting (treasure hunting) is currently only permitted by a policy previously adopted which allows metal detecting on Brighton and Hove City Council lands under the direction and involvement of the Brighton and Hove Archaeological Society. No unauthorised metal detecting should be permitted as vital finds and the recording of potential new sites could be lost. All finds from archaeological or historic locations should remain the property of the land owner such as the council.

HR9 What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

No comment

HR10 Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

No comment

HR11 Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

The Society believes that the nationally important ancient sites and their environs and the later settings from the later Regency periods are important and require protection. Other settings on the periphery of the city also need some protection. These areas include earthworks, field systems, trackways and burial mounds which are often destroyed by agricultural activity.

HR12 What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

No comment

HR13 Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

Whitehawk Hill, Hollingbury Iron Age Hill-Fort, the Patcham Dovecote, the Hangleton Dovecote and any other surviving Scheduled Ancient Monuments would benefit from a specific heritage policy.

HR14 Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation? E. Are there any other heritage issues?

Stanmer Park in particular is an area that justifies enhancement of a conservation policy. The current project to develop a Heritage site focused around the gardens of Stanmer House, and to encourage exploration of the surrounding landscape should be supported and encouraged. Stanmer is an ancient village with many sites of archaeological interest. One disturbing aspect is that although the village paddock is a Scheduled Ancient Monument it is currently used for keeping too many horses and ponies. The presence of the animals is effectively destroying this important medieval site. The moving of the animals to another location close by should be encouraged. Recent research at Stanmer has revealed an ancient heritage that includes sites from both the Iron Age and Roman periods. It is likely that other ancient sites are located in this vicinity. Consideration of any future development at Stanmer should include a provision for archaeological investigation.

HR15 Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

There are a number of issues relating to heritage that should be included in the new city plan. The A27 Brighton Bypass produced a number of new and important sites, especially from the Mesolithic and Bronze Age periods. It is highly likely that new and similarly important sites may be found in future developments. Any planning application should be viewed with its potential for affecting archaeology. Other archaeological aspects not covered previously include:-

- a) **The Brighton and Hove foreshore** - The possibility of foreshore archaeology is at present unknown, but recent finds along the path of the Southern Water pipe line showed that several sites may be buried in this location. Part of the old Brighton Blockhouse is known to be buried beneath the pebbles at the bottom of West Street. Any planning application along the coast line should be viewed as having the potential for archaeology
- b) **The West Pier** – What remains of this tragic relic of the City’s history should be recorded before it is finally lost, including facets located below the water line.
- c) **Brighton Museum** – The current project to reinstate an archaeological gallery at Brighton Museum in order to produce a full study of the ‘History and Archaeology of Brighton and Hove’ should be supported and encouraged.
- d) **Storage** – The revealing of new archaeological sites in and around the city has produced a number of important finds that warrant further study, display and/or storage. The Brighton and Hove Museums now have limited capacity for the storage of any new collections either archaeological or historical. The Society would advise that the adequate storage of collections is an important facet of the Heritage policy and that the city council should seek and explore initiatives to utilise, where possible, existing locations within its own

properties or encourages a storage facility or funding as being part of any development scheme.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	106
Response Date	21/09/16 10:41
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Organisation Name (If Applicable) .

Individual Name

Individual Address

Individual Email

Individual Tel

Agent Name ..

Agent Address .

Agent Email .

Agent Tel .

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Planning policy should look to protect lawful, licensed and properly operating HMOs and seek to remove unlawful ones that cause the most harm to communities.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

An appreciation within policy towards a semi-detached pair of houses where one is an HMO and the other one of the pair is applying to change to an HMO should be supported. Similarly where a house is neighboured either side by HMOs it should not be made to stay as a family house as less likely to sell as a family home and if family want to move they are effectively stuck. A preference for detached houses being allowed to change to HMOs

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	107
Response Date	21/09/16 10:15
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Retail and town centre uses
- . Heritage
- . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

It would be highly desirable to pedestrianise St James Street. There is already excessive diesel particulate pollution in the street and the busses could easily be moved to Madeira drive or St Edwards Street. A bus stop could be located in the OLD Stein to keep Morrisons happy. Turning this street into one like Gardner Street on a Sat/Sun would dramatically enhance the street and shopping feel of this street This is also the street that tourists encounter when they come up from the sea front to the East of the Pier and should be attractive.

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

It would be highly desirable to pedestrianise St James Street. There is already excessive diesel particulate pollution in the street and the busses could easily be moved to Madeira drive or St Edwards Street. A bus stop could be located in the OLD Stein to keep Morrisons happy. Turning this street into one like Gardner Street on a Sat/Sun would dramatically enhance the street and shopping feel of this street This is also the street that tourists encounter when they come up from the sea front to the East of the Pier and should be attractive.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

Save the Victorian walkway between the Pier and the Marina. The way it has been allowed to disintegrate is a disgrace and is more reminiscent of third world countries than first. This is a key backdrop to all the vehicle and cycle rallies that end in Brighton and gives the first impression of the state of Brighton. It could be magnificent and should not be a disgrace to the city

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

Save the Victorian walkway between the Pier and the Marina. The way it has been allowed to disintegrate is a disgrace and is more reminiscent of third world countries than first. This is a key backdrop to all the vehicle and cycle rallies that end in Brighton and gives the first impression of the state of Brighton. It could be magnificent and should not be a disgrace to the city

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

The key area to address is the way in which the eastern part of the seafront and a few street back are so run down and give an appalling introduction to the city. More facilities should be made to accommodate or help the street sleepers

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	108
Response Date	21/09/16 11:14
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Biodiversity and Open Spaces . Sustainability Appraisal Scoping Report
Organisation Name (If Applicable)	Deans Preservation Group

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes we fully support this. The council should make it as easy as possible to build on brownfield sites and should look for ways to introduce incentives for doing so. Land banking should be discouraged.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Yes there are other assessment considerations; the cumulative effect on infrastructure of building on several urban fringe sites within an area. This would include the effect on school places, community facilities, transport provision, road traffic levels, pollution levels e.g. the effect on Rottingdean AQMA, flood risk and green space between villages. B&HCC should also follow the lead given by Greenwich Council whereby a non redacted, open viability report is an essential requirement for every proposed development. Planning should be transparent,

not hidden

<http://www.out-law.com/en/articles/2016/february/greenwich-council-adopts-new-viability-assessment-requirements/>

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Yes spare land on university campuses could be utilised to build more student accommodation thus releasing more housing space for families in the city.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

City Plan 2 should specify the range of properties required to satisfy housing needs. New properties should be sympathetic with local housing stock i.e. adhere to local character areas as specified in CP1. There are far more opportunities to build upwards in the city centre on the Grand Avenue model. This has been done extensively and very attractively in many cities in France. Gardens could be created on top of developments as has been done in Sky Garden in London.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes, providing the housing fits in with the local character area and there is sufficient infrastructure.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Build sufficient public sector housing on brownfield sites which are generally nearer to the city centre and have access to suitable infrastructure.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No. Goal-setting guidance is needed to maximise site use where appropriate, but to avoid inappropriate impact on existing areas.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes, designation is better than allowing developers to build inappropriately to maximise their profits.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes, definitely

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No, all types of housing should be treated on their merits.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

No

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Yes HMOs should be released to the market by moving students on to on-campus accommodation. A policy could be introduced to restrict the conversion of HMOs to Air B&B use, which would diminish the residential stock.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

More construction of accommodation on university campuses.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Brighton is a destination for second home owners, e.g. from London. This restricts the quantity of homes available for those who live locally. This needs to be addressed by for example higher council tax on second homes not in permanent occupation. The cumulative impact that all potential developments within the area will have on air quality, especially the impact on an AQMA MUST be recognised as a reason for refusal of a planning application. ANY planning application that FAILS to REDUCE POLLUTION in an AQMA MUST be refused. For a development to be considered, the relevant number of school places to cover ALL proposed developments (cumulative impact) in the local area MUST exist or the development should be refused at source, not mitigated as this does not create the required local school places. CP16 MUST be adhered to fully.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

More detailed policy is required and existing policy MUST be adhered to. This is not happening currently. The policy has a fundamental flaw. It sets levels that air pollution and noise must not exceed. However these measurements are calculated over a defined period say 24 hour period. This ignores that traffic flow and stationary tailbacks are at a much greater volume during rush hour periods and therefore pollution is much higher during that time. In semi urban areas rush hour periods are elongated and occur for many hours. Pollution in for example the Rottingdean AQMA far exceeds permitted pollution levels during rush hour periods.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

It must be recognised that whilst each individual planning development may not in itself add to excessive pollution, the cumulative effect of a number of developments in the area will have a detrimental effect. The cumulative impact that ALL potential developments within the area will have on Air Quality, especially the impact on an AQMA MUST be realised as a reason for Refusal of a planning application. ANY planning application that FAILS to REDUCE POLLUTION in an AQMA MUST be refused.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

There is a clear link between ill health and air pollution from traffic. Any development which increases air pollution above legal limits, even by a small amount, should be refused. Where air pollution is within the legal limit and it can be established that the development is going to increase traffic and thus air pollution, then developers should be required to make a contribution to mitigate the effects of air pollution. This should be enshrined in policy.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

It should be provided through a policy. It needs to be very clearly enshrined in City Plan Part 2 so it is fully enforceable.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

Yes a new policy is needed.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

No

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

There is a clear link between ill health and air pollution from traffic. Any development which increases air pollution above legal limits, even by a small amount, should be refused. Where air pollution is within the legal limit and it can be established that the development is going to increase traffic and thus air pollution, then developers should be required to make a contribution to mitigate the effects of air pollution. This should be enshrined in policy.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Yes

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

Yes

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

No. It needs to be enshrined in legislation.

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

No

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

The City of Brighton is changing from a small city surrounded by semi rural suburbs to a much larger urban sprawl. It will face the same challenges other large cities face in providing a comprehensive transport system that will deter use of the car in the city centre.

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes. Development should only be allowed within the Nature Improvement Area if it can be proven to result in net gains in biodiversity. Some areas of the NIA e.g. some urban fringe sites are valued habitats and contain rare species. Any proposed development within the NIA must adhere to policy QD18 and should also take into account priority habitats and species listed in the B&H Local Biodiversity Action Plan.

B2: If you think a policy is needed, what types of development should be included?

Any development within the NIA. Development should only be allowed after comprehensive ecological assessments i.e. in the case of sensitive urban fringe sites, more comprehensive assessment should be undertaken than has already been carried out.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes definitely

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

Sites without a specific designation should have recognition if they contain species or habitats listed within the LBAP. LBAP was B&H Council's answer to meeting the obligations of the NERC and contributed to the biosphere reserve status of the city, therefore are hugely important and should be observed.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes definitely. Policy QD 18 has not been fully incorporated into CP10. Policy QD 18 on species protection should be adopted fully as policy in the City Plan. QD18 says "permission will not be granted for any development including changes of use that would be liable to cause demonstrable harm to such species and their habitats."

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes but new sites should be included where new information has become available. There should be a mechanism for putting forward and adopting new sites as happens with other councils.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Yes, wildlife corridors, stepping stones and nature reserve areas, all of which are an important and integral part of the biosphere.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

No

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Yes, Urban Fringe Site 42, Land South of Ovingdean Road. This unique green space is demonstrably special to the local community and hold particular significance because of its beauty, tranquillity and richness of its wildlife. It is local in character.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Further detailed Landscape Impact Assessments should be carried out on sensitive urban fringe sites, for example Site 42, before they go forward for designation for possible development. (This has not been done fully under the LUC 2015 study.)

Please indicate which topic or topics you would like to comment on?

- . 1. Biodiversity, Flora and Fauna

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Yes

Q2b.

If 'Yes' please provide details

Species data at the Sussex Biodiversity Records Centre should be referred to at all times in decision making and this should be enshrined in policy.

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? No

Q6b.

If 'No' please suggest changes

There is a risk that ecologically important sites could be overlooked. Policy QD 18 has not been fully incorporated into CP10. Policy QD 18 on species protection should be adopted fully as policy. QD18 says "permission will not be granted for any development including changes of use that would be liable to cause demonstrable harm to such species and their habitats." Not all urban fringe sites were assessed in the 2013 SNCI designation exercise. There should be a facility for adopting new sites for designation as Local Wildlife Sites where new information is available. This happens with other councils. Sites without a specific designation should have recognition if they contain species or habitats listed within the LBAP. LBAP was B&H Council's answer to meeting the obligations of the NERC and contributed to the biosphere reserve status of the city, therefore are hugely important and should be observed.

Conservative Group City Plan Part Two Consultation Submission

September 2016

The Conservative Group's primary concern in relation to all development considered under the City Plan Part Two is that sufficient consideration to ensuring adequate infrastructure is provided alongside any new developments. Whilst we have been assured by officers that the infrastructure delivery plan sits alongside the City Plan Part 1, the Group feels that the planning and development of new infrastructure should be considered and provided at the same time as new development and therefore must also be a consideration under Part Two of the City Plan. This has previously been raised by Members of the Conservative Group at a Policy and Resources Committee during discussions regarding City Plan Part 1. As part of the debate we attempted to put down a formal amendment to ensure that future development would only be considered in areas in which a new school can be provided at the same time if the existing local schools are unable to cater for the additional children. This amendment was however ruled 'unsound'. Our concerns regarding adequate infrastructure still remain in regards to education, parking, traffic issues, shops, doctors' surgeries, employment, adequate sports and leisure facilities, pollution etc. and how pressures on these areas will be sufficiently handled should development take place.

Housing

We fully support the Council's intention to allocate suitable brownfield sites for housing through City Plan Part Two in order to safeguard their use for housing development over the Plan period. We have always argued, including in our submission to Part One, that all types of development should be prioritised on brownfield sites rather than greenfield sites in the city's urban fringe.

One of the key considerations in establishing whether or not there is housing potential on urban fringe sites should be the provision of adequate infrastructure to support any development. For example, areas on the outskirts of the city such as Woodingdean, Rottingdean and Saltdean already suffer from severe transport-related problems such as congestion and poor air quality. Any developments that compound these problems should not be encouraged.

Where sites are to be developed we agree that a specific proportion of family sized housing should be sought given the city's high demand for this type of accommodation and lack of suitable sites.

Question H9

Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

The Conservative Group agrees with the proposals for new space standards as the rooms in many new dwellings are far too small.

The policy on developer contributions to affordable housing should be clarified in the light of Government guidance and the recent court case involving Reading and West Berkshire councils. Given the high percentage of housing in Brighton & Hove that is delivered on small sites, we believe that, in order to maintain financial viability and to protect this supply, sites of less than 10 units should be exempt from developer contributions.

City Plan Part 2 should set out a policy on how to manage the number of 'party houses' in the city and how to address some of the negative impacts associated with them. It should also be wary not to include overzealous environmental rules in house building and alterations.

Economy and Employment

In relation to economy and employment, the City Plan should be doing more to ensure that there is adequate office space in the city. This should be both for existing city-based firms wishing to expand and also to attract new companies to the city, both start-ups and established firms. The Council needs to do more to protect current office space and Prior Approval changes of use where good quality office space exists. Whilst the Group appreciates that the current Article 4 Direction which covers Central Brighton, the New England Quarter, London Road Area, the Edward Street Quarter and City Park Hove, does not provide a guaranteed protection for office space it does provide the Council with some level of control in these areas. We would therefore suggest that the Article 4 Direction should be extended more widely in the City in consultation with the business community.

Retail and Town Centre Uses

'Special' retail areas such as the Lanes and North Laine should be given further protection in planning policy in order to preserve their unique independent status.

Transport and Travel

The Conservative Group would like to emphasise the need for a coach site in the city in order to increase transport choices for visitors and to protect residents in areas of the city blighted by on-street coach parking.

Biodiversity and Open Space

The Group very much welcomes the proposed designation of Benfield Valley, 3 Cornered Copse, Hollingbury Park and Ladies Mile Nature Reserve as Local Green Spaces and agrees that they should be identified and promoted as gateways to the South Downs National Park. We strongly support the park around Hove Museum, the land around St Leonard's Church, St Christopher's School playing field between Leicester Villas and Glebe Villas, Ovingdean Hall School, St Albans Playing Fields, Roedean Pitch and Putt Course, the land in the front of the Lawn Memorial Cemetery in Woodingdean, and the Plainfields Open Space in Patcham to be designated as well. Green spaces not only provide valuable opportunities for leisure activities but also provide enormous health benefits for residents in what is one of the most densely populated urban areas in the country.

We support policy CP16 Open Space in City Plan Part 1 which affords protection for many of the city's open spaces including village greens, sports pitches, playing fields. However, we believe that the Council should undertake an audit of green spaces with a view to further designating areas not currently afforded protection under CP16.

The Conservative Group reserves the right to supply further locations in due course.

Design and Amenity

Members would like to see greater vision for good architecture and design in the future. This includes making better use of buildings, for example utilising flat roof spaces on the top of new buildings where appropriate. Whether it be a garden, terrace, hive, sundeck, allotment or hot tub platform, such areas could be an important source of additional outdoor space in Brighton and Hove's dense urban environment. Consideration could also be given to utilising roofs in commercial areas to include outside space for bars, cafes, restaurants, and tea rooms.

The Group welcomes that Design South East is running design training for officers but would ask for an assurance that Members concerns will not be unfairly dismissed when raising important issues about building design as has happened previously. Design South East's effectiveness should also be monitored.

In reference to place making as referenced in the City Plan Part two, complaints are often received about anti-social behaviour in such spaces. Proper consideration therefore needs to be given to ensuring that any new sites do not attract such problems and sufficient resources are available to manage such instances if they occur.

Heritage

We believe that much of the city's street scene has poor visual amenity and is dirty and poorly maintained. City Plan Part 2 should therefore include a policy on improving the maintenance and appearance of the city's many valued listed buildings and Conservation Areas, particularly in those areas which are highly visible to visitors. Work should be undertaken to determine how this can be most effectively achieved looking at best practice in other areas and could include setting a minimum standard of maintenance in Conservation Areas and more effective and timely use of enforcement notices under Section 215 of the Town & Country Planning Act 1990.

Student Accommodation

We are concerned about the amount of family housing being converted to HMOs, predominantly for students. If the universities wish to expand they should make provision for sufficient numbers of purpose-built accommodation units to meet demand, where possible on campus. They should also do more in partnership with the Council to try and relieve pressure on the city's already over-stretched housing stock when these additional students seek accommodation in the city in their second, third and fourth years. This should include looking to source/build new student accommodation in towns in neighbouring local authorities such as Lewes, Falmer and Newhaven in Lewes District which have good transport links to Brighton & Hove.

We believe that the current Article 4 direction and City Plan Part 1 Policy CP21 is a useful tool in restricting the conversion of family homes to HMOs in the specified Wards. However, consideration should now be given to strengthening the Direction by extending it to other areas of the city facing growing pressures and also by increasing the area of restriction from 50 metres to 150 metres where applications for conversion to HMOs will be rejected if more than 5% of current dwellings are already HMOs.

Traveller Accommodation

We do not believe that there are any locations in the city that could realistically deliver a new site to meet the demand projected in the recent Gypsy and Traveller Accommodation Needs Assessment. The recent site search for the new permanent site only uncovered two options, Horsdean and Hangleton Bottom. Horsdean has already been developed at significant cost due to environmental concerns and Hangleton Bottom is already allocated as a site for waste and minerals in the East Sussex and Brighton & Hove Waste and Minerals Local Plan. Furthermore, we do not believe that any new sites should be located within the South Downs National Park which occupies 40% of the city's area. Therefore, options for meeting any shortfall in pitch provision should be explored by working with neighbouring local authorities under the 'Duty to Cooperate' plan making process.

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Economy and Employment

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Economy & Employment Summary:

Key objective is supporting local businesses and building on the success of the city's local and regional economy. The section invites comments on relevant matters including: the identification of sites for offices, industrial uses, mixed use and other employment uses; safeguarding sites; and, promotion of specific employment types.

This form has two parts: Part A – Personal Details
Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title		ASSOCIATE PLANNER
Organisation	PALACE STREET DEVELOPMENTS LTD	STILES HAROLD WILLIAMS
Address	C/O AGENT	ONE JUBILEE STREET
		BRIGHTON
Postcode		BN1 1GE
Email Address		
Telephone No.		
Mobile No.		

Part B: Your Comments

A: Offices

Question E1

Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

One such site to be considered is the Peacock Industrial Estate. Now almost entirely surrounded by residential use and with excellent public transport facilities, the site is considered hampered in terms of providing further industrial use. This should be utilised for the provision of providing a level of employment floorspace alongside residential use for the notably advancing service sectors such as finance, digital and media. The 2012 Employment Land Study highlights the fact that the site is 'average quality' and provides 'limited potential for intensification without full-scale redevelopment'. Instead, the Peacock Industrial Estate offers an opportunity to contribute towards meeting the significant shortfall of housing and additionally contribute towards the office floorspace needs of the city on easily-accessible brownfield land in the form of a new residential led mixed use development with supportive employment use.

Question E2

How can we better support the delivery of office sites in the city?

Within the CPP2 it is suggested by BHCC that a particular mix of uses can help enable office delivery on particular sites. This is fully supported, as additional office space can be created through a level of employment space alongside residential use. This ensures that the shortfall of both housing and office space is addressed within the city.

Question E3

In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

Permitted Development Rights are intended for the conversion of office space that is no longer fit for purpose to be converted into much needed housing. Given the overwhelming need for more housing in the city, the expansion of the Article 4 Direction is not viewed favourably. Every effort should be made to ensure that the required provision of housing needed in Brighton and Hove is able to be met.

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

B: Mixed Employment Areas and mixed use allocations

Question E4

Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

It is supported that BHCC should seek to identify new mixed use site allocations. This gives the opportunity for creating new sustainable communities, where living, working and amenities are within close proximity. Such developments benefit from the increased safety and vigilance of a number of uses in operation throughout the day and night. Similarly, a number of green energy options can be taken advantage of through mixed use developments. Photovoltaic panels, which are seen predominantly on residential properties, can be utilised as part of such a development and contribute towards the energy needs of daytime uses on the site, such as within a healthcare establishment or offices.

The Peacock Industrial Estate therefore represents an ideal opportunity for the allocation of a residential led mixed use site to create a new sustainable community. The site has excellent nearby public transport facilities and so is feasible for the provision of a number of new homes and a level of alternative employment space, all within close and easily accessible proximity to the city centre.

Question E5

Are there any sites you are aware of that would be suitable for mixed use employment uses and that you would like to see considered for allocation through City Plan Part 2?

The previously mentioned Peacock Industrial Estate is located centrally within Hove and is bounded to the south by Davigdor Road, and to the north by the mainline railway tracks. The area is characterised by a variety of land uses.

To the south the land use becomes largely residential in nature, being a mix of new build and older predominantly brick built and render faced apartment buildings, semi-detached and terraced houses set amongst tree lined streets. To the east are a series of medium to tall office buildings, having undergone changes of use, expressed in red brick and reflective glass and the large brick built St Mary and St Abraam Coptic Orthodox Church.

The site contains a selection of medium and low height commercial and retail units predominantly brick built with low pitched roofs and leisure facilities with associated large areas of hardstanding for parking.

Beyond the mainline railway tracks is an area largely residential in nature, being a mix of new build and older predominantly brick built and render faced a semi-detached and terraced

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

houses. The wider area lacks a homogenous feel with building forms and architecture being of varying styles.

The site was once encompassed within an employment envelope with a range of uses to all sides. To the north, across the train line, were residential houses, to the west were industrial, and to the south and east were large scale offices. However, over time, these uses have changed significantly.

Planning permission has been granted or Permitted Development Rights exercised on various buildings around the site. The result of which means that the site is no encompassed within a residential envelope. This means that any intensification of the employment uses is near impossible to achieve whilst maintaining suitable levels of residential amenity. The 2012 Employment Land Study confirms this, with the site being described as 'average' and needing full scale redevelopment in order for any intensification to be possible.

With excellent nearby local transport facilities, the site is considered appropriate for a mixed use scheme with both residential and employment uses to form a new residential led mixed use development.

Question E6

Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

Rather than relying on specific policies, it is encouraged that the provision of more specialised office spaces is left to market demands. Flexibility within planning policy ensures that this is possible and that a wide range of employment spaces can be provided to meet demand.

C: Industrial

Question E7

Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

Greater contextual evaluation of existing sites should be considered alongside existing protection policies. Larger scale sites which are limited in potential for intensification and are in close proximity to transport links should be instead considered for alternative uses such as residential redevelopment in order to contribute towards the much needed housing supply. The Peacock Industrial Estate represents such an opportunity, where larger scale industrial units surrounded by residential usage are considered contextually appropriate for any release from protection and welcomed for residential redevelopment with a level of alternative employment space.

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Question E8

Are there any opportunities to identify and safeguard land/site for a new industrial estate in the city? If yes, where?

N/A

Question E9

Are there opportunities to intensify existing industrial estates to bring forward new industrial floorspace? If so, which estates?

Only industrial floorspace that has previously been highlighted as suitable should be intensified. The 2012 Employment Land Study provides guidance with this in guiding appropriate industrial estates for intensification.

Question E10

Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

The April 2016 revision of the General Permitted Development Order now takes noise into consideration in residential conversions. In light of this it is highly unlikely that industrial estates will see further loss of space from office to residential conversions and so the introduction of an Article 4 Direction is considered to be unnecessary.

Question E11

Are there any other opportunities to bring forward new industrial floorspace in the city?

N/A

D: Are there any other employment issues?

Question E12

Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

N/A

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Signed/typed*:	
Dated*:	21.09.2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Housing

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Housing Summary:

Key objective is to maintain attractive and vibrant shopping centres. The section invites comments on relevant matters including: Shopping centre boundaries; local centres and parades; mix and balance of retail uses; special retail areas; uses in centres above ground floor; and, markets.

This form has two parts: Part A – Personal Details
Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title		ASSOCIATE PLANNER
Organisation	PALACE STREET DEVELOPMENTS LTD	STILES HAROLD WILLIAMS
Address	C/O AGENT	ONE JUBILEE STREET
		BRIGHTON
Postcode		BN1 1GE
Email Address		
Telephone No.		
Mobile No.		

Part B: Your Comments

A: General housing (Use Class C3) supply and additional site allocations

Question H1

Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period?

(NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Given that the CPP2 sets out a housing provision of 13,200 homes to be delivered up to 2030, when the objectively assessed housing needs assessment (2015) stipulates that 30,120 homes are actually required, the use of brownfield sites to accommodate significantly more housing is supported and in fact vital to help meet the need for housing.

One site which should be considered for housing is the Peacock Industrial Estate. This site is now almost entirely surrounded by residential development and with excellent proximity to public transport facilities, the site is considered hampered in terms of providing further industrial uses. The site is considered highly sustainable for residential development, with industrial use no longer appropriate. The 2012 Employment Land Study highlights the fact that the site is of 'average quality' and provides 'limited potential for intensification without full-scale redevelopment'. Instead, the Peacock Industrial Estate offers an opportunity to contribute towards meeting the housing demands of the city on an easily-accessible brownfield site.

Question H2

The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

This level of consideration is sufficient, given the gap between deliverable output and assessed need for housing varies so widely, with a shortfall of 16,547 homes up until 2030. According to the Brighton and Hove Urban Fringe Assessment (2014) only 1,180 homes can potentially be provided through such sites and so instead of concentrating efforts on urban fringe sites, more brownfield sites should be identified to meet the housing needs of the city. An example of a suitable site is the previously mentioned Peacock Industrial Estate, which through a number of planning permissions throughout previous years, has seen much of the surrounding site converted to residential use. This has left the site within a residential envelope. Alongside the excellent public transport links, this presents the site as an ideal location for providing much needed housing in the city.

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Question H3

Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Peacock Industrial Estate is located centrally within Hove and is bounded to the south by Davigdor Road, and to the north by the mainline railway tracks. The area is characterised by a variety of land uses. To the south the land use becomes largely residential in nature, being a mix of new build and older predominantly brick built and render faced apartment buildings, semi-detached and terraced houses set amongst tree lined streets. To the east are a series of medium to tall office buildings, having undergone changes of use, expressed in red brick and reflective glass and the large brick built St Mary and St Abraam Coptic Orthodox Church.

The site contains a selection of large commercial and retail units predominantly brick built with low pitched roofs and leisure facilities with associated large areas of hardstanding for parking.

Beyond the mainline railway tracks is an area largely residential in nature, being a mix of new build and older predominantly brick built and render faced a semi-detached and terraced houses. The wider area lacks a homogenous feel with building forms and architecture being of varying styles.

The site was once encompassed within an employment envelope with a range of uses to all sides. To the north, across the train line, were residential houses, to the west were industrial, and to the south and east were large scale offices. However, over time, these uses have changed significantly.

Planning permission has been granted or Permitted Development Rights exercised on various buildings around the site. The result of which means that the site is no encompassed within a residential envelope. This means that any intensification of the employment uses is near impossible to achieve whilst maintaining suitable levels of residential amenity.

The site is considered entirely appropriate for a residential scheme alongside a suitable level of alternative employment space. This is due to the requirements for housing within Brighton and Hove and the changing setting of the site which has severely hampered the sites potential to deliver any increase in employment use.

B: Housing mix - dwelling types, sizes and tenures

Question H4

Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

By allocating a wider selection of sites, a broader range of housing tenures can be achieved. The challenge of allocating such sites to meet the city's needs is highlighted within CPP2. The potential for using larger brownfield sites is also outlined in the CPP2 as a solution towards

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

ensuring a good mix of housing types and sizes. It should however be considered that a housing mix be dictated by market conditions to ensure meeting the needs of the city, rather than sole reliance on policy. The Peacock Industrial Estate site is approximately 2.3 hectares in size, representing a sufficient size to provide a broad selection of housing types and sizes in its redevelopment.

Question H5

On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Previously dismissed sites should be considered as site allocations to increase the level of housing provision in and around the city. The redevelopment of brownfield sites provides the opportunity to make sure that a range of tenures are being delivered. It is noted that the urban fringe is suitable for the delivery of family sized units however a higher density within urban locations is encouraged in order to contribute towards the housing needs of the city. The Peacock Industrial Estate offers such an opportunity for providing a range of tenures at high density.

Question H6

Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

As mentioned previously, a further consideration of sites within the city is required to ensure that a good mix of housing gets delivered in the city. As the city only has identified capacity for 13,573 units up to 2030, when the assessed need is at 30,120, a much broader selection of sites is needed in order to provide the range of tenures and levels of housing needed. The development of further brownfield land is logical for this, without the need for additional and already constrained greenfield land on the urban fringe. As previously recommended, it could be suggested that family housing could be supported on the fringe, with a higher density within urban locations on brownfield sites. After assessment, only approximately 1,180 homes can be provided through the urban fringe, therefore leaving brownfield land such as the Peacock Industrial Estate as a suitable location for the provision of a wide range of housing at a higher and more appropriate density to tackle the housing shortfall.

C: Making full and effective use of sites

Question H7

Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

With the shortfall in provision of 16,547 houses up until 2030, as well as developing additional sites, selecting the most suitable level of development should also be a priority. This means maximising the potential of brownfield land in particular to ensure the site is appropriately utilised. Therefore a policy that resists the under development of sites is supported, by way of making 'every effort' to reduce the housing shortfall. However, rather than reliance on planning policy, it is suggested that market conditions prescribe the amount and mix of housing to ensure that the housing shortfall is addressed.

D: Housing for key groups in the city

Question H8

Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

By reducing the shortfall of housing and seeking to address the needs of the city, the matter of providing specialist accommodation can be dealt with more effectively. The urgency of meeting the housing shortfall is imperative and it is considered that meeting this with greater effect is more important than the provision of specific tenures. As noted previously, the most logical solution towards the provision of higher housing delivery is the consideration of more brownfield allocation. The Peacock Industrial Estate offers an appropriate location within a predominantly residential area, which can contribute towards this much needed delivery.

Question H9

Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

It is considered that the under delivery of housing by 16,547 is more of a priority than specifically seeking to address different housing needs. Given this shortfall, it is not seen as appropriate to specifically seek tenures of housing through planning policy. Instead, the market conditions should be left to decide the conditions for development in a move to tackle the great under delivery of dwellings in the city.

In addition, the over prescription and regulation of additional policy could stifle development and affect the viability of developments. Policies should be site specific and subject to the market to avoid this.

Question H10

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Each site should be taken on an individual basis due to contextual differences, to consider what level of development is appropriate.

E: Retaining housing

Question H11

Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Policies within CPP2 should resist the loss of housing due to the limited provision of new housing planned up to 2030. The current BHCC targets reach no more than 900 dwellings per annum whereas the assessed needs of the city equates to the production of 1506 dwellings per annum and so any measures to prevent a reduction in this number are supported. Additional sites for development, such as brownfield sites, which have been previously discounted should be reconsidered.

Question H12

Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs?

All existing residential use should be considered as protected given the current shortfall in the provision of new housing.

F: Private outdoor amenity space in new housing development

Question H13

Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes but this should allow flexibility across sites.

Question H14

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes but this should allow flexibility across sites.

G: Access and space standards in new housing development

Question H15

Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

The introduction of space standards is supported. This allows for a level playing field in terms of assessing development proposals and ensures consistency in the delivery of high quality residential development.

Question H16

Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes but this should allow flexibility across sites.

Question H17

Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

N/A

H: Houses in Multiple Occupation (HMOs)

Question H18

Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

N/A

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

Question H19

Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

N/A

Question H20

Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

N/A

I: Are there any other housing issues?

Question H21

Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

NB: This consultation also includes separate sections on Student Housing and Traveller Accommodation.

N/A

Signed/typed*:	
Dated*:	20.09.2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016



Planning Policy Team
Planning & Building Control
Brighton & Hove City Council
2nd Floor
King's House
Grand Avenue
Hove BN3 2LS
Sent be email only to planningpolicy@brighton-hove.gov.uk

Date 19 September 2016
Your ref
Our ref 0808

Dear Sir or Madam

City Plan Part 2 – Proposed Allocation
Land adjacent to the American Express Community Stadium, Village Way, Falmer

We write on behalf of The Community Stadium Limited to propose the allocation of land adjacent to the American Express Community Stadium, Village Way, Falmer for the development of a hotel along with ancillary community and leisure uses. As the allocation boundary also relates to the administrative area of Lewes, this letter is copied to Lewes District Council who are also at the early stages of their allocations document.

As you are likely to be aware this proposal was subject of a planning application in 2015 (BH2015/03285) comprising a hotel and cancer treatment centre. The planning application was ultimately refused by Brighton & Hove City Council on design and financial contribution grounds only, with the broad principle of the development supported.

A great deal of information supporting the proposal is available on the public record for the above planning application and therefore it is not considered beneficial to resubmit this information again (although we are happy for it to be used to inform the City Pan Part 2 process). However, in summary we consider that this allocation is appropriate for the reasons set out below.

The City Plan Part 1 indicates that the proposed site lies partly within the Built up Area within the administrative boundary of Brighton & Hove and partly within the countryside within the administrative boundary of Lewes. It is not subject of any other landscape, heritage, ecological or environmental designations, although it is visible from some views within the South Downs National Park.

Gainsborough House Pegler Way Crawley West Sussex RH11 7FZ DX 57102 Crawley
Main line 01293 605000 Direct line 01293 605545 Fax 01293 663520 Email

Offices in London, Gatwick, Guildford and Brighton. Website www.dmhstallard.com

DMH Stallard LLP is a limited liability partnership registered in England (registered number OC338287). Its registered office is Gainsborough House, Pegler Way, Crawley, West Sussex, RH11 7FZ and it is authorised and regulated by the Solicitors Regulation Authority. The term partner is used to refer to a member of DMH Stallard LLP. A list of members may be inspected at the registered office. The firm is part of Law Europe and is represented around the world through its international network.
DMH Stallard LLP incorporates the practice of Ross & Craig.





It is located in a highly sustainable location, approximately 5 minutes walking distances from Falmer Railway Station which offers services between Brighton & Hove and Lewes. It is also served by bus routes (offering a 24 hour service), and good cycle and footpath connectivity into Brighton Town Centre, the South Downs National Park and the Sussex coast.

The City Plan Part 1 generally emphasises the need to concentrate tourist development within the town centre and is cautious about the provision of new hotel development (given existing provision). However, it recognises that there may be opportunities for hotels outside of the town centre for destination based accommodation. The Lewes Core Strategy Part 1 recognises a general shortfall of hotel provision within the district.

The site is well positioned to attract business from activities associated with the University of Sussex and the University of Brighton, as well as business users or other travellers using the A27. It is also ideally located for tourists who want easy access to the South Downs National Park, Lewes and Brighton & Hove, particularly for cyclists and walkers.

There are, therefore, clear and significant reasons for locating the hotel adjacent to the American Express Community Stadium as a destination based tourism offer, which the City Plan Part 1 generally supports. The Socio Economic Impact Assessment (SEIA) and Sequential Site Analysis (SSA) submitted in support of the application reference above confirmed that:

- The SSA has identified that there are no other sites sequentially preferable to meet business model of the proposed hotel.
- The SEIA confirms that the proposal would not have an unacceptable impact on existing hotel trade within Brighton and Lewes.
- The proposal would contribute around 5.8 m revenue within the local area and help to create 82 FTE jobs.
- The proposed hotel will enhance Brighton and Hove's visitor economy offer. It will improve access to the SDNP and address some of the need for hotels in Lewes.
- It would help develop another revenue stream for Brighton and Hove Albion Football Club, a major local employer.
- It would help secure ancillary business and/or community uses and employment opportunities within the local area.

It is considered that the erection of a hotel on this site will provide significant economic and social benefits to the local area, enhancing Brighton and Hove as a visitor



destination and meeting some of the need for Hotels within Lewes. The development of a hotel in this location would help the council meet its sustainable economic development objectives whilst having a limited impact on the surrounding environment.

Consequently, it is our view that the site should be allocated in principle for the above use, in order that any future planning application can focus on the details of the submission. We are hopeful that both Brighton & Hove and Lewes District Councils are supportive of the proposed allocation. If you require any additional information relating to this proposal please do not hesitate to contact me.

Yours faithfully

Planner
For and on behalf of DMH Stallard LLP

Enc. Location Plan

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	112
Response Date	21/09/16 12:51
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

Individual Tel

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Family housing has already been identified as a big problem and policies that address the need for a significant amount of new affordable family housing should included. - A policy to retaining the existing family housing stock would be the foundation of any such policy.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Most definitely - in areas such as Bevendean and Moulsecoomb - perfectly good affordable family homes are being given over to HMO's. BHCC City Plan Part 1 (March 2016) – CP20 identifies the city's need to provide more family sized homes. I refer you directly to supporting text 4.218 which identifies the difficulties many families have in purchasing affordable family homes. Supporting text 4.226 also states that "the Housing Register indicates that amongst those households identified as in the highest priority need (Bands A and B), approximately 50% need a 2 bedroom or larger property often because they are young families with children". Bevendean is one of few remaining areas in Brighton and Hove where there are "affordable" family homes. Why does the council therefore continue to allow such affordable family homes to have their use changed? The existing family housing stock needs to be retained at all costs, given the shortage and high demand for such properties. There is

no logic in continuing to allow the change of use from family home to HMO when they (family homes) are such a priority.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Family Homes - The granting of change of use from family home to HMO continues at its current rate there will be no affordable family homes left in the city.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No - purpose built suitable homes are needed for the occupants of HMO's. Converting existing family homes into HMO's results in an over intensification of use, developers looking for maximum return on their investments pack in as many tenants as possible. Family Homes designed for 2 parents and 2 children are inhabited by 6 or more Adults. - This not only makes for poor housing for the respective tenants but also results in more noise, more refuse, more parking problems and more problems with anti social behaviour.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Most definitely the current lack of affordable family homes is resulting in a forced exodus of hard working families from the city. Many HMO's (previously family homes) close to the universities provide housing for students however purpose built accommodation for students is more cost effective and suitable. Both the retention of the existing family housing stock and active encouragement to change HMO's back into family homes will put less pressure on the need for extra family housing that is required and prevent the loss of amenity residents living close to these properties have to deal with. Foremost is the drop in intake at local schools such as Bevendean Primary - Brighton & Hove City Council Planning Authority cannot allow developers to continue to change the use of family homes to HMOs and should actively be encouraging their change back to their original purpose.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

To avoid high concentration the council should look to distribute these across the city - there are good travel links. A policy that can assist in penalising irresponsible landlords and letting agents who fail to manage their tenants effectively causing untold disruption to those in neighbouring properties. A policy that puts pressure on the Universities to be more proactive in providing purpose built student accommodation for their students. And set targets for the amount of purpose built student accommodation that are required.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	113
Response Date	21/09/16 13:25
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	<ul style="list-style-type: none">. Housing. Economy & Employment. Retail and town centre uses. Tourism. Transport and Travel. Biodiversity and Open Spaces. Design. Heritage. Community facilities. Student accommodation. Sustainability Appraisal Scoping Report. Call for sites. General comment
--	--

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Only if heritage is not lost.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there

other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

No point in new housing unless can be ring-fenced for people who live and work in Brighton and not made available to investment buyers/holiday home purchasers. New buildings should be unobtrusive and New England/Old Sussex in style if Regency cannot be afforded.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Would like to see more disused old buildings sensitively converted into housing rather than demolished.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

I am more concerned about style and believe that all new builds should be either Regency or New England style to fit in with the heritage Brighton and Hove is famed for. Would like to see more communities like Hanover, which is low rise, but densely packed, characterful and highly community-orientated which benefits all. Or New England-style small developments around communal squares with a focal point such as a bell or a well and flowerbeds + benches in the middle rather than providing individual gardens.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

I think the council need to offer incentives to older people to free up family-sized housing. And have a stricter policy on empties and allowing many properties to remain unoccupied for large swathes of the year when bought as holiday homes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

I think the city needs to say NO to further expansion. Endless expansion is unsustainable and will ruin Brighton and Hove. We need to say at some point that we are full. We also need to differentiate between those who are only living in Brighton temporarily (ie students and fixed term or seasonal contract workers) and those resident in the city and contributing to the city long term. Alternatively we have 19,000 seasonal workers who could be housed on decommissioned cruise ships at Shoreham harbour since they do not require long-term accommodation. This would be far more cost-effective (for them and for the city) than building for them as the land price is taken out of the equation from the start.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Only if it is not at the expense of heritage or sites of special interest and there are strict height and design criteria requiring all new development to be both sympathetic and appropriate to its neighbours and surroundings.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes for disabled people or those with assisted living needs.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Don't think ghettos are a good idea. Only those with assisted living needs might have a case for specialised housing.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No. All house building needs to be strictly controlled or we will end up with all kinds of blots on the landscape, aka the ribbon development of Peacehaven. Ghastly. And a criminal waste of its unique setting.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Not if it has no heritage/cultural value and the site could be better used.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

All pre-1950s heritage and housing catering for those with assisted living needs should be protected.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Outdoor space doesn't need to be private if nearby parks available. Can be communal. Often better looked after when communal and encouraging of community spirit.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

As above

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Less than 5% of disabled persons are wheelchair bound. Council should be guided by national percentages.

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

All property should have adequate turning room and wide enough front doors to bring in furniture. All property should have large windows.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

70% of HMO's (UK-wide) are occupied by professional sharers. Therefore to penalise students is to penalise many people who cannot afford to get onto the housing ladder. For this reason existing HMO's should be protected and increased to 40% of each street to give both tenants and neighbours more legal protection.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes as long houses are properly converted and well-managed. The majority of people can no longer afford former family homes as family homes anyway.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Yes. Roll out additional HMO licencing across the city with annual fees for annual council visits to ensure ongoing compliance. Bring in more laws to force agents/landlord to inspect properties 4 times a year as part of HMO licence to prevent maintenance and tenant issues. Can be fully self-financing and bring in profit for council.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Roll out additional HMO licencing across the city with annual fees for annual council visits to ensure ongoing compliance. Bring in more laws to force agents/landlord to inspect properties 4 times a year as part of HMO licence to prevent maintenance and tenant issues. Can be fully self-financing and bring in profit for council.

A: Offices

E1: Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

Want more effort to be put into filling all the existing empty offices and converting shops which cannot be let.

E2: How can we better support the delivery of office sites in the city?

Fill up what we have first.

E3: In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

No.

B: Mixed Employment Areas and mixed use allocations

E4: Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

No. We should better utilise what we have. City doesn't need any more shops or restaurants. We are at saturation point and the vast majority are closing down within a year or two.

E5: Are there any sites you are aware of that would be suitable for mixed use employment uses and that you would like to see considered for allocation through City Plan Part 2?

Former factory/brewery/pub conversions idea for workshops on ground floor and flats above.

E6: Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

Brighton has plenty of start-up sites already what with Preston Park and Circus Street redevelopments in the pipeline and the expansion of the Werks. Any more would be oversupply at this juncture.

E7: Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

Madeira arches need to be restored and brought back into use. A number of artists lost their workshop and shop window spaces.

C: Industrial

E8: Are there any opportunities to identify and safeguard land/site for a new industrial estate in the city? If yes, where?

If we need a new industrial estate, why the redevelopment of Sackville Road industrial Estate? In addition, there are plenty of empty units in Southwick and Portslade which are not being utilised.

E9: Are there opportunities to intensify existing industrial estates to bring forward new industrial floorspace? If so, which estates?

If we need a new industrial estate, why the redevelopment of Sackville Road industrial Estate? In addition, there are plenty of empty units in Southwick and Portslade which are not being utilised.

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

Shoreham harbour and surrounds should be protected from losing industrial space as it makes sense to site it around the harbour.

E11: Are there any other opportunities to bring forward new industrial floorspace in the city?

Do we need this?

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

No

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

Only in post 1950s areas.

R2: Are there successful stretches of shops (not currently protected) that should be included in defined primary or secondary frontages of defined shopping centres?

Any pre 1960s buildings should absolutely be protected from destruction or ruination.

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

Yes

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

No. Brighton is known for its independent shops. This is what Brighton should focus on as its USP. People can go anywhere for the larger stores, and with cheaper parking available.

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

As long as general frontage policy protects all pre 1960s buildings from destruction or ruination, that is all I ask.

R6: Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

No

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

No further retail units are sustainable at the Marina. There are already a large number of empty units.

R8: Alternatively, should changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

The marina is already ruined and there is nothing of architectural interest/value there. The council is lucky if anyone wants a unit there.

D: Local Centres and Parades

R9: Is there a need for a separate policy for assessing changes of use in local centres and parades?

Only special areas like the seafront

R10: Alternatively, could there be a general policy to assess changes of use in these and other retail areas in the city which fall outside of town/district centre designations? (e.g. the seafront)

(as R9)

R11: Should Part 2 designate any additional local centre's coming out of large scale housing developments such as at Toads Hole Valley?

All new developments require amenities so yes.

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

All

F: Individual Shops and Small Clusters of Shops outside Protected shopping centres and parades

R13: Given changes to the GDPO, is there a need for policy to protect shops and parades outside of existing centres? Should the City Plan Part 2 include a policy that covers larger shops over the 150sqm threshold of the GDPO?

Yes if pre 1960s and of architectural or cultural value.

G: Floorspace above shops and commercial premises

R14: Should the City Plan Part 2 include a policy to guide appropriate uses for floorspace above shops and commercial premises in shopping centres outside of the Central Brighton Area?

Yes. Should cover the whole of Brighton and Hove

H: Markets

R15: What are the key criteria that should be taken into account when assessing proposals for additional permanent markets?

Are they needed? Will they impact negatively on similar facilities nearby?

R16: Are there any sites that might be considered for allocation for a permanent market use?

We already have indoor market on London Road. Not sure more than this would be sustainable.

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

How shabby city centre is and offputting with level of homelessness and aggressive begging. Needs to be tackled.

A: The Seafont

T1: Are there any further seafont development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

The seafont Lanes scheme should not be permitted. The beach is not for residential buildings but for everyone to enjoy.

T2: Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafont?

No

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

There are plenty of hotels and they are closing down due to all the ghastly premier inns, holiday inns, jury's inns, Ibis' that are invading and ruining the city. We should be protecting our local hotels, not allowing prison-like new monoliths to invade.

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

Should be taxing Air B&B's. They are raking in enormous amounts of money in Brighton and Hove and council should be benefitting. Reopen Tourism office. It is ludicrous that a city famed for its tourism no longer has a Tourist information office. Even Lewes has one!

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Part 1 of city plan sufficient

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

All parking meters to continue to accept coins. All parking fees suspended from 6.30pm to encourage evening economy. All meter parking capped at £1 for first hour as local businesses suffering in areas where it is £3.50 for one hour!

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Policy

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

Yes to question 1

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes, Regency or New England.

B2: If you think a policy is needed, what types of development should be included?

All

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

I think the city plan should respect all as closely as possible

B5: Should there be a specific policy to address the general protection and enhancement of species?

yes

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Don't think this is necessary

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

If goes ahead,. Regency or New England style with appropriate infrastructure.

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

No more ugly or brave new modern buildings please. Not what tourists come to admire.

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

Yes and yes

D5: Are there any other design issues that this policy should provide guidance on?

Make it clear that ugly and brave new modern buildings are not welcome in the city.

C: Protection of Residential Amenity

D6: Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

Yes

D7: Are there any further issues you consider an amenities policy should address?

Sufficient libraries, public toilets, leisure centres, museums and indoor public spaces such as concert venues. Particularly address the inequality between Brighton and Hove.

D8: Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

No

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Not enough attention given to style, scale, local need and sympathy to local surroundings. Any new development should seek to enhance it surrounds not detract or stick out like a sore thumb (unless Pavilion style). NO megablocks. This is not London and we don't want it to become outer London.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

Yes, and all city conservation areas need to be updated.

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

Brighton and Hove heritage is rapidly disappearing, never to be seen again. This needs to be stopped.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

They are all important to me. Former entertainment venues such as Hippodrome and Astoria form a specific grouping where they are only permitted for re-use as entertainment venues.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

I think all relevant city plan policies need to be mirrored in supplementary planning documents as a belt and braces approach and to ensure legal cover for the council.

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

Lack of priority/appreciation of Brighton's heritage, which cannot be replaced with a blue plaque or a panel in the local museum. Needs to be restored and cherished properly with no compromise.

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

No. Brighton is a special case. Brighton needs to update its conservation areas before it allows another planning application through.

HR7: What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

The fact that we are a REGENCY city and that IS our USP!

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

Yes,

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

Developers are the greatest threat. And neglect of old buildings. Often to facilitate developers.

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

No

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

Yes. Let's have a 106 agreement which forces all developers to adopt either Regency style or New England style.

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

Regency roots. 106 agreement needed as per HR11

HR13: Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

All of them

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

No.

E: Any there any other heritage issues?

HR15: Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Recognition that once heritage is gone, it's gone. No one will ever build a building of that quality, magnitude, beauty and architectural detail again, let alone build to last (although of course they require maintenance - all buildings do). New buildings have no soul and no architectural narrative and are mostly shoddily built. They also make a city anonymous, generic - you could be anywhere. The policy needs to be that Brighton is not allowed to become Basingstoke-on-sea - it's history and identity sacrificed for the sake of a quick profit, and often for the developer alone.

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

Community assets have also been disappearing for many years. Needs to be a policy preventing any more losses.

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

Meaningful community consultation

CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

Ask the community

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Yes, King Alfred Leisure Centre was a Land Ship in WWII so marine site and it provides affordable sports, leisure and community space, which the proposed development will not.

B. Site Allocations for Community Facilities

CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

No

CF6: Are there sites you are aware of that you would like to see put forward as community facilities allocations in City Plan Part Two?

No

C: Are there any other issues that relate to Community Facilities?

CF7: Can you think of any other policy issues relating to community facilities that City Plan Part Two should address?

Inequality in provision between Brighton and Hove despite both paying same council taxes.

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

No

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

No. Universities should be encouraged to take over failing or closed-down hotels as bedrooms already built

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

Travel, but Brighton and Hove buses happy to lay on additional routes if necessary.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Very expensive. Less than 10% of students can afford it. Oversupply in certain cities which has led to developers going bust.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Needs to be strictly well-managed to avoid problems. The majority of students are not bad people - just need close management and education in community living. This they are not getting from commercial letting agents.

Please indicate which topic or topics you would like to comment on?

- . 6. Cultural Heritage, Landscape and Open Space
- . 7. Population, Human Health & Inequalities
- . 8. Housing & Community

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new “Decision Making Criteria” have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new “Decision Making Criteria” have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Preserving heritage, getting empty properties back into use, ringfencing local housing for local people, forcing holiday home owners to let out properties empty fo more than a month, more temporary housing provision for temporary residents, better HMO management by agents/landlords, roll out of HMO additional licencing scheme across city with yearly council inspections (extra fees) to ensure ongoing compliance.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	114
Response Date	21/09/16 15:10
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Student accommodation
Organisation Name (If Applicable)	University of Sussex Students' Union
Individual Name	
Individual Address	University of Sussex Students' Union, Falmer House, Falmer

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Careful mitigation may be able to prevent some of the most negative impacts of the combination of unregulated student number growth and a failure of national housing policy. Certainly, market forces working without guidance from local government are unlikely to produce a solution to the problem. As Hubbard has identified, the growth of PBSA is not a student housing panacea, and can easily exacerbate problems as much as it solves them if not implemented correctly. We cannot see a way of local government properly coordinating the development of PBSA that does not involve targets being embedded within the CPP2.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Specifically built housing for students increases the visibility of students and the student-centredness of facilities within the area. This can work to create a narrative of displacement of local communities by students which can exacerbate tensions between the two groups. Nevertheless, we want all of our members to have access to decent, affordable accommodation in Brighton and Hove. Students struggle with housing in the private rented sector in a number of ways which have both national and local consequences. Students are subjected to substandard housing conditions merely under the pretext that they are students and have therefore come to expect lower quality services than the general renting population, whilst paying higher rents. As such, and considering the current environment of Brighton and Hove we believe that the allocation of sites for purpose built student accommodation is a necessary, although not sufficient, step towards mitigating the student housing crisis - but only if basic standards of affordability and quality can be met.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Areas outside of the academic corridor of Lewes Road, which have not experienced significant studentification should be prioritised as potential locations for PBSA.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes, this is a necessary approach in order to mitigate the negative impacts related to studentification. However, this necessity must be balanced with proper access to the infrastructure and facilities required by student residents. PBSA proposals in other cities have been in areas which are in need of regeneration that would benefit from the expenditure and services that students bring. However, dispersal requires a commitment to adequate infrastructure and support services, developments must not be granted in isolation from these considerations. It is also important that efforts are made to ensure there is community cohesion in the areas which are identified as being suitable for PBSA. Segregation is likely to foster tensions in communities and therefore it is important to ensure that PBSA sites also include facilities of shared use. Place for community interaction must be guaranteed and though we accept that housing providers alone can not resolve the challenges of cohesion, infrastructure is an important element to this.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

We need to weigh up the needs of students for housing, and the damage that badly planned housing expansion can cause to other local communities. We are keen to avoid the potential damage as a result of 'studentification', and mitigate that damage already caused by unregulated increases in student numbers in areas outside the Lewes Road academic corridor. When the expansion of housing has to be so rapid in order to meet the current demand both HMO and PBSA solutions present real problems for students and the local community, given a framework where housing is treated as a commodity rather than an essential social good. The treatment of housing as a commodity leads to speculation and the creation of inflated housing markets. In Brighton, in particular, this had made areas of the city unaffordable to the majority of residents. One obvious barrier is, therefore, that the cost of locating new-build PBSA in central parts of the city would be so high as to make them an unprofitable investment unless the rents charged were unaffordable or the quality of accommodation was unacceptable. USSU struggles to see a solution to this problem that falls short of a system of rent controls regulating the private rental sector, which would allow for the democratic control of accommodation costs for both students and the local community.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential both on an individual and group basis. This is an important step in order to

guarantee that any impacts of PBSA are captured. Ideally this consultation would be sufficiently varied in order to avoid elite capture and guarantees that grass roots, and less formalised community groups are also consulted. This should also include formalised feed in mechanisms for student unions and student interest groups from within the city. In addition, any expansion plans proposed by universities should be properly scrutinised in order to ensure that growth plans are in line with the ability of PBSA and the PRS to accommodate both new arrivals and returning students. An appropriate communication plan should be implemented to ensure all stakeholders can review, feedback and flag issues where appropriate regarding PBSA. Any of these review and feedback mechanisms should include remedies and mitigation strategies for potential issues that may arise. The current frustrations around enforcement and the limited remedies that this has brought about should be reviewed and adequate staffing and resource should be provided in order to properly enforce any new policies. We agree with NUS who state that both local and national government need to be optimistic and innovative in order to overcome the challenges faced by student housing in the city. There is a need for thorough research into the wants and needs of the local communities with due reference to affordability and a commitment to an innovative and diversified set of responses to the varied and niche requirements of the city. Research conducted by NUS found that studio flats now account for nine per cent of the PBSA sector despite there being no evidence or research that shows any student demand for this kind of accommodation. This growth is being driven by private providers, as opposed to the affordability needs of the student population. However, it is also the case that institutions across the country have been able to use their purchasing muscle to achieve a better deal for students, in a way that is not based on a developer-driven agenda. Examples include Liverpool John Moores University and the University of Bristol who have secured a balance of low cost accommodation despite the region around it having a higher cost rental structure. These cases make for interesting models of best practice that should be investigated further when considering the best approach for Brighton and Hove and highlights the need for the inclusion of the two universities to play a key role in the provision of affordable and good quality accommodation for the student population.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Since 2010, changes in the Higher Education policy environment have generated a model of university development predicated on a consistent increase in student numbers. HEIs are expanding rapidly in order to increase their budgetary surplus, with the aim of increasing reserves and pursuing massive capital investment programs. They consider this development necessary if they are to survive in a prospective HE environment in which market competition and unregulated fees leads to the 'market exit' of a large number of HEIs. In this context, there is no structural incentive to ensure that the facilities - such as housing - required to support increased student numbers expand at the required rate. This has led to a serious deficiency in the private rented sector accommodation available for the increasing student population. It is in this context that we have seen huge HMO growth, a spike in rents, and now the emergence en masse of PBSA, filling a gap which universities or smaller landlords increasingly cannot. An unregulated increase in student numbers has been combined with a total lack of consideration for local housing, leading to rampant studentification and negative impacts for both students and local populations. There should be no contradiction between students and the wider community. Both have common interests that, in a better national context, could be productively developed. Their common interest is in a mitigation of harm and a balancing of needs. But long-term, it is only by recognising the damaging impacts of the market on the HE sector and on communities at large that these common interests can be brought to the fore. Landlords, property developers, the government and university strategies are all engaged in driving processes that actively increases the housing crisis in Brighton and Hove and increase the friction between students and the local community. Until these processes are halted, there can be no perfect solution to a structural housing crisis. NUS report Students in the Community draws on Smith's ideas of studentification and notes that "students, and student-led organisations (NUS, students' unions), are key stakeholders for addressing the challenges of processes, as well as realising the benefits that students and universities can bring to cities and towns". We seek constructive engagement with the community; we expect the views of students to be taken seriously and considered in all relevant decisions taken within the city. We want to develop a more structured relationship and to build on our already good relationship with the local authority and local MPs. As such, we would encourage the council to commit to regular consultation with both students' unions in the city and ensure we can play a meaningful role in the realisation and delivery of the City Plan Part 2. We believe that the relationship between students and the community

should be one of mutual respect, cooperation and learning. We believe students should feel themselves to be and to be seen by others as part of the community. As such we believe it is vital that students' views are voiced and listened to in relevant local and national forums, consultations and decision making processes. Our aim is to increase student participation and engagement in the provision of their own opportunities to become informed and critical citizens that are valued by the community.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	115
Response Date	21/09/16 15:33
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Student accommodation

Organisation Name (If Applicable) Family homes not HMOs

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes this should be made a priority so that those houses that are now HMOs can be returned to family housing

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes but rather than building on brownfield site outside the campus of both universities they should seek to find room within the campus boundary to build more accommodation at a reasonable price

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Areas within the existing University campuses

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

No in parts of the city where there is a large amount of student accommodation at certain times of the year when they leave to go home they are virtually areas

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

The great deal of opposite position that exists within the city for student accommodation

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Houses with families mean council tax payers family shopping and a better neighbourhood.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Yes the 50 m radius should be increased to high over our 150 m or if a particular area or ward has an over abundance of student accommodation then any further applications should be automatically refused. Also the centre of any radius whether it is 50 or 150m should be pointed at the centre of the property and not from the front land threshold

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 116
Response Date 21/09/16 16:42
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Design
- . Community facilities
- . Call for sites

Organisation Name (If Applicable) Varndean College

Individual Address

Agent Name

Agent Address NTR Planning, Clareville House, 26-27 Oxendon Street, London, SW1Y 4EL

Agent Email

Agent Tel

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Please see accompanying pack of information in relation to land at Surrenden Road.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

The type and size of housing to be provided on each site should be governed by an up-to-date assessment of need within the City as well as the unique opportunities and constraints of each development site. On this basis it is considered unduly restrictive to provide specific policy on residential type and size when this can be guided both through general residential and design policy, and through site specific allocation policies.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

There would be benefit for developers in having further clarity on space standards established through planning policy, and were the College to seek planning permission for development on any part of their estate, they would be committed to providing high quality residential development in line with the Nationally Described Space Standards.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

The College would be committed to providing high quality and well-designed development, and would support the inclusion of such a policy within City Plan Part Two.

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

It would be helpful, both to provide clarity and also as a way of appropriate assessment for the local planning authority, if policies relating to community facilities were grouped as suggested within the City Plan Part Two Scoping Report. This would allow each type of community facility to be considered independently, taking into account the differing characteristics, impacts and benefits of and need for each community use type.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

The supporting text to this chapter identifies Class D1 non-residential institutions as a separate category of community facility, which would include all educational uses. We consider that D1 educational uses should ideally be assessed on their own merits rather than using an umbrella 'community facilities' policy, owing to their particular importance to society as a Class D1 community use.

B. Site Allocations for Community Facilities

CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

The forthcoming closure of the Central Sussex College campus in Haywards Heath has, and will continue to, result in an increase of incoming students at Varndean College as recognised by the Education Funding Agency who have guaranteed additional funding to provide for additional student intake. The existing site at Varndean College has the capacity to accommodate expanded buildings and facilities, and it is requested that the immediate and future need for expansion at the College site and within the further education sector generally to meet the increased need for educational facilities is recognised within the City Plan Part Two. The Council will also be aware of the need within the City for the provision of additional High School places from 2018, following an increase in take-up of primary school places. This will have knock-on implications for further education providers with approximately 500 additional sixth form places required across the city from 2020.

Please indicate which topic or topics you would like to comment on?

Site 1

Site address / location Land at Surrenden Road

Site area - Hectares (ha) or square metres (m2) 0.54 Ha

Current use(s)

Unused

Current occupier(s) Varndean College

Current ownership If known, please provide contacts details

Varndean College, Surrenden Road, Brighton, BN1 6WQ

Your interest in the land e.g. owner, occupier, developer etc. Owner

Proposed use(s) and amounts e.g. Units or Floorspace (square metres m2)

Residential use, 10 units. Please see separately emailed documents for more information.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	117
Response Date	21/09/16 19:13
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	<ul style="list-style-type: none"> . Tourism . Transport and Travel . Biodiversity and Open Spaces . Heritage . Traveller accommodation
---	--

Organisation Name (If Applicable)	Kemp Town Society
--	-------------------

Individual Name

Individual Address

Individual Email

Individual Tel

Agent Name	N/A
-------------------	-----

A: The Seafront

T1: Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

The general principle that there should be no substantial commercial or residential development between the King Alfred and the west wall of the Marina should be enshrined in the City Plan. Small tourist attraction development should be the only permitted development and height and scale must always be the prime considerations. The Gas Works Site should provide car and coach parks on its polluted areas. A Park and Ride on this site along Madeira Drive and Kings Road has much to recommend it. At present the East end of Madeira Drive is in summer rendered hideous by nose to tail parked coaches, which in hot weather have their engines running to keep the air conditioning on. These fill this area with fumes and detract from the visual effect of the, connection between the sea and the Kemp Town Estate and Marine Parade terraces. Coaches also fill Roedean Road. If there are more attractions there will be more coaches, and cars, and a line of such vehicles parked on Marine Parade or Kings Road and Kingsway will again create a visual divorce from the seafront. The arches

in Madeira Drive, until they were closed off as unsafe, were just a car park. Developers of facilities, suitable in scale and to attract tourism in this area must be made to provide parking facilities away from the seafront, say on the Gasworks Site.

T2: Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafront?

No. There must be much clearer guidance in the City Plan as to what would be permissible within the vision for future developments on the seafront, eg. Buildings must be sympathetic to and in scale with the present adjoining historic structures; Any development must not impose a barrier between historic set pieces such as the Kemp Town Estate and Brunswick and Palmeira Squares and the sea; No residential accommodation must be created on the sea side of Madeira Drive or Kings Road or (up to the west end of the Hove Lawns) Kingsway; Any development must provide for basic amenities and not overload the current infrastructure facilities.

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

If there is to be a conference centre at Black Rock more adjacent hotels will be needed. This is probably the case even without the conference centre. The only major locations near Black Rock for this again the Gas Works Site, although pollution may be an issue here. The Marina could possibly accommodate another small hotel on top of, or in place of ASDA instead of the housing previously proposed here. The same issues of light to lower rooms abutting the cliff and nearness to the ramps requiring artificial ventilation to avoid traffic fumes would not be of such great concern in temporary accommodation. The Cliff height restriction should however be strictly observed to preserve views to and from Marine Gate and prevent further overshadowing of residential accommodation from the West.

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

The preservation of Madeira Drive as the final destination of the many National events that terminate here and are such key a feature of the area and of the Brighton tourist experience and should be enshrined in the City Plan with an absolute bar on development or road traffic arrangements or parking areas interfering with them or access by the public to them The issues raised by increased use of the more Eastern areas of the seafront between the Pier and Black Rock relating to traffic management and parking and the safety of pedestrians will need careful consideration. Given the proposed developments within the Marina abutting the west wall for which planning permission has been granted :- how are the increasing number of marina permanent and temporary residents going to get in and out especially at week ends and in holiday times when there is likely to be a great many more of them? is the present position of the nudist beach appropriate or should it be moved to a more central position along the beach? what can be done to the Dukes Mound slopes to make them more salubrious and accessible, especially in the evening, when presently they are a complete no go area to most people.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

There should be a detailed policy on tourist access to the seafront in the summer. Shuttle buses in dedicated bus lanes from the station could be considered to co-ordinate with London train arrival times. More Park and Ride is desperately needed around the City perimeters with frequent buses to the seafront.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Within large zones generally guidelines on the current basis are probably adequate, provided small zones can be implemented with their specific requirements on an individual development basis. It should be made clear that the large zones are general zones with general guidance and there will be individual requirement for each development. Developers should be aware from the start that they may be required to provide funding in whole or part for clean public transport alternatives and parking areas as a condition of the planning consent.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

There are limits to what developers will consider it economic to contribute but such contributions should be considered and where possible obtained on every new build. All the examples given are relevant but off-site parking with transport links should be added.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

As these will almost certainly change over time this should not be specified but a stated policy should require compliance with the thresholds from time to time in force.

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Through Planning Guidance as these should be on an individual basis for each development.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

As these would be better being site specific the Plan should draw attention that compliance will be required and the requirements be delivered through SPDs or PANs

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

Park and Ride on the as Gas Works Site to remove coaches and cars from the Eastern SeaFront

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Consideration could be given to designating all or parts of the seafront area from Kings Lawn to the west wall of the Marina as a new Local Green Place or 2 Open Green Places. While the Eastern end of Kings Avenue is not at all green Hove Lawns is precious as a green foreground to the sea from the heritage buildings and as a green setting for the heritage buildings from the sea . Further west Dukes Mound and the Lower Slopes are green similarly precious as green spaces and the continuing cliffs are certainly geologically important and bio-diverse.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Consideration could be given to designating all or parts of the seafront area from Kings Lawn to the west wall of the Marina as a new Local Green Place or 2 Open Green Places. While the Eastern end of Kings Avenue is not at all green Hove Lawns is precious as a green foreground to the sea from the heritage buildings and as a green setting for the heritage buildings from the sea . Further west Dukes Mound and the Lower Slopes are green similarly precious as green spaces and the continuing cliffs are certainly geologically important and bio-diverse.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

A specific policy for each type of Heritage Asset has the advantage of simplicity. However a more appropriate approach might be to grade Heritage Assets in classes of national and local importance. Heritage Building Grades do this to a certain extent for individual buildings but Archaeological and Conservation Areas are not so graded and perhaps should be. Clusters of similarly graded buildings in the lower categories, for example, might have greater Heritage significance than any of them standing alone, or their setting may be of great importance to their integrity and any defect or neglect of one such building or inappropriate intrusion in their surroundings might adversely affect the Heritage impact of others in the grouping.

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

Heritage assets are vulnerable to the impact of unsympathetic and overlarge neighbouring buildings. Heritage Assets should not be allowed to deteriorate by intentional damage or unintentional neglect and easier public access to enforcement policies and processes in the event of defaults should be available. It can take some time for breach of regulations concerning Heritage assets to be noticed and drawn to the Council's attention and even then the Council, probably through lack of resources, often takes time to do anything. Perhaps if the period after which it is not possible to enforce against such a breach were extended to, say, 5 years or a substantial financial penalty was available against the original offender, perhaps jointly with the present owner, which was payable at any time after the offence this would deter commission of such breaches in the first place. The conflict between the ever rising need for more housing and the height limitations this should imposes in areas which abut or might affect neighbouring Heritage Assets is difficult to reconcile but must be taken into account. If foreseeable damage will be caused political expediency should not prevail. Ever higher rise housing in the vicinity of heritage assets is a blight on those assets and is not suitable for families with children

and so has more attractions for 2nd homers and investors - not the occupiers that Brighton most wants or needs.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

Yes The Grade I Listed Kemp Town Estate is a heritage asset which while perhaps not of quite the same unique status as the Royal Pavilion, is one of only four Grade 1 Listed Estates in England (as opposed to squares, crescents, roads etc. comprising only Grade I listed buildings), the other such Listed Estates being Regents Park London, Royal Crescent Bath, and Cheltenham. This being the case, the setting is of almost unique importance and the connection to the sea must at all costs be preserved. Recognising this the Residents of the Estate have recently raised over £200,000 to re-instate in cast iron the railings on the south boundary of the Estate in their original position, as rightly insisted on by B&HCC. The Kemp Town Estate is the only Grade I Listed estate by the sea. The connection of this Historic Asset to the sea must be preserved so that the view of the Estate from the sea is not interrupted and the view from the Estate to the sea does not allow any development interposing a modern disconnect. Any proposals for development in DA2, especially of the Black Rock Site must not rise above the cliff height in front of the Estate and as Historic England (then English Heritage) specified when the recently abandoned proposals for a 7,000 seater ice rink and events centre on the site were made ANY development on this site should have a green roof and slope from below the cliff down towards the sea. This should apply to the Conference Centre currently under consideration for Black Rock. There should be an absolute ban on developments on Dukes Mound and the Lower Slopes which is not complementary to the leisure and seaside use of this area and, of course, of a height always well below the top of the cliffs. People come to Brighton for its Heritage, the Seafront and its arts and crafts. The seafront from the King Alfred to the west wall of the Marina should be designated a Heritage Area in its own right with the important connection between the Regency elegance along and behind Kings Road and Marine Parade and the Sea protected against inappropriate obstructions. The i 360 does not block Regency Square, and although modern, its surroundings are sympathetic with the Regency Seafront. All other developments in this area should be required to be to a similar standard and to have similar regard to their surroundings. Where there are a large number of Heritage Assets in an area, such as both East and West Brighton Seafronts, but also the North Lanes, Montpelier, and other such areas there should be a policy for the whole area which would require the effect on Heritage to be considered within that whole area, so that developments such as the Odeon Cinema and Thistle Hotel on the seafront cannot occur again.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

It is vital the City Plan makes clear the principle of the importance of the surroundings of heritage assets in the City Plan, reinforcing the need for conformity of scale and superior design in all cases of proximity. Individual details of what is or is not likely to be permitted could be left to SPDs or PANs

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

It is obvious from some of the developments which have been permitted in the City in the past that Heritage was not always a consideration. Conservation officers should always be consulted right at the start of every development application to ascertain if a Heritage issue arises. Brighton has an immense number of important listed building and these are part of its tourist draw. The number of such assets should not be allowed to detract from the importance of each one. The discovery of Pugin's Cottage hidden in the old Hanningtons' building reinforces the fact that there may be other gems to discover, not destroy as so nearly happened here.

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

Council officers may not have lived in the City for long and may be overstretched. There is an immense wealth of knowledge within the many local heritage societies and a mechanism for consulting the

relevant Society right at the start of every application for local knowledge would be beneficial. National Policy will not always be sufficient.

HR7: What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

The city of Brighton & Hove is, obviously, by the sea and as a result was chosen by Royalty and the nobility to pursue their leisure activities. It was considered a healthy climate and so attracts hotels, lodging houses and schools from Georgian times to the present. It was at the forefront of developing a sea side leisure culture and has a long association with the performance arts and as a result of all of this it has a special elegance tinged with fun that has resulted in a great number and variety of groups of Heritage Assets which make it very special. This atmosphere and ambience must be preserved at all costs. It may be London by the Sea but it is not London and should not be allowed to become overfull of out of scale glass and concrete towers dwarfing and detracting from its proud heritage.

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

CP15 expresses laudable aims but keeping a list of Heritage Assets at risk does not prevent further decay and 'seeking' to find uses for them is not always successful. Again, a policy involving local societies at an early stage might generate ideas for innovative uses. There should be a policy whereby owners are not allowed to continue neglect but are forced into at least minimum preservation action.

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

The greatest threats to the Conservation Areas in the City is an excess of immensely tall buildings of mediocre modern design within or close to heritage assets which take no account at all of the context in which they will be set. While accepting that moderate height is a necessity due to the limits on available land, such building are often ugly solid blocks of concrete or glass without texture or elegance and by dwarfing their surroundings render these insignificant and unimportant and so likely to suffer further detriment by decreasing their importance. Where modern buildings appear in the vicinity of heritage assets their design must be superior and their scale appropriate. The second greatest threat is deliberate or negligent neglect. The third is the failure to enforce against inappropriate development or alterations to listed heritage assets.

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

Heritage assets often cannot reasonably comply with many energy efficiency policies for example, by having no cavity in their walls to insulate and having windows changed by the installation of double glazing. If policies can be found that would inform owners and occupiers of sympathetic measures that could be taken at reasonable cost, without detracting from their appearance, then gentle encouragement by Policy to adopt such would be almost certainly be successful. Flood protection is a necessity for all properties whether heritage or otherwise, but large modern buildings by concreting over previously porous areas can add to the flood risk

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

Yes. A specific design policy making it clear to developers that a 'one size fits all' maximum number of units design is not appropriate would be wonderful. Sympathetic design criteria and height proportionality should be a requirement for all areas.

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

The key to local distinctiveness is the relationship of the set-piece buildings to each other in their immediate vicinity, and a certain uniformity of scale throughout. Their relationship to the sea and the backdrop of the Downs is also of vital importance to that distinctiveness. The City Plan should make it clear that development disconnecting Heritage assets from any of these will not be permitted.

HR13: Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

The Royal Pavilion with the Museum, the Garden and the Dome form is a unique heritage asset and must be preserved as such. A specific policy prohibiting any development within the immediately surrounding area above tree height should be implemented. Palmeira Square, Brunswick Square Regency Square and the Kemp Town Estate must have their visual connection with the sea and adjoining green areas preserved

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

Historic parks and Gardens should be considered part of the City's heritage assets and protected from inappropriate use and alteration accordingly, Where a Park or Garden is not properly maintained to provide an appropriate setting for a Heritage set piece there should be a policy requiring it to be made more appropriate. A contribution to such enhancement should be considered as part of a planning gain., if possible.

E: Any there any other heritage issues?

HR15: Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

No

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

Enforcement of removal of Travellers from unlawful sites is too slow and allows them to cause damage and discard large amounts of rubbish which blows about. They can be aggressive and a considerable nuisance and threat to local people. It would be easier to enforce removal if additional sites were available in areas on the extreme outskirts of the City but such sites should have transport available to other parts of the City so individuals and families could visit without their vehicles and aggressive dogs.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	118
Response Date	21/09/16 19:29
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Individual Name

Individual Address

Individual Email

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

I believe actions carried out by owners of Urban Fringe Sites prior to them submitting planning applications should be specifically addressed through the planning policy. As you might/ will be aware there have been significant tree reduction, destruction and tree clearance directly adjacent to Longhill Close, Ovingdean (Urban Fringe Site 43). Many local residents view the acts of the land owners (particular the land adjacent to Longhill Close) to be an act of Ecology vandalism. This has already adversely affected this wildlife reserve (and the wildlife corridor between Beacon Hill and Happy Valley) before any possible future planning applications are submitted with Ecology reports, which will not reflect the status of the habitat prior to recent events. If we are not careful, it will be viewed by the local community that we are being put in a position where we are having no other option but to accept the actions of landowners who would be viewed as acting in their own financial interest, therefore not considering the impact on the environment and that the council are left with no other recourse but to approve any subsequent planning application as the environmental damage has already occurred - a fait accompli. In my opinion urban site 43 – land behind Longhill Close, Ovingdean should be designated by the council as a site inappropriate for redevelopment. Now referring to Council policy documents: These policy documents seem to have been ignored by the owners of the land and the council being

unable to protect the land as stated in their own policy documents. Brighton and Hove appendix 11: re Urban Fringe Sites [Land to rear of Longhill Road, Ovingdean] stated planning constraints – Designated as countryside within the adopted Local Plan – NC6. NC6 states ... 'development will not be permitted outside the built up area boundary as defined on the proposals map. Exception will only be made where there will be no significant adverse impact on the countryside/ downland ...' If the status of this land (site 43) is still covered by NC6 policy document then the remaining trees and wildlife on this land must be protected permanently as local residents feel that this site has already been adversely affected and destroyed. Brighton and Hove: Further assessment of Urban Fringe Sites 2015: - site 43 – Overall conclusion section on page 148 it states 'The trees higher up the slope should be preserved to retain a wooded backdrop. ... The extension would likely result in some significant tree loss, the ecological effects of which would have to be mitigated within the surrounding woodland.... The northern half of the site is recognised as natural/ semi natural greenspace'. Again, this policy document did not stop the actions of the land owners. The BHCC City Plan (Part 1) Sustainable Buildings policy ('CP8') further requires that all new development proposals demonstrate how the development enhances biodiversity. There is a Brighton & Hove 'Building Green' group to promote awareness and the application of good practice locally.... The approach taken by Biodiversity Action Plans is that most species' needs can be addressed through habitat conservation measures'. This clearly cannot take place now in the case of Urban Fringe Site 43. In conclusion: Surely it makes common sense that the City Plan Part 2 must address any pre-empted actions of owners of Urban Fringe sites. Many in the local community feel that the owners of these urban sites should not be rewarded for damaging the environment in speculation that they will be granted planning permission in the future once the current review by the council has been completed

Please indicate which topic or topics you would like to comment on?

Date: 21 September 2016
Our ref: 189655

Resp119



Brighton and Hove City Council
Planning Policy

Customer Services
Hombeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Brighton & Hove City Council: City Plan Part Two – Scoping Consultation

Thank you for your consultation on the above dated 30 June 2016 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Please find below Natural England's response to specific questions raised within the scoping document:

Question H2

The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

We advise that when assessing urban fringe sites for development within the City Plan that the following needs to be very carefully considered in order to ensure a clear and robust evidence base for a site selection. We also advise that points raised in this section are of relevance to the Biodiversity and Open Space Section. We further advise that the urban fringe sites will require bespoke consideration for any development potential due their location in the setting of the National Park, their contribution to the NIA and Biosphere and their value to biodiversity, open space and recreation. We advise that the following needs to be considered and assessed for these sites:

1)The Potential to enhance links into the South Downs National Park:

Local Plans provide the opportunity to provide Green Infrastructure and access to green spaces on a landscape-scale. Providing Green Infrastructure and links into the National Park via the fringe sites would benefit people in a City in which open space is limited. This would also complement the endeavours of the National Park to enhance Green Infrastructure and Ecosystems Services on a truly landscape-scale across the Park's boundaries into neighbouring Local Authorities. A great opportunity exists here through strategic planning to enhance these links into the National Park.

A number of fringe sites have the potential to promote and increase the opportunity for people to access the South Downs National Park. Opportunities for the provision of greenspace and G.I. are stretched in Brighton and Hove, and the promotion of such sites for access and enjoyment of nature

would be beneficial for health and wellbeing. Opportunities also exist for the provision of environmental education on the wildlife and landscape within and around these sites. This echoes and compliments an objective of the Biosphere to provide Knowledge on environmental education and sustainable development. Where sites provide biodiversity benefits access routes for should be clearly defined to avoid the trampling and deterioration of these areas. A balance can be struck between encouraging access for enjoyment and education and ensuring wildlife has the opportunity to thrive.

The provision of such areas if carefully managed could showcase enhanced wildlife corridors and habitats networks into the National Park.

2)Evaluating the setting of the National Park

The existing value of the site in the context of the setting of the National Park should be carefully considered. The scoping document states that landscape has been considered in previous assessments and evaluations of fringe sites. We recommend however that this encompasses a clear evaluation of the value of the land within the setting of the National Park. This should include views out from various vantage points within the adjacent National Park and the consideration of tranquillity for example, both of which are special qualities of the National Park and can be seriously diminished via light pollution and noise as well as the development itself. This is also echoed in P4 regarding the Dark Skies Initiative. We advise therefore that the setting of the fringe sites within the context of the special Qualities of the National Park should be clearly considered. A comprehensive evidence base including assessment and avoidance of impacts at this stage ameliorates such issues at the development control stage when opportunities for mitigatory measures are more limited.

Planning Guidance states the following:

Section 11A (2) of the National Parks and Access to the Countryside Act 1949, Section 17A of the Norfolk and Suffolk Broads Act 1988 and Section 85 of the Countryside and Rights of Way Act 2000 requires that 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities 'shall have regard' to their purposes. A list of the public bodies and persons covered under "relevant authorities" is found in Defra guidance on the 'have regard' duty. Natural England has published good practice guidance on the 'have regard' duty.

This duty is particularly important to the delivery of the statutory purposes of protected areas. The duty applies to all local planning authorities, not just national park authorities. The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.

3)Consideration of the chalk aquifer

We also advise that the importance of the sites to recharge the underlying chalk aquifer should be given high regard when considering the development of these sites. The region suffers from high water stress which is a situation that is likely to be exacerbated by climate change. There is thus a need to work to reduce pressures on the freshwater environment. The development of fringe sites through the City Plan period has the potential to affect water quantity and quality via pollution and this should be evaluated.

The incorporation of Sustainable Urban Drainage systems should be encouraged. Planning policies must take account of the impact on the vulnerable water resources within the Downs catchments, but also of the impacts of development on groundwater.

4)Ecosystem Services Provision

We advise that the Ecosystem services that are provided by the site (to include water supply as above for example and the importance of the site for soils and agricultural land for example) should be assessed.

Question H7

Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be

appropriate planning considerations to include in such a policy?

We advise that high-density housing would not be appropriate on the fringe sites. This should be balanced with the impact on the South Downs National Park and the need to incorporate Green Infrastructure and greenspace for local people in high quality developments.

Question H13

Should housing policies in City Plan Part 2 include a requirement for the Provision of appropriate outdoor private amenity space?

Due to the limited green space and opportunities for G.I. this should be carefully considered in order to improve the quality of developments and the potential for Ecosystems Services.

Question T4

Do you have any other issues for this topic area to consider?

The Plan could consider the potential for an increase in recreational tourists to Brighton and Hove if links to the South Downs National Park are improved.

Question TR4

Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

The potential may exist for a strategic approach to improving sustainable transport options, for example improved cycling opportunities and green routes through the city to and from schools for example. Furthermore green routes into the National Park could be identified.

Question TR6

If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

The impact of transport and travel on any fringe sites will need to be carefully considered with full regard to the deleterious impacts of noise and light pollution on the tranquillity of the setting and neighbouring National Park for example. These sites will require more bespoke assessments in this area.

Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

Such a move if delivered at a strategic level could benefit residents and wildlife via improving green routes and strategic Green Infrastructure. Again this should be linked into the National Park to encourage walking and cycling opportunities and access to green spaces for recreation and enjoyment of the natural world.

Question B1

Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

The objectives on the NIA are clearly presented in Policy CP10. This calls for a strategic approach to nature conservation with landscape-scale improvements to biodiversity and for example:

- linking and repairing habitats and nature conservation sites to achieve landscape scale improvements to biodiversity;
- conserving, restoring, recreating and managing priority habitats and protecting and recovering priority species populations;

We advise the above objectives provide robust protection to the NIA and that development in the NOA may be contrary to these.

Question B3

Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Natural England would welcome a strategic landscape-scale provision of biodiversity and Green Infrastructure in the City and the intention to link and repair habitats and sites. We agree that the City Plan provides a key opportunity to compliment, build on and enhance joint working on the South Downs Green Infrastructure Framework. We advise that the Plan has a great opportunity to capture great gains for wildlife and people which could showcase green links through the City to the National Park. We advise that this would complement Biodiversity 2020 and that that clear links between this and the policy regarding fringe sites should be made.

Additional benefits include linking wildlife habitats, providing stepping-stones for wildlife through the city and the provision of more robust wildlife populations into the future. The connecting of habitats is also key for enabling the adaptation of wildlife through climate change and species migration.

Question B4

How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

A single policy could include a hierarchy of designations based on statutory designations (including geological sites), priority habitats and species for example. The irreplaceability of habitats could also be criteria.

Question B5

Should there be a specific policy to address the general protection and enhancement of species?

We advise that Brighton and Hove should securing enhancing and connect habitats into the future through robust strategic policies. . Keystone species will exist within these habitats. Quality habitats should be safeguarded and monitored into the future. Statutorily protected species should also be included in biodiversity policy.

Question B7

Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Ancient woodland and veteran trees are specifically cited for planning policy protection in the NPPF for their importance for biodiversity and their irreplaceable nature. Brighton and Hove should seek to ensure that any such valuable sites are strictly protected in robust policies in the Brighton and Hove City Plan.

Question B11

Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Natural England would welcome the enhancement and provision of Gateways into the National Park. Please refer to the Urban Fringe section for further comments.

Question B12

Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

As afore-mentioned Brighton and Hove City should maximise its G.I. and natural greenspace opportunities wherever possible as these are limited in the City. Great opportunities, however, exist to contribute to and enhance a bespoke G.I network which reaches beyond the boundaries of Brighton and Hove and into the National Park. This would secure a truly landscape-scale provision of G.I and include new opportunities for Brighton and Hove to access and enjoy the natural world.

Clear links need to be made between policy regarding open space and that regarding the fringe Sites to ensure consistency.

We advise that clearer links to Ecosystem Services could be made throughout the scoping document. This could be linked to the Biosphere and NIA objectives

Question P4

How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

This will be particularly important when considering Fringe Sites for development. I refer you to my previous comments regarding tranquillity and the setting of the National Park in the fringe sites Section. Light pollution from new development can be particularly deleterious and this will need careful scrutiny for new developments in this area.

Question P5

Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

We advise that water quality and quantity issues are of key importance to Brighton and Hove given its reliance on the Chalk aquifer and the vulnerability of the aquifer to pollution sources.

Question P6

Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

Again given the vulnerability of the chalk aquifer receptor to pollution careful guidance will be required for the use of hazardous substances in vulnerable areas. This is also applicable to the question P8

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Rebecca Pearson on 0300 060 4090. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

We also welcome your feedback on Natural England's revised standing advice in terms of its usability (ease of access, presentation), quality of content and, its clarity and effectiveness as a tool in guiding decision-making. Please provide this, with any suggested improvements, by filling in the attached customer feedback form or by emailing your feedback direct to consultations@naturalengland.org.uk.

Yours sincerely


Bel e

Brighton and Hove City Plan part 2 Comments on the Scoping Document

The Regency Society wishes to comment on three of the sections of the initial scoping document, namely Housing, Design and Student Accommodation.

Housing

H1 Do you support the allocation of brown-field sites to housing?

The Regency Society supports the allocation of brown-field sites to housing.

H2 Criteria for assessing urban fringe sites

Urban fringe sites should be subject to the same assessment criteria as other sites. Assessment should take into account access to open space outside of the city boundaries. Peripheral sites should be subject to similar appraisal in terms of density, mix etc.

H3 Are there sites that you would propose?

We believe that there should be a detailed assessment of 'left-over sites' that are the result of poor planning decisions in the past. Areas like Bevendean, Moulsecomb, Coldean etc are full of small bits of useless green space that we believe should be brought forward as 'pocket schemes'.

Similarly areas of older poor quality low-density housing should be redeveloped to higher densities, for example in Bevendean and Moulsecomb.

H4 Should site identification identify specific dwelling types and sizes?

Each proposal should be evaluated on its merits at the time when it is about to be developed.

H5 Should peripheral sites be weighted towards family housing?

Not necessarily: the aim should be, wherever possible, to produce a good mix of housing.

H6 Suggestions for ensuring good mix.

See H5

H7 Should CP2 ensure that development maximises site potential?

It is important that appropriate densities should be stipulated. We are critical of the tendency to over-develop in central areas (e.g. Circus Street) but equally critical of the use of too low a density on peripheral sites (e.g. Toads Hole Valley).

H8 Should CP2 include requirements for housing particular groups (e.g. the aged)?

Special housing aimed at people with special needs is needed, but wherever possible this should be integrated with other forms of housing

H9 Should sites be specifically required to address particular needs?

Each site should be assessed on its merits in relation to what are the priorities at any given time. The council should avoid opting for stereotypical prescriptions: many old people prefer to live in a central locations; families should not necessarily be pushed out to the periphery.

H10 Should there be provision for self-build and custom-build?

Self-build is often wasteful of land. Self-build and custom-build schemes should simply be allowed to happen as and when: no special measures are needed.

H11 Should CP2 resist the loss of housing from the existing stock (change of use?)

There is a natural migration of building types; at present the flow seems to be away from office and commercial towards housing. But some degree of control would be beneficial.

H12 Are there particular types that should be protected?

Some degree of intervention would be beneficial.

H13 Should CP2 policies include a requirement for private outdoor space?

The need for private outdoor space depends entirely on housing type, density and location. There seems little point in providing large gardens that aren't used (as is evident for example in areas of Hangleton). Blocks of flats should have access to communal gardens, providing that a maintenance agreement is put in place. Brighton has some excellent historic examples of communal gardens: e.g. Lewes Crescent, Park Crescent.

H14 Should policies provide guidance on issues relating to open space?

Providing that the guidance not too prescriptive..

H15 Should CP2 stipulate minimal space standards.

Yes, certainly. All developers should be required to adopt space standards that conform with nationally agreed space standards. Special standards are needed for apartments – including provision of balconies, extra-mural storage, cycle storage, adequate refuse facilities etc. Special standards are needed to regulate HMOs.

H16 Should CP2 seek to introduce enhanced access and adaptability standards for the disabled?

In line with nationally agreed practice.

H17 Are there any new issues that you would like to introduce?

See H21.

H18, 19, 20

The popularity of HMOs simply reflects particular need. Higher education constitutes a major plank in the economy of the City and students need to be housed. Young working people also find it difficult to find and pay for self-contained housing. So the Council should encourage HMOs, though it should also take steps to regulate them, to discourage unscrupulous landlords, and to avoid the build up of concentrations of HMOs or HMO ghettos.

H21 Any other Housing Issues?

The popularity of AirBnB is on the increase. It offers affordable accommodation to tourists and brings more of them into the city. But it also threatens the more conventional types of accommodation – hotels and guest houses. It needs to be regulated (as it is increasingly in other countries for example in Berlin) to ensure it meets appropriate standards, for example for health and safety.

Energy Efficiency / renewable energy etc: there seems to be no mention in CP2 of the need to build energy efficient homes, or indeed the need to improve the efficiency of existing homes. Likewise with renewable energy, should CP2 not address the alternative forms of renewable energy and draw up guidelines on the installation of solar panels?

General comments on housing:

In drawing up the Draft City Plan the Council was under pressure from government to adopt ambitious house-building targets. The plan thus included the aim to complete 13,200 new homes during the 15 years leading up to 2030 (880 per year)

The problem with this target is that, on the one hand, it is simply not sufficient to meet the combined demand for new homes and for replacement of redundant stock, while on the other, it is unachievable in terms of current rates of housing completion and currently available land resources. Furthermore, the Council's hands are tied because it has only a limited proactive role as a housing developer: its main role is reactive - it depends on the willingness of land-owners to make land available of private developers to invest.

In order for a City to thrive and prosper it is essential that it is free to develop and grow. However, Brighton occupies a circumscribed territory between the Downs and the Channel. Much of its future growth can only be achieved through densification - either by building on left-over pockets of land or by replacing redundant stock.

The Regency Society believes that, in order to achieve this ambitious target, it is a matter of urgency that the Council revises its its policies on density and tall buildings.

Large areas of Brighton were developed during the 20th C. at unsustainably low densities - one thinks of areas like Moulsecoomb, Hangleton and Westdene where net residential densities rarely exceed 30 dwellings per hectare, where huge areas of landed were wasted in creating extensive high-maintenance grass verges and purposeless green spaces and in providing overly generous private gardens that are often ignored. The problem with low density housing is not simply that it consumes more land: it also requires more infrastructure, it requires more maintenance and servicing and is less energy efficient, and within certain limits, is less socially cohesive.

On the other hand, it is interesting to remind ourselves that Brighton has a unique history of interesting high-density urban housing. The great marine estates like Brunswick Town and Kemp Town were early examples of high-rise (6 storeys) and high density developer housing driven by the demand for seafront locations. The rows of small terraced houses of Islingword were built initially on a tight grid of streets to a density of about 95 houses per hectare. Today many of those houses have been sub-divided so that the current density is probably more like 150 dwellings per hectare. And yet many Islingword homes enjoy the use of small gardens and enjoy reasonable access to on-street parking. Brighton can also boast Victorian suburbs such as the Stanford Estate where substantial terraced houses with front and back gardens achieve densities of 50 dwellings per hectare. And Brighton also has elegant apartment blocks built between the wars, built often to a height of seven storeys to densities of around 200 dwellings per hectare.

The Regency Society proposes the following:

- That the Council undertakes a comprehensive quantitative study of unused and under-used land, as well as a study of existing housing that is suitable for redevelopment at higher densities.
- That the council revisits its 'Tall Buildings Policy' , both with a view to re-defining the different categories of tall buildings and reviewing the zoning policy.
- That the Council re-examines its policy on development density with a view to defining optimal densities with clear minima as well as maxima. This should include an absolute minimum density of 50 dwellings per hectare on peripheral sites (rising to 75-100 dwellings per hectare where the mix includes a high proportion of small dwellings)

The Society is concerned that the Council operates with measures of density that are too crude and simplistic. This has been evident in the past in the way that it has handled such schemes as King Alfred, Circus Street etc. A given dwelling density (dwellings per hectare) can cover a range of bed-space densities that reflect different dwelling size and room count (i.e. number of theoretical

bed-spaces). It is also necessary to ensure that developers build to nationally accepted space standards – there are concerns that much of the lower-end developed housing is built to lower space standards than those achieved in local authority housing fifty year ago.

The Society urges the council to develop the necessary tools to define and discuss density in a meaningful way and draw up acceptable minimal space standards for homes. Such space standards should include, for apartments, the provision of storage, balconies & etc. development densities should be quantified in terms of floor area ratio (FAR) (i.e. the ratio of building area to site area), building footprint (i.e. the ratio of ground covered to site area), building height, and in the case of residential development, dwelling density (dwellings per hectare), notional bed-space density (theoretical bed-spaces per hectare) and internal space standards.

Design

We welcome the recent setting up of an external ‘Design Panel’ which will hopefully address the problems that arise from the diminishing number of in-house Council staff with appropriate design qualifications and experience. We urge council officers and elected members to take the recommendations of the panel seriously. We hope that this will help to raise the standard of architecture and design in the city (9.1).

The Regency Society also welcomes the Council's intention to prepare an Urban Design Framework for the city in the near future. In addition to developing and defining the city's overall vision for place making and design standards, it is understood that this will evaluate the importance of strategic views, including the impact of tall buildings.

Whilst we applaud the emphasis on ‘Place Making’ (9.2, 9.5), we are concerned about how this will translate into action. We wonder how good place making can be encouraged by policy statements (D1). We urge the Council to use arrangements such as S106 agreements or the Community Infrastructure Levy to oblige developers to improve public spaces in the vicinity of their schemes. We also urge the Council to consider to adopt key place-making principles when they draw up revised proposals for Valley Gardens.

We have been very disappointed by the quality of the Council’s recent Design Briefs (e.g. that for Edwards St. / Amex site). We urge the Council to seek to attain a higher standard of design and place making in the preparation of such briefs, to consult more thoroughly with local amenity societies and, if necessary, to employ suitably qualified consultants. Similarly we are aware that recent HE guidance recommends that Character Studies and Management Plans should be in place for Conservation Areas. The RS would welcome a commitment that the Council will prepare studies for the CAs without these: Queen's Park, College and management plans for those CAs under development pressure, including Old Town.

Student accommodation

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

No. Forecasting student numbers is not a precise science. Students’ preferences can change. Decisions about the provision of purpose built accommodation should be left to the market, in other words to the establishments which attract the students and to private developers.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No. The Plan should encourage the institutions which attract students to provide housing for them on their own sites where this is possible. Sites elsewhere will be identified by the market. The role of the planners is to appraise the suitability of such sites when proposed and to establish policies to prevent excessive studentification of particular areas.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

We welcome the plans for additional student housing on the Falmer and Moulscroomb campuses. Further sites are best identified by the universities and private developers.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Students are people and will benefit from living alongside other groups of people, as opposed to living in student ghettos. There is a good case for providing some accommodation on campuses, for example to house first year students. It is not appropriate to allow students to take over other residential areas, forcing out existing residents. This suggests that the answer to this question is “yes, provided there are strong controls to prevent studentification”.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

The main barrier is the reasonable concern of existing residents that their area will become a student ghetto, hence the need for strong controls over the number of new student housing development in specific areas.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

The need for controls mentioned above suggests that some sort of quantitative limits are needed, as have been established already for HMOs. Consideration should be given to establishing an acceptable proportion of student places in relatively small, clearly defined neighbourhoods, possibly as specific as individual streets or small groups of streets.

21 September 2016

Planning Policy Team,
Brighton & Hove City Council,
Room 201 Kings House,
Grand Avenue,
Hove BN3 2LS

By email to planningpolicy@brighton-hove.gov.uk

22 September 2016

Dear Sir or Madam,

RE: City Plan Part 2 Scoping consultation

I live in Hollingdean and am a member of Friends of Hollingbury and Bursted Woods. I wish to support the recommendation to drop site 18, Hollingbury Park from the list of urban fringe sites deemed potentially suitable for housing development. This recommendation is set out in the background document which reviewed the status of Urban Fringe Sites for housing.

I also support the whole area of Hollingbury Park, including the woodlands, being designated as Local Green Space as it well used and appreciated by local people.

I urge the council to ensure that the proposed Local Nature reserve designation process is completed as part of the actions related to the City Plan.

I fully support the comments submitted by Friends of Hollingbury and Burstead Woods and Brighton & Hove Friends of the Earth.

Yours sincerely

Porch Hall Road Brighton BN1 5PD
T 01273 413700
E admin@lewisplanning.co.uk
W www.lewisplanning.co.uk

Planning Policy Team
Brighton & Hove City Council
Room 201 King's House
Grand Avenue
Hove
BN3 2LS

21 September 2016

And by email to planningpolicy@brighton-hove.gov.uk

Dear Sir/Madam

Brighton & Hove Draft City Plan Part 2 – Scoping Document Land to the North East of Longhill Close, Ovingdean

Further to receiving notification of the City Plan Part Two Scoping Document, we write to respond on behalf of Ovingdean Estates Limited – the owners of the above site.

These representations specifically request that the above site (Land to the North East of Longhill Close, Ovingdean) is allocated in the City Plan for future housing development.

Proposal Site

The site is detailed in a Lewis and Co Planning letter (dated 28 September 2015) that was submitted in respect of the Council's Strategic Housing Land Availability Assessment (SHLAA) programme. A copy of that letter is appended to this letter.

The site is an urban fringe site – being adjacent to the built up area boundary and outside the South Downs National Park. The site is largely clear of trees, other than on the site boundaries.

A site location plan is included overleaf. As can be seen, the site is surrounded by other development, and can connect directly to the public highway at two points – Wanderdown Close (to the north) and Longhill Close (to the west).



RTPI

mediation of space · making of place

Chartered Town Planners

Lewis and Co Planning South East Limited
Company Number 05809390
Registered Office: Preston Park House, South Road,
Brighton, BN1 6SB
Registered in England and Wales

Site Location Plan



Planning Policy History

The site is included in the Council's Draft 2015 SHLAA Update (July 2016) under site reference 723 and 43. The SHLAA entry confirms an allocation of 6 units in the site's north east corner. This is in line with the recommendation in the Council's 2014 Urban Fringe Allocation Statement.

City Plan (Part One) Policy SA4 allows for development within urban fringe location where a site has been allocated for development in a development plan document. The policy goes on to state that should a proposal for development come forward prior to adoption of Part 2 of the City Plan, the 2014 Urban Fringe Allocation Statement will be a material consideration in the determination of applications for residential development.

Policy C 1 (Housing Delivery) includes an allowance for 1060 new dwellings to be built in urban fringe locations. This allowance forms part of the City Plan Housing Delivery Strategy to provide at least 13,200 new homes before 2030.

The SHLAA allocation confirms that at least 6 units should be allocated for development on the site. We ask firstly that this allocation is carried through to the City Plan Part 2 site allocations.

However, we also ask that the whole site be allocated for residential development. The site is completely surrounded by residential development, and subject to a development scheme being sensitively designed, there is no reason why a greater proportion of the site cannot be developed in a manner sensitive to the surrounding area. Officers should note that the City Plan (Part One) Inspector confirms that no stone should be thrown in the search for housing sites. To “only” allocate 6 houses on the site would not fulfil such a request. Development of a larger part of the site would allow for:

- A greater contribution towards overall housing supply
- A greater contribution towards affordable housing
- A reduction in pressure for development that would “push out” the urban boundaries of Brighton and Hove rather than the “consolidation” of boundaries that would arise out of the development of the subject site.

Allocation of the whole site for development (the site measures 1.1 hectares, so a development of around 20 to 30 units would be reasonable) would enable a development that could be designed to a high standard. Any allocation can be subject to the caveat that the applicant must demonstrate the development to have an acceptable impact on views to/from conservation areas, listed buildings and the National Park. Boundary trees should be retained.

Conclusion

We trust that the information contained in this letter and appendix can be taken into account for the publication of future versions of the City Plan (Part Two).

If you would like to discuss the merits of the site further, please contact Simon Bareham MRT on 01273 413700.

Yours faithfully

LCP

Lewis & Co Planning

Email to simon@lewisplanning.co.uk

APPENDIX 1

Lewis and Co Planning Letter dated 28 September 2015.

Planning Policy Team,
Brighton & Hove City Council,
Room 201 Kings House,
Grand Avenue, Hove,
East Sussex,
BN3 3LS

By email

28 September 2015

Dear Sirs

SHLAA UPDATE 2015 LAND TO THE NORTH EAST OF LONGHILL CLOSE

Please find enclosed the completed forms and site plan for the above site for consideration through the SHLAA process. Note that part of the site has previously been considered acceptable through earlier SHLAAs the site forming part of SHLAA site reference site 3".

This submission is made on behalf of the site's owner, Ovingdean Estates Limited.

Site 3" is shown below, whilst the the Ovingdean Estates site is shown overleaf:



RTPI

mediation of space · making of place

Chartered Town Planners

Lewis and Co Planning South East Limited
Company Number 05809390
Registered Office: Preston Park House, South Road,
Brighton, BN1 6SB
Registered in England and Wales

map showing the location of land owned by Overdale Estates and which is considered suitable for development:



The total site area is approximately 1.1 hectares, and is bordered on three sides by residential development, whilst on its south eastern side it is bordered by garden land serving 50 Longhill Road.

In providing her initial findings on the emerging City Plan, the Inspector stated in her letter dated 13 December 2013:

I recognise that there are significant constraints to providing land for development, and that there are competing priorities for any land which may be available. However, given the significant shortfall in meeting housing needs, it is important that the Council rigorously assesses all opportunities to meet that need.”

[Urban fringe] sites are not subject to nationally recognised designations, which would indicate that development may be restricted. Whilst it may be the Council's aspiration to designate some of the sites as Local Green Space, this is not being pursued through Part 1 of the Local Plan and I have doubt as to whether some of the site area would meet the requirement of paragraph 77 of the Framework."

"Having now seen some of the sites and had the opportunity to examine more closely the underlying evidence on which this analysis is based, I am not persuaded that the protection from development implied by Policy SA4 is justified in relation to all urban fringe sites. In coming to this conclusion, I have taken account of paragraph 73 and 74 of the Framework. However, your own analysis concludes that some of these sites do not make a significant contribution to the provision of suitable open space, and have limited potential to do so in the future. No consideration appears to have been given to the possibility of allowing development on these sites, which would enable the provision of good quality public open space, as part of a package of development."

"In view of the significant shortfall in meeting objectively-assessed needs I consider the Council should undertake a more rigorous analysis of the urban fringe sites, along the lines I have already suggested, to determine whether there is greater potential for the delivery of new housing from this source."

"I recognise the constraints faced by the Council but if I am to find the Plan sound, notwithstanding such a significant shortfall in the provision of new housing, I would need to be satisfied that the Council had left no stone unturned in seeking to meet as much of this need as possible."

Subsequent to the above comments being made, further amendments to the emerging City Plan have increased the Council's Objectively Assessed Need for housing from 24,000 units to 30,120. In the light of the above comments, and such a further significant increase in the need for housing, the benefits of the site for the provision of new housing are clear. Furthermore, the site has no special environmental designations, is privately owned with no authorised public access, and its development would lessen pressure for development on more sensitive sites.

The site is eminently suitable for development, with read-made vehicular access points on both the south-west and north-west boundaries of the site (Longhill Close and Wanderdown Close), and the ability to retain generous buffer strips to neighbouring properties in order to protect amenity. Consequently the whole of the site should be included within the HLA assessment.

Yours faithfully

LCP

Lewis and Co Planning

If responding to this letter, please contact Simon Bareham, either at the address shown at the top of this letter, or by email on simond@lcpplanning.co.uk

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 123
Response Date 21/09/16 20:48
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on? . Housing

Organisation Name (If Applicable) Triangle community Group

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

yes

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

specify a range of dwelling types and sizes

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

yes

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Loss of HMOs should be left to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes in areas where the density of HMOs is well over the designated 10%

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

More powers to challenge and prosecute those who try to buck the system by converting properties to HMOs illegally. The times scales for dealing with such offenders should be considerably reduced. At the moment some property owners are getting away with a whole year of inappropriate HMO rental before a deadline to remove tenants is given.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Purpose built student accomodation should be extended throughout the city and not just focus along the 'academic corridor'. There are good transport networks and so this is feasible

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 124
Response Date 21/09/16 23:00
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Community facilities
- . Student accommodation

Organisation Name (If Applicable) Councillor

Individual Name D. Yates

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

No

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

I believe that for each neighbourhood the city plan part two should establish a set %ge of properties which can be converted from housing to HMO use - rather than a simple distance basis. In some areas (such as moulsecoomb and bevendean ward) levels of HMOs are very significant (over 14%) across this large community which is well above a threshold that the council established of 10% under the article 4 direction

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

The city has a severe need for affordable housing for workers in key lower paid public sector roles (such as paid carers). Availability of homes specifically for groups such as these should be established through city plan part two

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

In order to prevent specific groups of residents such as those with learning disability and older residents losing touch with their communities it would be advisable that sites for seniors housing developments and supported living be identified for each community within each community.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes - I believe that for each neighbourhood the city plan part two should establish a set %ge of properties which can be converted from housing to HMO use - rather than a simple distance basis. In some areas (such as moulsecoomb and bevendean ward) levels of HMOs are very significant (over 14%) across this large community which is well above a threshold that the council established of 10% under the article 4 direction

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

family homes (see response to H11)

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes - at a high standard and level to meet the needs of future generations increasingly living independently with increasing complexity of needs and functional limitations

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

no they should not - in some areas density is over 40% which is well over the 10% threshold we consider tolerable elsewhere

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

I believe that for each neighbourhood the city plan part two should establish a set %ge of properties which can be converted from housing to HMO use - rather than a simple distance basis. In some areas (such as moulsecomb and bevendean ward) levels of HMOs are very significant (over 14%) across this large community which is well above a threshold that the council established of 10% under the article 4 direction.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

We need a clear criteria, process and appeals process for the acceptance of requests to register assets of community value

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

there are significant changes planned for the future delivery of healthcare and social care across the city. planning policy must enable these collocated services to be developed and redundant sites to be freed up.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Pubs - I believe we should consider the wandsworth approach to protecting pubs.

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

only if it is associated with specific allocations by area of the city

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

no

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

waste transfer station, moulsecroomb way

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

yes - concentrations of student housing in moulsecroomb and bevendean are very high - both purpose built and HMOs

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

there are none - the city should bear equally the impacts

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

we should follow the lead of major student cities such as Nottingham where a specific threshold for communities has been set for combined student household (both HMOs and purpose built accommodation)

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	125
Response Date	21/09/16 23:24
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	<ul style="list-style-type: none"> . Retail and town centre uses . Tourism . Transport and Travel . Design . Heritage . Community facilities
---	--

Organisation Name (If Applicable) Rottingdean Parish Council

Individual Name Clerk to Rottingdean Parish Council

Individual Address

Individual Email

Individual Tel

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

No it would be better to give encouragement and guidance to raise standards in all shopping centres.

R2: Are there successful stretches of shops (not currently protected) that should be included in defined primary or secondary frontages of defined shopping centres?

No ... it is good to see Rottingdean High Street listed.

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

Yes it would be clearer if there was a single policy, apart from uniquely distinct areas such as the North Laine, The Lanes and the Marina where character and unit size are related.

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

Yes as large retail units help to sustain and characterise a primary shopping area.

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

Yes, see R3 – frontages help define character.

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

It should have its own policy so that the Marina develops a distinct brand.

R8: Alternatively, should changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

In some respects a general frontage policy gives clarity but the Marina does perhaps require a defined approach because of its unique location and features.

A: The Seafront

T1: Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

The Black Rock area has the potential to be a wonderful location for an ice rink.

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

Brighton and Hove appears to have sufficient hotel accommodation especially within the central Brighton area. It would be interesting to explore the possibilities of encouraging the development of hotel accommodation outside the central area e.g. more guesthouses in locations such as Rottingdean.

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

To consider how we can more effectively signpost and facilitate tourists to visit areas outside the immediate centre of the city such as Devils Dyke, Stanmer Park, Rottingdean etc

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes, to include improved clarity on thresholds to apply in all areas.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Add more specific thresholds which are quantifiable.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

TR3 -An holistic approach – a single focused policy with locally agreed set of criteria against which developments should be assessed. This should include specific areas e.g. AQMAs and congestion zones properly measured. Air quality and noise need to be prioritised as key issues with a major impact on health and welfare in particular areas of the City e.g. Rottingdean High street. It is important that CIL developer contributions can be linked to traffic pollution as a matter of priority. So that local residents can see the connection. E.g. A future St Aubyns development in Rottingdean linked to the serious level of pollution and congestion in the High Street.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes, for instance there should be congestion and pollution thresholds. Recent Transport Assessments have been shown to be particularly weak in both areas and officers have not challenged the Developer's consultants

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

This should be decided by what best meets the need. Whatever will have desired effect.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

A briefly outlined policy in City Plan Part 2,, supplemented by more detailed Planning Guidance is probably the best way to encourage developers to address the promotion of active travel. There needs to be a recognition of differences between Brighton City central area and the outlying areas where circumstances are not the same.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

This could be developed further with signposting to practical advice.

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

Possibly but the key areas are traffic congestion and air pollution and to a lesser extent noise pollution.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

It would have more impact if there was a zonal transport/travel policy focussed on equality, mobility and accessibility, linked to developer contributions.

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

Yes shop mobility is a real issue especially in areas such as Rottingdean High Street where a focussed zonal policy would have a positive impact upon the lives of those citizens with mobility issues.

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Wherever possible quantity should be reduced without compromising the overall intention of the policies.

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes, including providing more direct sustainable transport links from the Rottingdean/Saltdean area to Lewes.

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

Possibly a policy to raise awareness of the dangers to health of traffic pollution and how citizens can adopt safe practices when walking through an areas having poor air quality

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Yes - plans for new developments should not look just at a specific development but how it 'sits' within the area and how interactions are made between new developments and existing ones. In particular how the infrastructure flows between old and new. Place making policy is essential to promote happy, purposeful communities and as such it would be good to consider this when planning and developing individual sites and streets.

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

Yes – see above any new development has to be seen as seamless with the surrounding area- this can only be achieved through expert review and in particular integrated infrastructure design. Too often infrastructure follows development instead of being integral to development design. Place making policy should be incorporated into the creation of all design work and it would be really helpful if this approach could be explained to local communities so that they could effectively give their ideas and views.

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

Increasingly the requirement to extend building is achieved through larger extensions and the raising of roof heights. This should be better controlled to ensure it does not result in a negative impact on the streetscape in suburban areas. Equally development of back gardens by purporting to build extensions and garages, which then become separate homes leads to unplanned or legitimised population densification. Planning permissions should be adhered to and enforced.

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

Yes it should incorporate all the aspects of SPD12 , it should supersede it and be refined to include current alterations trends such as cellars, solar panels and impact on street scenes and particularly conservation areas.

D5: Are there any other design issues that this policy should provide guidance on?

Yes increasingly in an effort to increase floor space, householders extend up into loft spaces but to give enough headroom the height of roofs are being increased. Better control/ consideration should be given to these extensions to guard against a negative impact on surrounding properties and the street scene. More guidance is required.

C: Protection of Residential Amenity

D6: Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

The protection of amenity is a wide ranging issue and a single policy would not give enough detail to the issues involved. It should be broken into elements with each element being defined and addressed. This would give better specific guidance to developers, which would hopefully prevent long drawn out processes for agreement of development. At the moment it would appear that planning decisions makers do not have a standard approach to developments.

D7: Are there any further issues you consider an amenities policy should address?

It would be helpful if residents had a clear, uncomplicated and unfettered way of putting across their point of view.

D8: Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

Yes if parameters are developed for each site to provide guidance to developers it would reduce the amount of time it takes to agree development proposals. It would also reduce the costs to developer. Currently proposed developments within Rottingdean have been stalled, costing thousands of pounds to the developer in appeals etc. if parameters had been developed for these sites, the cost to the developers and the anxiety to residents would have been reduced and perhaps developments would have gone ahead and much needed housing provided. Some parameters have been set up already on Urban Fringe sites where the study has identified the number of houses to be built however plans put in by developers seem to have ignored these so perhaps it is about developing parameters that are meaningful and carried through.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

Think there should be a different policy for each type of heritage asset as they each need a different approach.

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

For Rottingdean it's about the preservation of our heritage buildings and rapid action to ensure that listed buildings are preserved in an appropriate way. We have two buildings within the conservation area that have been neglected and we feel that enforcement action has been too long and drawn-out, hence too ineffective a process.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

Yes there are as suggested above but also the seafront and arches on Marine Drive, along with the Regency buildings on the seafront. Where in private ownership there is a willingness to maintain these but more funding should be put into the seafront regeneration.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

Its better to put into policies and these would have priority over guidelines. However there is a need for planning briefs where substantive new developments have an impact on conservation areas and listed building e.g St Aubyns School Development in Rottingdean

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

It is easy for planning decision-makers to disregard the views of local residents. What is seen, as being important, by local residents can be sometimes seen as NIMBYism by planning decision makers. For example the needs of Rottingdean are very different from those of Hove or Central Brighton. Local heritage education and Consultation should happen alongside planning decision makers visiting sites to truly comprehend local issues.

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

One would assume that Neighbourhood Plans would accommodate the local heritage issues that should be taken into consideration when looking at development however this is a very time consuming and complex process that many areas would not be able to contemplate. Perhaps if there was a simpler method of achieving a design statement which could be developed with BHCC and local communities it would be helpful. The current design statements do not have sufficient power to influence departments in the council to conform to them e.g. In Rottingdean instead of putting in lampposts that are in keeping with the heritage of the area we have inherited a mix of modern lampposts which we are having to have changed so we can revert to heritage lampposts.

HR7: What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

If we are to be a destination for visitors, then we need to portray a city which is quirky but that cares for the heritage assets that it has, whether it is the Brighton Pavilion, the Regency avenues of Hove, the historic seafront or the village by the sea that is Rottingdean, each is worthy of investment and relevant to the experience that is Brighton. Each also needs a different approach in terms of planning and development.

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

Yes there is a need for further policy; if this was not the case then the problems of the seafront on Madeira drive would not be evident. There is a need to be more strategic and long-term in measures to reduce heritage risk within the city, as opposed to what is seen as a knee jerk reaction.

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

Two issues which affect Rottingdean are pollution and traffic through the High Street as the streets within Rottingdean were not built to take the level of traffic they are currently dealing with, neither were they designed to take the constant stream of heavy lorries. The constant pollution and vibrations are causing damage to building. This is equally true of other areas within the city with Pollution causing the biggest problem for our heritage assets.

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

These elements should be incorporated into a general policy on Heritage at Risk.

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

There are some specific areas which should be better protected than others so perhaps a priority listing should be developed to protect key areas

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

Architecture and historic open spaces are key to local distinctiveness which is why development should take into consideration the local area and fit into the street scene. That's not to say there can't be innovation but local planning briefs and heritage statements would clarify local needs and priorities.

HR13: Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

Yes there are areas – Brighton Dome, the Royal Pavilion and the Hippodrome. The twittens through the town, the Laines area, the seafront – Madeira Drive, Rottingdean.

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

Yes – the gardens near the Pavilion require enhancement, Stanmer Park, as does Kipling Gardens in Rottingdean

E: Any there any other heritage issues?

HR15: Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

There should be policy guidance on signage within conservation areas and de-cluttering of signage where appropriate.

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

Community facilities could be grouped under broad headings and then policies to be written accordingly: educational, recreational, social & cultural/health & well being/ resilience & emergency services

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

to look beyond short term cost cutting so that embedded community facilities which are part of the local social fabric are not brushed aside, To take account of changing demographics in localities e.g. studentification, ageing population etc when reviewing facilities. To properly consult with local community groups using easily accessible communication pathways

CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

To ensure that existing community facilities have been effectively resourced, managed and updated rather than constructing new premises which do not necessarily give value for money. To ensure that policy includes extensive consultation to provide needed and affordable facilities.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Community facilities which serve the very particular requirements of those citizens with special needs would benefit from a separate/unique policy. However, integration of individuals with special needs wherever possible should be the overall aim.

B. Site Allocations for Community Facilities

CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

An ice rink would be a wonderful addition to our community facilities.. it would serve all ages and needs and would help to generate jobs directly and indirectly. The Black Rock area has the potential to be a wonderful location for an ice rink.

C: Are there any other issues that relate to Community Facilities?

CF7: Can you think of any other policy issues relating to community facilities that City Plan Part Two should address?

To facilitate the development of smaller indoor community swimming pools similar to the Newhaven pool. Especially on the eastern side of the city.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	126
Response Date	22/09/16 08:43
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Individual Name

Individual Address

Individual Email

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

It should have a plan to develop brown field sites before any green field sites are considered.

B2: If you think a policy is needed, what types of development should be included?

One which protects our wildlife and open spaces. There is an ancient wildlife corridor in Ovingdean running from the South Downs national park to Beacon Hill. This land on sites 41, 42, and 43 has already been partly cleared and untold damage has been done to the environment. Protected species including badgers and slow worms are on these sites and there has been a blatant disregard of their safety and preservation. A lot of the woodland has also been an historic divide between Rottingdean and Ovingdean and had stood for centuries.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

Consideration for the conservation of wildlife should be high on the list.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Sites 41, 42 and 43.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

St Aubyns fields Rottingdean

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance)).

St Aubyns field Rottingdean. The site of Ovingdean Hall college.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	127
Response Date	22/09/16 09:32
Status	Processed
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Housing
Organisation Name (If Applicable)	Brighton Housing Trust

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable development plan status that goes with a formal site allocation).

See H21 below

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e that City Plan Part 2 should also consider to guide the allocation of urban fringe sites)?

See H21 below

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) all

See H21 below

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should type of planning policy?

The scoping Paper has already identified that: For affordable housing, the analysis suggests that a greater proportion of one and two required. However, the study notes that this does not reflect any specific priorities for family households in need or that smaller homes typically offer in accommodating changing requirements of households. BHT believes that, given the constraints put on local authority should use all possible approaches to try to ensure that the supply of housing matches the needs of those in need as well as acceptances. This would require that the City Plan – as the statutory document – does specify a range of dwelling types and sizes.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing?

See H21 below

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered?

See H21 below

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to under-development of housing sites)? If so, what might be appropriate planning considerations to include in such a policy?

See H21 below

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of key communities? For example, policies to specifically address and support housing options for older people; for families and young people?

See H21 below

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market?

See H21 below

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and shared ownership?

See H21 below

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Given the existence of a housing crisis in Brighton & Hove, BHT's answer is an unequivocal 'yes'.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings, shared ownership, or accommodation for those with various support needs?

See H21 below

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor amenity space?

See H21 below

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether amenity space is useable and accessible?

See H21 below

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing de

See H21 below

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' wheelchair user dwellings?

See H21 below

H17: Are there any other issues in relation to the national technical standards for new housing development that

See H21 below

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs

BHT recognises that HMO's can give rise to problems such as noise but we believe that such is the depth of the housing problem that the potential serves those who are excluded by purchase or rental cost from other types of accommodation is protected.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family

See H21 below

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further

See H21 below

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the scoping paper) that Part Two should seek to address?

BHT Submission to the Brighton & Hove City Plan Part Two Scoping Paper. Brighton Housing Trust is pleased to respond to Brighton & Hove City Council's consultation on the City Plan Part Two Scoping Paper Brighton Housing Trust (BHT) is at the very heart of initiatives in Brighton and Hove ' and elsewhere ' to address both the causes and effects of homelessness in the city. BHT offers services, advice and support for those forced to live on the streets through its First Base day centre in Montpelier Place with 14,708 visits to our early morning session by 955 different clients in 2015/16. We provide housing advice to those with housing problems including those threatened with losing their homes and for those seeking access to the private rented sector. In 2015 through the advice centre we prevented homelessness in 436 cases. We provide skills training both at First Base and at the Whitehawk Inn and run an intern placement programme. We provide addiction treatment with some 74 per cent of our clients still abstinent 18 months after their treatment was completed. We provide community housing in the city including Phase One, a 52 bed high support hostel for single homeless men and women; Route One which serves those who are excluded by purchase or rental cost from other types of accommodation is protected. This response to Brighton & Hove City Council's consultation on the City Plan Part Two Scoping Paper is designed both to demonstrate BHT's willingness to contribute its expertise and informed viewpoint to the development of Part Two of the City Plan and to put forward a number of key issues related to the focus of our work. BHT would be pleased to discuss any of these matters covered above further and looks forward to being engaged as the process of drafting Part Two develops.

provides support and accommodation for 60 adults with mental health needs and Richardson's Yard, an award winning scheme for housing those in need. The housing crisis in Brighton and Hove is acknowledged in Part One of the City Plan itself as well as through: BHT's publications including our Impact Report 2015 (<http://www.bht.org.uk/wpcontent/uploads/2015/10/BHT - Impact - Report - 2015 - final - screen - opt.pdf>), the Council's Housing Strategy 2015 (<http://www.brighton-hove.gov.uk/content/housing/generalhousing/housing-strategy-2015>) the Brighton & Hove Fairness Commission (<http://www.brighton-hove.gov.uk/content/council-and-democracy/fairness-commission>) and statistical updates such as Brighton & Hove Housing Statistical Bulletin (<https://www.brighton-hove.gov.uk/content/housing/general-housing/housing-strategy-statisticalbulletins>). It is hoped, the position does not need restating in this submission. BHT recognises the important role played by strategic planning, planning policies and individual planning decisions in aiding the provision of much needed housing in the city and, in particular, the provision of housing for those most in need. In recognising this, BHT is fully aware of the burgeoning constraints placed on the planning system that increasingly restrict its ability to require truly affordable housing to be delivered through the development process. We have seen with dismay, for example, the change in the definition of affordable to one that means that housing delivered through planning within this category is not affordable to those in need and those on low and average incomes in the city. This requires that the City Plan looks for innovative solutions. BHT has already called for Brighton & Hove to be designated as a 'Housing Crisis Zone' (<http://andywinterbht.wordpress.com/2015/08/08/brighton-and-hove-should-be-declared-a-housing-crisis-zone-requiring-all-housing-development-to-be-for-social-renting-only/>). This designation and some of the necessary actions that could follow are matters for central government working with the City Council but BHT urges the City Council to use the City Plan to spell out clearly the extent of the housing crisis and to use that evidence base to support and justify the introduction of strong policies and the unswerving implementation of those that exist. For example, we acknowledge the strength of the existing policy CP20 setting the affordable housing requirement. However, first, the City Council cannot be seen to be wavering in enforcing its own requirements. Second, BHT believes that the nature and depth of the housing crisis in the city 'coupled with the lack of available larger sites' means that the Council should resist revising this policy to raise the threshold in line with the result of R (West Berkshire District Council and Reading Borough Council) v. Secretary of State for Communities and Local Government [2016] EWCA Civ 441. Further, BHT asks that consideration should be given to an even more joined-up approach to affordable housing provision through s.106. This may include using receipts from commuted affordable housing payments to support initiatives such as the Council's own empty homes strategy or in supporting bodies in the city, such as housing cooperatives, which provide housing for those most in need. As part of this strategic approach, we believe that there needs to be greater coordination and mutual reinforcement between the City Plan and the Council's housing strategy. We note that the diagram of 'The Housing Strategy Family' on page 4 of the Housing Strategy does not include the City Plan. One of the 'most important roles of Part Two of the City Plan is to find means of providing housing to meet the objectively assessed housing need for new housing. As paragraph 37 of the Inspector's report () points out clearly: The City Plan Part One, as proposed to be modified, seeks to meet only 44% of the objectively assessed need for new housing. This is a very significant shortfall which has important implications for the social dimension of sustainable development. However, as noted above, the City is subject to significant constraints in finding land for new development. The target of 13,200 new homes is expressed as a minimum, which offers scope for that number to be increased when more detailed consideration of individual sites is undertaken for the preparation of the City Plan Part Two. To meet the other 56 per cent of previously assessed need, let alone any additional need that may be identified as part of the Part Two preparation process 'is an extremely challenging task. BHT urges the City Council to make full use both of identified sites and of windfall sites by maximising densities in line with good practice in sustainable development. It also urges the Council to examine the scope for encouraging the densification of housing within existing developments 'including through the call for sites exercise to be undertaken as part of the Strategic Housing Land Availability Assessment update process. The Part Two Scoping Paper poses a number of consultation questions. In this submission to the consultation, BHT wants to focus on three of these. Question H4 asks whether proposed housing site allocations in City Plan Part 2 should seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy? The scoping Paper has already identified that: For affordable housing, the analysis suggests that a greater proportion of one and two bedroom affordable properties will be required. However, the study notes that this does not reflect any specific priorities for family households in need or that smaller homes typically offer more limited flexibility in accommodating changing requirements of households. BHT believes that, given the constraints put on local authorities in delivering truly affordable housing, the City Plan should use all possible approaches to try to ensure that the supply of housing matches the needs of those in need as evidenced through, for example, data on homeless acceptances. This would require that the City Plan 'as the statutory document' does specify a range of dwelling types and sizes. Question H11 asks whether policies in City Plan Part 2 should resist the loss of housing from within the existing housing stock. Given the existence of a housing crisis in Brighton & Hove, BHT's answer is an unequivocal 'yes'. Finally, Question H18 asks whether the City Plan Part 2 should include a policy that seeks to protect existing HMOs? BHT recognises that HMO's can give rise to problems such as noise but we believe that such is the depth of the housing problems in the city that any accommodation that potential

TR: If you consider a more detailed policy is the best option, what might be your preferred approach, for example

B10. Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	128
Response Date	22/09/16 09:55
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Individual Name

Individual Address

Individual Email

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Yes, once these are lost, it affects the current and future generations. Our heritage and biodiversity is not ours to destroy.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	128
Response Date	22/09/16 09:45
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

The use of urban fringe for extra housing has a huge effect on the local population. If transport links are weak, eg heavy through traffic or poor bus service, then extra demand can make life very difficult and in some cases dangerous (eg villages with limited pavements).

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

brownfield sites as above, particularly in areas where there is existing infrastructure.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

New housing should be tailored to the site and the targeted population. It is naive to designate affordable housing in an area where prices are very high, it won't stay affordable. The housing policy should not be subsidising property developers.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Overall there will be a requirement for this, but see answer to H4.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Innovative use of disused office space for student accommodation in the city. Offices can be converted and are often located where students want to live.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Infrastructure and environmental considerations to ensure no overdevelopment.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes and ensuring this specialist housing is where people want to live.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes but see answer to H8

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Only with sufficient controls over quantity and quality.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes assuming it is habitable and appropriate.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Do not know about this, but it sounds appropriate

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Do not know about this, but it sounds appropriate

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Not if there is a shortage

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Depends on what is required

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	129
Response Date	28/09/16 12:22
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Biodiversity and Open Spaces . Sustainability Appraisal Scoping Report . Call for sites . General comment
Organisation Name (If Applicable)	Futureform Global Investments Limited
Agent Name	Vail Williams

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

The Urban Fringe Assessment 2014 was prepared in support of the CPP1 but at a very strategic level. For CPP2 a more detailed analysis is required in order to fully understand the full potential of each site and how it might contribute to the City's housing land supply.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Benfield Valley is put forward as a potential housing site (see section 5 of this document)

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

We give support the proposal that a range of types and tenures of residential development should be provided but this should be considered on a site by site basis to address site characteristics and context as well as overall need across Brighton and Hove.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

We give support the proposal that a range of types and tenures of residential development should be provided but this should be considered on a site by site basis to address site characteristics and context as well as overall need across Brighton and Hove.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

We give support the proposal that a range of types and tenures of residential development should be provided but this should be considered on a site by site basis to address site characteristics and context as well as overall need across Brighton and Hove.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

We support the proposal that new development should maximise site potential in order to avoid underdevelopment of housing sites.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Brighton and Hove City Council have commissioned GL Hearn to produce 'The Objectively Assessed Need for Housing: Brighton and Hove'. This document is regularly updated. The latest version was produced in June 2015 and found that the Brighton and Hove area has a need for 30,120 new homes over the City Plan period to 2030. This is an increase from the 2013 assessment where a need of 16-20,000 new homes was required to the end of the plan period, 2030. The housing need of 30,120 new homes by 2030 equates to 1,506 new homes per annum. 2.2. CPP1 policy CP1 (Housing Delivery) outlines that the Council will make provision for at least 13,200 new homes to be built over the plan period 2010 to 2030 which equates to 660 dwellings per annum. This housing target includes 1,060 homes from urban fringe sites. 2.3. According to CPP2 Sustainability Appraisal Scoping Report (June 2016) the net housing completions from 2010 to 2015 have been significantly below the per annum target of 660 dwellings set out in CPP1 policy CP1. The net housing completions for 2010 to 2015 are as follows: o 2010/11 = 283 o 2011/12 = 309 o 2012/13 = 374 o 2013/14 = 436 o 2014/15 = 581 2.4. The CPP2 Sustainability Appraisal Scoping Report goes on to state that the housing trajectory set out in CPP1 anticipates that up to 2018/19 the local authority will achieve 600 units per annum and subsequently approximately 950 units per annum during the period of 2019 to 2034. 2.5. The net housing completions between 2010 and 2015 demonstrate a year on year under-delivery of housing units compared to the housing target. The projections indicate that this under-delivery will continue until 2019. 2.6. The NPPF at paragraph 47 requires Local Planning Authorities to boost significantly the supply of housing by ensuring that their Local Plan meets the full objectively assessed housing needs. This includes identifying key sites which are critical to the delivery of the housing strategy over the plan period. However it also requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period). Where there has been a persistent record of under-delivery, the buffer should be increased to 20%. This requirement has implications for the phasing of development within the City Plan. First, it is not considered acceptable for the emerging Plan to backend the delivery of housing as this would be contrary to national policy set out in the NPPF. Rather, the phasing should reflect the need to redress the previous under-delivery. Further, that reliance should be based on the identification of a supply of specific deliverable sites for the first five year period, i.e. those which are available now, offer a suitable location for development now and are achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. If necessary the Local Planning Authorities should increase the overall housing allocation in order to deliver a level of

housing that is capable of at least securing the housing target set out in CPP1 policy CP1. This is particularly critical as policy CP1 sets out a minimum housing target and that the housing need identified by GL Hearn in the latest Strategic Housing Market Assessment is over double the housing target set out in the City Plan but also that policy CP1 sets out a minimum housing target. 2.7. The Inspector's report associated with the examination into CPP1 (and subsequently adopted) makes a number of comments that relate to the delivery of housing. These are outlined in the following paragraphs. 2.8. Paragraph 26 of the Inspector's report notes that Main Modification 64 allows for sites to come forward in advance of the adoption of Part Two of the Plan but that any such proposals would be subject to scrutiny through development management process in the usual way. The Inspector acknowledges at paragraph 27 that the 2014 Urban Fringe Assessment comprises robust evidence to guide strategic level policy through the CPP1 but that decisions on whether individual sites should be developed will be made either through the process of preparation for CPP2 or in advance of that through the development management process. The Inspector felt confident that the draft plan struck the right balance between meeting the need for new housing and retaining open space. As outlined in paragraph 37 of the Inspector's report, this view was based on the CPP1 meeting only 44% of the objectively assessed need for new housing and which represents a very significant shortfall against objectively assessed housing needs. The Inspector noted that the City is subject to significant constraints in finding land for new development. She did, however conclude at paragraph 37 that the housing target of 13,200 new homes expressed in CPP1 policy CP1 is a minimum target which could be addressed when more detailed consideration of individual sites is undertaken for the preparation of the CPP2. She considered that the housing target could be augmented through three categories of site including urban fringe sites. 2.9. Based on the Planning Inspector's comments in her examination of the Brighton and Hove CPP1 it is imperative that CPP2 assesses whether the housing target could be increased. This will require detailed consideration of the characteristics and potential capacity of individual sites. 2.10. The Urban Fringe Assessment produced by Land Use Consultants in 2014 is not a policy document but forms part of the evidence base to the City Plan. However this document is considered robust by the Planning Inspector as outlined within her report on the examination into the Brighton and Hove CPP1. Since the 2014 document further assessments have been produced by Land Use Consultants (landscape and ecology) Archaeology South-East (archaeology) looking at each site in more detail. However, these reports did not form part of the Urban Fringe Assessment considered by the Inspector and as with the 2014 document, have not been scrutinised through a consultation process and cannot therefore be assumed as robust. These background documents and assessments were based on the number of dwellings identified within the Urban Fringe Assessment rather than considering the development potential of each site as a blank canvas. Such an approach does not comply with the requirements of the NPPF to boost significantly the supply of housing land, nor with the requirement that plans should be positively prepared (NPPF paragraphs 47 and 182). Accordingly, any resulting Plan will not be seen as being positively prepared, justified, effective or consistent with national policy and consequently not capable of being found sound. 2.11. The Urban Fringe Assessment 2014 looked at approximately 60 sites and considered that they had potential to provide a total of 1,356 dwellings over a developable area of 8.5% of the total Urban Fringe sites. 2.12. The Urban Fringe Assessment 2014 provides an in-principle assessment of sites, subsequently assessed by the 2015 background studies which sought to verify whether the developable areas indicated in the 2014 assessment were deliverable based on landscape, ecology and archaeology constraints. The purpose of these representations and the pre-application discussions held to date is to open discussions into the extent of those apparent constraints and the suitability of sites balanced against the significant shortfall in available sites when measured against objectively assessed housing needs. 2.13. These representations conclude that there is justification to increase the amount of residential development generally coming forward on Urban Fringe sites through a detailed assessment of constraints on a site by site basis; and more specifically that the Benfield Valley site is capable of delivering an extended developable area to accommodate a significantly greater number of dwellings. Such a detailed assessment of the constraints of each urban fringe site should be undertaken both through the Development Plan preparation process and through the development management process via pre-application discussions and the release of suitable sites early in accordance with the Inspector's conclusions (Paragraph 27 of the Inspector's report). It is suggested that in order for this process to be effective, it should include topic meetings, where specialists from both the Council and developers can meet to come to an acceptable understanding of the relative constraints. Once the constraints are fully understood the developable areas can be appropriately identified. 2.14. The Benfield Valley site is therefore put forward for residential development under Question H3 of the CPP2 Scoping Report. Further information is provided in respect to this call for sites representation within Section 5 of this report.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

Summary: Policy should be restricted to setting the general principles whilst further detail should be provided where necessary within supplementary planning documents, guidance notes and development briefs. Larger and strategic sites should be considered on a site by site basis to allow transport and travel solutions to respond to local circumstances. Detailed Comments... 3.1. The consultation questions posed in parts A, B, and C generally consider the principle of whether sufficient clarity is contained within the policy requirements or whether this would be better provided through planning guidance such as through Supplementary Planning Documents or Planning Advice Notes. It is considered that the policy should set the principles and further detail should be provided where necessary within the subsequent planning guidance notes and development briefs. 3.2. Under a scenario where policies contain too much detail, this may lead to developments being non-compliant when they would ordinarily be acceptable subject to appropriate mitigation measures or financial contribution. The process to amend a policy document can be resource intensive and time-consuming, whereas it is a relatively simple process to amend planning guidance notes. In addition, a detailed or constrained policy document may lead to increased planning appeals. 3.3. For Benfield Valley, outlined in Section 5 of this report, it is important that policy is written in with a flexible approach as there are many methods and opportunities within the site to deliver the transport and travel requirements. Through detailed investigations by a highways consultant certain methods may be considered more appropriate than others and need to be considered on a site by site basis rather than an overly restrictive policy.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Objection is made to the proposed designation of Benfield Valley as Local Green Space (question B10) for the reasons set out above: It is considered contrary to National Policy; the supporting text; and the requirement to consider quality, access and maintenance. The application of a blanket approach is considered contrary to the proposal in question H7 which seeks the efficient use of land and maximisation of site potential, thereby avoiding under-development. On larger sites, there is the opportunity to provide both high quality open space as well as making a significant and vital contribution to housing provision and other community facilities. This is particularly important for any large strategic sites which can make significant contributions to wider demands and opportunities, and should as a result be fully explored without undue or premature constraint.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Summary In addition to the quantum of open space delivery, consideration should be given to the quality and accessibility of provision, along with the longer term potential for management and maintenance. The close relationship of some open spaces with the South Downs National Park should also be carefully considered and opportunities explored to enhance access and the creation of 'gateways' into the Park. The consideration of open space protection and delivery also needs to be balanced with other critical but often competing demands such as housing provision and a proportionate conclusion drawn as to the benefits arising. Objection is made to the proposed designation of Benfield Valley as Local Green Space (question B10) for the reasons set out above: It is considered contrary to National Policy; the supporting text; and the requirement to consider quality, access and maintenance.

The application of a blanket approach is considered contrary to the proposal in question H7 which seeks the efficient use of land and maximisation of site potential, thereby avoiding under-development. On larger sites, there is the opportunity to provide both high quality open space as well as making a significant and vital contribution to housing provision and other community facilities. This is particularly important for any large strategic sites which can make significant contributions to wider demands and opportunities, and should as a result be fully explored without undue or premature constraint. 4.1. The CPP2 Scoping Document (June 2016) includes a section on Biodiversity and Open Space. This scoping document continues to evolve and develop from the CPP1; including Policy CP16 relating to open space. It is widely recognised that open space provision provides significant benefits, and this is identified within the CPP1 at paragraph 4.175 where it states that: "Green open spaces contribute to physical, mental and emotional wellbeing and can offer lasting economic, social, cultural and environmental benefits. They act as heat sinks, help to cool urban environments and offer visual relief from the urban character of the city. Parks, outdoor sports areas, play areas, cemeteries, natural / semi-natural areas, school grounds, amenity spaces within housing estates and allotments are all part of this rich mix". 4.2. This is also recognised in the National Planning Policy Framework (NPPF) where one of the three dimensions to sustainable development is the environmental role; which needs to be balanced with the economic and social roles. This is also highlighted within the ministerial forward where it identifies that: "Our natural environment is essential to our wellbeing, and it can be better looked after than it has been". The NPPF continues to highlight the importance of restoring habitats and reconnecting isolated species and the benefits that this brings. For Local Planning Authorities the NPPF states that they should: "Set out a strategic approach in their local plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure". (NPPF Paragraph 114). This places the emphasis on planning positively for the future, the importance of management to help secure the provision of high quality, publically accessible open space in the longer term. City Plan Part 1 4.3. The CPP1 identifies the benefits of well designed green spaces that should be planned positively. This includes, in paragraph 4.185 (with reference to Biosphere Reserve principles) that it will: "Seek to bring together people and nature, and should therefore aim to provide greener living and working environments. Innovative solutions will be explored to increase accessibility and for the pooling of funds to enable the best solutions for this compact city. The maintenance and consequent funding of open space is key to providing good quality provision and will be sought as part of the provision of open space". 4.4. The following paragraph (4.186) also highlights that improvements to the links between these spaces would be investigated. 4.5. In relation to the 2014 Urban Fringe Site Assessment Study paragraph 4.177 notes that: "Some urban spaces within the City's urban fringe have been identified as having potential to help meet the City's housing requirements. Unlike other urban open spaces the loss of these sites can more readily be mitigated through the provision of new publicly accessible space, enhancement to existing space or by alternative provision within the National Park and/or compensated for by the National Parks Open Space offer". 4.6. The second part of Policy CP16 Open Space contains a number of points that provide guidance for the overall aim of the policy. These identify that, rather than just the quantity of open space, there are other important considerations that need to be taken into account. Paragraph 2 (CP 16) states that: "..... provision of and improve the quality, quantity, variety and accessibility of public open space" Point 'b' highlights that: "Developments will be expected to help improve sustainable means of escape to open space and facilitate appropriate lengths to the City's open space framework" This continues in point 'c' which notes that: "All provision should optimise accessibility to all users.....". And the main thrust of points 'e' and 'f' are in relation to: "Help to secure investment in poor quality, under-used open spaces to bring about enhancements in quality and public use" and to: "Seek proactive and appropriate management of open spaces including the enforcement of local by-laws and seek the enhancement and improvement of open spaces and features". 4.7. This part of the policy clearly highlights the importance of creating variety and high quality open space, the importance of accessibility for people to utilise the open space provision, along with the longer term management and investment in open space. City Plan Part 2 Scoping Document 4.8. The Scoping Document continues in this theme, including in paragraph 7.9, where it states that: "The plan expects development to improve access and the links to the city's open space framework". 4.9. The relationship between the City and the South Downs is also identified within paragraph 7.21 where it states that: "The key to the setting of the City is the wider South Downs landscape and its importance is nationally recognised through its National Park status. The city's location, adjacent to the National Park, is one of its positive attributes and it is important that this is recognised and an understanding of and access to the South Downs National Park appropriately promoted". 4.10. The importance and relevance of the South Downs National Park can not be understated. As recognised above, the South Downs is fundamental to the

character and setting of the City and access should be promoted. The supporting document produced by LCE (Commentary on Open Space) demonstrates the current poor links to the National Park and the consideration of 'gateways': "There are only 8 exclusively pedestrian/cycle crossings within the City boundary on the A27, which is circa 12 km long boundary to boundary. Of those only the ones at either end are easily located and relatively simple to use as access to the South Downs – the bridge close to Foredown Tower (which includes vehicular access to farmland) and the tunnel at Falmer. The former is underused as it is some distance from centres of population (in terms of walking). The remaining six are bridges and very difficult to locate and probably only serve a very small catchment. Of the 4 potential Local Green Spaces, none currently work as "Gateways" to the SDNP. Three Cornered Copse: This leads to the major junction of the A27 with the A2038 and Dyke Road Avenue. There is not even a pavement on the southern side of the two roundabouts and access to the SDNP by foot is almost impossible. Hollingbury Park: Access to SDNP is by way of a vehicular bridge over the A27 that meets a junction of Ditchling Road with Coldean Lane. This is an improvement on the access described above, but there is only a footpath on the western side of Coldean Lane and there is no easy way of accessing the Park on the other side because of trees and embankments. Ladies' Mile Open Space: The simplest route is by way of the major junction linking the A27 with Carden Avenue and Coldean Lane. But like the Three Cornered Copse it does not work for the pedestrian/cyclist. It might be possible to link this space to the Patcham footbridge but it would be very expensive to achieve. Benfield Valley: Has a footbridge over the A27, but is difficult to find and currently has very low use, mainly by golfers playing the Benfield Course. However, it represents the easiest route to upgrade and does not require the visitor to cross a major junction to get from the City to the SDNP." Benfield Valley: Proposal 4.11. Policy CP16 of the CPP1 states that: 'The council will work collaboratively to safeguard, improve, expand and promote access to Brighton and Hove's open spaces (public and private) and the diverse range of experiences offered by these spaces'. Open space, is key to the consideration of Benfield and its potential for future development. Various means of achieving the retention and enhancement of open space are set out within the policy. The policy states that the Council will: "..... seek better, more effective and appropriate use of all existing open space". Exceptions criteria are then set out for the justification of any loss of open space. Point b) of the Policy states that: "The site is not part of a playing field (current or historical) and the loss is necessary to bring about significant and demonstrable long term enhancements to the city's public open space offer as a whole". 4.12. In relation to open space, and compliance with Policy CP16, Benfield Valley has the potential to make open space publically accessible as well as greatly increasing the quality of open space provision. The proposal ensures that it can be secured for the longer term and provide a suitable management plan that would increase accessibility. These all accord with the principles as detailed in the Local Plan and its supported evidence base. Indeed the Open Space Study update (March 2011) identifies in Appendix 3b that the site is in part a golf course and natural and semi-natural urban greenspace. The proposals have regard to the importance of the study, but are aligned with the principles of providing a balance between retention of open space and the opportunities for enhancement and improvement. 4.13. The proposal for development on the site is also considered to comply with the specific criteria contained within Policy CP16. In relation to point a), the City Plan Part Two provides the opportunity to allocate Benfield Valley for residential / mixed-use development of a size and scale as detailed in the accompanying Vision Document (LCE, September 2016). We would welcome the opportunity to work positively with the Council to determine the scope of an allocation that would help to deliver much need housing whilst providing and securing high quality improvements to open space provision and enhancing the long term opportunities to retain valuable open space. 4.14. In relation to criteria b), as the site is not part of a playing field and, part of its "loss", would allow significant and demonstrable long term enhancement to the open space provision on this site, especially when compared to the existing offer, it is considered to comply with this section of the policy. 4.15. Criteria c) refers to "development is ancillary to the use of the open space and will result in only a small loss of open space, provides improvements to and better use of the remaining space and optimises public access." The site is located adjacent to the National Park, which is a hugely significant open space benefiting all residents of the City. The proposal seeks to facilitate enhanced access to the National Park and, proportionate to the National Park, will only be a small loss of urban open space that will result in improvements and better use of the remaining space (both within the site and the wider National Park). The development will also optimise public access; again, to both the site and also the National Park through the use of structural landscaping, and green corridors which are central to the potential layout and design of the development, reflecting its character and importance as a transition site to the National Park. 4.16. In addition, under criteria e), the site is within the Urban Fringe Assessment and identified for residential development; albeit the quantum of development needs to

be thoroughly examined and the proposal demonstrates considerably higher potential than considered in the Urban Fringe Assessment. Therefore, the thrust of Policy CP16 that identifies where potential development will be suitable, provides sufficient flexibility to actively and positively consider Benfield Valley given the wider benefits of the proposal. 4.17. Furthermore, there is a requirement through planning to positively consider the longer term and this proposal responds to this and provides certainty and security for open space provision over the longer term. Whilst the proposal would result in the loss of some "open space", this needs to be taken in context of the policy and the supporting text in both the City Plan Part 1 and also the Part 2 Scoping Document and its requirement to provide variety, quality, and accessibility. All of these will be significantly improved through the proposal. In addition, and specifically addressed through the proposal, is the relationship to the South Downs National Park which is directly north of the Benfield site. Currently the local area has very poor links with and accessibility to the National Park and the proposed scheme at Benfield Valley provides a fantastic opportunity to greatly enhance this essential link to the National Park. This proposal accords with Paragraph 7.21 of the City Plan Part 2 Scoping Document. 4.18. Therefore, consideration should be given to the allocation of Benfield Valley for development through the City Plan Part Two, as it does not directly conflict with adopted policy and will result in numerous benefits for the local community and also the wider City. 4.19. It is considered that the proposal at Benfield Valley, with specific details to be agreed through the detailed design process, would offer a significant improvement in terms of public access to quality open space and specifically to the South Downs National Park. It would achieve this whilst securing investment in the open space and also providing a proactive and appropriate management structure to ensure the longer term enhancement and maintenance of the space. Evidence Base and Background Studies 4.20. It is a requirement in National Policy that the Local Planning Authority should ensure that the local plan is based on adequate and up-to-date and relevant evidence (NPPF Paragraph 158). 4.21. The Open Space, Sport & Recreation Study was undertaken in October 2008, with an Open Space Study Update completed in March 2011. The Open Space Study Update 2011 is referred to in Policy CP16 in relation to open space. There have been significant changes since these reports were produced, in particular the introduction of the NPPF (2012), and, importantly, the Planning Authority for the South Downs National Park was also established in 2011. The SDNP have, therefore, continued to evolve and develop their vision for the National Park over the last 5 years. 4.22. Furthermore, the reports are high level strategic documents designed to help inform the creation of planning policy across the whole of the city. Given the opportunity to provide significant development within Benfield, more detailed and site specific studies are required to allow a complete and up-to-date understanding of the site and the benefits that the development could deliver to the local and wider area. Elsewhere in this report, the other benefits for development at Benfield are discussed in detail (including the high level of need and demand for housing) and this should be balanced with the opportunity to secure high quality publically accessible open space provision for the longer term. 4.23. The current evidence base, dating from 2011 and earlier, pre-dates the NPPF and is not considered up-to-date. The NPPF clearly emphasises the importance of economic development and need for housing, at both national and local level. Whilst the importance of open space, specifically in an urban environment, is recognised, the quality and opportunities of site specific schemes need to be carefully considered to enable a balanced judgement that considers the wider benefits of the scheme and also the opportunity to increase the quality and secure the longer term provision of open space. Of particular importance to the Benfield Valley, is its relationship to the South Downs National Park and the huge open space and recreational opportunities to the public that it provides. There is the potential to greatly increase access not only to Benfield but also create a gateway to the National Park, thereby having the benefit of making this valuable resource available to, and accessible by, a significantly larger proportion of the local community. Local Green Spaces 4.24. Question B10 of the CPP2 Scoping Document identifies that Benfield Valley is being considered for designation as Local Green Space. The proposed designation as Local Green Space is not supported. 4.25. The NPPF, in Paragraph 76, states that: "Identifying land as local green space should therefore be consistent with the local planning of sustainable development and compliment investment in sufficient homes, jobs and other essential services". Given the widely acknowledged need for housing within the city, as detailed within this report, any proposals for Local Green Spaces need to be carefully balanced against these other needs and requirements, as clearly identified within the NPPF. Consideration of this balance does not appear to have occurred in relation to Benfield, where it is possible to secure benefits for homes, open space and to wider local community. 4.26. The NPPF also states in Paragraph 77 that: "The Local Green Space designation will not be appropriate for most green areas or open space". 4.27. Paragraph 77 of the NPPF then continues and identifies, in bullet point 2, that the green area under consideration has to be demonstrably special to the local community and hold particular local significance, for example

its beauty, historic significance or recreational value, tranquillity or richness of wildlife. The Benfield Valley does not meet these strict criteria to enable it to be designated as a Local Green Space. The documents accompanying this representation, evidence that the site does not hold significant historic, ecological, recreational or any other local significance when assessed against this part of the NPPF. 4.28. The third point under Paragraph 77 of the NPPF states that: "Where the green area concerned is local in character and is not an extensive tract of land". A blanket approach to Benfield, which is an extensive tract of land, is contrary to the requirements of the NPPF in considering designating Local Green Space. There are clear and conflicting demands within the wider city and the NPPF requires a balance of these competing elements to ensure sustainable development. Benfield Valley has the potential and opportunity to deliver across these various criteria, including the provision of much needed housing, whilst improving the benefit and public accessibility of open space provision. The proposal at Benfield is not to develop the whole site, but to greatly facilitate wider public access to the site, including access to the South Downs National Park, whilst (as detailed elsewhere) maintain an enhanced biodiversity and habitat, whilst delivering much needed housing and local facilities. 4.29. Identification of the Benfield Valley in its entirety as a Local Green Space as set out in question B10 has not been justified, is contrary to the NPPF, and fails to grasp the opportunity to contribute to the quality and variety and accessibility of public open space. 4.30. In conclusion, the site should not be designated as Local Green Space, but a mixed use scheme of the nature proposed at Benfield Valley should be explored in more detail in order to realise the potential to bring about significant wider benefits to the local community, wildlife, accessibility and to secure the longer term maintenance and management of the open space area. 4.31. We would welcome the opportunity to explore the benefits to development at Benfield, including securing accessible high quality open space, with the Council. These wider benefits need to be balanced and explored, through detailed and site specific studies and reports, to fully understand the current and future potential for Benfield.

Please indicate which topic or topics you would like to comment on?

Site 1

Site address / location Benfield Valley, Hangleton Way, Hove

Site area - Hectares (ha) or square metres (m2) 25.05ha

Current use(s)

Private Golf Course with Public Rights of Way

Current occupier(s) Benfield Investments Ltd

Current ownership If known, please provide contacts details

Brighton and Hove City Council

Your interest in the land e.g. owner, occupier, developer etc. Developer - Option Agreed With Occupier

Proposed use(s) and amounts e.g. Units or Floorspace (square metres m2)

Lifetime Residential Development including Young People Living, Retirement Living and General Residential.

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

see additional info submitted Appendix 1 - Proposed Sustainability Appraisal Framework – Benfield Valley (assessment of Benfield valley)

22 September 2016

Planning Policy Team
Brighton & Hove City Council
Room 201 King's House
Grand Avenue
Hove
East Sussex
BN3 2LS

Dear Sir / Madam

City Plan Part Two: Scoping Document 2016

Thank you for consulting the South Downs National Park Authority (SDNPA) on your emerging City Plan Part Two.

As you will be aware the SDNPA has published and consulted on the South Downs [Local Plan: Preferred Options](#). Through the preparation of this plan a set of strategic cross boundary planning issues have been identified by the National Park Authority. These 6 key issues, set out below, form the basis of the Authorities comments on the City Plan Part Two, we apologise that this does not directly follow your comments form.

1) Conserving and enhancing the natural beauty of the area.

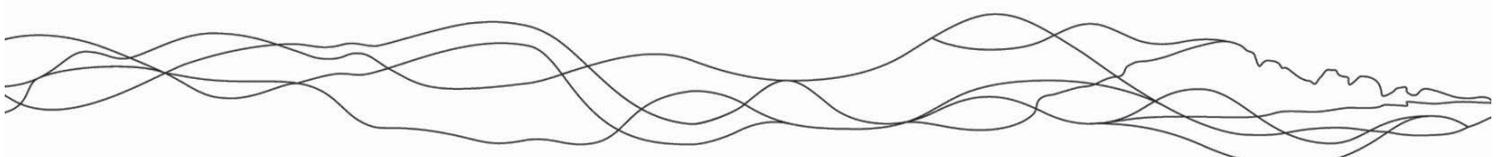
The SDNPA and all relevant authorities including Brighton and Hove City Council (BHCC) are required to have regard to the Purposes and Duty of the South Downs National Park as set out in Section 62 of the Environment Act 1995. At a strategic level this has been addressed through the adopted Brighton & Hove City Plan Part One. BHCC are fully aware of their responsibilities in regard to the National Park and it is anticipated that this will continue to be considered as the City Council seeks to allocate sites for development around the city. Detailed comments on individual sites will follow at the Draft Plan consultation stage in autumn 2017.

2) Conserving and enhancing the region's biodiversity (including green infrastructure issues)

The SDNPA welcomes the references to the South Downs Green Infrastructure Framework and the cross authority approach to green infrastructure. Clearly we would support a continuation of the landscape scale approach which reflects the joint work between both authorities.

The SDNPA is currently considering how best it can incorporate the work already done by BHCC on Local Wildlife sites within the SDNPA area in order to ensure a consistent approach is taken to sites that cross the planning authorities boundary or provide links from the City to the Downs. The SDNPA will be consider the proposed strategic biodiversity policies of the South Downs Local Plan at Planning Committee on the 13th October. These will be available from our website 5 working days beforehand and may provide some further useful detail to assist in formulating your own.

Finally we query what the impact of the City Plan II will be on the sensitivities of the Brighton & Lewes Biosphere.



3) The delivery of new homes, including affordable homes and pitches for Gypsies and Travellers.

The SDNPA recognises the development pressures being experienced in Brighton and Hove. The Scoping Consultation asks a series of questions about the type of housing that should be provided, amenity space and housing standards. At this stage it is not considered that these detailed matters raise any issues for the National Park Authority. At the point at which sites are identified for allocation the SDNPA will need to consider the impact on the National Park in more detail.

The SDNPA notes the reference to the joint working between the two planning authorities on the search for sites for Gypsies and Travellers. The SDNPA would wish for any allocation of sites to be addressed through the City Plan Part 2 rather than a separate Development Plan Document as the preparation of a further plan will delay any provision and contribute to the continuation of the current high levels of unauthorised encampments.

4) The promotion of sustainable tourism

The SDNPA would support an update to the Hotel Futures Study. In particular it should of course include an assessment of the impact of demand and growth of the visitor economy following current and future developments, for example the British Airways i350, Brighton Marina, King Alfred Centre/Churchill Square and Black Rock. It would also be helpful if it could consider what degree of overspill, current and prospective, into SDNP accommodation takes place and should take into account the SDNP Hotel Futures Study (<http://www.southdowns.gov.uk/wp-content/uploads/2015/02/Visitor-Accommodation-Review-Report.pdf>)

The following further issues for consideration have been identified when assessing the need for, or impact of, further hotel accommodation:

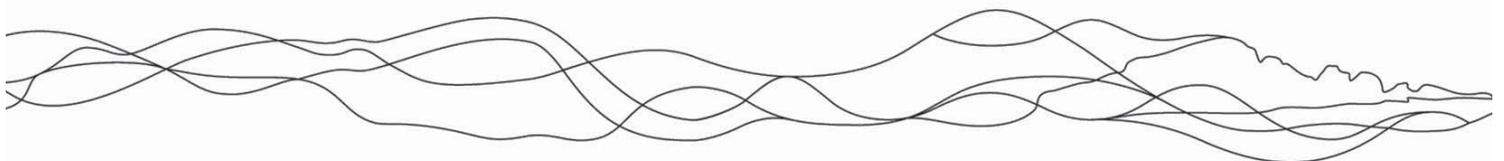
- Will these developments place additional pressure on routes into the city that traverse the SDNP?
- Is there a strategy in place to co-ordinate improvements in Sustainable Transport and access into the city to manage an increase in the visitor economy?
- Can greater integration / coordination with the existing and emerging SDNPA strategies and plans such as the Tourism Strategy and the emerging South Downs Local Plan be achieved?

5) Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

Both BHCC and the SDNPA share similar interests in terms of the need to see a sustainable travel system. It is a key issue for both Authorities and the consultation document includes an extensive range of issues and options. Certainly for development locations close to the National Park, the SDNPA would look for works to be done which would ensure access into the SDNP by sustainable means, walking, cycling, or by public transport. The comments on the provision of a purpose built Park and Ride facility are noted and the SDNPA would wish to be a party to discussions which may impact on the National Park.

6) Development of the rural economy.

This is a key strategic issue for the National Park Authority but not one which is of significance for BHCC. However clearly opportunities for the City to allocate or intensify the use of land for business units to allow residents to work near to home has sustainability benefits.



We wish you well with the progression of the City Plan. If you have any queries please do not hesitate to contact me.

Yours faithfully

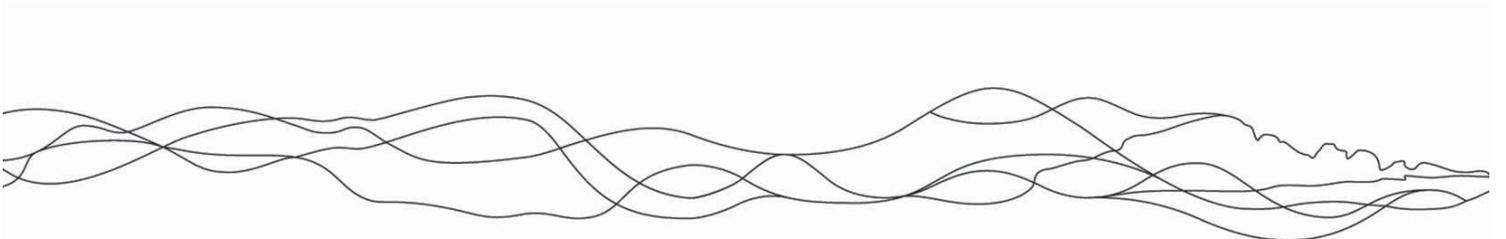
Planning Policy Manager

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie



Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	131
Response Date	22/09/16 11:40
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Addressing pollution, water and energy resources . Design . Community facilities . Student accommodation

Organisation Name (If Applicable) U+I Plc

Individual Address

Agent Name

Agent Address NTR Planning,

Agent Email

Agent Tel

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

Additional clarity would be beneficial in relation to the policy requirement for provision of wheelchair and accessible units. Whilst the new Building Regulations Part M provides guidance in terms of internal sizing and design, there remains an opportunity for the City Plan Part Two to set out the detailed requirements of the Brighton & Hove City Council Housing Department in terms of the application of the terminology 'adaptable' and 'accessible' (Building Regulations M4 (3) covers both) and final fit-out of the units. Developers would also benefit from the introduction of a 'cascade mechanism' to provide guidance on required design standards where there is a proven lack of market demand for accessible units. It is also noted that the current proportion of accessible units required (10% of affordable units, 5% across the site) is based on need as assessed in 2005. It is hoped that an updated assessment of need within the City is to be undertaken to more accurately inform emerging policy.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

The difficulties associated with clusters of HMO housing within the City are appreciated, and it is considered that the high number of HMOs is due, in part, to the lack of student accommodation within the City. The University of Brighton currently has capacity to house only 60% of their first year students and this inevitably means an increase in the amount of HMOs within the City. In order to address this problem it is proposed that the City Plan Part Two allocates additional sites, in close proximity to existing University campuses, for Purpose Built Student Accommodation as well as seeking to maximise efficient delivery of student bed-spaces on existing allocated Purpose Built Student Accommodation sites.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

It is felt that district heating, being a technical subject with extensive implications for the city and for forthcoming development schemes, would be better considered in detail within a Supplementary Planning Document. In particular, clarity is required on the method of practical implementation of district heating systems across the City.

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

With a £4.7bn portfolio of complex, mixed-use, community-focused regeneration projects, U+I embrace the important role place-making plays in helping unlock urban sites. Through this approach U+I have proven how place-making has helped create huge, long-lasting social and economic change for the communities in which we build. The development team is therefore committed to high quality place-making in Brighton, and would support the introduction of such a policy.

C: Protection of Residential Amenity

D6: Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

It is our opinion that a single policy on the protection of amenity would enable the simple assessment of schemes, both by developer and decision-maker.

D7: Are there any further issues you consider an amenities policy should address?

Particularly on sites that are allocated for significant levels of development through the City Plan, it is crucial for policy to recognise the balance to be struck between maximizing the efficient use of land on the one hand, whilst providing contextually appropriate development and managing amenity impact.

D8: Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

It is important to ensure that the level of development being sought on allocated sites is not unduly prohibited in terms of constraints. However, it is considered that this would be more appropriately

considered within site-specific policies and/or Planning Briefs or SPDs rather than within a general amenity policy.

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

City Plan Part One indicates that the Council will bring forward an Urban Design Framework and this is welcomed to provide additional clarity on the acceptable delivery of tall buildings as well as a more general assessment of urban design. It is considered that the City Plan Part Two should provide confirmation of the content and time-frame for production of this document. It would be preferable for the Urban Design Framework to come forward alongside City Plan Part Two to help guide the forthcoming development of allocated sites.

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

It would be helpful, both to provide clarity and also as a way of appropriate assessment for the local planning authority, if policies relating to community facilities were grouped as suggested within the City Plan Part Two Scoping Report. This would allow each type of community facility to be considered independently, taking into account the differing characteristics, impacts and benefits of and need for each community use type.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

The supporting text to this chapter identifies Class D1 non-residential institutions as a separate category of community facility, which would include all educational uses. We consider that D1 educational uses should be assessed on their own merits rather than using an umbrella 'community facilities' policy, owing to their particular importance to society as a Class D1 community use.

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

There would be value in Brighton & Hove City Council working collaboratively with the Universities and educational establishments within Brighton to objectively assess the need for Purpose Built Student Accommodation, and then to use this assessment to ensure sufficient developable land is allocated for this use. It is considered that a collaborative approach to this issue could help to alleviate some far-reaching problems within the City caused by a shortfall in the supply of student accommodation.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

As above, it is considered that such allocations will be crucial to ensuring the ongoing health of the City's educational establishments as well as reducing the strain on family housing stock within the City.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

The provision of purpose built, managed accommodation is essential in addressing the city's severe shortage of managed student accommodation. The adoption of a city wide management standard will ensure the continued successful operation of this form of accommodation, to the benefit of both students seeking a safe and controlled environment, and residents who currently have no enforcement against students living in unmanaged HMOs within the city. A set of standards for managed accommodation would also provide developers certainty and clarity over the City's requirements for new student housing and assist in its much needed provision.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

We see the City Plan Part Two as an opportunity to provide increased clarity and guidance relating to student accommodation for example the provision of accessible units within student accommodation, and daylight and sunlight assessment targets. Whilst such guidance should not unduly constrain the delivery of student accommodation which is crucial for the future of the City, additional clarity would provide developers with greater design certainty and would allow the local planning authority to objectively and efficiently assess such schemes as they come forward.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	132
Response Date	22/09/16 12:41
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	. Biodiversity and Open Spaces
Individual Name	T. Janio (Cllr)

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

I, Cllr Tony Janio The Woodland Trust Tree Champion, would like to support the submission from The Woodland Trust to the City Plan Part 2 – received 22 September 2016. There is currently a lack of any strategic tree strategy across Brighton and Hove, and the submission from The Woodland Trust should be considered for inclusion onto the City Plan Part 2 in an attempt to rectify the situation.

Please indicate which topic or topics you would like to comment on?

From: jed
Sent: 22 September 2016 12:07
To: PlanningPolicy
Subject: City Plan Part 2 Scoping consultation

I support the recommendation to remove Study Area L6/E5 Site 18 at Hollingbury from the list of potential housing development in the draft City Plan.

J Dumbrill

Food Partnership response to City Plan Part 2 – Sept 2016

Introduction

The city's commitment to taking a systematic approach to achieving a healthy, sustainable and fair food system is set out in its [Food Strategy Spade to Spoon: Digging Deeper](#) (2012) agreed by Brighton & Hove City Council and adopted by the Local Strategic Partnership. One aim of the plan is to ensure that food is at the heart of planning and policy work with an action to see that the City Plan supports a sustainable food systems planning approach, recognises the need of land for food growing (especially on the urban fringe), space for food infrastructure and the importance of urban design that encourages healthy behaviour.

We would like to see the City Plan Part 2 make reference to the key elements put forward in the Local Government Association's joint report (with Public Health England and Town & Country Planning Association), [Building Foundations – Tackling obesity through Planning and Development](#). The report sets out six elements to help achieve healthy weight environments through the planning process. The six elements are: **movement and access; open spaces, recreation and play; food environment; neighbourhood spaces; building design; and local economy**. We feel this is very strong and would like to see many of the recommended local actions considered within the City Plan Part 2.

We will also be putting in a separate proposal to develop a new Supplementary Planning Document (SPD) around three key areas: **food growing; access to healthy food; and preventing obesogenic environments**. We believe that this is an important next step in order to help both planners and developers embed a food systems approach. The Brighton & Hove Food Partnership is willing to identify and secure financial resources in order to produce this SPD.

In the [City Sustainability Action Plan](#) (Sept 2015) (Local & Sustainable Food section, p22), there are key actions and targets relating to food production.

Increase food growing projects in city:

- (1) at least 1 new food growing project on council housing land e.g. Bevendean
- (2) Plant 2 community orchards /yr (over 5 trees).
- (3) 1 new demo garden in central location.
- (4) Progress plans to reinstate food growing at Stanmer Walled Garden.
- (5) support community food projects to be resilient and sustainable

If the city is to meet these targets, there should be some reference to them within the City Plan.

Food Partnership response to City Plan Part 2

2: Housing



In the development and adoption of the [Food Poverty Action Plan](#) (2015) a key theme that emerged as important in preventing food poverty (both crisis e.g. food bank use and ongoing e.g. people skipping meals / trading down to healthier choices) was the need for affordable, decent quality housing. We therefore support the needs to build good quality housing that is to a high energy efficiency standard as another key driver behind food poverty is the fuel vs food bill dilemma.

We welcome food playing a role within the City Plan but would like to see this strengthened to ensure food growing and access to healthy food is a key consideration in all future housing developments. We would like to develop a new Supplementary Planning Document (SPD) to support potential developers in achieving this vision.

QH2 - Urban Fringe Assessment

We would like a specific requirement for food growing space within any new developments within Urban Fringe Areas and the retention of the food growing space requirement for Toads Hole Valley. If space cannot be accommodated on site we would ask that a contribution from developers be found to support other food growing spaces accessible from the sites of new development. We feel that this would be appropriate due to overlap of those sites deemed suitable for development (within 2014 Urban Fringe Assessment) and those sites deemed suitable for food growing (within Food Growing Mapping work carried out by Food Matters on behalf of the Council as part of the One Planet Living Sustainability Plan). This mapping work has already been shared with the Planning team but we can send it again if required. The city's [Sustainability Action Plan](#) Sept 2015 (p25) has a medium/long-term action to see that food production is delivered on the majority of land identified as suitable by the mapping work undertaken.

The Local Plan Policy [QD21 – Allotments](#), will be deleted by City Plan Part 2. Allotments are mentioned on p 30, 115, 201, 211 of the City Plan, but nothing states clearly, as per QD21, that 'Planning permission will not be granted for proposals that would result in the loss of allotments.'

We strongly oppose building on any current allotment site in the city and would ask that they receive some sort of protection under the new plan.

QH5 & 6 – Urban fringe site allocation / Good mix of housing

The Food Poverty Action Plan (p3) identifies groups of people who are particularly at risk of food poverty and this includes families. Any steps that can be taken to specify affordable housing for groups at risk of food poverty including specific proportions of family housing should be taken.

Supporting Community Land Trust and other non-commercial house building through the planning process is one way that a good mix of housing could be built in the city. Also building on the city's eco-homes / sustainable building expertise and supporting the build of homes to ground breaking environmental standards

QH7 – Policy to ensure new development maximises site potential



In order to manage the tension between the need for open space and the need for good quality housing, policies that maximise site potential would have value.

Clear guidance around the importance of good quality shared open space in these policies (including food growing, leisure and biodiversity-rich space) would need to be developed. The importance of open space for activity and play is also key in preventing and reducing obesity in adults and children as is the design of developments to prevent obesogenic environments. We would ask that any policy takes a strong lead on both of these areas.

We would like to now strengthen the information available for developers by developing a new Supplementary Planning Document (SDP) around food which could highlight case studies on multi-functional land use – further detail on this can be found in a proposal which will be submitted to BHCC separately.

Additional supporting info via Sustainable Food Cities Network

Planning policy and growing

- Belfast City Council has led the development of a [Growing Communities Strategy 2012-2022](#) which aims to ensure that all parts of the community in Belfast have the opportunity to participate in and experience the benefits of growing. This includes as a key action the identification of new, sustainable sites for growing and the integration of green space provision in planning.
- The Royal Borough of Kensington and Chelsea has included food growing in the Climate Change section of their Core Strategy 2010 stating that: “The Council will: require development to incorporate measures that will contribute to on-site sustainable food production commensurate with the scale of development”.
<http://sustainablefoodcities.org/Portals/4/Planning%20Sustainable%20Cities%20and%20Community%20Food%20Growing.pdf>
- [Croydon Council](#) applies a presumption in favour of development provided applications assist in the delivery of a [Green Grid](#) which includes:
 - Protecting and enhancing allotments, community gardens and woodland; and
 - Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites; and encouraging major residential developments to incorporate edible planting and growing spaces at multiple floor levels; and
 - Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.

The policy derives from the [London Plan](#) which includes several strategic policies promoting productive landscapes and encourages boroughs to identify other potential spaces that could be used for commercial food production or for community gardening, including allotments and orchards.

QH10 - Self-build plots



We support site allocations that make provision for self-build and custom build housing because of the potential for both of these options to introduce affordable / sustainable housing and the potential for the Food Partnership to collaborate with such buildings to introduce multi-functional land use / shared space that includes community food growing.

QH20 – Concentrations of HMOs

A lack of shared housing options for younger working people (HMOs not used by students) is a challenge for people living and working in the city on a lower wage and anecdotally is resulting in people who would traditionally work in lower paid health and social care jobs leaving the city. If an increase in student housing can be achieved in order to meet the demand for student accommodation, a licencing scheme for non-student HMOs could be introduced. This would have the added benefit that whilst students are exempt from Council Tax, shared houses aren't.

QH21 – Other policy issues

We would like to now strengthen the information available for developers by developing a new Supplementary Planning Document (SDP) around food which could highlight case studies on multi-functional land use – further detail on this can be found in a proposal which will be submitted to BHCC separately.

4: Retail and town centre uses

QR6 – Restrict changes of use

We support policies that prevent the 'knocking together' of smaller shops to make larger shops in designated areas of the city because it is this practice that can price out smaller / start-up businesses in favour of the large chains. If the distinctive nature of certain areas of the city including the independent food retail – shops and restaurants, is to be maintained it is important the high street is not homogenised.

QR9 – Changes of use in local centres and parades

We would like to see access to healthy and sustainable food a consideration within planning around local parades of shops with restrictions on numbers of hot fast food outlets permitted so they do not dominate these important community parades.

Within the city's [Food Strategy](#) (Aim 3, p12), the following action is relevant to this question:
3.3 Safeguard the diversity of food retail including shops, markets and other outlets.

- Explore and learn from best practice in UK regarding use of planning and licensing around retail premises

- Explore potential for setting restrictions on any change of use to hot food takeaway (class A5).

Ensure that this issue is incorporated into the drafting and consultation for BHCCs City Plan Part 2.

The 2011 [impact study](#) on hot food takeaways near secondary schools (conducted by Brighton & Hove City Council) concluded that the focus of planning guidance should not be on hot food takeaways. However, given the success from several other parts of the country in introducing



policies to either restrict the number of hot food takeaways in proximity to schools, or by placing conditions relating to healthier catering in these establishments, we would therefore like to see this policy revisited.

Planning policy and access to healthy food – examples from across the Sustainable Food Cities Network

- [London Borough of Waltham Forest](#) has adopted Supplementary Planning Guidance to deny planning permission to new fast food outlets within 400 metres of schools. See this [report](#) from the LGA for guidance on the successful use of SPDs.
- London Borough of Islington adopted a [Location and Concentration of Uses Supplementary Planning Document](#) (p36) that conditions planning applications for new hot food takeaways to “achieve and operate in compliance with the [Healthy Catering Commitment standard](#).”
- [Leicester City Council](#) introduced a Street Trading Policy to prevent burger vans trading outside schools.
- [Hillingdon Council](#) has passed a resolution under Section 37(2) [London Local Authorities Act 1990 \(as amended\)](#), prohibiting itinerant ice cream trading in certain areas in the vicinity of schools and in streets falling in listed major retail areas.
- Guilford Council requires in its [Street Trading Requirements and Application Form](#) (p7) that “at least one healthy meal choice should be provided”. The document gives examples of such menus however, these could be updated to reflect current nutritional guidelines.
- The [London Borough of Barking and Dagenham](#) introduced a Supplementary Planning Document (SPD) that calls on Section 106 to levy a £1,000 charge on hot-food takeaway businesses when they are granted planning permission and assigns the proceeds exclusively to the Borough’s fight against obesity. This adds to the SPDs further restrictions imposed in terms of the appropriate location (not in proximity of schools) and concentration of hot food takeaways.
- The London Borough of Lambeth has also introduced a policy – ED9 Hot Food Takeaways near Schools, which attempts to prevent the establishment of hot food takeaways if they are within 400 metres of a primary or secondary school. Lambeth Public Health (NHS Lambeth) developed [supporting evidence](#) to the policy.
- This [study](#) shows that 21 authorities have a policy to restrict the number of takeaways near to schools, 15 of which have developed an SPD which they have quoted when refusing planning applications for hot food takeaways.

QR12 – Important Parades

Whilst we have not had time to do any research into this issue we feel that due to certain areas of the city having poor access to fresh food in walking distance, there may be value in designating some parades as ‘local parades’. If there is support for this idea we could work with you to identify which ones might meet this criteria due to access to fresh food.

Within the city’s [Food Strategy](#), there is an action (2.1, p11) to ensure that people throughout the city are within walking distance of outlets selling affordable fresh produce.

QR15 – Permanent markets

We welcome the opportunity for additional permanent markets, particularly in sites where access to affordable, fresh, healthy produce is currently not available. Markets also provide a way for new



businesses to start, for example, the Street Diner market has enabled a number of new local enterprises to start and expand.

If there is to be a new site for a market there should be an evaluation of and learning from the redevelopment of the Open Market and in particular the challenges of combining the residential units and a working market (for example opening and delivery times)

Any new permanent market would be better if this is covered space

6: Transport and Travel

We strongly support the emphasis on active travel throughout the city including measures to improve the rights of way and access to the South Downs National Park. Active travel is a key means of preventing and reducing obesity.

Within the city's [Food Strategy](#), there is an action (2.6, p11) to create healthier environments that encourage walking & cycling to do food shopping

7: Biodiversity and Open Space

QB9 – Local Green Space

We would like to see all allotments designated as Local Green Spaces due to their recognised value to wildlife and biodiversity and to the mental and physical health of residents. As much of the city's allotments are not statutory allotment land they do not have any protection and yet are a crucial part of the city's network of green spaces. With the deletion of QD21 we would like there to be more specific reference within City Plan Part 2 to the role of allotments and community food growing spaces.

We believe some of the city's community growing spaces, such as [Moulsecoomb Forest Garden](#), [Racehill Community Orchard](#) and the [Secret Garden](#), should also be designated as Local Green Spaces. We would be willing to work with the growing spaces and BHCC to demonstrate the range of benefits they bring both to people's health and to the local communities they are a part of.

9: Design & Amenity

QD9 – Design of new development

We would like to see stronger planning policy that relates to the integration of food growing in new developments and to the inclusion of design principles that prevent an obesogenic environment. If this is not to be achieved via a specific SPD we would like to see this better referenced within City Plan Part 2.

Within the city's [Food Strategy](#), the following actions (Aim 2, p11) are relevant to this section:

- 2.1 Ensure that people throughout the city are within walking distance of outlets selling affordable fresh produce.
- 2.6 Create healthier environments that encourage walking & cycling to do food shopping



In the [City Sustainability Action Plan](#) (Sept 2015) (Local & Sustainable Food section, p22) there is also a specific action for there to be facilities for food waste collections available at all buildings in the city with catering outlets. We would therefore like this to be incorporated within the City Plan part 2.

11: Community Facilities

CF7 – Community Facilities

Integrating kitchens that can be used to teach cookery and/ or to run shared meal projects (lunch clubs / cooking groups / pay as you feel cafes) will be an important tool in achieving the vision of ‘a city that cooks and eats together’ – a key aim within the city’s [Food Poverty Action Plan](#).

We recognise the value of community kitchens and venues that offer ‘shared meals’ in helping to address the impacts of food poverty by providing healthy food at an affordable cost with the benefits of reducing isolation and acting as a gateway to advice and further support. We would therefore like to see these important community facilities protected within the City Plan Part 2. We would be willing to work with BHCC to identify all the relevant sites.



A proposal for a new Supplementary Planning Document on food.

Introduction

The Brighton & Hove Food Partnership (BHFP) would like to work with Brighton & Hove City Council (BHCC) to develop a new **Supplementary Planning Document (SPD)** on food. This would focus on three key areas: **food growing; access to healthy food; and preventing obesogenic environments**. We believe that this is an important next step in order to help both planners and developers embed a food systems approach.

The Brighton & Hove Food Partnership is willing to identify and secure financial resources in order to produce this SPD. BHFP has a strong track record of working in this area and is able to commit some time towards developing the document, bringing in expertise from other partners including Brighton Permaculture Trust, Food Matters and Public Health.

The SPD could cover any one or all of these three key areas and we would welcome the opportunity to talk to you / colleagues in Public Health about how to take this forward.

Key considerations

1. Food growing

The SPD would further strengthen the information available, providing much-needed guidance for potential developers in successfully integrating food-growing spaces within their plans and subsequent developments. For example, the SPD would deliver appropriate responses to particular sites, e.g. what edible planting is suitable for large areas of landscaping; how far fruit trees should be positioned if in close proximity to major roads; what planting is possible within areas of contaminated soil. Good practice would be highlighted from both community gardens and allotments with additional detail on roof gardens, plus further detail on integrating blue and green infrastructure (including food waste recycling, rain water recycling, green roofs etc.).

2. Access to healthy food

A report on the implications for spatial planning arising from the [Marmot Review \(2010\)](#) noted that deprived areas could particularly benefit from policies which aim to improve availability of healthier food options and better access to shopping facilities, coupled with planning restrictions to control the density of fast food outlets. The SPD would therefore also provide significant guidance and highlight policies and best practice case studies from elsewhere to demonstrate how to help create a healthier built environment. For example, policies to restrict the quantity and opening hours of planned hot food takeaways, alongside a requirement for existing food outlets to improve the nutritional quality of food they serve – this could be addressed locally through the successful [Healthy Choice Award](#) scheme.

3. Preventing obesogenic environments

Clear guidance around the importance of good quality shared open space in these policies (including food growing, leisure and biodiversity-rich space) would need to be developed. The importance of open space



for activity and play is also key in preventing and reducing obesity in adults and children as is the design of developments to prevent obesogenic environments.

Background

The development of the new SPD on food would help to strengthen the guidance currently available. It would sit alongside the [SPD on Nature Conservation & Development](#) and the UK's first Planning Advisory Note ([PAN 06](#)) on Food Growing and Development, which BHFP helped to develop in conjunction with Food Matters and the Council as part of Harvest Brighton & Hove. This ground-breaking policy has been nationally recognised through a number of key awards (World Green Building Council, Royal Institute of Town Planners; and Construction in Excellence Awards) and has since been replicated widely by other cities as a result.

Providing robust guidance through this SPD would ensure a food systems approach is successfully embedded within the planning process, helping the city to meet important actions both within the citywide [Food Strategy](#) and the Local Government Association's report – [Tackling obesity through Planning and Development](#).

September 2016

Director
Brighton & Hove Food Partnership
Vic@bhfood.org.uk
01273 431 712 or 01273 431 700
www.bhfood.org.uk



A proposal for a new Supplementary Planning Document on food.

Introduction

The Brighton & Hove Food Partnership (BHFP) would like to work with Brighton & Hove City Council (BHCC) to develop a new **Supplementary Planning Document (SPD)** on food. This would focus on three key areas: **food growing; access to healthy food; and preventing obesogenic environments**. We believe that this is an important next step in order to help both planners and developers embed a food systems approach.

The Brighton & Hove Food Partnership is willing to identify and secure financial resources in order to produce this SPD. BHFP has a strong track record of working in this area and is able to commit some time towards developing the document, bringing in expertise from other partners including Brighton Permaculture Trust, Food Matters and Public Health.

The SPD could cover any one or all of these three key areas and we would welcome the opportunity to talk to you / colleagues in Public Health about how to take this forward.

Key considerations

1. Food growing

The SPD would further strengthen the information available, providing much-needed guidance for potential developers in successfully integrating food-growing spaces within their plans and subsequent developments. For example, the SPD would deliver appropriate responses to particular sites, e.g. what edible planting is suitable for large areas of landscaping; how far fruit trees should be positioned if in close proximity to major roads; what planting is possible within areas of contaminated soil. Good practice would be highlighted from both community gardens and allotments with additional detail on roof gardens, plus further detail on integrating blue and green infrastructure (including food waste recycling, rain water recycling, green roofs etc.).

2. Access to healthy food

A report on the implications for spatial planning arising from the [Marmot Review \(2010\)](#) noted that deprived areas could particularly benefit from policies which aim to improve availability of healthier food options and better access to shopping facilities, coupled with planning restrictions to control the density of fast food outlets. The SPD would therefore also provide significant guidance and highlight policies and best practice case studies from elsewhere to demonstrate how to help create a healthier built environment. For example, policies to restrict the quantity and opening hours of planned hot food takeaways, alongside a requirement for existing food outlets to improve the nutritional quality of food they serve – this could be addressed locally through the successful [Healthy Choice Award](#) scheme.

3. Preventing obesogenic environments

Clear guidance around the importance of good quality shared open space in these policies (including food growing, leisure and biodiversity-rich space) would need to be developed. The importance of open space



for activity and play is also key in preventing and reducing obesity in adults and children as is the design of developments to prevent obesogenic environments.

Background

The development of the new SPD on food would help to strengthen the guidance currently available. It would sit alongside the [SPD on Nature Conservation & Development](#) and the UK's first Planning Advisory Note ([PAN 06](#)) on Food Growing and Development, which BHFP helped to develop in conjunction with Food Matters and the Council as part of Harvest Brighton & Hove. This ground-breaking policy has been nationally recognised through a number of key awards (World Green Building Council, Royal Institute of Town Planners; and Construction in Excellence Awards) and has since been replicated widely by other cities as a result.

Providing robust guidance through this SPD would ensure a food systems approach is successfully embedded within the planning process, helping the city to meet important actions both within the citywide [Food Strategy](#) and the Local Government Association's report – [Tackling obesity through Planning and Development](#).

September 2016

Director
Brighton & Hove Food Partnership
Vic@bhfood.org.uk
01273 431 712 or 01273 431 700
www.bhfood.org.uk



City Plan Part 2 Consultation on the Scoping Document Brighton Society comments

2. HOUSING

Question H1

We fully support the intention to allocate suitable brownfield sites for housing. However we think that this has to be accompanied by some form of UDF that without being too prescriptive, should set out design parameters such as approximate density, suitable scale and height, and relevant visual considerations, particularly where sites lie within Conservation Areas.

Question H2

Yes – we think studies to consider the potential density of the sites reviewed is important – see para 3 below.

Question H3

We think most potential sites within the City boundaries have now been highlighted. However we think that it is essential for a liaison and dialogue with neighbouring local authorities such as Adur, and East and West Sussex are established. The housing problem is not just for Brighton & Hove – it affects the whole south coast region.

Question H4

We think as much guidance as possible should be given to developers, rather than leaving it up to them. After all the Planning Authority is just that – a Planning Authority. Guidance need not be prescriptive – but it should set some parameters within which suitable development proposals can be formulated.

Question H5

Yes – very much so. Almost 50% of the housing demand in the City is for 3 -4 bedroom homes.

Question H6

See paras 1 – 3 below

Question H7

See para 3 below

Question H8

Yes – it is important that these particular accommodation requirements are not overlooked – they may be suitable in some areas and not in others. Where they are, they should be included in the list of design parameters referred to above - and if necessary incentives as well - to ensure they are included.

Question H9

Yes – just as for Question 8 above

Question H10

There might be a few sites where this might be one of the options to be included in the design parameters, and it may go some way to providing opportunities for people to build their own houses who would not otherwise be able to afford a house. As a general principle we feel such developments would not contribute a lot to the housing targets.

Question H11

Yes

Question H12

Yes – all those listed under the question, subject to regular review of the actual requirements as discussed in para 1 below.

Question H13

Most certainly yes. As the population density increases, the provision of private open space becomes crucial. One has to assume also that in some cases, as families grow, they might be trapped within their existing flat for financial reasons and are unable to move on to larger accommodation.

Question H14

Yes. The more guidance the better. Otherwise it won't be provided.

There are some further comments we would make:

1. Monitoring of housing targets

It is important to carry out monitoring of housing targets on a frequent and regular basis. Besides the annual targets for the various categories of housing (i.e private, affordable, size of units - 1-bed, 2-bed 3-bed etc.), the reviews should refer to the actual target, the planning approvals granted and the numbers of units built. Reviews should be carried out at six monthly intervals and the results posted on the Council website.

The review should highlight the numbers of 'windfall' developments which were not specifically included in the official targets.

2. Housing stock information

Information should also be collected and published on the existing housing stock, in particular the take up of newly built units.

The information should include the numbers of privately owned dwellings, the number of rental properties (both private and social housing), the number of HMOs and occupants, the number of second homes, the number and type of vacant properties, and the numbers of short term lets such as Air BnBs. If possible it should also establish the numbers of properties bought as investments by absentee owners.

This information should also be posted on the Council website.

3. Housing densities

It is important to be clear about the sort of housing densities are suitable for the range of sites and locations identified in both parts of the City Plan. For

example this lack of guidance accounts for densities of 612 dwellings per hectare (dph) being proposed for the recent 17-storey application for the Sackville Hotel site which is ridiculously high, and the Anston House application at 388 dph is probably also too high. The density for the Ellen Street development in Hove is 470 dph.

On the other hand, Policy CP14 of the City Plan in its proposals for DA1 – 6 and DA8, seems to indicate that 100dph in central DA city sites and 50 dph outside these DAs would be suitable – both of which seem to be unrealistically low.

It is important to realise that high density does not necessarily mean tall buildings. The Brighton Society has demonstrated in its objection to Anston House that a low rise solution providing more units than the 229 proposed can be achieved in buildings of 7 – 10 storeys rather than the 13, 14 and 15 storey towers proposed by the developers.

Providing this sort of guidance to developers as to the preferred levels of densities appropriate for particular sites is not a difficult problem and would be indicative without being prescriptive. Actual densities higher or lower would (as is currently the case) depend on other planning considerations on a site by site basis, but would be considered within the parameters of a realistic density target for the city area concerned.

Additional comment on City Plan Part 2 Background Study on Strategic Housing Land Availability. Specifically with reference to Assessment of Urban Fringe Sites 2015.

Study Area L6/L5, Site 18 Land east of Ditchling Road adjacent to the reservoir. The conclusion contained within the assessment "That it would not be possible to avoid or mitigate significant landscape impacts, and that it recommends that this Study Area is removed as an urban fringe site with potential for housing". We previously submitted objections to this proposed site based on the detrimental effects on the landscape. We therefore fully support the decision to remove this site for potential housing from the City Plan.

6. TRANSPORT

TR1. Policy CP9 in Part 1 is sufficient

TR4. General transport mitigation should be linked to developer contribution. Issues such as air quality, noise, public realm and sustainability must be part of any consideration of developments and a linkage to contribution would seem to be a logical step.

TR5./TR6. Provision of a policy in Part Two would be possible but in terms of providing more clarity the use of a Planning Advice Note would be less cumbersome and would provide greater flexibility for adjustment and amendment in the future.

TR9. The linkage between transport mitigation policy and developer contribution should be part of any consideration of a development.

9. DESIGN AND AMENITY

Tall Buildings and Urban Design Frameworks

This topic is vitally important given the increasing number of applications coming forward for tall buildings both inside and outside the areas designated for tall buildings within the City.

For example, both the first and second highly contentious planning applications for Anston House would have been far easier to deal with had the parameters for the design of the buildings in terms of height, bulk, their effect on listed Preston Park and the surrounding topography, as well as views both from the park itself and from the surrounding residential areas on the valley sides above, been included in an Urban Design Framework Study within the Tall Buildings guidance for that area of the City.

A study of the views included in the planning application from the north east of the new buildings, demonstrate clearly that taller buildings would fit far better into the northern end of Preston Road where from most viewpoints they would sit below the tops of the surrounding slopes, rather than at the southern end where the buildings project uncomfortably above the skyline.

A study would have shown that tall buildings above about 10 storeys are not suitable at the southern end of the park because of this - and also because the park is considerably narrower at its southern end, and thus less subject to the substantial overshadowing of key areas of the park that applications for buildings up to 15 storeys will create.

Another example where the lack of an Urban Design Framework has caused problems is the Sackville Tower proposal, though how the 17 storey proposal ever got as far as it did even without a UDF is extremely concerning.

The Sackville hotel site is within a Conservation Area, which includes 4 – 5 storey Victorian terraces of some considerable character each side of the site. Although that stretch of Kingsway is within an area designated for tall buildings of 6 – 8 storeys, it has to be presumed that Conservation Area status has to take precedence over a planning guidance note. A UDF would surely have stated this obvious priority.

So a development of about five storeys to match the adjacent buildings along that section of Kingsway within the Conservation Area would seem to be a sensible solution, and one which, had there been a UDF in place, should have been quite clear. So how did it get to the point where an enormous amount of time, effort and money went into a proposal for a totally unsuitable 17- storey building on that site?

It is clear from these two examples that that the lack of clearly defined design parameters within the tall buildings guidance is responsible for developers making up their own rules and shows too, how urgent it is to complete these UDFs and incorporate them within the tall buildings guidance.

Placemaking

We fully support the current policy framework asking *that “new development take account of context, architecture, sustainability, built and archaeological heritage, patterns of movement and access, landscaping, opportunities for deterring crime and impact upon long views”*.

To this we would add two further considerations:

1. The public interest

We have seen too often where the public interest has been sacrificed for private gain – for example the recent (approved) planning application for redevelopment on Marine Parade of a long single storey building projecting above street level along a lengthy stretch of Marine Parade to create a private club, cafes etc. This development completely cuts off existing public views of the sea, the pier and the western seafront, only for the benefit of the developer. This represents a considerable loss of public amenity and should never have been permitted.

Another example is the current (and second) planning application to construct a restaurant high above Bartholomew Square, cutting off views of the sky and causing considerable overshadowing of a public space. This is quite unacceptable.

A third example is the tall buildings policy. Two recent applications – The Texaco site in Hove and the 17 storey tower in the Ellen Street redevelopment near Hove Station – where buildings are either out of scale with their surroundings in adjacent Conservation Areas (Texaco site) or unnecessarily project above existing skylines in long views from Hove Park and beyond – all for the sake of one or two dwelling units. The top two floors of the Ellen Street tower for example, contain only 2 flats, as do the top two floors of the Texaco site building.

The public interest must take priority over private interests (unless the two complement each other), and this principle should be specifically expressed in the Planning Policy.

2. **Architectural Design**

Can we make a plea for architectural design to be “polite”? So many planning applications, many within Conservation Areas - as these make up a large proportion of the central City area - take too little account of the surrounding buildings in terms of scale, height, modelling, character or materials.

This is not a plea for pastiche – anything but. There have been a few good examples which illustrate the point we are making – the recent proposals for new buildings including a backpacker hotel and other uses between West Street, Middle Street and South Street, are well designed and respect the scale of the streets they are part of. Higher buildings included in the scheme are set back so that they are virtually invisible from the surrounding streets. Their architectural language is also polite to the neighbouring buildings in terms of scale, modelling and materials.

Another important consideration is the choice of materials. So many of the current crop of designs have rendered facades. In some instances this is acceptable where a new building needs to relate to its neighbours, but as a general principle we think it should be discouraged where other materials would be acceptable, on grounds of ensuring that appearance of the buildings is maintained in the long term. So many of these rendered boxes pay inadequate attention to the weathering details, inevitably resulting in a few year’s time, in unsightly staining of the rendered wall finish to the considerable detriment not only of the building in question, but also the quality of appearance of the surroundings.

The question of expert review is a good suggestion. Groups like the Conservation Advisory Group (CAG) already assist the Council in advising on planning applications within Conservation Areas and to Listed Buildings – maybe this idea could be extended to a similarly constituted group which could also consider pre-application advice, particularly as this aspect of planning advice is now being effectively restricted both by lack of officer time and fees for advisory meetings which applicants for smaller proposals in particular, may choose not to pay.

How this might be achieved would require careful thought and consideration. The Brighton Society would be willing to participate in any preliminary discussions on the subject. We would also suggest that any groups of experts should be comprised of people with a good local knowledge and understanding of the City and its planning policies, history and background, rather than “experts” from outside the area such as the South Eastern Design Panel.

3. **Conservation Areas and nearby sites which affect those CAs**

High design standards are particularly important in these areas, in particular the recognition of context, scale and the principle of sympathetic design in relation to adjacent buildings within the Conservation Area. This “higher

standard” should also apply to new buildings on sites immediately adjacent to a Conservation Area.

4. Extensions and Alterations

SPD12 is a useful document. In some ways we feel it is too prescriptive – a degree of flexibility to cover particular circumstances would we think be an improvement. A general clause stating the objectives of the guidance and the importance of the principles of respect for neighbours, the visual characteristics of the area, and ‘polite’ design might be sufficient.

5. Protection of Residential Amenity

As intensification of development within the City increases, problems of overlooking, overshadowing, loss of sunlight etc. will become more critical. It is therefore important that existing rights to these amenities are protected from development proposals which threaten them.

It comes back to ‘polite’ design. Planning Policy must address this problem and ensure that good design can result not only in more housing but also protection of residents’ existing amenities.

6. Graffiti

We can find no reference to graffiti in the scoping document, and are not sure under which heading this should be covered.

The sheer extent of uncontrolled graffiti is an increasing problem particularly in Conservation Areas such as the North Laine, where certain parts of the CA are completely desecrated by gaudy, scruffy and generally unattractive spray paint.

There are certain situations where graffiti may be acceptable, but we feel strongly that this problem has to be brought under some form of planning control and enforcement.

7. Negative Statement regarding the importance of amenity in Scoping Document

In 9.15 there is a statement "This would offer the opportunity to ensure that amenity matters are not used as a means to prevent the effective use of sites". This seems to suggest that any detrimental effect on the local amenity of an area should not be used to prevent development. The effect on the local area is one of the most critical aspects of considering proposed developments so as it stands this statement is misleading and certainly goes against the many other statements in the Design and Amenity Section. A rewording of this sentence is imperative.

10. HERITAGE

Vulnerabilities

HR9: Many of the conservation areas, especially some of the more centrally situated, are vulnerable to a general ignorance, resulting in disrespect and detriment. Local public knowledge or awareness of the existence and extent of an area's conservation status is generally deficient in the city. Education of the public in this matter could be improved through policy statements on a number of fronts:

Tourism and visitor initiatives could be expected to make more reference to these designations, for example colour shaded maps and web pages. Voluntary amenity and conservation societies can actively support measures such as Article 4 directions, and can help to promote knowledge of conservation issues, but the commercial sector could be encouraged to contribute as well. In the context of retail provision, lawyers and estate and property agencies for example could be urged to highlight more boldly and positively properties' location in conservation areas.

Environmental, transport and community policies should note the virtue of de-cluttering streetscapes and vistas, and cooperate in the introduction of subtle signage indicating conservation areas' titles. Moreover local authority services such as highways, lighting and refuse should be required to consult on heritage implications before pursuing plans for city-wide or neighbourhood facilities and products.

HR1, HR2 & HR15: In the heritage policy, there should be a much more forthright assertion of the significance of the city's exceptional historic decorative and ornamental infrastructure and street furniture. The seafront strategy stresses the need for higher priority in the regular maintenance of these neglected features, and this point should be reinforced in the city plan.

HR7: The plan should also address problems presented by graffiti, murals and informal public art. The historic visual character of the city is at risk from an uncontrolled proliferation of intrusive and intimidating script and imagery.

Important groupings

HR3: The Royal Pavilion, together with its neighbouring associated buildings and grounds, merits a specific paragraph in the heritage policy.

While Grade 1 and 2* buildings enjoy special protection, and the needs of individual listed buildings are dealt with in the revised conservation strategy document, nevertheless there is a case for including a paragraph in the city plan concerned with grand schemes such as Kemp Town and Brunswick, and Hove Engineerium, so that the sensitivity of these to the impact of new development and surrounding land use is properly recognised.

Gaps in Knowledge and Understanding

HR5 & HR6: The relationship of the city's architecture with its underlying topography and geology ought to be better known, and the heritage policy could include reference to this.

A number of Brighton born-and-bred historic artists and scientists have achieved lasting international renown – not least the composer Frank Bridge and artist Aubrey Beardsley. These figures are undervalued in the general cultural profile of the city and could be noted in the policy as candidates for exceptional commemoration in the public realm. Judicious place naming can honour legacy in a category different from blue plaques (though it is unfortunate and inappropriate that the Madeira Terrace is now named Max Miller Walk, and the Madeira Walk's name is practically forgotten).

Design in historic and heritage settings

HR11: The need for design in these settings that is sympathetic to or genuinely revivifying for them is set out in statutory and detailed local guidance but receives only mild, arguably equivocal, confirmation in the city plan.

The relevance of historic vernacular forms and local building materials, as distinct from superficial fashions of the past, could be noted; and more could be made of vestiges and emblems of historic industries and crafts.

The principles underpinning the role and work of the city's conservation advisory group might also be mentioned somewhere, so that the continuance of a consultative process of this kind is assured.

Promotion of local distinctiveness through planning

HR12: There are aspects of profound distinctiveness that are local to the city as a whole. The focus in planning policy on listed buildings, conservation areas and notable neighbourhoods is vital, but there are certain thoroughgoing phenomena, such as sea views and urban downland cityscape, that could be connected to the standard and statutory heritage considerations, so that planning policy protects the unique overall shape and character of the city and not merely long views.

12. STUDENT ACCOMMODATION

Question Numbers are from Housing Section - comments are specifically with reference to student accommodation/HMO's.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Developers for student housing should be required to contribute towards new-build affordable housing, thus reducing yields and ensuring that a good mix of housing is delivered.

Developers are building student housing which is less expensive to build, with better returns. An example is the old Co-op site along London Road which would have provided much needed housing.

When a transient population of young people becomes the dominant demographic it is to the detriment of permanent residents.

Retaining housing H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Loss of housing from the existing housing stock should be resisted. Planning policies regarding HMOs should be strengthened.

H: Houses in Multiple Occupation (HMOs) H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No. Protecting existing HMOs would result in less availability for residential use in the future.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes. Family sized homes are much needed. In certain areas in the city the concentration of HMOs is excessive and policies to reduce the level of HMOs should be implemented. This should include a quota system on an area-by-area, or for each ward, basis. The current 10% limit is exceeded in many areas and has been for years. Indeed, it is 80% in some streets. Families are being pushed out to outer areas due to the proliferation of mainly student HMOs. The increase in the number of students year-on-year means that these students will be looking for homes to rent after their first year, adding to the high number of HMOs already registered. The loss of family housing will therefore increase.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

See above (H19).

And: Air B&B and party houses – This city-wide issue is a problem. We are aware that the present regulations such as the regulations on HMOs and environmental regulations do not cover them. AirB&B, party houses, and

holiday lets are classed as *sui generis*. We would appreciate investigations in this area and hope that a way of regulating this area of the economy is found.

Submitted on behalf of the Brighton Society Committee. 21st September 2016.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	136
Response Date	22/09/16 12:59
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

I think that the council should not allow any planning application for St Aubyns Rottingdean which includes a proposal in the development, any building on the St Aubyns playing field. St Aubyns Field is and historically always has been a playing field and therefore should never be built on.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Ensure that there is a proportion of smaller affordable homes within every development of more than ten houses.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

No but I think grants should be available for those people to adapt their property to suit their needs.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

All of the above

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Left to the market because there is already insufficient accommodation for both students and single people who are working and living away from home and cannot afford to buy a place of their own. There will always be annexed for HMO properties.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Not all HMOs have a negative impact. I feel your question is very much biased towards student HMO properties but even those are needed with two universities in the city neither of which can provide accommodation for their first year students let alone second, third, fourth year and PhD students.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	137
Response Date	22/09/16 13:09
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Housing
- . Retail and town centre uses
- . Biodiversity and Open Spaces
- . Addressing pollution, water and energy resources
- . Call for sites

Organisation Name (If Applicable)

The Woodland Trust

Individual Name

Individual Email

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered the sections above) that you think City Plan Part Two should seek to address?

1) We would wish to see new and existing trees planned into new development at an early stage. We would wish to tree cover increased. Rationale: Trees and green spaces are extremely important in new housing developments. Over 80 per cent of the population in this country now live in towns and the benefits of providing high quality green spaces is widely recognised. These vital spaces can be taken for granted but add significant value to developments in terms of social, economic and environmental benefits. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the benefits they can provide. For more information on this, see our report 'Residential Development and Trees' : <http://www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/> Old individual trees are an important part of our cultural and landscape heritage : ancient, veteran and notable trees resonate with the history of the landscape and form markers in the lives of individual people and communities. Ancient trees also have a special conservation value, supporting many species of epiphytes, invertebrates and fungi, whilst also providing a habitat for other animals including owls, woodpeckers, other hole nesting birds and bats. In addition, trees make a significant contribution to the urban environment both in visual terms and in helping to abate air pollution and create oxygen. It is important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. 2) We would wish to see ancient woodland protected and buffered from development. Rationale: Ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of biodiversity, but because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable. Their long continuity and lack of disturbance means ancient woods are often also living history books, preserving archaeological features and

evidence of past land use, from earthworks to charcoal pits. They are also places of great aesthetic appeal, making them attractive for recreation and the many benefits this can bring in terms of health and well being. With only 2.4% of the land area in Great Britain covered by ancient woodland, it is essential that no more of this finite resource is lost. This means that ancient woodland must be protected absolutely from permanent clearance, but also that it must be protected from damaging effects of adjacent and nearby land-use that could threaten the integrity of the habitat and survival of its special characteristics. It is not possible to replace ancient woodland by planting a new site, or attempting translocation. Ever ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna.

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

We would wish to see the number of street trees increased. Rationale: Trees in the urban environment provide a huge number of benefits (eg reducing the heat island effect, improving air quality and reducing noise pollution). An important publication from the Forestry Commission, *The Case for Trees in development and the urban environment* (Forestry Commission, July 2010), sets out 'The multiple value of trees for people and places – increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial', and lists (on p.10) the benefits as – Climate change contributions Environment advantages Economic dividends Social benefits. Trees within our towns and cities provide a huge number of benefits and services as outlined in guidance produced by the Trees and Design Action Group - 'No Trees, No Future' (Trees and Design Action Group, 2010): 'There is a growing body of evidence that trees in urban areas bring a wide range of benefits. Economic benefits of urban trees: • Trees can increase property values by 7-15 per cent. • As trees grow larger, the lift they give to property values grows proportionately. • They can improve environmental performance of buildings by reducing heating and cooling costs, thereby cutting bills. • Mature landscapes with trees can be worth more as development sites. • Trees create a positive perception of a place for potential proper buyers. • Urban trees improve the health of local populations, reducing healthcare costs. • Trees can enhance the prospect of securing planning permission. • They can provide a potential long-term renewable energy resource. Social benefits of urban trees: • Trees help create a sense of place and local identity. • They benefit communities by increasing pride in the local area. • They create focal points and landmarks. • They have a positive impact on people's physical and mental health. They have a positive impact on crime reduction. Environmental benefits of urban trees: • Urban trees reduce the 'urban heat island effect' of localised temperature extremes. • They provide shade, making streets and buildings cooler in summer. They help remove dust and particulates from the air. • They help to reduce traffic noise by absorbing and deflecting sound. • They help to reduce wind speeds. • By providing food and shelter for wildlife they help increase biodiversity. They reduce the effects of flash flooding by slowing the rate at which rainfall reaches the ground. • When planted on polluted ground they help improve its quality. Full report: www.forestry.gov.uk/tdag There is evidence that urban trees remove large amounts of air pollution and improve urban air quality (Nowak et al 2006). Columbia University researchers found asthma rates among children aged four and five fell by a quarter for every additional 343 trees per square kilometre (Lovasi et al 2008). The UK has one of the world's highest rates of childhood asthma, with about 15 per cent of children affected and a higher prevalence in lower socio economic groups in urban areas (Townshend 2007). It is also important that we plant more native trees to mitigate the potential impact of tree disease on current tree stock. References: Lo G., Quinn, J., Neckerman, K., Perzanowski, M. & Rundle, A. (2008) Children living in areas with more street trees have lower prevalence of asthma. *Journal of Epidemiology & Community Health*, 62(7), pp. 647-649 Nowak, D., Crane, D. Stevens, J. (2006) Air pollution removal by urban trees and shrubs in the United States, *Urban Forestry Urban Greening*, 4, pp. 115-23 Townshend, J., Hails, S. & McKean, M. (2007) Diagnosis of asthma in children, *British Medical Journal*, 28; 335(7612), pp. 198-202

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B7: Are there any other sites or features that should be included or specifically addressed through planning policy (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

We would wish to see ancient woodland and aged/veteran trees addressed in this document. We would wish to see a target to increase tree cover; this with help to mitigate the effects of climate change, as well as providing many other benefits (eg improving air quality and potentially reducing flood risk).

B10: Do you consider the following green spaces should be designated Local Green Spaces?

P7: Are there other pollution issues that the City Plan should address?

We would wish to see mention of the role of tree planted as a way to improve air quality.

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan P 2 should seek to address?

We would wish to see mention of the role of trees in water management. Woods, trees and hedgerows can play a key role in water management whether reducing flood risk, improving water quality or helping freshwater wildlife thrive and sur - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf) - <https://www.woodlandtrust.org.uk/publications/2008/03/woodland-actions-for-biodiversity-and-their-role-in-water-management/>. Trees can deliver the following water environment benefits. Water quality and river ecology • Trees trap and retain nutr (such as phosphates and nitrates) and sediment in polluted run-off before it reaches rivers and streams. • They can also prevent spray drift of pesticides by providing a physical barrier between fields and watercourses. • Trees provide shade that is essential in helping prevent a rise in river temperatures and helping freshwater wildlife adapt to climate change Trees can also provide a source of woody debris in rivers and streams which is beneficial for many species of plants invertebrates and fish. Flood risk Trees and woodland can reduce localised flooding and alleviate the effects of larger floods in a variety of ways, including: • Water penetrates more deeply into the woodland soils (higher infiltration rates) leading to less surface run-off. • Trees, shrubs and large woody debris alongside rivers and streams and on floodplains act a a drag on flood waters, slowing down floods and increasing water storage. • Trees protect soil from erosion and reduce the sediment run-off, which help the passage of water in river channels, reducing the need for dredging. • The greater water use of trees can reduce the volume of flood water at source. • Trees slow the speed at which rain reaches the ground, with some rain evaporating into the atmosphere - even in winter native deciduous trees intercept up to 12% if rainfall. Drought Trees can reduce the impact of drought as, under the right conditions, shelterbelts can enable crops to use water more efficiently which could reduce the need for irrigation and lead to less abstraction. Flooding, in particular has a devastating – and costly – impact of homes, businesses and infrastructure. Annual flood damage costs are in the region of £1.1bn and could rise to 25bn by 2080. Europe Economics calculate in their publication The Economic Benefits of Woodland (January 2015) that: “the potential value in terms of flood risk reduction of managing a hectare of woodland located in the upper Thames catchment could be £350 to £500 per hectare, per year”. A joint Environment Agency/Forestr Commission publication Woodland for Water: Woodland measures for meeting Water Framework objectives states clear that: ‘There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives’ (Environment Agency, July 2011- <http://www.forestry.gov.uk/fr/woodlandforwater>).

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	138
Response Date	22/09/16 13:11
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces
 . Heritage
 . Community facilities

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

We believe that the few green spaces in Saltdean and the rest of the Deans should be preserved and in particular The Oval should have protected status.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

The Oval in Saltdean is already an open space but has no protection from travellers' groups - we feel the security of this site should be improved

B10: Do you consider the following green spaces should be designated Local Green Spaces?

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

Saltdean Lido - the CIC have done tremendous work in raising funds to restore this heritag site and deserve to have unswerving support from BHCC especially financial

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

The total lack of knowledge about what happened to the sub station that supplied the Lido and which the CIC has to raise an extra £75K to re-instate.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	139
Response Date	22/09/16 13:11
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Heritage

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Housing in the Urban fringe should not take place until all the Brown field sites have been fully developed within the city, to develop any of the urban fringe sites before a brown field site goes against all logical reason.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

the old brown field sites along Preston road (old office blocks and waste ground) close to the viaduct start of Preston park and Preston road (between lovers walk and Dyke RD Drive) these sites have been stood empty of derelict for at least 15 plus year and need immediate development.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

general criteria

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

If developing on urban fringe after Brown field site are fully utilized then Family housing should only be specified as these would fit more into the local urban fringe areas.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No as this then goes against the local housing landscape i.e. you wouldn't place a 10 story block of flats in Rottingdean i.e. certain housing / accommodation fits in certain areas, and the infrastructure i.e transport needs to be able to cope. until there is another access road to the east of the city up to the a27 then large scale building past Kempton would gridlock all the roads. we need another road at the back of saltdean or peacehaven out of the city to the A27.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

yes

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

no

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Family homes

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

no

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

yes these need to be protected and not left to the market.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

no

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

no

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

more detailed policy on travel etc is needed

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

New roads to move traffic out of the city.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

yes

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

yes

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

main roads out of the city to reduce traffic at peak times, currently there are only 4 mains routes out of the city all the roads are single lane with multiple traffic lights that hold up the traffic in and out of town, a new road to the east of the city or widening of existing roads needs to occur.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

yes

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

heritage brings in business it needs to be maintained

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

yes

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

lots

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

what tourism money it does actually bring in

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

no

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

yes

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

yes

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

city wide

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

yes

Please indicate which topic or topics you would like to comment on?

One Chapel Place
London
W1G 0BG

T: 020 7518 3200
F: 020 7408 9238

Your ref:
Our ref: 3760665v1

Planning Policy Team
Planning and Building Control
Brighton & Hove City Council
2nd Floor
King's House
Ground Avenue
Hove
BN3 2L

21 September 2016

Dear Madam

BRIGHTON AND HOVE CITY PLAN PART TWO – SCOPING DOCUMENT REPRESENTATIONS

Please find attached four separate forms in response to the Council's request for comments on its City Plan Part Two Scoping Document.

These submissions are made on behalf of Newton Lodge Property and GN in the context of their land ownership at the Brighton Gasworks site on Boundary Road. These sites include site allocation A2 in the City Plan Part One, known as Brighton Marina, Gasworks and Black Rock Area.

I would be grateful if you could confirm that their presentations have been sufficiently reviewed and I would also be grateful if you could continue to keep us informed of further progress into this Part of the City Plan moving forward.

The attached representations should be self-explanatory. However, should you have any further comments or queries, please do not hesitate to contact me at the above address.

Yours faithfully

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Housing

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Housing Summary:

Key objective is to maintain attractive and vibrant shopping centres. The section invites comments on relevant matters including: Shopping centre boundaries; local centres and parades; mix and balance of retail uses; special retail areas; uses in centres above ground floor; and, markets.

This form has two parts: Part A – Personal Details
Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title	N/A	
Forename		
Surname		
Job Title		
Organisation		Carter Jonas LLP on behalf of National Grid Property/SGN
Address		One Chapel Place London
Postcode		W1G 0BG
Email Address		
Telephone No.		0207 5183200
Mobile No.		

Part B: Your Comments

A: General housing (Use Class C3) supply and additional site allocations

Question H1

Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period?

(NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

This is a sensible approach with emerging Government Policy in mind and the need to protect and designate housing sites in the area, given the shortage of housing identified at Stage 1 of the City Plan.

It is important to ensure that any sites listed on a brownfield register are not unduly restricted in terms of density. It is vital that best use of brownfield land is supported in line with the NPPF, particularly in the context of the identified need for housing in Brighton.

As the City Council boundary is restricted by green belt, the South Downs National Park and the coastline, it is even more important to ensure that brownfield land is utilised to its full potential.

Question H2

The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Whilst it is acknowledged that this question relates to urban fringe sites, we consider that there is the potential to increase and review density of existing strategic sites. Policy DA2 which relates to the Brighton Marina relates to a minimum of 85 residential units and 2,000 sqm of business floorspace.

There are viability concerns over the 2,000 sqm of business floor space and in line with our previous representations into Part 1 of the City Plan, we consider that gas holder site can and should promote more new homes in this location. National planning policy is pushing to ensure that employment designations are not retained where viability is likely to be an issue and whilst we understand that the existing allocation is trying to link the site to the Bell Tower industrial site to the north west, we do not consider that this link should be pursued in this instance.

This site is suitable for a high quality residentially-led scheme and planning policy should reflect this in order to meet the considerable shortfall in housing identified by the Inspector in relation to Stage 1 of the City Plan.

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Question H3

Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

As per the response to Question H2 above, the gas works element of Policy DA2 has significant potential for an increase in housing numbers and this should be recognised in Part 2 of the City Plan.

B: Housing mix – dwelling types, sizes and tenures

Question H4

Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

This should be left to a more general criteria-based planning policy.

Each site will be unique and will present its own challenges in terms of efficient use of space and design and these characteristics, alongside the site location can and should be reflected on a site by site basis. This will allow for flexibility of delivery over the Plan period and will ensure planning policy is not unduly prescriptive.

Question H5

On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city’s lack of suitable sites for family sized housing?

This should be considered on a site by site basis, dependant on the site characteristics. Seeking a specific proportion of family sized dwellings could provide an inflexible policy, which could reduce the ability to make best use of brownfield land.

Question H6

Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Any future planning policy should be flexible to reflect site specific requirements. This should be led by the market, which will respond appropriately on a site specific basis.

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

C: Making full and effective use of sites

Question H7

Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

This suggestion is strongly supported. The under-utilisation of brownfield sites is one of the biggest threats to housing delivery in Brighton and Hove and a policy of this nature is extremely important. Each site should be considered on its merits and a design response to local context will be vital to ensure that no opportunities are missed to maximise housing development potential.

D: Housing for key groups in the city

Question H8

Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Planning policy should not be overly prescriptive. A generic housing mix policy, which provides flexibility, will allow a variety of housing options to come forward in line with the demand for certain types of facility.

Question H9

Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

No. This approach would prevent the chances of providing mixed communities and would be unduly prescriptive. This market should decide with a degree of guidance from the Council's SHMA, but this should be applied on a site-specific basis.

Question H10

Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

-

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

E: Retaining housing

Question H11

Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

-

Question H12

Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs?

-

F: Private outdoor amenity space in new housing development

Question H13

Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

This should not be set out in a prescriptive policy. Solutions for outdoor amenity space should be provided on a site by site basis.

Question H14

Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Guidance on important elements of amenity space could be helpful but any policy should not be unduly restrictive and will need to consider site specific aspects.

G: Access and space standards in new housing development

Question H15

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

A national space standard is understood to be an important factor to ensure future housing stock is of sufficient quality. However, it is not considered necessary to apply these standards on a mandatory basis, because unique site circumstances could require deviation from a national standard and therefore any future policy should be worded accordingly.

Question H16

Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

-

Question H17

Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

Government guidance has recently moved away from sustainability requirements such as the Code for Sustainable Homes (CSH), in order to ensure that viability concerns do not unduly impact on the delivery of new homes. Therefore, the detailed policies in Part 2 of the Plan should be sufficiently flexible, so as to not impact on much needed housing delivery within Brighton and Hove.

H: Houses in Multiple Occupation (HMOs)

Question H18

Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

-

Question H19

Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

-

Question H20

Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

-

I: Are there any other housing issues?

Question H21

Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

NB: This consultation also includes separate sections on Student Housing and Traveller Accommodation.

-

Signed/typed*:	Carter Jonas LLP.
Dated*:	22 September 2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Economy and Employment

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Economy & Employment Summary:

Key objective is supporting local businesses and building on the success of the city's local and regional economy. The section invites comments on relevant matters including: the identification of sites for offices, industrial uses, mixed use and other employment uses; safeguarding sites; and, promotion of specific employment types.

This form has two parts: Part A – Personal Details
Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title	N/A	
Forename		
Surname		
Job Title		Partner
Organisation		Carter Jonas LLP on behalf of National Grid Property/SGN
Address		One Chapel Place
		London
Postcode		W1G 0BG
Email Address		
Telephone No.		0207 5183200
Mobile No.		

Part B: Your Comments

A: Offices

Question E1

Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

The Gas works site DA2 includes an element of 2,000 sqm of business floor space.

We feel that this has been incorrectly allocated in lieu of the site's industrial past. The location of the site is ideal for a comprehensive housing development and given the cost constraints of remediating a gas works site and the need to ensure best use of brownfield land; we feel this allocation should be reviewed in the context of meeting unmet housing need with Brighton and Hove.

Question E2

How can we better support the delivery of office sites in the city?

-

Question E3

In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

-

B: Mixed Employment Areas and mixed use allocations

Question E4

Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

-

Question E5

Are there any sites you are aware of that would be suitable for mixed use employment uses and that you would like to see considered for allocation through City Plan Part 2?

-

Question E6

Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

-

C: Industrial

Question E7

Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

-

Question E8

Are there any opportunities to identify and safeguard land/site for a new industrial estate in the city? If yes, where?

-

Question E9

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Are there opportunities to intensify existing industrial estates to bring forward new industrial floorspace? If so, which estates?

-

Question E10

Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

-

Question E11

Are there any other opportunities to bring forward new industrial floorspace in the city?

-

D: Are there any other employment issues?

Question E12

Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

-

Signed/typed*:	Alister Henderson
Dated*:	22 September 2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Transport and Travel

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Transport and Travel Summary:

Key objective is the provision of an integrated, safe and sustainable transport system that meets the needs of future development. The section invites comments on relevant matters including: air quality and noise issues; Transport Assessments, Statements and Travel Plans; increasing active travel, equality, mobility and accessibility; and, identification of sites such as park & ride, coach and lorry parking

This form has two parts: Part A – Personal Details
Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title	N/A	
Forename		
Surname		
Job Title		Partner
Organisation		Carter Jonas LLP on behalf of National Grid Property/SGN
Address		One Chapel Place
		London
Postcode		W1G 0BG
Email Address		
Telephone No.		0207 5183200

Mobile No.		
------------	--	--

Part B: Your Comments

A: Improving public health

Question TR1

Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

No further detail is required in Part 2 of the City Plan.

Question TR2

What issues could a more detailed policy include that are not already covered by Policy CP9?

-

Question TR3

If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

- **A single focused policy on air quality and noise - Introduce a new sustainable transport policy with a set of criteria against which new development (by size/scale of development) should be assessed?**
- **A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.**
- **An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.**

As per TR1 – no further detail is required.

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

Question TR4

Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

CIL items should be covered separately in the Regulation 123 list and should not be specifically referenced in City Plan policy.

B: Transport Information requirements for New Development/Uses

Question TR5

Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

No, this can be determined on a site by site basis. The scope for any Transport related planning application material can and should be agreed with the applicant and the Council in advance of the submission of a planning application for a specific site. A generic policy in the City Plan Part 2 would not assist this process.

Question TR6

If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

-

C: Increasing Active Travel

Question TR7

Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

This would be best placed in separate planning guidance.

Question TR8

Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Yes – the Part 1 plan covers these topics adequately.

D: Increasing Equality, Mobility and Accessibility

Question TR9

Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

-

Question TR10

Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

-

Question TR11

Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

-

E: Sustainable Transport Site Allocations

Question TR12

Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

-

Question TR13

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

-

Question TR14

Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

-

F: Are there any other issues relating to transport/travel issues?

Question TR15

Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

-

Signed/typed*:	Alistair Henderson
Dated*:	22 September 2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Addressing Pollution, Water and Energy Resources

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Addressing Pollution, Water and Energy Resources Summary:

Key objective is conserving and enhancing the natural environment and reducing pollution. The section invites comments on relevant matters including: pollution and nuisance; land stability; water and drainage infrastructure; coastal and marine planning; low carbon / renewable energy and identification of sites; and, energy efficiency.

This form has two parts: Part A – Personal Details
 Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title	N/A	
Forename		
Surname		
Job Title		Partner
Organisation		Carter Jonas LLP on behalf of National Grid Property/SGN
Address		One Chapel Place London
Postcode		W1G 0BG
Email Address		
Telephone No.		0207 5183200

Mobile No.		
------------	--	--

Part B: Your Comments

A: Polluted Land and Buildings

Question P1

Are there any planning issues that you consider a Polluted Land and Buildings policy should address?

This policy should understand the need to consider remediation costs and viability constraints in order to ensure that best use of brownfield land can be achieved on certain sites. Allocation of sites for end uses which are unlikely to yield a commercial return could result in sites which become sterilized for development purposes.

B. Land Stability

Question P2

Should the City Plan Part Two include a development management policy regarding unstable land or is this sufficiently addressed by national planning policy guidance and through Building Regulations?

-

C. Pollution and Nuisance Control

Question P3

Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

-

Question P4

How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Question P5

Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

-

Question P6

Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

This is not necessary and there is sufficient national guidance to ensure that inappropriate development does not take place in the wrong location.

Question P7

Are there other pollution issues that the City Plan should address?

-

D. Water and Waste Water Infrastructure

Question P8

Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

-

E. Sustainable Drainage

Question P9

Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

-

F. Coastal/ Marine Planning

Question P10

Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

-

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Question P11

Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

-

Question P12

Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

-

G. Low carbon and renewable energy

Question P13

Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

-

Question P14

Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

-

Question P15

Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

-

Question P16

If yes, what sites should be investigated for energy uses? (taking into account the areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study)

-

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Question P17

Should a renewable energy policy be explored for City Plan Part 2?

Overly prescriptive policies should be avoided as they can impact on the viability and deliverability issues in the context of much needed housing development on brownfield land.

Question P18

What factors should be considered when exploring this approach?

-

Question P19

Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

Question P20

Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

No, there has been a shift away at the national level for policies which can impact on the viability and deliverability of housing schemes. This should be avoided in Brighton and Hove, where housing need is not being met.

H. Are there any other issues that relate to this topic area?

Question P21

Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

-

Signed/typed*:	Alister Henderson
Dated*:	22 September 2016

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	141
Response Date	22/09/16 13:22
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Design
- . Heritage
- . General comment

Organisation Name (If Applicable) Montpelier and Clifton Hill Association

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

City Plan Part 2 Consultation Comments submitted by the Montpelier and Clifton Hill Association (MCHA) 1 If the consultation process itself is to be legitimate the documents offered to amenity groups and the public must be in plain language and must avoid planners' jargon. Expressions such as "place making" and "legibility" should not, for example, be used. 2 The central aim of any local development plan should be the protection of the public interest, which should always prevail over private gain. Private gain should not be confused with private amenity which should be maintained unless there is an overwhelming public interest at stake (in which case appropriate compensation is made). 3 It follows from above that in paragraph 9.15 of Design and Amenity the sentence "This would also offer the

opportunity to ensure that amenity matters are not used as a means to prevent the effective use of sites” should be deleted. 4 Apart from the obvious need to update some references (e.g. to English Heritage) the 2016 adopted HE and QD policies together with the supporting SPDs and SPGs should be retained without being watered down or “streamlined”. SPG15 should be amended to restrict further tall buildings city wide (see below). 5 This Association is particularly concerned by the harm tall buildings can do to the setting of the Montpelier and Clifton Hill conservation area and is dismayed by developers’ recent attempts to ignore the policy (Ice Rink site Queen Square and Crown House Upper North Street). Paragraph 7.3.3 of SPG 15 should be amended to state that tall buildings will not under any circumstances be allowed within conservation areas and that the sentence: “In areas adjoining conservation areas where new tall buildings may be appropriate, tall buildings should, in general relate well to the unique urban grain, visual axes, general context, sense of place and topography of surrounding conservation areas, and this should be tested through detailed character and impact assessment” should be replaced by the sentence: “In areas adjoining conservation areas it is unlikely that tall buildings will be appropriate but may be allowed in exceptional circumstances if an overriding public interest can be proved and if they relate well to the unique urban grain, visual axes, general context, sense of place and topography of surrounding conservation areas, and if this has been tested through detailed character and impact assessment” ”.

E: Any there any other heritage issues?

HR15: Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

City Plan Part 2 Consultation Comments submitted by the Montpelier and Clifton Hill Association (MCHA) 1 If the consultation process itself is to be legitimate the documents offered to amenity groups and the public must be in plain language and must avoid planners’ jargon. Expressions such as “place making” and “legibility” should not, for example, be used. 2 The central aim of any local development plan should be the protection of the public interest, which should always prevail over private gain. Private gain should not be confused with private amenity which should be maintained unless there is an overwhelming public interest at stake (in which case appropriate compensation is made). 3 It follows from above that in paragraph 9.15 of Design and Amenity the sentence “This would also offer the opportunity to ensure that amenity matters are not used as a means to prevent the effective use of sites” should be deleted. 4 Apart from the obvious need to update some references (e.g. to English Heritage) the 2016 adopted HE and QD policies together with the supporting SPDs and SPGs should be retained without being watered down or “streamlined”. SPG15 should be amended to restrict further tall buildings city wide (see below). 5 This Association is particularly concerned by the harm tall buildings can do to the setting of the Montpelier and Clifton Hill conservation area and is dismayed by developers’ recent attempts to ignore the policy (Ice Rink site Queen Square and Crown House Upper North Street). Paragraph 7.3.3 of SPG 15 should be amended to state that tall buildings will not under any circumstances be allowed within conservation areas and that the sentence: “In areas adjoining conservation areas where new tall buildings may be appropriate, tall buildings should, in general relate well to the unique urban grain, visual axes, general context, sense of place and topography of surrounding conservation areas, and this should be tested through detailed character and impact assessment” should be replaced by the sentence: “In areas adjoining conservation areas it is unlikely that tall buildings will be appropriate but may be allowed in exceptional circumstances if an overriding public interest can be proved and if they relate well to the unique urban grain, visual axes, general context, sense of place and topography of surrounding conservation areas, and if this has been tested through detailed character and impact assessment” ”.

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

City Plan Part 2 Consultation Comments submitted by the Montpelier and Clifton Hill Association (MCHA) 1 If the consultation process itself is to be legitimate the documents offered to amenity groups and the public must be in plain language and must avoid planners’ jargon. Expressions such as “place making” and “legibility” should not, for example, be used. 2 The central aim of any local development

plan should be the protection of the public interest, which should always prevail over private gain. Private gain should not be confused with private amenity which should be maintained unless there is an overwhelming public interest at stake (in which case appropriate compensation is made). 3 It follows from above that in paragraph 9.15 of Design and Amenity the sentence "This would also offer the opportunity to ensure that amenity matters are not used as a means to prevent the effective use of sites" should be deleted. 4 Apart from the obvious need to update some references (e.g. to English Heritage) the 2016 adopted HE and QD policies together with the supporting SPDs and SPGs should be retained without being watered down or "streamlined". SPG15 should be amended to restrict further tall buildings city wide (see below). 5 This Association is particularly concerned by the harm tall buildings can do to the setting of the Montpelier and Clifton Hill conservation area and is dismayed by developers' recent attempts to ignore the policy (Ice Rink site Queen Square and Crown House Upper North Street). Paragraph 7.3.3 of SPG 15 should be amended to state that tall buildings will not under any circumstances be allowed within conservation areas and that the sentence: "In areas adjoining conservation areas where new tall buildings may be appropriate, tall buildings should, in general relate well to the unique urban grain, visual axes, general context, sense of place and topography of surrounding conservation areas, and this should be tested through detailed character and impact assessment" should be replaced by the sentence: "In areas adjoining conservation areas it is unlikely that tall buildings will be appropriate but may be allowed in exceptional circumstances if an overriding public interest can be proved and if they relate well to the unique urban grain, visual axes, general context, sense of place and topography of surrounding conservation areas, and if this has been tested through detailed character and impact assessment" ".

 www.facebook.com/Bricycles

 <https://twitter.com/Bricycles>

Brighton & Hove City Council
Planning Policy Team
By email:
planningpolicy@brighton-hove.gov.uk

22 September 2016

City Plan Part Two Scoping Document Consultation: CP9 Sustainable Transport

On behalf of Bricycles (Brighton and Hove Cycling Campaign) and as a Cycling UK campaigner for Brighton and Hove, I am writing in response to the above consultation.

It appears that neither air quality nor noise are mentioned in the bold print of CP9, only in the supporting text. The priority of air quality needs to be raised.

Air quality will deteriorate around the new "informal" park and ride sites. This will affect rural areas and places outside Brighton and Hove.

Legal rulings are pending which may result in the Government taking greater action on air quality with local implications.¹ There need to be strict standards/criteria against which to assess air quality.

Mitigation is not enough. New developments should have a positive or neutral effect on air quality in order to bring about improvements.

The scientific understanding of air quality is fast-moving. We note that recent research has shown that the penetration of particulate matter is far greater than previously thought, and that the products of engine combustion are now known to pass along the olfactory nerve in the nose to enter human brains². We would like to see reference to the World Health Organisation's recommended limits³

Reference should also be made to the Space for Cycling campaign, aiming to create conditions where anyone can cycle anywhere, to which Brighton and Hove City Council is a signatory (Cllr Gill Mitchell). Essential to this is a high standard of cycle-friendly planning and design, and the funding needed to deliver it.

CP9 includes the policy to "Implement an integrated cycle network by 2030". A formal cycling strategy should be updated to specify how this can be brought about, with key areas and routes outlined on a map. Bricycles is working with national cycling charity, Cycling UK to produce a map of this kind.

There needs to be reference to best practice in design for cycling such as the London Cycling Design Standards⁴. Policies need to be strengthened with reference to the Cycling and Walking Investment Strategy (2016)⁵ which says: "Our long term goal up to 2040 is that walking and cycling should be a normal part of everyday life, and the natural choice for shorter journeys such as the commute to school, college, work or leisure trips."

Traffic reduction should be the aim.

¹ <http://www.clientearth.org/clientearth-clean-air-case-fast-tracked/>

² <http://www.telegraph.co.uk/news/2016/09/05/air-pollution-particles-linked-to-alzheimers-found-in-human-brain/>

³ <http://www.who.int/mediacentre/factsheets/fs313/en/>

⁴ <http://content.tfl.gov.uk/lcds-chapter1-designrequirements.pdf>

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf

Shopmobility is available locally in Churchill Square car park and London Road car park, however, there is very little information, advertising or access to the service on ordinary busy shopping streets where non car-driving older people and disabled people are walking or using wheelchairs and might find out about the scheme.

We note that some text in the scoping document and plan might need tightening up. On several occasions there seems to be a quite unnecessary qualification of an obvious statement e.g. "4.126: Parking can have a significant role in generating traffic." or "4.118 "Cycling and walking ...can benefit personal health and wellbeing" "6.14 "Land use planning can have an important role in delivering these priorities". This gives the impression there is some doubt.

We do not support the use of car parks for Park and Ride, either formal or "informal" unless city centre parking spaces are correspondingly reduced. We question the language of CP9 1b "Promote and facilitate better use of existing large car parks on the periphery of the city..." which is ambiguous. In our view, a better use for many car parks would be housing, a children's play area, a green space, a market square etc. not greater motor vehicle use. Park and Ride gives a service to car users with cheap parking and bus fares, but those who use public transport (or walking and cycling) for their whole journey get nothing, yet this is the group that should be encouraged. Car parks are a poor use of space whether in town, suburbs or rural areas. They are traffic generators and a cause of poor air quality.

We are in favour of traffic reduction in Brighton and Hove and in the wider city region and would want this taken into account in response to TR14 (Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region beyond the boundary of Brighton & Hove.)

Other issues

CP9 promotes electric car use but we have not seen statements about enabling people to charge electric bikes at electric vehicle charging points. This should be included.

CP9 4.112 supporting text refers to Intelligent Transport Systems to reduce congestion, but will this also enable people to cross roads more easily whether on bike or on foot? Cyclists need gaps in moving traffic, or for it to become stationary/ slow moving in order to get across or join the carriageway.

CP 4.99 supporting text refers to Brighton and Hove's role as a transport hub and working with adjacent authorities. Both East and West Sussex County Councils are committed to bigger road schemes as part of their transport strategy. Their plans are being realised by Highways England (not Highways Agency as stated in the text) in a mistaken mono-modal car-based approach. This should be opposed for reasons of health, emissions, poor land use and because increased traffic in Sussex will not stop at the borders of Brighton but will cause extra pressure on our roads and facilities, thus discouraging sustainable transport. Brighton and Hove is a national leader in promoting bus patronage. It would be beneficial to share this good practice with neighbouring councils.

Cycling design standards (mentioned above) are relevant to **CP12 and CP13**. See London Cycling Design Standards⁴ for well-received best practice.

We need an integrated transport system which takes bikes on trains and can run a full 7-day a week service (i.e. not the frequent weekend engineering works).

We want to ensure that the "rapid/express buses" are not run at dangerously fast speeds which are a hazard to vulnerable road users.

Many thanks for the opportunity to put forward these points. We hope you will take them into consideration.

Yours sincerely,

Campaigns Officer & News Editor, Bricycles, the Brighton and Hove Cycling Campaign
www.bricycles.org.uk www.facebook.com/Bricycles and twitter.com/Bricycles
Cycling UK campaigner, Brighton and Hove www.cyclinguk.org/

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 143
Response Date 22/09/16 13:28
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Transport and Travel
- . Biodiversity and Open Spaces
- . Community facilities
- . Call for sites

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site

allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

No

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Specific range.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

No.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

The market should not decide because this would result in the desire for profit over the effects of such development.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Definitely.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Policy should protect existing HMOs.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

The preservation of existing green spaces, including parks and existing green spaces.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Definitely more detailed policy.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

The Oval park in Saltdean which is the only green area of any size in Saltdean.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

Separate policies.

CF2: What are the key planning issues that will need to be taken into account when considering the retention of existing community facilities?

The local need, demand and availability to the community.

B. Site Allocations for Community Facilities

CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

Saltdean Tigers Football Club has several hundred members ranging from the age of 6 to 15. The training and playing facilities of the junior teams are confined generally to facilities at the Oval Park, where shelter and storage facilities are virtually non-existent.

Please indicate which topic or topics you would like to comment on?

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Housing

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Housing Summary:

Key objective is to maintain attractive and vibrant shopping centres. The section invites comments on relevant matters including: Shopping centre boundaries; local centres and parades; mix and balance of retail uses; special retail areas; uses in centres above ground floor; and, markets.

This form has two parts: Part A – Personal Details
Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title		Planning Director
Organisation	X-Leisure (Brighton II) Ltd and Land Securities	Nathaniel Lichfield & Partners
Address		14 Regent's Wharf
		All Saints Street
		London
Postcode		N1 9RL
Email Address		
Telephone No.		02078374477
Mobile No.		N/A

Part B: Your Comments

A: General housing (Use Class C3) supply and additional site allocations

Question H1

Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period?

(NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

N/A

Question H2

The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

N/A

Question H3

Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

N/A

B: Housing mix - dwelling types, sizes and tenures

Question H4

Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

In the event that BHCC adopt a general planning policy approach to housing mix, the policy wording should be sufficiently flexible to allow housing mix to be assessed on a site by site basis. This would allow schemes to come forward that maximise development at allocated sites and in the strategic development areas allocated in the City Plan Part One, such as at Brighton Marina. Prescriptive policy wording on housing mix could impact viability by reducing the quantum and density of development achievable at sites. Accordingly, in preparing policy wording consideration should be given to paragraph 173 of the NPPF which requires that *"the sites and 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."*

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Question H5

On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city’s lack of suitable sites for family sized housing?

N/A

Question H6

Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

N/A

C: Making full and effective use of sites

Question H7

Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

We strongly support the introduction of an additional policy requiring schemes to maximise a sites development potential in accordance with NPPF paragraph 58 which states that planning policies should ensure that developments optimise the potential of the site to accommodate development.

To achieve this, BHCC will need to ensure that this policy and others within the proposed City Plan Part 2 do not unreasonably restrict development densities at allocated strategic development areas and site allocations. Instead, policy wording should be flexible to allow development schemes to respond to its surrounding context. This approach would be in line with NPPF paragraph 47 requiring local authorities to set their own approach to housing density to reflect local circumstances.

D: Housing for key groups in the city

Question H8

Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city’s communities? For example,

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

N/A

Question H9

Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Policy wording on housing need should not be unduly onerous so as to undermine the viability of a scheme coming forward. Accordingly, the wording should provide enough flexibility that the ability of the site to provide specific housing needs (such as older housing or family housing) can be assessed on a site by site basis.

Question H10

Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Self-build plots may not be suitable to all allocated sites and therefore the policy wording should provide sufficient flexibility so that this can be assessed on a site by site basis. This would ensure that development schemes for sites that are not suitable for self-build plots are not unnecessarily constrained.

E: Retaining housing

Question H11

Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

N/A

Question H12

Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs?

N/A

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

F: Private outdoor amenity space in new housing development

Question H13

Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

We support in principle the aim to provide appropriate outdoor private amenity space. However, there is a balance to be struck between providing outdoor amenity space and housing delivery. The policy requirements should not be unduly onerous such that they constrain housing delivery and should also be mindful that Brighton has a range of outdoor amenity spaces including the beach and the South Downs.

Question H14

Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

N/A

G: Access and space standards in new housing development

Question H15

Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

N/A

Question H16

Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Any policy on higher optional technical standards for access and adaptability should be drafted in accordance with paragraph 008 of the National Planning Practice Guidance (NPPG) (reference ID: 56-008-20160519) which requires that *"where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body."*

In particular, policy wording should take into account site specific circumstances, such as

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

vulnerability to flooding, site topography etc. as required by NPPG paragraph 008, may make a specific site less suitable for the optional standards to be applied.

Question H17

Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

N/A

H: Houses in Multiple Occupation (HMOs)

Question H18

Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

N/A

Question H19

Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

N/A

Question H20

Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

N/A

I: Are there any other housing issues?

Question H21

Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

NB: This consultation also includes separate sections on Student Housing and Traveller Accommodation.

N/A

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Signed/typed*:	
Dated*:	22/9/2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Retail and town centre uses

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Retail & Town Centre Uses Summary:

Key objective is to maintain attractive and vibrant shopping centres. The section invites comments on relevant matters including: Shopping centre boundaries; local centres and parades; mix and balance of retail uses; special retail areas; uses in centres above ground floor; and, markets.

This form has two parts: Part A – Personal Details
Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title		Planning Director
Organisation	X-Leisure (Brighton II) Ltd and Land Securities	Nathaniel Lichfield & Partners
Address		14 Regent's Wharf All Saints Street London
Postcode		N1 9RL
Email Address		nathaniel@nathaniellichfield.com
Telephone No.		02078374477
Mobile No.		N/A

Part B: Your Comments

A: Boundaries of Primary and Secondary shopping frontages

Question R1

Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

N/A

Question R2

Are there successful stretches of shops (not currently protected) that should be included in defined primary or secondary frontages of defined shopping centres?

N/A

B: Updating Retail Frontage Policies

Question R3

Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

N/A

Question R4

Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

N/A

Question R5

Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

N/A

Question R6

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Should policy seek to restrict changes of use to new large¹ A3/A4 uses to service seated customers only?

N/A

C: Brighton Marina – Special Retail Area Policy

Question R7

Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

Our client strongly supports the provision of a special retail area policy for Brighton Marina. This would provide additional policy support for the provision of the retail uses at the site in accordance with City Plan Part One Policy DA2 and the aspiration to create a new neighbourhood centre that will support those who will live and work at the Marina.

The criteria applied should be in accordance with Policy DA2 and should focus on delivering a mix of A1, A3 and D2 floorspace to create a thriving neighbourhood centre at the site.

Question R8

Alternatively, could changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

N/A

D: Local Centres and Parades

Question R9

Is there a need for a separate policy for assessing changes of use in local centres and parades?

N/A

Question R10

¹ For units above 150sqm

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

Alternatively, could there be a general policy to assess changes of use in these and other retail areas in the city which fall outside of town/district centre designations? (e.g. the seafront)

N/A

Question R11

Should Part 2 designate any additional local centre's coming out of large scale housing developments such as at Toads Hole Valley?

N/A

E: Important Local Parades

Question R12

Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

N/A

F: Individual Shops and Small Clusters of Shops outside Protected shopping centres and parades

Question R13

Given changes to the GDPO, is there a need for policy to protect shops and parades outside of existing centres? Should the City Plan Part 2 include a policy that covers larger shops over the 150sqm threshold of the GDPO?

N/A

G: Floorspace above shops and commercial premises

Question R14

Should the City Plan Part 2 include a policy to guide appropriate uses for floorspace above shops and commercial premises in shopping centres outside of the Central Brighton Area?

N/A

H: Markets

Question R15

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

What are the key criteria that should be taken into account when assessing proposals for additional permanent markets?

N/A

Question R16

Are there any sites that might be considered for allocation for a permanent market use?

N/A

I: Are there any other retail issues?

Question R17

Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

N/A

Signed/typed*:	Pauline Roberts
Dated*:	22/9/2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	145
Response Date	22/09/16 13:47
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Student accommodation

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

The City Plan should seek a more dispersed approach to building student accommodation around the City. There is little space available in Lewes Road, and it is important that no more cheaply constructed blocks intended solely for students to live in on a short term basis are given planning permission in this area. Instead, the Plan should focus on high quality mixed developments, which have multiple use, now and in the future. Communities need support in times of change, and this begins by providing or assisting the Universities to provide accommodation which is pleasing, includes accessible green spaces, and encourages tenants to become part of the community. This approach should also be reflected in existing areas where there are large numbers of HMOs and both students and young professionals create a shifting population which means people struggle to get together. They need support to build local action and commitment, to be happy and to care for each other, instead of feeling at odds with their neighbours. Work can be done with local communities and organisations to create small hubs through which problems can be addressed and positive ideas can be explored together.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

It has been suggested that transport links could be a barrier to locating accommodation outside the Lewes Road area. This is based on an assumption that all accommodation will be provided for students. If there are more mixed developments, the bus companies will benefit from an increased customer base and more income, through a more widely dispersed population across the City.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Students deserve good quality housing and consideration of their needs, rather than becoming the focus for criticism and intolerance. If we build cheap accommodation based on a perception of short term residency and drunken parties, then we will get what we expect. If we raise our own expectations and encourage students and other short term residents to live and work amongst us in harmony and in the best conditions we can create, then standards will rise and we will all be happier, doing things together and building our communities in response to changing conditions, rather than feeling threatened and afraid. The politics of fear is winning at the moment, and we have to turn this around.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	146
Response Date	22/09/16 14:07
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Retail and town centre uses . Addressing pollution, water and energy resources . Student accommodation . Traveller accommodation . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Only if the sites are sensitive to the needs of the communities already in situ

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Site allocations should be clearly stated and should be specifically attributed to an overall policy aim. For example, a desire to house more students should be clearly stated as a 'student hub', likewise a desire to promote a community for families and workers should be clearly stated as just that and policies should then be directed to ensure that the intended aim for that development is kept to - a community built for families that then becomes taken over by buy-to-lets etc which then fill up with students should be clearly stated as a breach. This sort of thing can absolutely not be left to the market or general

criteria's - the market is only interested in the bottom line and general criteria are unenforceable. The council needs to outline specifics and have clear plans for each site allocation - it needs to specify what it wants to achieve with each development using specific language around benefits the proposals have. A general criteria allows too much interpretation and would lead to a position where the outcomes are poorly thought through and left to the communities to deal with.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Urban Fringe sites should be reclassified as hubs for whatever communities you wish to build. the council needs to have direction and purpose about what it wants to achieve, if you clearly state that you want specific communities to adopt the developments you propose then everyone is on the same page and a family moving into a zonal family area won't then be surprised that they have landed in a student village. Family sized housing should carry protections against market invasion via buy-to-let landlords and policies should aim to iron-clad those protections.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Generally the council clearly needs to state the direction it wants for these developments and a way to enforce its vision would be to prescribe zonal requirements for each area - building developments for specific groups means that you can anticipate and plan for the growth of these developments - allowing the market a free hand under the guise of 'freedom of choice' just means you have no plan and no thought for outputs of a non-decision. There is nothing wrong in building homes fit for commuters and homes fit for students - everyone knows what to expect and the council becomes proactive with its vision for the future it wants.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Absolutely not. Maximise potential sounds great but we all know it means maximise profit. What is under development of housing sites? Is that building houses or flats that are big enough to swing a metaphorical cat in and don't mean you know the breathing patterns of your three closest neighbours then I am all for under development So no I do not think additional policies should ensure that sites are maximised, additional policy should come into play that ensures that the sites are sympathetically maximised and these maximisers need quantification ie we want everyone to have a garden, we want everyone to have privacy. If maximising means units sold then no.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes. But the council needs to have clarity around these accommodation needs. Where you have heavy concentrations of a type in one area you need to drive through measures that facilitate those groups.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes and you should be doing this now anyway. The elderly and families are effectively being driven out of many areas of Brighton (Hanover, Elm Grove) because the council has allowed the growth in student population to trump the needs of the locals. It has allowed this with no changes to the local

infrastructures and with no policies directed at this effective change in use for some areas. If you have specific groups then you have specific needs and specific issues - you need to be better at anticipating these needs and issues and have measures in place to effectively deal with them - measures that are tailored to the needs of the communities you are seeking to fulfill.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

yes - this would create a greater investment in the social contract for the people living there who would feel far more rooted to the site of their dwelling - this can only be a good thing.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

You should not sell your council houses.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Yes - you should state in your vision that you want to protect the rights of specific groups and you should then tell us how you are going to do that.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes, people with gardens front and rear live longer and are happier and less likely to be the perpetrator in anti social behaviour or other criminal behaviours. If however you mean building flats and placing in some swings on some aeroturf all this will do will give low level criminals a place to sell cannabis; councillors should spend an early evening at the skatepark on the Level for proof of this if they want.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

You need to provide more than guidance. If you are investing in specific outcomes based on the communities you are seeking to improve you need to provide prescription. Its no use building amenities and then letting them fall into disrepair and neglect.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes but only if you are in agreement with them - local requirements for a town like Brighton are probably looking for a more tailored approach - all attempts should be made to avoid congestion and if that means pushing further out to Preston Park, Moulescombe then that would be preferable.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Of course - why are you even asking.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Neither. The council should actively work to restrict and denude the current levels of HMOs which are already excessive - the idea of protecting them is ludicrous and the idea that you should leave it to the market is equally ludicrous (the market already protects them at a rate) - if it was left to the market we'd all be living in HMOs. If you are making decisions based on a Do Nothing approach (ie leave it to the market) then I for one would feel better if it was left to conscience or better yet based on a Nimbyism approach. Take a straw poll at the next general council meeting of how many councillors would feel happy living next door to several HMOs and then take that as your decision point.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes, or specify the types of dwellers for HMO's and enforce accordingly. Specification on what is meant by family-sized dwelling is needed. You need to convert sympathetically to the local community.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

If you are to allow HMO's to prosper (as you have done) then you need to get proactive across the board on a number of mitigation measures. For example if a HMO is to be set-up in a Victorian terrace then there needs to be an aggressive policy around soundproofing of the HMO, parking and noise pollution should also be subject to a special order that holds the landlord accountable - the actual owner of a HMO should be made to share their details with all immediate neighbours. Planning policies should incorporate policies that deal effectively with known side-effects of high concentrations of HMO's - many councils signpost against anti-social behaviours such as loud music, loud voices, anti-social driving - simply placing media in known hotspots suggesting that the Council will not tolerate anti-social behaviours has been proven to work effectively. Pointing out to people that others have a right to peace and quiet beyond 11pm each night, combined with effective community based policing that is alive to the issues. All HMOs that are specifically for students should be mail-dropped each September with information informing them of what the council believes to be appropriate behaviour for living in the community. The most workable approach would be to build HMO's expressly for this market and to restrict the invasion of HMOs into local family/elderly/ couples communities - the problem with most HMOs is that the perpetrators of anti-social behaviour who think nothing of slamming doors and shouting (etc) at 3am are not subject to these conditions themselves as they live next door to some poor sod who has to get up at 6am and go to work and who tends not to create the conditions that might make the perpetrator stop and think - if all HMO's were clustered together then they can all disturb each other. Where HMO's are established policy should also be aligned to deal with local businesses who can exacerbate problems by staying open too late selling food and alcohol. All known HMO hotspots should incorporate a strict closing time for local businesses selling food and alcohol where the premises have a residential area within 50 metres.

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

The academic Corridor (Lewes Road) encourages anti-social behaviours through the excessive number of fast-food and takeaways that stay open for business far too late (3am in some cases) - the sort of people buying kebabs at 2am are exactly as you would imagine and this issue is a blight along the Lewes Road leading to raucous behaviour in a predominantly residential area - all shops selling food and beverages should be closed on the Lewes Road at midnight latest. All of the anti social behaviour is linked to these shops as punters stop to buy, they loiter, they urinate up people's houses, sit on doorsteps eating their food, and have voluble conversations or fight. The staff are only marginally better behaved as they assume that because they are delivering/working then its okay to talk and smoke in the street at any hour, slamming car doors etc. If these locations were closed at a reasonable hour then all of these issues would cease and the streets would be clean and vomit free.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Separately. Noise pollution needs its own policy simply because of its all pervasive nature - the impacts of noise pollution are severe and well documented. Air, Land and water pollution are usually associated with landowner, industrial or construction interests - noise is the number one pollutant in communities, and very often the noise is usually a by-product of that community and its dis-functioning. The plan, the council, need to be direct addressing how it will enforce the rights of its citizens in getting a decent nights sleep without getting woken up by singing drunks (students) and the mechanized bin men at 4am. The policy needs to be direct and give details about what the council deems to be appropriate and what it does not. It also needs to stipulate whose interests are being catered for in terms of noise: local businesses or local residents as it is often hard to tell with some of the planning decisions that are made.

P7: Are there other pollution issues that the City Plan should address?

Noise pollution along the academic corridor (the Lewes Road student runway) needs to be addressed specifically, as the pollution each night is noise and the pollution in the morning is debris on the pavements - food and bodily outputs that attracts vermin and seagulls. Lewes Road needs policies that target the food and drink outlets and that create these issues by funnelling the students to stop and create outside these establishments.

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

Because of the specific and well publicised issues of noise associated with the concentration of students/MHO/facilitating businesses - policies need to deal with these issues specifically - the council needs to step up to the plate and come out on the side of local residents if it wants to be taken seriously.

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

When I was a student in Southampton my student housing was a campus site located several miles from the University - why not purpose build a student hub outside of Brighton.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

More dispersed and it does not have to be in Brighton but if so should move away from academic corridor concentrations.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

If you live in an area free from students why would you think its a good idea to introduce them: whilst the council is always quick to point out the economic value of having students to the city it rarely expresses anything quite so succinct about the many issues their youthful excesses bring to the communities they impact - so I would imagine local communities would mobilise to ensure they stop developments - a way to overcome this would be to show a more effective hand in how students are coped with in the current over-saturated Lewes Road area - if the number of student problems are seen to be dealt with in a more community focussed and sympathetic manner then barriers might come down.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Where you have a known heavy concentration of students/young people the council knows well the issues it is creating - its answer to these questions is often a light touch response based on local residents having to provide reams of evidence in order to have the issues even vaguely looked into. A proactive reassurance that the issues are known and that their is a plan in place for dealing with known issues would be a start - whether its a formalisation of quiet zones or a zero-tolerance to 3 Strikes type response to known offenders. Just knowing the policies are there to protect local residents and protect the safety and wellbeing of local indigenous communities would be a good start.

Traveller Accomodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

Smaller sites are less likely to cause concern amongst local residents - larger sites, dependant on their location are likely to be viewed with suspicion and may create tensions that are difficult to cope with once established. As being a Traveller is a life-choice then suitable accommodation for them should always play second fiddle to the needs and desires of the established local community.

TA2: Should new site provision be public site provision, or private or both?

Private. Public spaces are there for the public - groups of people living on public fields and spaces means that it's no longer useable by the public. The recent attempted incursions onto the Level by tent-dwellers meant that local residents were put-off, effectively making the Level a traveller site for a week or so.Tr

TA3: Should future pitch requirements for Traveller Accommodation be addressed through City Plan Part 2 or would this matter be better addressed through a separate Development Plan Document?

A separate plan - the scope of the Plan 2 is already bloated.

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

Travellers have chosen to live in a certain manner - I don't believe they need our support in sustaining their lifestyle choice so I fail to see why Traveller Accommodation gets a chapter all to itself whilst nowhere in the City Plan is there any reference to Council-Tax Paying, Indigenous Working People.

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

The City Plan is large in its scope but the omission of a chapter dedicated to the ordinary people who make up the backbone of Brighton & Hove I find exasperating. The plan should at its heart be all about how we make the city a better place for all of us who live here now, year on year - working and living in Brighton. It should be a vision statement for how we make this city great, not just 'how can we fit more students in'. There's no law that says student intakes can't be restricted or pulled back. Instead the focus is on those areas that are opportunities for 'market development' and the issues of how the council can get us 'the people that live here' to swallow more of the same tired policies that do nothing for us except give us a black and white option of how big do you want your issues to be. I would like the council to step back and think about how things are right now and how it wants to proactively deal with them - otherwise I see the City Plan 2 as another excuse for pushing through developments that no-one wants and that add to the well established known problems (antisocial behaviours, late night noise pollution from students, open drug dealing in public parks- the Level, takeaway eateries breaching their licenses on a nightly basis) nowhere have a seen effective communications for how you propose to counter some of these long-standing issues.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	147
Response Date	22/09/16 14:10
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Addressing pollution, water and energy resources

Individual Name

Individual Address

Individual Email

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

These should be addressed separately as they are very different things and will affect the City in different ways.

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Could look at turning street lights off during early morning hours in urban fringe sites.

P7: Are there other pollution issues that the City Plan should address?

Air quality policies are needed.

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Yes.

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

There are areas to the East of the Marina where coastal erosion remains a threat to the A259 and seafront communities. The City Plan part one seeks to monitor this but actually areas around Ovingdean Roundabout, Rottingdean and Saltdean may require specific policies as they are within 10m of the A259.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	148
Response Date	22/09/16 14:18
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . General comment

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

yes.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

infrastructure including school places/doctor places/road infrastructure NPPF74 is not mentioned in planning reasons for refusal so this needs to be taken into account Because there are other developments coming up all the time, the cumulative impact should be taken into account.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

no.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Yes, the range of dwelling types and sizes should be stated.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No, the city is getting near maximum already. By building to capacity everywhere it could lead to over crowding/high density that creates its own problems.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

yes.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

yes.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

no.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

yes.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

no.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

yes, the council have already identified there are not many open spaces.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

yes.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

yes.

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

no.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No, consideration should be given to the number of HMO's in a given street ie not too many - there is already evidence that this pushes the families away from these types of street where there are too many HMO's.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

One answer is in the question posed - "concentrations" - there should be no concentrations of HMO's. There could be rules around rubbish clearing around HMO's are there is a lack of responsibility. Rules around responsibility should be introduced ie upkeep/rubbish clearance etc.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

As mentioned earlier, cumulative impact should be considered in all cases and made policy. Also as mentioned earlier, NPPF74 must be taken into account and documented. it is little seen if at all in planning decisions School and doctor places must be allocated before development can begin, or be

refused if not. No amount of S106 monies can mitigate against a school or doctor place. These establishments should be included as a consultee or their opinion taken into account. Once the developer has disappeared off with their profits it is left to the public and B&HCC to deal with this type of situation. it is the same with Sport England who are a Statutory Consultee. There is already evidence that their documented requests have been ignored. This does little for the respect B&HCC may wish to have. Another policy must be taken into account is CP16. Air quality management areas. What is the point of designating an AQMA if the council seeks to add more property and therefore more traffic into such an area? it speaks for itself that air quality should be far higher on the planning committee's agenda and therefore policy. The aim of an AQMA is to have it reduced therefore any development that doesn't assist that should not be granted until the AQMA is no longer an AQMA.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

There should definitely be more detailed policy as it is currently being ignored/given little credence.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

I see that Transport Assessment are only done for larger scale developments. This should be changed to smaller developments say over 10 units. This naturally leads to the fact that the cumulative impact in the area should also be taken into account as policy. This would include AQMA areas and as has been mentioned, unless the application can prove to reduce the AQMA then it should not be passed and therefore refused.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

No.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes.

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Guidance will not work because it will be ignored. Something concise and clear needs to be drawn up that is measurable and enforceable.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

No because developers dont consider the actual setting of the development and its natural constraints ie a cycle plan for Woodingdean would be absurd.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Yes.

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

No.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

No.

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

No.

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

No.

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

No.

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

No.

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes.

B2: If you think a policy is needed, what types of development should be included?

Development that is on a greenfield site.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

The Oval, Saltdean because it already is an established public park and as far as I believe, the only public park in Saltdean. If it gains protection it would mean that it would never be developed and so free for the use of the local community and the many visitors to Saltdean.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

The St Aubyns School Playing Field in Rottingdean. The site is protected by NPPF74 and has the designation already included in the emerging Neighbourhood Plan as a Local Green Space. There are two Rottingdean village Referendum whereby on two occasions 94% of the local residents wished this to happen which is why it is in the Neighbourhood Plan. There has also been a petition done for the playing field to be designated as such (with 1800 signatures) and all 52 Councillors unanimously voted in favour of the designation in a full Council Meeting.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

The wildlife corridor in Ovingdean.

P7: Are there other pollution issues that the City Plan should address?

How air quality management areas can be brought out of being air quality management areas and by what means. Refusing development that has any allocated parking would stop an area that is already in or near an air quality management area from getting worse for instance.

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

Be sensible about introducing cycle schemes that developer's are so fond of because cycling in winter on the seafront is virtually impossible and dangerous.

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

A serious ban on oversized traffic that should not be travelling in the areas where it is prohibited. This is because it is constantly ignored. Consideration be given to creating pedestrianised areas that facilitate a positive shopping experience.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	149
Response Date	22/09/16 14:31
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . General comment

Individual Name

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Housing-there should be no provision of further housing in areas where there are not adequate services such as school places or Dr Surgery places for families/elderly. Type of housing should depend on the facilities available in the immediate area to support new populatoin. There should be no futher building in areas where pollution levels are already above safe levels, ie A259, including Saltdean/Rottingdean and also Woodingdean. there can be no futher housing in these areas as there is already dangerous levels of pollution and not enough school places and Dr Surgery spaces etc. Heritage should be preserved. Brighton Seafront needs more green and flowers etc.The i360 is a waste of money and is ugly. The Marina is also ugly and the new hotels lack design imagination and beauty adding to the already concrete and ugly look of this area.Why have a carpark facing you as you enter this tourist attraction and a superstore as well!!!! Traveller sites should be provided officially with facilities that are paid for by the occupiers. Police should remove from other sites immediately. Community Services must include parks with adequate facilities for children of all ages not just the very young. Larger Skate parks and multi sports areas with adjustable covering and all year round surfaces and lighting must be provided with Indoor games spaces for table tennis, pool, and other board games. Adequate seating for parents around play areas that is also covered for the Winter, and for familieis with dogs seating where you can see your children if you cant be in the actual area. Cafes should be in all parks for refreshments and toilets for children. Transport via buses must be cheaper to encourage people to use it. The cost for adults now is ridiculous and then you have to pay 50p per journey for children. Its too expensive, cheaper to take car and park in some cases. children should

pay a flat day rate of 50p and adults day savers only be 2.50, its enough, then the buses will be used more and pollution decreased.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	150
Response Date	22/09/16 14:41
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Call for sites
Organisation Name (If Applicable)	SAFE Rottingdean

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites? Cumulative Impact, Infrastructure including school places and NPPF 74 must be considered, which is not currently the case. B&HCC

should also follow the lead given by Greenwich Council whereby a non redacted, open viability report is an essential requirement for every proposed development. Planning should be transparent, not hidden
<http://www.out-law.com/en/articles/2016/february/greenwich-council-adopts-new-viability-assessment-requirements/>

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

City Plan 2 should clearly specify the range of properties required to satisfy housing needs and any development that falls outside these parameters (especially larger properties) should be refused

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Given that most families require 3 bed houses, yes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Build sufficient public sector housing on brownfield sites

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

I do not believe it should be policy to maximise site potential as this could lead to serious over crowding and excessive density. However, the city's housing balance should be considered rather than developers' profits

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes, designation is better than developer led market forces based on the profit to the developer

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Definitely

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

No

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No, the city should not protect HMOs. The city should seek to make all units individual dwelling places

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

No

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

For a development to be considered, the relevant number of school places to cover ALL proposed developments (cumulative impact) in the local area MUST exist or the development should be refused at source, not mitigated as this does not create the required local school places. NPPF 74 must be adhered to and it must be acknowledged in ALL relevant planning applications that Sport England is a Statutory Consultee who upon request MUST be kept informed at all stages. CP16 MUST be adhered to fully. The Cumulative Impact that ALL potential developments within the area will have on Air Quality, especially the impact on an AQMA MUST be realised as a reason for Refusal of a planning application. ANY planning application that FAILS to REDUCE POLLUTION in an AQMA MUST be refused.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

More detailed policy is required and existing policy MUST be adhered to. This is not happening currently

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

A full Transport Assessment must be demanded by B&HCC for every planning application over 9 units. The effect of ALL proposed developments (cumulative impact) in the local area MUST be taken into account as if they were a single planning application. This is a statutory requirement which has been ignored by B&HCC. The Cumulative Impact that ALL potential developments within the area will have on Air Quality, especially the impact on an AQMA MUST be realised as a reason for Refusal of a planning application. ANY planning application that FAILS to REDUCE POLLUTION in an AQMA MUST be refused.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

No. This currently causes so many problems with developers which leads to numerous refusals

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

This needs to be very clearly enshrined in City Plan Part 2 so it is fully enforceable

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

No

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Yes

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

No

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

No

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

No

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

No

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

No

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

No

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

No

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes

B2: If you think a policy is needed, what types of development should be included?

Any development on a Greenfield Site

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

The Oval, Saltdean. This is a long established public park and is the only public park / recreational area in the whole of Saltdean. It should be acknowledged as an Open Space and protected from any residential development, enabling it to be retained forever as a public Open Space available for recreational pursuits by all.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance)).

St Aubyns School Playing Field, Rottingdean This site is an established playing field protected by NPPF 74 with a pending designation as a LOCAL GREEN SPACE through both the Neighbourhood Plan and City Plan Part 2. This Local Green Space Designation for this field IN ITS ENTIRETY must be recognised in City Plan 2. It has twice been backed by a petition of some 1,800 signatures and has been endorsed by Rottingdean Parish Council. It is due before the EDC Committee in September 2016 to be fully endorsed IN ITS ENTIRETY by this committee upon the unanimous agreement of all 52 City Councillors. The second petition was needed due to a council officer amending the wording and hence the meaning of the first petition prior to its presentation to the EDC committee. It has already been already been acknowledged that this site meets all the required criteria to be designated as a Local Green Space.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Combined Policy

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	151
Response Date	22/09/16 14:42
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Housing
- . Biodiversity and Open Spaces

Organisation Name (If Applicable) CPRE Sussex

Individual Name

Individual Address

Individual Email

Individual Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

We welcome the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period. We strongly support a focus on regenerating brownfield sites through allocations.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

We believe open space, landscape, heritage, ecology and environmental considerations are of paramount importance, also the impact of any development on the 'setting' of the National Park/NIA and opportunities for landscape-scale conservation / opportunities for investment in green infrastructure and connectivity to deliver positive net gains in biodiversity. Clearly any emerging Neighbourhood

Plans will be given due consideration. We also believe that specific design SPDs should be produced for urban Fringe sites as these are sensitive areas in terms of landscape.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

This should be specified.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

No

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

This may be appropriate for some areas of the City but not all.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Yes and identify areas where this would be appropriate

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Yes, small family homes

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes, with clear standards and links to Policies relating to biodiversity.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes, clear guidance / standards

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

No

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Some reference should be made to the proliferation of Air BnBs and the impact on HMOs

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No – but there should be an exceptions clause in CP21 to so conversion from an HMO to a small family home can be made where appropriate.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Strengthening of Policy to guide development of new HMOs to suitable brownfield sites.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

No

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes, to comply with NPPF paragraph 117 it should provide a Policy to guide the types of development, if any, which are appropriate.

B2: If you think a policy is needed, what types of development should be included?

All types of development

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes. We would support the creation of a green infrastructure SPD

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

We think one Policy could distinguish between the hierarchy of different nature conservation designations, for example by requiring that designated sites are to be given protection and appropriate weight according to their importance and the contribution they make to wider ecological networks.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes. Policy QD 18 has not been fully incorporated into CP10. Policy QD 18 on species protection should be adopted fully as policy in the City Plan. QD18 says "permission will not be granted for any development including changes of use that would be liable to cause demonstrable harm to such species and their habitats."

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes, however sites if sites were unable to be accessed for the review that they should remain an SNCI until evidence is available to enable a review. BHCC should see SNCIs that have fallen into poor management as an opportunity for the council to work with land owners to get the site back into a positive condition and not an inevitable consequence that the site should be deselected. Additionally the site's value within the City's Green Infrastructure Network may mean that deselection is inappropriate. We would support new mechanisms to be put into place to allow further sites to be designated as LWS.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Ancient woodland, aged/veteran trees and Section 41 priority habitats and or species

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

No

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Yes, 'site 42' of the Urban Fringe Assessment, or "Meadow Vale," i.e. land south of Ovingdean Road. This unique green space is demonstrably special to the local community, rich in wildlife and acts as a gateway to the National Park.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes – if this affords additional protection from inappropriate development.

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Ecosystem Services (as per the SDNPA Local Plan IO) and rewilding.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	152
Response Date	22/09/16 15:11
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Housing
- . Transport and Travel
- . Biodiversity and Open Spaces
- . Addressing pollution, water and energy resources
- . Heritage
- . Community facilities
- . Sustainability Appraisal Scoping Report

Individual Name

Individual Address

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes and the city's Brownfield sites must be used for housing before Greenfield sites are made available to developers.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

1. More detailed investigation of individual UF sites is needed. The UF Assessment 2015 was in the main, a desktop study. This is an insufficient method to decide the fate of land as important as the city's Urban Fringes. Mistakes are apparent in the findings for example site 50 has no access for vehicles and yet this appears to have been completely ignored. 2. The findings of the UF assessment studies are already being disregarded and this must not be carried over into Part 2 of the City Plan.

Again, site 50 is a good example; both assessments for site 50/L19 land west of Falmer Avenue have stated only the lower part of the site might have potential and for a maximum of 12 homes (even though there is no road access) and even then, acknowledges there will be an impact on views from the SDNP. Despite this, the site is listed on the draft SHLAA 2015, published July 2016, as site 1001 for 32 homes. 3. Sustainability must be more carefully considered. Many UF sites are not truly sustainable and will create an increase in car usage which our roads cannot accommodate. 4. The views of the South Downs National Park Authority must be obtained on an individual site by site basis wherever an Urban Fringe site is located within the setting of The Park. 5. Views of residents on local recent history of sites should be sought and given proper consideration. The loss of a site which is considered unique to a community, once lost to development, is gone forever.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Leave to general planning policy.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

No. This proposal does not take into account that building of smaller properties can free up family homes by allowing 'downsizing'.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

No leave to market

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

CP9 needs improvement to ensure sustainable development. 4.127 makes much of review and preparation of an up to date Supplementary Planning Document for new development Cycle parking requirements, which takes no account of the fact that walking and cycling in hilly and/or outlying areas is not feasible. Whilst it is good that CP9 requires all major development schemes to submit a full Transport Assessment, this is only of any use if the policy is implemented consistently.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A single focused policy on air quality and noise - Introduce a new sustainable transport policy with a set of criteria against which new development (by size/scale of development) should be assessed?

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

No

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

This must be policy in part 2 of the plan Guidance is just that, a guide which can be ignored.

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

No. A general policy cannot cover individual site requirements and leads currently to ridiculous situations where for example high numbers of cycle racks are required at developments at the top of steep hills where residents will not cycle and travel vouchers are offered where there is poor public transport.

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Policy to guide types of development

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

More than one policy would be of benefit

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes. In my own immediate area alongside the National park, Urban Fringe and NIAs I have seen a worrying decline in species. We must work not just to stop the decline but to repair the damage.

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Landscape character.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Greater protection and promotion of Rights of Way especially where they access the SDNP.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

Yes

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

Natural beauty - Policy SA5 leans too far towards allowing mitigation of damage to the setting of the SDNP. The aim should be not to allow anything to harm the SDNP or it's setting.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

A high level of detail; guidance and briefs can be disregarded.

Please indicate which topic or topics you would like to comment on?

- . 1. Biodiversity, Flora and Fauna
- . 2. Water Quality and Resources
- . 4. Air Quality and Transportation
- . 6. Cultural Heritage, Landscape and Open Space

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Yes

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? No

Q4b.

If 'No' please suggest changes

SA4 it biased towards mitigating damage rather than avoiding damage to Urban Fringes

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new “Decision Making Criteria” have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? No

Q3b.

If 'No' please provide details

Insufficient weight given to landscape

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	153
Response Date	22/09/16 15:14
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Retail and town centre uses . Tourism . Transport and Travel . Addressing pollution, water and energy resources

Individual Name

Individual Address

Individual Email

Individual Tel Na

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Not just urban fringe as they do not have all facilities

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

No

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Yes

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

As part of planning look for smaller sites with mix of housing rather than squeezing as many as possible in

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Or over development of sites is worse

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

No

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

No

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Left to market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Spread them out

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Amenities and impact on residents already living near proposed development

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

No

R2: Are there successful stretches of shops (not currently protected) that should be included in defined primary or secondary frontages of defined shopping centres?

No

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

Nono

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

No

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

What about surrounding shops. Rottingdean Hove it's not just Brighton

R6: Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

Yes

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

No

D: Local Centres and Parades

R9: Is there a need for a separate policy for assessing changes of use in local centres and parades?

Yes

R10: Alternatively, could there be a general policy to assess changes of use in these and other retail areas in the city which fall outside of town/district centre designations? (e.g. the seafront)

No

R11: Should Part 2 designate any additional local centre's coming out of large scale housing developments such as at Toads Hole Valley?

Yes

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

Yes Rottingdean High St longridge ave

F: Individual Shops and Small Clusters of Shops outside Protected shopping centres and parades

R13: Given changes to the GDPO, is there a need for policy to protect shops and parades outside of existing centres? Should the City Plan Part 2 include a policy that covers larger shops over the 150sqm threshold of the GDPO?

Yes

G: Floorspace above shops and commercial premises

R14: Should the City Plan Part 2 include a policy to guide appropriate uses for floorspace above shops and commercial premises in shopping centres outside of the Central Brighton Area?

No

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

Parking charges and fairness throughout area not just the main town centre.

A: The Seafront

T1: Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

Black rock

T2: Is there sufficient guidance in the City Plan Part 1 to assess planning applications that come forward on the seafront?

Don't know

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

Yes

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

Attracting tourists to surrounding areas not just attractions in main town

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Air pollution traffic jams

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Yes

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

Planning

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

No

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Yes

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Polluted Land and Buildings

P1: Are there any planning issues that you consider a Polluted Land and Buildings policy should address?

Considering amount of houses being built in specific areas

B: Land Stability

P2: Should the City Plan Part Two include a development management policy regarding unstable land or is this sufficiently addressed by national planning policy guidance and through Building Regulations?

Don't know

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

In one combined policy

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Less street lighting consider amount of housing Beijing permitted

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

Yes

P6: Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

Don't know

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Yes

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Yes

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

No

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

Yes

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Yes

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Yes

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

Don't know

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

Don't know

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	154
Response Date	22/09/16 15:19
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Organisation Name (If Applicable) The Level Communities Forum

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

The City Plan Part 2 should include a Green Infrastructure landscape scale approach. Green spaces are at the heart of every community, and every green space across the City requires its own designation and value, creating a network of green spaces which include parks, allotments, local wildlife sites, recreation grounds, cemeteries, street gardens, and verges. It would then be possible to map local area sections and identify where greater investment in green spaces is needed to off-set pollution and deprivation.

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

A single policy could establish appropriate criteria relative to a hierarchy of designations. This would be achieved by taking a City wide approach, with objectives which support the needs of the City, its biodiversity, protection of species, habitats and communities. Such an approach would also enable the City to enhance its value from the perspective of embedded learning and eco-tourism. Existing resources could feed into an over-arching perspective which moves Brighton and Hove from being a much loved but over-populated and traffic polluted zone of Sussex, to being a City which demonstrates its commitment to protecting wildlife and creating a green environment which enhances the living experience for residents and communities.

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes, but we all need to understand more about what this means.

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Parks should be designated 'Local Green Space'. They are no longer the preserve of ornamental planting schemes, but increasingly reflect the importance of natural planting and surroundings which communities value so highly. Involving communities in assessing and evaluating the value of their green spaces and parks would help to engage residents and visitors in caring for and maintaining spaces in accordance with agreed criteria. The NPPF criteria should be the basis of future planning for the enhancement of parks and green spaces. The Level elm trees are of local significance and huge importance to the urban environment of the Level as well as being of great interest to visitors and schools. We should explore the parameters of the different designations and assign those which will best protect our parks and other green spaces.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Our City needs to change its approach to green spaces and the links between them. We always seem to look outwards to the fringe in search of fresh air and biodiversity. Instead we should be bringing the benefits of green spaces to our communities, using them to address pockets of deprivation, and helping people to move away from a climate of anxiety and negativity. Children must have a right to access green spaces, and to learn to appreciate the value of growing. We must change our expectations - this will mean working differently with communities and volunteers, moving away from the round of community meetings where everyone moans about the council and what is not being done. Instead we will have to be creative in our solutions and ideas, and bring parks and other spaces to the heart of everything we share. The aim will be to capture the energy of Brighton and Hove residents, so they help to develop planting and biodiversity schemes, maintain green spaces and build capacity. In addition, our tourism industry should create opportunities for visitors to see our green spaces and cityscape as a whole, not just the sea front. For example, the i360 should promote the City not just suggest that visitors are on a luxury trip to the sky - it should tell people about the City and its location in the South Downs and about the Biosphere and its value for biodiversity. Existing structures must be re-thought. People are part of the natural environment, and the Level Communities Forum is promoting this approach through its activities and commitment to the Level as a public space.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	155
Response Date	22/09/16 15:26
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Organisation Name (If Applicable) Brighton and Hove Allotment Federation

Individual Name

Individual Address

Individual Email

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

BHAF agrees that locally designated SNCIs should be renamed Local Wildlife Sites, but suggests it is important to understand how much protection is provided through the process of renaming. Allotments could be designated Local Wildlife Sites, but additionally we would propose that all allotments should be considered as Local Green Spaces (LGS), with the protection this might afford. The Council should define what the various designations would mean for a City wide plan for green spaces. In addition it should map and list sites which will be given the benefit of additional local protection from development. This would include allotment sites on the City fringe, where development opportunities are currently being explored. This is not to ignore the need for more local housing provision, but to ensure that local people can benefit from a City infrastructure which protects green spaces and values allotments as essential wildlife habitats.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

BHAF agrees that allotments should specifically be included in local planning policy. Allotment sites may include or border on ancient woodland, or other areas of significant importance in providing wildlife habitats. Recognition of this would contribute to a new approach to allotment policy, based on longevity, environmental protection, and the health benefits of organic and sustainable gardening.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Allotments bring huge benefits. They provide essential pockets of green space to urban areas, and create wildlife zones which bring opportunities to protect a range of habitats which can be linked throughout the City. In addition they have become centres for community volunteering, engagement and learning, with clear and measurable health benefits, in terms of affordable organic food growing, caring for the environment, encompassing and valuing the very activity of growing and an enhanced sense of well-being. BHAF recommends that all City allotment sites currently designated as 'temporary' should be re-designated as 'statutory sites' in accordance with recommendations made in the Fifth Report of the Select Committee on Environment, Transport and Regional Affairs, as long ago as 1998. The following statement was included in that report "We strongly recommend that all local authorities make clear the designations of their sites. With the exception of those sites which are ultimately intended for use as cemeteries, we recommend that any 'temporary' site which has been in continuous use as allotments for thirty years or more be automatically redesignated as 'statutory', subject to an appeal by the local authority to the Secretary of State"
(<http://www.publications.parliament.uk/pa/cm199798/cmselect/cmenvtra/560/56010.htm>)

Please indicate which topic or topics you would like to comment on?

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 156
Response Date 22/09/16 15:36
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on? . Retail and town centre uses
. General comment

Organisation Name (If Applicable) SCOTIA GAS NETWORKS (SGN)

Agent Name

Agent Address

Agent Email

Agent Tel

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

n/a

R2: Are there successful stretches of shops (not currently protected) that should be included in defined primary or secondary frontages of defined shopping centres?

n/a

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

n/a

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

n/a

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

n/a

R6: Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

n/a

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

As the gasworks site lies within the Brighton Marina area discussed in Part 2 of the plan it is important for this policy to consider the constraints of the site. Given the previous uses of the site, there are certain requirements upon SGN to re-mediate the site should the current operations halt. These works, alongside dismantling of associated infrastructure, can result in significant costs, which in turn require value from future land uses to fund this process. It is important that the policy for this area remains flexible and allow for a mix of future uses and we support the principles set out in policy DA2 around the enhancement of the retail offer for the Brighton Marina, Gas Works and Clack Rock Development Area. Due to the nature of the previous uses of the Gasworks site, we propose that the City Plan Part 2 directly acknowledges these constraints by including the following policy to reflect National Planning Policy Paragraph 173 advice on Hazardous Substance and Installations: "Policy Hazardous Installations Hazardous installations will be identified in the Local Plan. The Council will take into account the need to incentive's and fund decommissioning as part of any redevelopment proposal through higher value land uses"

R8: Alternatively, should changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

As per R7.

D: Local Centres and Parades

R9: Is there a need for a separate policy for assessing changes of use in local centres and parades?

n/a

R10: Alternatively, could there be a general policy to assess changes of use in these and other retail areas in the city which fall outside of town/district centre designations? (e.g. the seafront)

n/a

R11: Should Part 2 designate any additional local centre's coming out of large scale housing developments such as at Toads Hole Valley?

n/a

F: Individual Shops and Small Clusters of Shops outside Protected shopping centres and parades

R13: Given changes to the GDPO, is there a need for policy to protect shops and parades outside of existing centres? Should the City Plan Part 2 include a policy that covers larger shops over the 150sqm threshold of the GDPO?

n/a

G: Floorspace above shops and commercial premises

R14: Should the City Plan Part 2 include a policy to guide appropriate uses for floorspace above shops and commercial premises in shopping centres outside of the Central Brighton Area?

n/a

H: Markets

R15: What are the key criteria that should be taken into account when assessing proposals for additional permanent markets?

n/a

R16: Are there any sites that might be considered for allocation for a permanent market use?

n/a

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

n/a

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

Adopted NPPF (2012) In respect of Hazardous Substances and Installations, the adopted National Planning Policy Framework (NPPF), published in March 2012, provides support to the approach Local Authorities should take. It recognises the clear need for viable developments to come forward to avoid stymieing brownfield development sites. In particular, Paragraph 173 states that: "To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable." It is essential that the site is allocated for uses of sufficient value to ensure that the redevelopment of the site is viable, taking into account the significant abnormal costs of these enabling works. There are substantial costs related to the decommissioning of the gasholder, dismantling the associated infrastructure and decontamination of the site. In light of the above, we consider that the New City Plan Part 2 needs to address these site constraints and the key aspects considered pertinent to the redevelopment of a hazardous installation and the Gasholder site itself within the Brighton Marina Area. The emerging City Plan Part 2 needs to

proactively address the requirements and accord with the adopted NPPF (2012). We therefore propose that the New Plan Part 2 includes the following policy to reflect NPPF (2012), as proposed below:-
“Policy Hazardous Installations Hazardous installations will be identified in the Local Plan. The Council will take into account the need to incentivise and fund decommissioning as part of any redevelopment proposal through higher value land uses”

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	157
Response Date	22/09/16 16:09
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Retail and town centre uses . Tourism . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Community facilities
Organisation Name (If Applicable)	Standard Life Investments Shopping Centre Trust (SLI)
Agent Name	
Agent Address	GL Hearn, 280 High Holborn, London WC1V 7EE
Agent Email	
Agent Tel	

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Any proposed Policy which includes a requirement for the provision of outdoor private amenity space needs to be flexible. This is to ensure that private amenity space can be provided on site or allows appropriate contributions to be made in lieu of an on-site private amenity space provision.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Any Policy needs to be flexible to deal with urban sites where amenity space may be difficult to provide. The Policy should ensure it is not over restrictive and thus impacts on delivery of housing in appropriate locations.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

It is not necessary to repeat National Standards within Local Policy.

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

It is important that the Council keeps the retail frontages up to date.

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

It is preferable to have separate policies for each type of centre within the retail hierarchy to better respond to individual context. It is also important to allow for flexibility in Primary Shopping areas to enable A3 and A4 uses which contribute to vitality and viability.

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

We do not consider that there should be a Policy restricting the loss of large retail units in Primary Frontages. This would prevent retail development from being able to respond appropriately to ever evolving customer needs and demands and thus could lead to increased vacancies in prime shopping locations.

R6: Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

No, this would restrict potential development proposals coming forward in prime locations. Any Policy needs to be commercially driven otherwise risks increasing vacancies in prime shopping locations.

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

The Marina has no formal retail designation, its District Centre status having been removed by the Inspector within the City Plan Part One. It is therefore not appropriate to create a special retail area policy for the Marina. Albeit the Plan could provide guidance on the type of retail that may be appropriate but this has to be set in the context of the retail hierarchy set by the City Plan Part One.

R8: Alternatively, should changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

In the context of the answer to Question R7 this would be the preferred approach.

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

The City Plan should identify clear boundaries for the Primary Shopping Area (PSA) which is used for the purposes of assessing retail and other town centre use proposals, in the context of the impact and sequential tests included in the NPPF and in Policy CP4 of the City Plan Part One. The City Plan should also identify which parts of the city centre fall outside the PSA for these purposes. The City Plan Part Two should also identify edge and out of centre areas where provisions of Policy CP4 will apply. In addition, the City Plan should identify areas of the city centre where retail expansion is anticipated (including the DA1 Central site) and identify that once these areas are developed for retail and other town centre uses, they will form part of the designated PSA.

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

The City Plan Part 2 should include a Policy specifically identifying the importance of conference facilities to the Brighton economy, seeking to encourage provision for conference functions to be provided in the city centre and in other appropriate locations outside the city centre.

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Further detail specifically on the parking strategy for the city is required; otherwise all other modes are covered in sufficient detail.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Policy CP9 considers parking at a regional level in terms of better use of car parks at the periphery and encourages the transfer of journeys to bus and rail. This approach seeks to ensure the capacity of car parks is not increased in the central area, and the Council is committed to preparing new guidance for parking and servicing. However in the current absence of a parking strategy setting out the need and integration of these objectives with other travel and transport measures we would expect such direction to be provided in the policy. We note that in 2015 a broader Transport Interchange Strategy was agreed to include a coach and freight strategy, however this will need to be influenced by the parking strategy for the city.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

The existing developer contributions approach or the introduction of a Community Infrastructure Levy Regulations 123 list provides sufficient scope to cover a number of these issues.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

More clarity is required on using Planning Advice Notes rather than setting requirements through policy.

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

We would welcome Planning Advice Notes for Transport Assessments and Statements, and Travel Plans. Currently national advice is referred to, and local thresholds, variances, methodologies, variances, definitions are negotiated on a site by site basis at officer level. Clarity in the above through advice notes could provide notable savings and efficiencies to both Council and developer in terms of resources and programmes.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

No we consider that there is already sufficient Policy.

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Yes we consider that there is already sufficient Policy.

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

The introduction of Community Infrastructure Levy Regulations 123 list and existing developer contribution processes would provide sufficient scope to cover a number of these issues, without recourse to a general mitigation policy.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

We do not consider it necessary to have any further guidance but this will need to be monitored as the Plan progresses.

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

Guidance on the role of Shopmobility is welcomed. A specific new policy, however, is not appropriate and Shopmobility should only be referred to as one of many measures to enhance access for people with disabilities.

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

We do not consider it necessary to have any further guidance but this will need to be monitored as the Plan progresses.

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

Park and Ride and Lorry and Coach site allocations on the periphery could offer effective transport solutions particularly for journeys to the city associated with Waterfront development. However we have no preference or view on potential site allocation at this stage.

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

We consider that the City Plan Part Two should be as up to date as possible in this respect.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

Policy SA1 of the City Plan Part One provides detailed guidance on development in the Coastal Zone and we question the need for more policy guidance on these matters.

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Policy SA1 of the City Plan Part One provides detailed guidance on development in the Coastal Zone and we question the need for more policy guidance on these matters. Any new Policy relating to development of the shingle beach should be criteria based whilst retaining the presumption against encroachment onto the shingle beach. This is on the basis that there may be circumstances where encroachment is justified in terms of wider benefits that may be delivered.

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

Policy should not be prescriptive towards supporting certain types of energy. Technology rapidly advances in these fields meaning that policy could quickly become outdated.

P17: Should a renewable energy policy be explored for City Plan Part 2?

We consider that a Viability Assessment considering the cost of different forms of energy provision is required to inform this Policy.

P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

We consider that any further Policy should be included within the City Plan Part Two rather than an SPD.

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

It is considered that any Policy should not be over prescriptive as it may be inviable to deliver the energy efficiency targets in small development and existing buildings.

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Policy CP12 of the City Plan Part One is comprehensive and it is not considered that further detailed policy is required.

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

Yes, the Design capability of City Council has somewhat diminished and there is currently an over-reliance on other non-accountable bodies providing design advice. Therefore, it is considered that including additional design guidance within the City Plan Part Two would be beneficial.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

The NPPF includes all heritage assets and to be compliant the City Plan should reflect the same provisions.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

The NPPF provides sufficient guidance on proposals affecting heritage assets.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

To maintain a transparent and simpler planning policy basis the focus should be to include policy in the City Plan Part 2 rather than have a series of SPDs and other supplementary documents.

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

The NPPF provides guidance on proposals affecting heritage assets. Therefore it is not considered that there is a specific need for additional design policy.

Community and facilities

A. Retention of Existing Community Facilities, Assessing New Proposals for D1 Use Community Facilities etc

CF1: In the context of seeking to streamline policy in City Plan Part Two, what might be the most effective approach to setting out policies for community facilities? Different approaches could include, for example: - A single policy to address all types of community facility; their retention and how to consider new proposals? - Policies to address the retention of and consideration of new facilities which are organised around the three main groups of community facility (as described above)? - Separate policies for each individual type of community facility in particular where there is a difference in character between the uses and their impact?

In terms of loss of community facilities which includes public halls and conference facilities, any policy should be criteria based and differentiate from different types of community as there may be circumstances where loss of and/or replacement in a different form may be appropriate in planning terms.

Comment

Event Name City Plan Part Two - Scoping Paper
Comment ID 158
Response Date 22/09/16 16:32
Status Submitted
Submission Type Web
Version 0.1

Which section do you want to make comments on?

- . Housing
- . Economy & Employment

Organisation Name (If Applicable) RPS CgMs

Agent Name

Agent Address

Agent Email

Agent Tel

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Yes, this is supported. The redevelopment of certain brownfield sites such as P&H House and Preece House has previously been accepted through the LPA SHLAA which was published July 2016. This noted the following: Site Name: Preece House, 91-103 Davidgor Road, Hove; Number of dwellings proposed through SHLAA: 14 Timescales for delivery: 6-10 years Site Name: P&H House, 106 112 Davidgor Road, Hove; Number of dwellings proposed through SHLAA: 57 Timescales for delivery: 1-5 years Both Preece and P&H House are within the same ownership, detailed below is the current use on each site and relevant planning history: Preece House: Preece House currently comprises a four storey office building use class - B1 (a) with basement and associated car parking at the rear. P&H House: P&H House (located to the west of Preece House) currently comprises a seven storey office building with associated car parking. The building itself currently comprises approximately 4100m2 of B1(a) office accommodation. The site benefits from Prior Approval for change of use from offices (B1) to residential (C3) to form 57 no flats (LPA Reference: BH2014/03006). Neither Preece House or P&H House site is located within an area subject to an Article 4 direction preventing the change of office to residential via permitted development rights. In addition, neither site is allocated for employment use. Surrounding Uses Surrounding the area there is a diverse mix of uses in the surrounding area with an

emerging trend of residential development on former commercial sites, since the introduction of the PD Right. In addition, planning permission was granted at 121-123 Davigdor Road for the demolition of existing building and erection of a new part five, six, seven and eight storey (plus basement) building comprising a total of 47 one, two and three bedroom residential units (C3) with balconies, roof terraces (2 communal) to storeys five, six and seven, community space on the ground floor (D1) together with associated parking, cycle storage, recycling facilities and landscaping (LPA Reference BH2015/02917).

Planning Policy Housing Supply As part of the Core Planning Principles set out in paragraph 17 of the NPPF, local planning authorities should make every effort to objectively identify and then meet the housing, business and other development needs of an area and respond positively to wider opportunities for growth. Objectively Assessed Need for Housing: Brighton & Hove (June 2015) establishes the evidence base for the objectively assessed housing need for Brighton & Hove is 30,120 homes between 2010 and 2030. The City Plan Part I has identified a total supply of 13,210 homes over the plan period 2010-2030. This equates to 44% of the full objectively assessed need (OAN). The Examination Report for City Plan Part I refers to this as being a 'very significant shortfall which has important implications for the social dimension of sustainable development'. The Examination Report however emphasises that the City is subject to significant constraints in finding land for new development and concludes that "The target of 13,200 new homes is expressed as a minimum, which offers scope for that number to be increased when more detailed consideration of individual sites is undertaken for the preparation of the City Plan Part Two". Indeed, Paragraph 35 of the Examiner Report refers to the allocation of additional sites and notes the Council should give this particular attention during the City Plan Part II evolution. Furthermore, the Council have presided over an undersupply against annual housing targets since 2010, compounding the requirement to focus upon sites suitable for housing delivery. Paragraph 4.13 of the adopted plan states that the majority (87%) of new residential development will take place on previously developed land or brownfield sites. As such Paragraph 4.15 recommends that development from small windfall development activity will supplement housing supply achieved from identified sites and also provide a measure of contingency should there be an element of non-delivery from some of the large development sites.

Employment Land The recently adopted City Plan Part One comprises Policy CP3 – Employment Sites which states that 'Loss of unallocated sites or premises in, or whose last use was, employment use (Use Classes B1-B8) will only be permitted where the site or premises can be demonstrated to be redundant and incapable of meeting the needs of alternative employment uses (Use Classes B1-B8). Where loss is permitted the priority for re-use will be for alternative employment generating uses or housing (in accordance with CP20 Affordable Housing)'. The Employment Land Study Review (2012) helped to inform the preparation of the newly adopted City Plan Part One up to 2030. It acknowledges that Brighton and Hove City Council demonstrate loss of B class (largely industrial) space principally to residential (C3) use. The report states that demand for office space in the City remains strong, particularly for small units in Central Brighton and the station/Queen's Road area – despite a shortage of good quality, modern office space, with the majority of current office stock comprising refurbished older buildings that are not suited to the current business needs. The report illustrates the gross floorspace requirements up to 2030. Paragraph 3.14 of the Employment Land Review states that Brighton & Hove recorded an annual average loss of just over 7,320m² for the period 2000-2012, with most of this involving losses from B1a/b office (42%) and B1c/d factory space (38%). The majority of these losses were to residential use. The report concludes that there is sufficient land for offices albeit against a backdrop of very limited delivery of new office space over the past 20 years.

Summary of Current Position In summary, based on the above planning policy position on both housing land supply and availability of office floorspace, there is clear scope and capacity for increased residential or residential-led mixed use development within Brighton and Hove.

Availability of office floorspace in Brighton and Hove In terms of availability of office floorspace, based on publicly available information dated 21st September, there is currently approximately 42,841sqm of vacant office floorspace across Brighton and Hove: - Vacant office floorspace in Brighton – 29,822sqm; and - Vacant office floorspace in Hove – 13,019sqm. The Examiner Report regarding City Plan Part I identified the need for flexibility within the development plan policy regarding protection of sites for employment use and as such the now adopted Policy seeks a high level of protection unless it is demonstrated the premises or sites cannot meet alternative employment need. There is a clear preference for housing delivery as an alternative. This is supported mindful of identified housing need and set against current supply figures for office accommodation.

Shortfall in Housing Supply The shortfall in housing supply against the OAN as described above suggests that redevelopment of any site to provide new housing in areas of identified need has material weight in determining planning applications against hitherto restrictive land use policy – e.g. that which seeks to retain B1 floorspace.

Representations To Draft City Plan Part 2 As both Preece House and P&H House have been allocated

as potential sites in the latest SHLAA it is recognised by policy officers that residential use at both sites is acceptable.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

n/a

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Based on the above analysis within Question H1, Kames Capital wish to put forward two sites for proposed mixed residential and employment (office) use: 1. Preece House, 91-103 Davidgor Road, Hove; and 2. P&H House, 106 112 Davigidor Road, Hove. Site Plans for both sites will be sent separately.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

n/a

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

n/a

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

n/a

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

n/a

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

n/a

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

n/a

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

n/a

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

n/a

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

n/a

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

n/a

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

n/a

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

n/a

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

n/a

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

n/a

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

n/a

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

n/a

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

n/a

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

n/a

A: Offices

E1: Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

n/a

E2: How can we better support the delivery of office sites in the city?

n/a

E3: In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

n/a

B: Mixed Employment Areas and mixed use allocations

E4: Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

n/a

E5: Are there any sites you are aware of that would be suitable for mixed use employment uses and that you would like to see considered for allocation through City Plan Part 2?

Based on the analysis within Question H1, Kames Capital wish to put forward two sites for proposed mixed residential and employment (office) use: 1. Preece House, 91-103 Davidgor Road, Hove; and 2. P&H House, 106 112 Davigdor Road, Hove. Site Plans for both sites will be sent separately.

E6: Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

n/a

E7: Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

n/a

C: Industrial

E8: Are there any opportunities to identify and safeguard land/site for a new industrial estate in the city? If yes, where?

n/a

E9: Are there opportunities to intensify existing industrial estates to bring forward new industrial floorspace? If so, which estates?

n/a

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

n/a

E11: Are there any other opportunities to bring forward new industrial floorspace in the city?

n/a

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

n/a

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	158
Response Date	22/09/16 16:27
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Student accommodation

Organisation Name (If Applicable) RPS CgMs

Individual Name c/o agent

Agent Name

Agent Address

Agent Email

Agent Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

The City Plan part 2 should not establish a target for student housing as this would act as a cap for the potential to deliver student rooms for the 2 rapidly expanding universities. Currently, purpose built student accommodation cannot match the growing number of students in the city as set out in the Housing Scoping Report. Setting a target would fail to take into account the future changing rate of expansion, thus disrupting the required supply of PBSA. We suggest that there be wholesale support for purpose built student accommodation without a set target as this would continue to reinforce the

positive contribution that student housing can make to the current housing offer as well as encourage young people to study in a major City focused on higher education.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Additional sites should be sought for purpose built student accommodation, however it is recommended there should also be significant allowance for unallocated windfall sites. There is a significant and growing demand in Brighton for PBSA of which there is limited supply, thus by allocating specific sites it could restrict growth in the future. Windfall sites will enable the flexibility for PBSA to be built in locations that come forward as being suitable as well as in response to the increasing demand.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

The Lewes Road Bus Garage currently comprises a 2 storey garage building with associated parking for storing out of service buses. It represents a significant opportunity to provide high quality purpose built student accommodation through the development of additional storeys above the existing building. The garage is a brownfield site located along the city's academic corridor which maintains a degree of separation from existing residential areas. The site is well served by public transport as the ground and first floors act as the Brighton & Hove Bus and Coach Garage with 2 bus stops directly outside providing service from a total of 19 bus routes leading into the town centre and the University campuses. The bus garage can therefore deliver much needed student accommodation by maximising the development potential on a brownfield site.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes, due to the nature of student geography in the city it is not possible to locate all within the academic corridor. Student policy should not be restrictive to locations as this would hinder the provision of student housing which would clearly impact upon overall housing figures in Brighton and Hove. Paragraph 50 of the NPPF requires LPAs to plan for mix of housing to meet various community groups, including students. We therefore request that the location of purpose built student accommodation be expanded to include locations outside of the academic corridor.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

There are no barriers to locating student accommodation outside the academic corridor as students are already widely dispersed across Brighton and Hove. Students are not solely located in the academic corridor and therefore developing purpose built student accommodation across the wider city will increase the range of affordable accommodation and improve the quality of living for students already living outside the corridor.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

The cumulative impacts of purpose built student accommodation are easily able to be mitigated through the widespread support for this type of development; its benefits are evident throughout the borough and thus support for them should be encouraged. PBSA benefits local authorities and wider communities through reducing the pressure on the Borough's housing supply and creating more attractive and vibrant residential areas, as shared student houses are often disruptive and left empty for long periods of the year. PBSA are managed schemes that allow for specific controls to be imposed such as noise and behaviour agreements, whereas shared houses are not able to be managed in the same way. It is argued that comprehensive support and appreciation for purpose built student accommodation will lessen their perceived cumulative impacts.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

There are no other issues regarding student accommodation that we would like to see addressed.

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	159
Response Date	22/09/16 16:38
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Housing

Individual Name

Individual Address

Individual Email

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Development should be restricted to available brownfield sites and not green field sites. Also there are many properties that are left intentionally empty to allow profits to be made in the future. These should be compulsory purchased and developed.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

There are urban fringe sites that are unsuitable for development because of the areas lacking the infrastructure to be of use. For example, lack of suitable bus service, amenities, road network.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Developed sites that are deliberately left empty for years

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Dwelling types should suit the particular area

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Housing should represent the need and the area being considered.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

As previously mentioned, local infrastructure and amenities.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes. It is not practical to build housing that is unsuitable for the area

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Yes

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes. Plus public amenity space

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

I don't know of any

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

I don't know

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Better access to renewable energy utilities

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	159
Response Date	22/09/16 16:53
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Transport and Travel

Individual Name

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Yes, it is an urgent problem

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Identifying the need for better public transport, and air quality in the small roads which are used as rat runs

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Yes

TR6: If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?

Should be a consideration for all the above

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

New development should not be approved where there is a lack of public transport and already poor air quality

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

I don't think so

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

Yes

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

The latter

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

I do not know about this

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

I don't know

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

I don't know

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

Encourage more use of public transport and not the increasing use of cars

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	160
Response Date	22/09/16 16:43
Status	Submitted
Submission Type	Web
Version	0.1
Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Community facilities . Student accommodation . General comment
Organisation Name (If Applicable)	University of Brighton
Agent Name	(Bilfinger GVA)
Agent Address	
Agent Email	
Agent Tel	

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

The university is committed to working with the City Council to identify opportunities to provide new housing in the city and, in particular, encourages the City Council to consider opportunities for alternative uses of vacant/redundant buildings owned by the university and which do not reflect the university's strategic objectives for growth. Such assets could provide an important opportunity to contribute towards the City Council's challenging housing needs and the university welcomes further discussions surrounding specific university-owned sites that could contribute towards these needs, where for example they are not in the right locations for higher education provision. On this basis, the university supports the City Council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

As stated above, City Plan Part One sets a housing provision requirement for a minimum 13,200 new homes to be delivered over the plan period to 2030. Section 2.5 of this scoping document identifies the city's urban fringe to make a contribution of 1,000 new homes towards meeting this minimum requirement. Essentially, if the city's urban fringe does not provide 1,000 new homes, then additional pressure is placed on other areas to meet the minimum requirement. The 2014 and 2015 Urban Fringe Assessments presently identify there is housing potential for around 1,000 new homes on 39 of the city's urban fringe sites. On this basis, the university recommends there are no additional assessment considerations to guide the allocation of urban fringe sites, as this will only result in fewer new homes being identified on urban fringe sites. In addition, the university wishes to reaffirm previous representations made to City Plan Part One that requested clarity on the city-wide needs deemed to be appropriate development in the urban fringe, with an emphasis for the inclusion of student accommodation. City Plan Part One recognises that there will be 'some opportunities for development to help meet city-wide needs' (Section 3.156) in urban fringe locations. It is however unclear from the current policy wording which of the city-wide needs specifically could be met by appropriate development in the urban fringe. Further clarity on this would be beneficial within detailed development management policies to avoid ambiguity in future, and as a clear and robust basis for guiding the allocation of sites in City Plan Part Two. The university supports the City Council's objectives with regards to the careful use and management of land within the Urban Fringe, and in particular the inclusion of the wording 'where appropriate' to Policy SA4. We consider this policy wording strikes the right balance between directing housing needs to the most appropriate locations and the environmental benefits of retaining open space in the urban fringe. Opportunities may well arise for new development in the urban fringe which is sympathetic to the sensitive landscape context of the area (and therefore accords with the policy objectives of protecting and enhancing the wider landscape), whilst providing the essential infrastructure and services required for a sustainable future for the City. In light of the increased housing needs identified above, we suggest that this may well include sustainable living accommodation. We strongly believe that sympathetic and sustainable new development that meets the needs of the City (including potential student accommodation) should be deemed appropriate in the urban fringe. Opportunities exist at the Falmer and Varley Park Campuses in particular to promote new academic floorspace, student accommodation and sporting facilities that are sympathetic to the sensitive landscape context of the urban fringe. In our opinion, these opportunities could meet city-wide needs for student accommodation, and education, sports and recreational facilities.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

The university acknowledges that the 2014 and 2015 Urban Fringe Assessments identify university-owned land at Varley Park Campus (References: 21 (Land to the north east of Coldean Lane); 21a (Land north of Varley Halls) and 21c (Land south of Varley Halls) as having potential to accommodate additional housing growth of approximately 130 units. This site is identified within Policy CP21 of City Plan Part One as a site that will be allocated for purpose-built student accommodation of approximately 150 bedspaces. Given the acute need for additional student accommodation in the city, which will assist to alleviate pressure on the city's general housing stock, this is an urban fringe site allocation that would not be a suitable site for family sized housing due to its close proximity to the university's residential estate at Varley Park.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

The difficulties associated with clusters of House in Multiple Occupation (HMO) housing within the city are appreciated, and it is considered that the high number of HMOs is due, in part, to the lack of student accommodation within the City. In order to address this problem, it is proposed that the City Plan Part Two allocates additional sites, in close proximity to existing University campuses, for Purpose Built Student Accommodation as well as seeking to maximise efficient delivery of student bedspaces on existing allocated Purpose Built Student Accommodation sites.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

The university is currently preparing a planning application for detailed proposals on part of its Moulsecoomb Campus including the development of a multi-storey car park on the existing car parking area located to the south of the Watts building. The university has worked with the American Express Community Stadium to provide Park and Ride facilities for match days and would expect this to continue as it acknowledges the wider benefit this brings to the City. The site is located within the Lewes Road Development Area where policy DA3 of City Plan Part One supports proposals which facilitate improved sustainable transport infrastructure that provides choice. The university is committed to working with the City Council and welcomes further discussions in this regard.

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

The university would like City Plan Part Two to include a policy that provides clarity on what types of development may be appropriate within the NIA. At present, Policy CP10 is ambiguous in this regard and it would be beneficial for a detailed development management policy to be included to provide guidance to landowners, such as the university.

B2: If you think a policy is needed, what types of development should be included?

Significant areas of the university's Falmer and Varley Park Campuses are designated within the NIA and the University has identified land within these campuses for the provision of additional academic floorspace and student accommodation. As stated within our representations to City Plan Part One, the Varley Park campus is a dedicated site for student accommodation and conferencing facilities. Students based here are primarily allocated to either the Falmer or Moulsecoomb campuses for academic studies. The university consider there is potential for further intensification of development at Varley Park for student accommodation. This is supported by the 2014 and 2015 Urban Fringe Assessments, which has identified parcels of land located in the NIA for approximately 130 additional student bedspaces. The university encourages the City Council to support their objective to intensify development at the Varley Park Campus to provide additional student accommodation, both on university-owned land and any adjacent land which might be suitable for such purposes by including student accommodation as appropriate development in the NIA, as part of a detailed development management policy. Furthermore, the entirety of the Falmer Campus is located within the NIA but it is also located within Development Area 3 (Lewes Road). The main thrust of the strategy for the Lewes Road Development Area is to promote and enhance the role of the area for higher education, as part of an 'academic corridor'. The university therefore encourages education development to be included as appropriate development in the NIA, as part of a detailed development management policy.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

The university supports the inclusion of further policy in City Plan Part Two that incentivises delivery of low carbon and renewable energy. In particular, the city plan should assess which policy mechanisms have been used successfully by other local authorities and implement these locally.

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

The university notes that, locally, Community Energy Organisations are very well developed (Brighton and Energy Coop, BHESCo, Community Energy South etc.) and other areas have successfully developed municipal energy companies involving the local authorities, Community Energy Organisations and private sector partners to develop and manage local renewable energy installations e.g. Cornwall. There is also a lot of potential in the city or district heating that could be run using the model described above which is prevalent in Denmark. The local energy spend thus stays within the local economy which provides wider benefits.

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

The university considers that, having regard to the findings of the Renewable and Sustainable Energy Study 2012, City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks.

P17: Should a renewable energy policy be explored for City Plan Part 2?

The university supports the exploration of inclusion of a renewable energy policy in City Plan Part Two.

P18: What factors should be considered when exploring this approach?

The university recommends that the City Council explores successful renewable energy approaches that have been adopted in other local authority areas.

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

The university considers targets for energy efficiency should be explored for City Plan Part Two for smaller developments and those in existing buildings.

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

The university considers that locally there is a well-developed network of suppliers of low carbon, environmental goods and services – the Green Growth Platform. The plan could promote use of local supplier networks to deliver low carbon projects.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

We consider that class D1 educational uses should be assessed on their own merits rather than using an umbrella 'community facilities' policy, owing to their particular importance to the local economy and community. The university seeks a policy that enables the sustainable expansion of its academic floorspace in order to allow the university to respond to its academic floorspace needs over the plan period.

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

The university requests that the City Plan Part Two does not seek to establish a target for the amount of student housing to be met through purpose built student accommodation. It is essential for the university to have the ability to provide sufficient student accommodation for its students in line with its own strategic objectives. Student accommodation needs generally follow the profile of full time student numbers which is difficult at this juncture for the University to forecast accurately over the plan period to 2030. Furthermore, according to the City Council's own evidence, a significant proportion of overcrowding in the city can be directly attributed to the student housing market. Therefore, the objectives of the university and the City Council are closely aligned, and the university is committed to working with the City Council to ensure both the accommodation needs of its students and of the local population can be met. On this basis, the university requests that detailed development management policies to deliver the objectives of Policy CP21 are generally worded in flexible terms to allow the university to respond to its needs over the plan period.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Policy CP21 of the City Plan Part One requires proposals for new purpose built student accommodation developments to demonstrate that they have entered into a formal agreement with one of the city's two universities. The university is committed to working with the City Council to identify opportunities to allocate additional university-owned sites for purpose built student accommodation, which reflect the university's strategic objectives for growth.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Moulsecoomb Campus The Moulsecoomb Campus is located within the Lewes Road Development Area, where the strategy is to further develop and enhance the role of Lewes Road as the city's academic corridor. Notwithstanding, provision is made in Policy DA3 for an additional 1,300 student bedspaces across the development area and 750 student bedspaces in strategic allocation DA3.C.1 (comprising Preston Barracks, Mithras House and the Watts/Cockcroft site). As stated in our previous representations to City Plan Part One, in conjunction with its strategic partners, the university envisages the delivery of approximately 1,300 new student beds across strategic allocation DA3.C.1 in order to meet identified needs and improve the student experience at Moulsecoomb. In the context of the identified need for significantly more bed spaces, the university is keen to work with the City Council to support significantly more student accommodation at the Moulsecoomb campus. Uplift in the provision of student accommodation at this location also represents an opportunity to develop further the objectives of both the City Council and the university. An increase of student bed spaces will help create the vibrancy and 'critical mass' of student activity the university is striving to achieve at Moulsecoomb, in order to improve the student experience at this campus. By attracting new students, the university hopes to attract further investment to help deliver the City Council's aims for the area through the creation of a vibrant 'gateway' to the City, encourage sustainable modes of travel and the associated opportunities to deliver improvements in air quality. It is also important to highlight the City Council's own findings into housing needs in Brighton & Hove, which identifies significant levels of overcrowding currently experienced within the city, which is largely attributed to the student housing market. By enabling the university to provide sufficient student accommodation to meet its growing student intake in the coming years, the City Council will likewise help relieve pressure in the wider housing market for the benefit of the local population as vital housing stock is not occupied by students who are unable to secure halls of residence accommodation. Providing sufficient student accommodation is essential if the University is to achieve its own strategic objectives and continue to contribute positively to life in the city. For the reasons provided above the university requests that any detailed development management policies that are drafted to deliver Policy DA3 is flexible enough to allow the university to respond to its student accommodation needs over the plan period. **Falmer Campus** Whilst Policy DA3 is broadly supportive of the expansion of Falmer Campus, the university encourages the City Council to take a more positive approach to new development at Falmer as previously set out within adopted Policy EM18 (Local Plan 2005). The university is keen to work with the City Council to determine the appropriate level of growth at Falmer Campus in order to deliver the university's strategic objectives of enhancing its medical school, sports facilities and student accommodation provision at the campus.

More specific policy support for the enhancement of Falmer is essential to ensure the highest standards of student experience are delivered. Accordingly, the university may consider options for the refurbishment of its facilities and amenities at Falmer. The university is therefore keen to work with the City Council to ensure the Falmer Campus provides the highest standards of facilities for its students and staff.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

There are a number of areas which are planned for student accommodation in proximity to the university campuses where it is appropriate and most sustainable to locate student residences. A more dispersed approach to suitable locations for purpose built student accommodation is more likely to worsen accessibility to the university campuses and cause an unacceptable impact upon residential amenity in surrounding areas. Furthermore, by ensuring student residences are located in close proximity to the university campuses, a critical mass will be created that is necessary to deliver an exceptional academic and student offer.

Please indicate which topic or topics you would like to comment on?

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

The university acknowledges that the City Plan Part One sets a minimum housing target of 13,200 new homes to be built in the city over the plan period 2010-2030. However, as set out in our June 2015 representations to City Plan Part One, the university supported the findings of the City Council's study into 'Objectively Assessed Needs for Housing: Brighton and Hove (June 2015)' which identified a housing need within the city of 30,120 new homes to be delivered in the period to 2030. This equates to an average of 1,506 new dwellings per annum. This is significantly higher than the past levels of delivery in the city, which have averaged just 499 dwellings per annum over the last 10 years. Therefore, the City Plan Part One seeks to meet a minimum requirement that is a reduction of 56% from the objectively assessed need. We note that the City Plan Part One Inspector acknowledged that this would be an under-supply of 1,238 homes in the first four years of the Plan period (2010-2014). In this context, clearly everything should be done to maximise the delivery of new homes on deliverable sites as soon as practicable in order to address this shortfall. The sustainable growth of the city is essential to the success of its higher education institutions as the two are intrinsically linked. By ensuring the needs of the city are met, the City Council will create a more attractive environment (socially, economically and environmentally) for prospective students, who in turn contribute towards social, economic and cultural life within the city. The university recognises its role as key partner in meeting the City Council's strategic objectives and is committed to working with the City Council to deliver the Strategic Vision for the City. In particular, the university wishes to reaffirm its commitment to assisting in the delivery of key strategic housing allocations (e.g. The Moulsecoomb Campus development). The university further recognises the unique land availability constraints affecting the City and supports opportunities for the City to meet its own needs as best it can within its boundaries in collaboration with key landowners and strategic partners.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	161
Response Date	22/09/16 16:57
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on? . Biodiversity and Open Spaces

Individual Name

Individual Address

Individual Tel

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Re the open spaces on ditchling road , a place of dog walks football and wild life not to be built on a tragic thing open spaces v important

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Please indicate which topic or topics you would like to comment on?

From: J Hawkins
Sent: 22 September 2016 12:34
To:
Cc: PlanningPolicy
Subject: City Plan part 2 Consultation – Biodiversity and conservation section – comments

Dear Sandra, Helen and planning policy department,

I'm sorry, I've found the website consultation difficult to navigate and understand. I've been informed that commenting by ordinary email is allowed and that the comments submitted this way will also be considered.

I wish to comment on matters relating to the **Biodiversity and Open Space Scoping Paper**.

Within this subject area I would like to comment specifically on **Allotment sites** and **Gateways to the National Park**.

I am Chair of Craven Vale and Whitehawk Hill Allotments Society and I am also a committee member of Friends of Sheepcote Valley, which is East Brighton's Downland and our 'Gateway to the National Park' (as we have referred to it for many years).

1. Allotment sites

Ref Allotment sites and 'retained policies' from part 1 City Plan –

Myself and other allotmenters have worked through the 'retained policies' from part 1 of the City Plan. A *colleague summarises our thoughts on this*: "There are definitely two ways of interpreting the status of the 'retained policies'. It would be wonderful if they were already adopted but I fear they may only be valid as a holding position against developers until the final plan is adopted, with or perhaps without allotments protected. I am sure someone will be able to tell us eventually." [note: we still are not sure, as of 22/9/16].

Biodiversity –

Our comments are most relevant to policy CP10:

Policy CP10 Biodiversity in City Plan Part One requires development proposals to provide net gains for biodiversity, taking account of the wider ecological context of the development and of local Biosphere objectives.

Policy CP10 sets a strategic approach to nature conservation enhancement within the NIA. It indicates that 'within the setting' of the NIA, development will be encouraged to *incorporate innovative approaches to nature conservation enhancement, such as biodiverse roofs/walls*. Off-site nature conservation provision is to be directed to the NIA wherever possible.

Our thoughts – Biodiverse roofs/walls obviously are welcome, but they can deliver only a fraction of the nature conservation enhancement and biodiversity provided by allotments. City-wide, allotmenters are encouraged to garden with sensitivity to wildlife and to avoid using harmful chemicals. The vast majority of plot-holders garden organically and with habitat enhancement/creation for wildlife in mind.

Natural England recognises the importance of allotments for sustaining wildlife and promotes the creating of habitats and chemical-free cultivation in a document called ***Wildlife on allotments***. A pdf of this is available via this link, provided by Brighton and Hove Allotment Federation:

[http://www.bhaf.org.uk/documents/ne20wildlife_on_allotments\[1\].pdf](http://www.bhaf.org.uk/documents/ne20wildlife_on_allotments[1].pdf). The allotment federation website also has a page of downloadable advice and tips such as 'Butterflies and Moths Conservation', "Monthly Gardening tips from Pesticide Action Network UK", "How to help honeybees and other wildlife through the winter". This demonstrates that Brighton and Hove allotmenters take biodiversity seriously.

I write with direct experience of gardening for wildlife on allotments – Craven Vale and Whitehawk Hill Allotments are twin sites in East Brighton that share the same boundary fence. **They are both included within the boundaries of Whitehawk Hill Local Nature Reserve.**

Because we cultivate in a sensitive way with wildlife in mind, many uncommon species (often with falling numbers) are found on our two sites. This is also true of the other allotment sites across the City.

Mammals: We have two badger setts, bats are frequently seen flying overhead in the warmer evenings.

Reptiles and Amphibians: We have slow-worms and lizards in abundance. Many plot holders have created small wildlife ponds resulting in a sizeable population of frogs and also some common newts.

Invertebrates: Many notable butterflies are recorded by a CV&WHAS committee member who is also a member of the Butterfly Conservation group. A sighting of a short-tailed blue butterfly resulted in enthusiasts travelling from East Anglia in hope of seeing it. Earlier this year a ‘Toadflax Leaf Beetle’ *Chrysolina Sanguinolenta*, was discovered on a plot and verified/recorded by Graeme Lyons, senior ecologist for Sussex Wildlife Trust. It hadn’t been recorded in Sussex since 1979.

See Mr Lyons' blog: <http://analternativenaturalhistoryofsussex.blogspot.co.uk/2016/05/the-thin-red-line.html>

Plants: Because of our avoidance of harmful chemicals many ‘arable weeds’ flourish. These small, fragile flowering plants were once found widely on cultivated areas of the Downs, but now have all but disappeared. They are mostly found only on allotments these days. They require disturbed ground. 140 species of wild flowering plants were recorded by botanist Tony Spiers on our allotments last year. (An excel document with his findings can be supplied if required.)

Tony Spiers: "Of the rarer species, Dense-flowered Fumitory (*Fumaria densiflora*) was recorded on one plot. This species is included in the Arable Annual Group section of the Brighton and Hove Local Biodiversity Action Plan (LBAP) adopted by the City Council in 2013. It is also a Sussex Rare Plant Register (2001) species."

Other arable weeds have been recorded on Whitehawk Hill Allotments – these include Weasel’s-snout (*Misopates orontium*), (another B&H LBAP species) and Rough Poppy (*Papaver hybridum*) and Yellow Vetchling (*Lathyrus aphaca*) both included in the Sussex Rare Plant Register (SRPR)

Valuable health-giving 'Open space' provided by allotments –

The benefits of allotments cannot be overstated – in terms of both physical and mental health of the people that use them. They provide exercise, healthy fresh food, company and socialising for those who live alone. Local food production reduces ‘food miles’ and therefore contributes to mitigating climate change greenhouse gases. Many people living in Brighton and Hove do not have gardens or access to green outdoor space. Allotments provide a healthy and sociable alternative.

Summary: For the reasons stated above, on behalf of Craven Vale and Whitehawk Hill Allotmenters (and all allotmenters City-wide) –

we believe that it should be planning policy that no part of any Brighton and Hove allotment site should be deemed suitable for building development.

2. Open Space, Local Green Space and Gateways to the National Park

"Policy CP16 sets a strong positive approach to the retention of existing open space. This is because opportunities to deliver additional open space are limited, despite there being a significant objectively assessed need for open space."

7.20 The 2014 Urban Fringe Assessment identified four urban fringe areas as having potential for designation as Local Green Spaces. The study notes “these are the ‘green wedges’ into the urban area, which act as wildlife

corridors and important routes for people wishing to access the South Downs.” The four areas identified were: Benfield Valley; Three Cornered Copse; Ladies’ Mile; and, Hollingbury Park.

7.21 Key to the setting of the city is the wider South Downs landscape and its importance is nationally recognised through its National Park status. The city’s location, adjacent to the national park, is one of its positive attributes and it is important that this is recognised and an understanding of and access to the South Downs National Park appropriately promoted.

QUESTION B9 Are there any green spaces that you think should be designated as a ‘Local Green Space’? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

ANSWER:

YES, Sheepcote Valley (East Brighton’s Downs) + adjoining East Brighton Park at the South end of Sheepcote.

Location: Its Western boundary is Wilson Avenue, Eastern boundary is East Brighton Golf Course, North boundary is Warren Road, South Boundary is Roedean Road.

The whole area (excluding East Brighton Park) is a Local Wildlife Site (LWS) and comprises over 90 hectares of public open space. **The sloping Eastern flank of the valley is INCLUDED within the South Downs National Park Boundary** and is former arable land with an area of chalk grassland at the Southern end.

The Western side of the valley is flat and accessible through several wooden swing gates located along Wilson Avenue. There are many informal pathways throughout the valley which link up to provide circular walks. There is a bridleway which runs along the entire length of the eastern ridge giving stunning views across the Southdowns National Park and out to sea. On clear days the Isle of Wight can be seen in the South West. Belle Tout Lighthouse (at Beachy Head) is often visible looking Eastwards across the Downs from this ridge. An easy-access path runs from the North end of Wilson Avenue eastwards along the North of Sheepcote Valley (next to the Race Course) and along the entire length of the Eastern flank bridleway. There is also a well-used route Westwards from Wilson Avenue along Race Hill to Whitehawk Hill Local Wildlife Site.

Further links to the National Park – Crossing Warren Road at the North end of Sheepcote Valley the old ‘Drove Road’ trackway can be picked up behind the row of houses. This runs Eastwards to Falmer Road, which can be crossed to continue through the National Park along the Juggs Road track to Castle Hill National Nature Reserve or on to Lewes. From the North end of Sheepcote there is also a bridleway leading SE to Wick Bottom & Mount Pleasant, and a route on to Ovingdean and Rottingdean – all through National Park designated areas.

At the Valley’s South end, **East Brighton Park** is an attractive, well-maintained park encircled by trees which include many mature elms. There is a lovely café (now under new management by people from the deaf community – see: <http://www.crowdfunder.co.uk/dotties-cafe-east-brighton-park-community-cafe> and <http://www.theargus.co.uk/news/14727160.Ground-breaking-deaf-cafe-opens-in-Brighton/>)

The park is a much-loved area for meeting up, dog walking, playing sport. There is a very regular bus service to the park. East Brighton Park appears to be an ideal ‘gateway’ to the National Park – accessing both the very local SDNP Eastern slope of Sheepcote which extends southwards to the edge of the park, and the SDNP wider afield.

Opportunities for leisure, exercise and mental health as well as physical health benefits –

- A weekly, well-attended ‘Healthwalk’ has been running from East Brighton Park for the past 15 years – the route goes North from the park to the top of Sheepcote Valley along the National Park Boundary. It continues Eastwards to Wick Bottom before returning over East Brighton Golf Course bridleway and back to the park.
- Regular, led nature walks are held – The highlights are an ‘Early Bird’ walk held every April, to spot native and migrant birds resident in the valley, led by Dave Boddington from the local branch of the British Trust for Ornithology. BHCC Ranger, Paul Gorringer, leads a very popular butterfly walk in June or July.
- Many bird-watchers visit the valley to see rare passage migrants.

- Monthly work-days are held by local conservation group, 'Friends of Sheepcote Valley'. These include scrub clearance, bench-building, step-building, copse clearance and native species tree and shrub planting. These provide health-giving opportunities for outdoor exercise and socialising.

Potential beneficiaries of Sheepcote Valley/East Brighton Park being designated as a Local Green Space –

The Whitehawk Estate has been described thus by the Government's Indices of Deprivation report, 2015: "The most deprived area of city has been named as the northern most part of Whitehawk, which is the 332nd most deprived area in the country - putting it just outside the bottom 1%. The second most deprived area is also in Whitehawk - around the Whitehawk Clinic - ranked 338. The lower part of the estate is number four."

A higher profile for Sheepcote Valley and East Brighton Park with it's opportunities for leisure and gentle exercise, mental health boosts through contact with nature (biophilia), and opportunities to socialise could encourage neighbouring Whitehawk residents to visit and participate, creating many benefits in terms of physical and mental health.

The appeal of Sheepcote Valley/East Brighton Park as a 'Gateway' to the National Park would attract people from other areas of Brighton and Hove, who would also benefit in terms of physical and mental well-being.

ENDS

Thank you for your attention to my submission.

best regards,

- 1) Thank you for the opportunity to respond to the City Plan part 2. ¹

- 2) I was unable to locate and read every one of the 48 policy documents to which you refer in your most helpful Scoping document on housing. That made it difficult to frame a full response to your document. No doubt those worthy documents are daily fare for you, but for mere residents like me, it's a morass of turgid and uninteresting detail into which I do not have time to delve. Thank you for referring me to them.

1

City plan pt1
2015 Housing strategy
CP1 housing delivery
Policies DA1-DA8
Strategic Housing land Availability assessment
Urban fringe assessments
Emerging neighbourhood plans
2015 further assessment of Urban Fringe Sites
Housing and planning act
Brownfield site registers
Statutory development plan
2014 urban fringe assessment
Policy CP19 housing mix
SA6 Sustainable Neighbourhoods
CP20 affordable housing
2005 local plan
QD3 design etc
CP14 housing density
DA1-DA6 and DA8
CP19 housing mix
2005 Brighton and Hove Local plan
Policy HO5
Optional building regulations
Written ministerial statement
Building regulations Part M
CP8 city plan part 1
CP12 urban design
Saved local policy HO13
Lifetimes homes standard
HO14 loss of
Brighton and Hove Housing Strategy 2015
Brighton and hove Student housing strategy 2009-2014
Article 4 directive April 2013
Use class 3 in planning regulation
C4 use clause
HMO licensing
Cp21 student housing etc
Existing 2005 Local Plan Policies to be replaced / deleted by City Plan Part Two
HO1 Housing sites and mixed use sites with an element of housing
HO5 Provision of private amenity space in residential development
HO8 Retaining housing
HO9 Residential conversions and the retention of smaller dwellings
HO10 Accommodation for homeless people
HO11 Residential care and nursing homes
HO12 Sheltered and managed housing for older people
HO13 Accessible housing and lifetime homes
HO14 Houses in Multiple Occupation
HO15 Housing for people with special needs

- 3) I do not feel obliged to reply in the format of your questions. They are predicated on the basis of the existing City plan, existing housing policy, and existing housing policy objectives. I could not find a box (for example) that allowed a response '*no thanks, none at all*'.²
- 4) It is unsafe to regard each segment of the City Plan as self contained. The effects of the findings within the Economy paper will generate or reduce employment with consequences for each of the other topics.
- 5) Residents at Byre Cottages oppose the use of land in urban fringe 38 38a and 39 for housing.
- 6) Ovingdean is an historic semi rural farming village. The land is farmed all around the village, and is part of the National Park.
- 7) House prices are high. Housing take-up in the village will therefore be by relatively well off family or personal setups, which will dictate private transport.
- 8) Public transport is relatively poor, with buses to and from the City Centre at 90m intervals weekday daytime, none in mid evening, and hourly at Sundays.
- 9) The style of housing so far permitted in the village (I admit my interest since I live in one) has been 3 to 4 bedroom stock. That dictates families, travel, motor transport, nurseries, schools, doctors, shops, pubs, deliveries, and every other demand of modern life.
- 10) I can see twelve houses from my study. Those twelve houses produce twenty three vehicles between them. I admit to owning five of them, but I drive only one at a time. As families grow up the children seek the independence of driving licences and cars. Five of the families here now have children who drive and have their own cars.
- 11) Developers will not build housing that is unattractive to buy. They will not build housing that is uneconomic to buy. Housing of the type that could potentially sell will be the same as at present, which will produce large family units, more vehicles, and demand on services which at present is not met.
- 12) The City will be aware of the demand for services by housing from maternity wards to undertakers. None of that need is met in Ovingdean, apart from a local shop, and a church. I cannot identify any places where anything more substantial than a doctors surgery could be installed.
- 13) There will be no point in installing housing for diverse groups such as the elderly or the disabled or social housing. Members of those groups may not be able to afford the purchase price, or the difficulties imposed by transport restrictions, or the distance from the places that they want to visit.

² My remarks apply in equal measure to the Heritage paper CPP2, to which I make no greater response.

- 14) The city plan is all very well but it lacks a strategic oversight which is necessary for Brighton. With the geographic limitations imposed by sea and downland, the only way to build new housing is down or up or out.
- 15) People live where they want to live within their budgets. They want to live close to places that they use with transport to them. Those considerations should be included in planning policy and taken into account in every application, not just those matters listed in H2.
- 16) Question H3 is surely only going to provoke fifty replies from fifty respondents who may say '*by all means build but not near me*'. I can think of lots of places nowhere me where the City should build.
- 17) Has the city considered buying Mid Sussex and building there? There are fewer constraints such as those geographical ones I mention below.
- 18) The City is a highly desirable place in which to live, and meeting the targets imposed will only create yet further unachievable demand for more of the same – the M25 effect.
- 19) It is disingenuous to regard allocation of brownfield sites for housing as 'safeguarding' them. From what are they safeguarded? If you are hinting at a choice between housing and factories or between low level housing and high rise, then you should say so.

22 September 2016

ECE Planning

Planning Policy Team
 Brighton & Hove City Council
 Room 201 Kings House
 Grand Avenue
 Hove
 BN3 2LS

22 September 2016
 Ref: RH/Let/P1347

Dear Sir / Madam,

City College, Pelham Street, Brighton

We are writing to make representations on behalf of City College in relation to the current City Plan Part Two Scoping Paper Consultation (30 June to 22 September 2016). City College are looking to significantly improve the City College campus by providing enhanced learning and teaching facilities to serve Brighton & Hove and the wider area. The College wish to create a new sustainable mixed use development in the heart of the City that will build upon the surrounding regeneration of the area but most importantly deliver significant improvements to the existing college campus accommodation.

The existing further education accommodation in Pelham Street is provided by a number of restrictive Victorian School buildings and a 'Sixties' tower block which no longer meet the demands of 21st Century education. The restrictions faced by City College due to its inflexible accommodation have resulted in difficulties in providing appropriate facilities for certain courses, for instance, specialist Hair and Beauty and Construction Trades courses.

As the fabric of the College's accommodation has deteriorated, the cost of maintaining these building has also increased. At the same time, the overall size of the current College buildings are far larger than is required with a development strategy seeking to reduce the amount of overall floorspace but significantly improve the quality. Overall objectives for City College include:

- Re-imagination and extension of the existing Pelham tower and plinth to deliver outstanding teaching and learning facilities for Greater Brighton;
- Creation of a new Creative Industries building connected to the existing college by an atrium slot;
- Public realm improvements with new public square and improved pedestrian connectivity;

Directors

Chris Barker MATP MRTPI Managing Director
 Huw James MRTPI
 Adam King RIBA

ECE Planning Limited
 Registered in England
 No 7644833
 VAT No 122 2391 54
 Registered Office: Amelia House
 Crescent Road, Worthing BN11 1QR

ECE Planning

- Commercial and residential development opportunities created;
- Disposal site for much needed housing or other educational use;
- Kick-starting the wider regeneration of the area.

The City Plan Part Two scoping paper looks at education, in part, at Chapter 3 – Economy and Employment (Questions E4 to E7), and Chapter 11 – Community Facilities (Questions CF1 to CF4).

It is contended that the City Plan Part 2 should ensure that future detailed policies are not overly restrictive, potentially hindering the ability for education providers, such as City College, from investing in much needed improvements to facilities. The viability of large scale improvements is frequently dependent on separate funding streams and integration within wider mixed use schemes. Therefore, detailed policies should not place restrictions which unduly limit the viability of improvement schemes to education facilities within the City.

We trust this is of assistance at this stage of the City Plan Part 2 process and request that due consideration is given within the overall objectives and policy framework to help facilitate the needs of City College in the significant improvement of educational facilities at the Pelham Street Campus.

If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely
ECE Planning

Director
Enc.

City Plan Part Two Scoping Document Consultation 2016

Report of Comments from the Kingscliffe Society

2 Housing

H9: It should not be left to the market alone to decide on suitable locations for particular housing needs. The involvement of user groups and their representatives, and the perspectives of local residents, should inform the distribution and placement of at least some schemes.

H13: Private outdoor amenity space should certainly be provided in new developments, especially in the most densely built areas of the city.

H15: Better space standards are needed, especially as many of the central built areas are crowded and cramped and traffic-clogged.

H19: A policy that encourages conversion of HMOs to family-sized dwellings would benefit the East Cliff area.

3 Economy

R5: St James's Street could benefit from designation as a special retail area, as its identity is currently an uncomfortable compromise, loosely associated with seafront clubs and amusements, and suffering from an excess of alcohol, convenience and supermarket shops akin to North Street's, whereas its historic character has more in common with East Street and the Lanes special area while its residential character is comparable to North Laine special area.

R12: St George's Road, between Bristol Road and Portland Place, is significant in its neighbourhood and in the broader surrounding context, and should be considered an "important local parade".

5 Tourism

T1: "it is essential that the seafront is well maintained and managed" [5.4] "Maintaining seafront infrastructure is currently a high priority issue" [5.5].

While the condition of the decorative infrastructure of the seafront is clearly germane to investment in the underlying solid structures and their engineering, the city plan fails to make the permanent, regular and skilful maintenance of all the ornamental iron and woodwork (lamps, railings, shelters, benches) a top priority for expenditure. One-off regeneration projects are merely temporary measures.

At the same time, while there is obviously a need to improve and augment the practical facilities (lighting, showers, toilets, kiosks, shade, etc) required along Madeira Drive, development sites should be low-scale and restricted to the existing points i.e. opposite the Aquarium terraces, at the Peter Pan area, and at the Black Rock Volk's station, in order to preserve long broad promenades with wide open sea views.

T2: There is insufficient guidance in the city plan for seafront planning applications. A clear principle should be established that solid or opaque new developments should not be erected on the south side of the seafront roads.

T3: We support the view of the hoteliers' association that there are more than enough hotels in the city and that their quality should be given priority over their preponderance.

T4: We believe that, for the sake of residents and of the long term tourist economy of the city, it is absolutely essential that the trend towards party housing and airb&b, threatening the community and character of entire historic streets in conservation areas, is in some way recognised in the city plan. It is neither sufficient nor fair simply to wait for national government policy to respond to these phenomena.

The large-scale entertainment and celebratory events for which the city is famous constitute another element of the tourist offer extended by the city authorities. Arguably in the tourism section, but certainly somewhere in the city plan, consideration should be given to the necessity for restitution and cleaning of land, streets and pavements in the immediate aftermath of such events, including where necessary deep cleaning.

6 Transport

TR15: We would appreciate some attention in the city plan to the lack of public transport along Madeira Drive, Grand Junction Road, King's Road and the east Hove front. The precise need may not be simple to assess or to meet, but it needs acknowledging.

7 Biodiversity and Open Space

B9: We note that in the recent local listing review, several public green spaces in the city, including for example the Dorset Gardens park, lost their local listing status. We trust that the general commitments in the city plan to the preservation of existing green spaces of this type will endure.

Meanwhile we would propose that, if the south Victoria Gardens' grass and trees can be more wholly protected by designation as a local green space then this should be sought. This is a unique city field of timeless undulating rural character with several grand mature elms and open views of fine architecture in all directions.

There is widespread concern that the south Victoria Gardens, Old Steine gardens and Hove Lawns are subjected to an excessive scale and duration of occupation for entertainment and marketing events.

P10: We consider there is insufficient concern for the marine environment in the requisite process and procedures for seafront planning applications.

P12: The presumption against encroachment on the shingle should be strengthened. Development should not interrupt the spectacular lengthy rectangular stretches of shingle beach. Reference could be made to the potential removal of some of the unsightly and more or less redundant structures.

9 Design

D1: Vernacular scale and contours, and reliable traditional materials, can be applied or extended carefully at an immediate local level, as can distinct new modern-styled places, but bland pastiche or vague ideas of "referencing" do not help local character and interest.

Certain locations and neighbourhoods are much more distinctive than others and require sensitive and sympathetic policies.

D3: Opportunities for large scale new developments should be approached with a deft attention to design, to avoid soulless monoliths. Their categorisation as major projects makes consultation all the more necessary. Local residential knowledge and feeling, which is seldom simply negative and is generally able to be constructive, ought to be given much greater trust and credit by the planning authority than at present, particularly in relation to tall and massive developments.

D2: If there is to be expert architectural review, advance information would be helpful regarding the individual experts' qualifications, experience and perspective. High quality design should depend on technical competence, durability, performance and appropriate materials rather than architectural fashions and tastes.

Improved cooperation among the range of relevant services, departments and disciplines would clearly be welcome, provided practical infrastructure issues do not overwhelm but do support sensory considerations in the design process.

D4: Whether policy on extensions and alterations is in the main city plan or in supplementary documentation is less important than the accessibility and effectiveness of the guidance.

D7: It is less important whether a policy on amenity is spread through the policy areas or compacted into one policy than that the translation of policy into officer judgments and committee decision making is more democratic from a local resident point of view. There is much less risk of "prevention" of development if local interest is genuinely consulted and incorporated.

10 Heritage

HR9: Local public knowledge or awareness of the existence and extent of an area's conservation status is generally deficient in the city. This is particularly true of the East Cliff Area. Policies should note the virtue of de-cluttering streetscapes and vistas, and cooperate in the introduction of signage indicating conservation areas' titles, possibly by refinement or embellishment of some existing street entrance signage. Moreover services such as highways, lighting and refuse should be required to consult on heritage implications before pursuing plans for city-wide or neighbourhood facilities and products such as signage and bins.

The plan should also address problems presented by graffiti, murals and informal public art.

Apart from inside the museums, Royal Pavilion and planned Volk's exhibition space, and a few old large posters in Hove, there is very little physically presented information about the heritage of the city.

HR11: From time to time a particular feature of the seafront ironwork becomes the popular subject and focus of concern or celebration. In the heritage policy, there should be a much more forthright assertion of the significance of the whole of this exceptional historic decorative and ornamental infrastructure and street furniture. The seafront strategy stresses the need for higher priority in the regular maintenance of these neglected features, and this point should be reinforced in the city plan.

We are especially concerned that any development from below should not rise above the Marine Parade pavement level, and that any development along the south side of Madeira Drive should be minimal in its impact on the promenade, beaches and open sea views.

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 expanding its customary area, and without damaging the essentially relaxed pedestrian and beach-orientated nature of Madeira Drive.

HR12: Planning policy could help to enhance the graceful historic character of St James's Street as a retail and residential neighbourhood by a much stricter approach to alcohol and night licensing.

HR15: Planning policy should not only serve to protect listed buildings, green spaces and conservation areas, but also by some means the unique overall shape and historic character of the city, which is essentially determined by the downland and shoreline topography.

Committee of the Kingscliffe Society

21 September 2016



Sussex
Wildlife Trust

By email only

planningpolicy@brighton-hove.gov.uk

Brighton and Hove City Council



F.A.O Planning Policy Department

City Plan Part Two – Scoping Document

The following comments, related to biodiversity matters, are made on behalf of the Sussex Wildlife Trust. The comments are based on the Brighton and Hove City Plan Part Two scoping document.

Question H1

Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safe guard their use for housing development over the plan period?

The allocation of any sites, including brownfield sites, should be guided by a comprehensive and up to date evidence base. We would encourage Brighton and Hove City Council (BHCC) to ensure that before any sites are allocated, their ecological value has been recently assessed, with a commitment to reassessing the ecology of the site prior to approval of any planning application. By doing this, BHCC will comply with National Planning Policy Framework (NPPF) paragraph 111 '*Planning policies and decisions should encourage the effective use of land by re-using land that has previously developed (brownfield land), provided that is not of high environmental value.*' To be in accordance with paragraph 114 of the NPPF, BHCC should also evaluate a site's contribution to delivering a coherent ecological network before a step towards allocation is made.

Question H2

The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

We recognise that the evidence base includes preliminary ecological surveys for the urban fringe assessment sites, undertaken in September 2015. However all site allocations need to be considered in the context of ecological connectivity and their value in delivering towards the City's ecosystem services.

Woods Mill, Henfield, West Sussex BN5 9SD

01273 492630

enquiries@sussexwt.org.uk sussexwildlifetrust.org.uk

President: David Streeter MBE Chairman: Carole Nicholson Chief Executive: Dr. Tony Whitbread

Objective 3 of Policy SA4 in the City Plan Part 1 is *'The promotion of urban fringe land as part of the city's green network and, where appropriate, encouraging opportunities for multi-functional uses such as, appropriate recreation and cultural experience, new allotments and local food production and biodiversity conservation and enhancements (see CP10 Biodiversity).'*

This objective requires the data relating to the ecological network to be up to date. We are concerned about site selection in the urban fringe taking place without this information playing an integral part in the decision making process. The Sussex Wildlife Trust is aware that that BHCC have had some of their ecosystem resources map by the Sussex Biodiversity Records Centre. This information could be vital in the process of selecting sites and we would encourage the necessary links with the council to be made to ensure this information is used as part of the evidence base.

We ask BHCC to ensure that all the ecological surveys are in compliance with the BS42020 guidelines: Biodiversity - Code of practice for planning and development.

Question H13

Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

We would encourage BHCC to ensure that when sites are allocated, the provision of private outdoor amenity space is stipulated within policy wording. Private outdoor amenity space can contribute greatly to the City's natural capital and deliver towards the multifunctional ecosystem services that the council have committed to delivering during the life time of the plan through CPP1, CP10.

Question B1

Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

NPPF paragraph 117 states that:

'To minimise impacts on biodiversity and geodiversity planning policies should where Nature Improvement areas are identified in Local Plans consider specifying the types of development that may be appropriate in these Areas'

Policy CP10 in the CPP1 does touch on the NIA, but does not go as far to recommend the types of appropriate development. Given of the wording of the NPPF we would encourage BHCC to consider a specific policy to this end.

Question B2

If you think a policy is needed, what types of development should be included?

Due to the diverse area the NIA covers, some considerable thought would be required as to the types of developments that should possibly be included in a policy. It is also important to recognise that although a type of development might be included in a policy it does not automatically mean it would be suitable; it may lack sufficient information about biodiversity impacts or biodiversity gains. It could be beneficial to contact other local authorities in NIA areas to see how their local plans have addressed this approach.

Question B3

Should the City Plan Part Two include a green infrastructure landscape Scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

We would strongly encourage BHCC to ensure that they move rapidly towards developing an up to date Green Infrastructure network and implementation strategy. The strategy should look to develop an overall vision of a connected green /blue infrastructure network, but should also provide a detailed approach on a scale which is applicable to developments.

The council should demonstrate its commitment to this approach by adopting a green infrastructure policy within the City Plan Part Two. The policy should include wording to ensure development contributes to the delivery of the BHCC green infrastructure strategy. This could be built upon further with the inclusion of a green infrastructure SPD. We would encourage BHCC to work with their neighbouring authorities on matters relating to green infrastructure, thus helping to ensure opportunities beyond the city's boundaries are considered.

Question B4

How should the City Plan Part Two set out criteria based policies to distinguish between the hierarchy of different nature conservation designations? For example should a single policy establish appropriate criteria relative to hierarchy of designations? Please indicate what you think would be appropriate criteria.

The local plans we are asked to comment on increasingly recognise the hierarchy of sites as underlined in NPPF paragraph 113. An example of this is demonstrated in policy wording in the Mid Sussex District Plan (pre submission):

'Biodiversity will be protected and enhanced by ensuring development:

- Contributes and takes opportunities to improve, enhance, manage and restore biodiversity, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats, and incorporating biodiversity features within developments; and*
- Protects existing biodiversity, so that there is no net loss of biodiversity. Appropriate measures should be taken to avoid and reduce disturbance to sensitive habitats and species. Unavoidable damage to biodiversity must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances); and*
- Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience; and*
- Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Sites of Nature Conservation Importance, Local Nature Reserves and Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, aged or veteran trees, Biodiversity Opportunity Areas, and Nature Improvement Areas.*

Designated sites will be given protection and appropriate weight according to their importance and the contribution they make to wider ecological networks.'

We encourage BHCC to seek other examples of hierarchical policies in order to inform their policy.

Question B5

Should there be a specific policy to address the general protection and enhancement of species?

We would encourage a policy that encourages the ethos of the NPPF which is a net gain in biodiversity. A policy on this could also set in place the clear importance of protection of a site's existing biodiversity value, including species. The policy should also highlight the importance of net gains and enhancements being thought through creativity and with innovation, and not simply be in the form of providing bird or bat boxes.

Question B6

Should City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

We encourage BHCC to take every opportunity to recognise the value of their Sites of Nature Conservation Importance (SNCI). This must be enshrined in the City Plan Part Two by the council committing to a regular review of sites. This would ensure steps to encourage positive management of the sites are underway. In turn the benefit of these sites for biodiversity and wider ecosystem services could be calculated for the City.

To our knowledge the 2013 technical review has not been formally published and therefore we are unclear at this stage if sites are being suggested for deselection or selection. The Sussex Wildlife Trust attended the three workshops for the SNCI review in 2013 and express concern at the methods and selection criteria that were used for the review.

The Sussex Wildlife Trust feel strongly that if sites were unable to be accessed for the review that they should remain an SNCI until evidence is available to enable a review. As a public body, BHCC has a duty under section 40 of the Natural Environment and Rural Communities Act 2006 to *have regard...to the purpose of conserving biodiversity*. Therefore BHCC should see SNCIs that have fallen into poor management as an opportunity for the council to work with land owners to get the site back into a positive condition and not an inevitable consequence that the site should be deselected. Additionally the site's value within the City's Green Infrastructure Network may mean that deselection is inappropriate.

We would support the renaming of SNCIs as Local Wildlife Sites (LWS)

We appreciate that there are sites that are being brought forward for possible selection as suitable for SNCI status on a regular basis. For example we are aware of the wealth of survey work that has been undertaken at Meadow Vale. A recent NVC survey has found it to be a mosaic of MG5b and MG6c (both communities found over chalk bedrock) with a very high cover of herbaceous species. Additionally, there are over 4000 individual plants of Red Star-thistle and the site boasts a very considerable invertebrate assemblage. We would be encouraged to see BHCC consider sites such as this for SNCI/LWS status.

Due to the continued proposal of sites for SNCI /LWS status, we encourage BHCC to plan for the next review and in doing so consider adoption of LWS selection criteria that is used by both East and West Sussex. I have attached a copy of this selection criteria. We would be happy to work with you and other relevant partners to ensure a consistent approach is achieved across Sussex.

Question B7

Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient Woodland , aged veteran trees , local geological/geodiversity sites)

Policy CP10 currently lacks specific reference to Section 41 priority habitats and or species and therefore a policy to highlight the importance of these habitats would offer welcome recognition of their value and clarity to developers about their important within the city. Any policy should encourage the preservation, restoration and re-creation of these habitats and species.

NPPF paragraph 117:

'Planning policies should: promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'

NPPF paragraph 118:

'Planning permission should be refused for developments resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland unless the need for, and benefits of, the development in that location clearly outweighs the loss'.

The City Plan Part Two must include policies that sufficiently protect and enhance Local Wildlife Sites.

Question B8

Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

While we do not feel currently able to offer specific suggestions for allocations of new open space, we would encourage BHCC to consider new open space designations following a review of their green infrastructure network. This review should include the mapping data from the Sussex Biodiversity Record Centre on ecosystem services provision. Any newly designated open space should have multifunctional benefits to people and wildlife.

Question 10 B

Do you consider the following green spaces should be designated local green spaces?

**Benfield Valley
Three Cornered Copse
Ladies' Mile OpenSpace
Hollingbury Park**

We are keen that BHCC seek all opportunities available to them to protect valuable natural assets within the city. If by designating these sites as Local Green Spaces it further protects them from development we would support this. However we are keen that the council ensure that other assets within the city's ecological network are considered for their merit in receiving local green spaces status, especially those that currently have no formal protection.

Question 11B

Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park ?

We welcome the council's ideas for increasing accessibility to the South Downs. If they are minded to adopt an approach which designates gateways then we would encourage measures to protect these areas from development. Some of these areas are already designated LNRs with Hollingbury Park being a proposed LNR. We are keen to understand what added value the council feels the designation of local green space will bring to these sites. Before commenting on the suitability of these sites to act as gateways, we would welcome more information on how the council intends to make them into gateways and link them with the South Downs National Park.

Question 12B

Can you think of any other policy issues that relate to the natural environment (not already covered in the section above or topic areas) that you think City Plan Part Two should seek to address?

We would support a policy that looks to specifically highlight the importance of ecosystem services within the city. It should aim to ensure that over the life time of the plan the cities natural capital is not compromised by development but actively improved. A policy of this nature would be a bold and positive step forward for the city.

Given the urban nature of the city we would encourage the council to adopt a policy that looks at resisting the inappropriate development of residential gardens. In such a heavily populated area gardens form an important component of the cities ecological connectivity. Therefore we encourage the council to follow the sentiment of the NPPF paragraph 53 which states.

'Local authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'

Question P10

Is there Sufficient policy guidance in the city Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

The plan needs to addresses the cross over between the terrestrial and marine planning environment to ensure that the appropriate safeguards for our natural environment are in place in terms of policy wording. We would strongly advise you seek the expert advice of organisations such as the inshore fisheries and conservation authority (IFCA) to ensure that mechanisms to achieve this are in place.

Question P12

Is there a need for a further policy regarding the presumption against encroachment onto the shingle beach?

We would fully support a policy that sought to protect the rare and globally threatened habitat of vegetated shingle from encroachment. Vegetated shingle habitat is a priority habitat as noted under section 41 of the NERC Act. There is already considerable pressure on this habitat from development along the Sussex coastline. Therefore protection through a policy would be a sound approach for the council to take.

Question P15

Having regard to the findings of the renewable and sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation and storage or networks?

The Sussex Wildlife Trust encourages efforts made to reduce carbon emissions and encourages micro generation. However should BHCC progress towards allocating specific sites for energy generation, we ask you to be mindful of the entire land take of the scheme, particularly if connection to the grid is required.

Should you wish to discuss any of the matters we have highlighted within our consultation response we would be happy open dialogue so that we can ensure that the City Plan Part Two progresses in a positive way.

Yours sincerely,

Sussex Local Wildlife Site Selection Criteria

These criteria are applicable to East Sussex and West Sussex administrative areas only.

Sites of Nature Conservation Importance (SNCI), a term defined locally, shall be referred to as Local Wildlife Sites (LWS) in this guidance, a term used across England and in Government legislation and guidance.

The recommended selection, modification or deletion of LWS will be agreed by a panel of local experts, the LWS Technical Panel, in line with the criteria listed below, with reference to the standard selection criteria in the Local Guidance sites guidance 2006, listed in appendix 1.

The LWS Selection Panel may include suitably qualified or experienced representatives from:

- East Sussex County Council
- West Sussex County Council
- Sussex Wildlife Trust
- Sussex Biodiversity Record Centre
- District or Borough Councils
- Natural England

And where appropriate, suitably qualified or experienced:

- Local nature conservation experts
- Member of the Sussex Botanical Recording Society
- Member of the Sussex Ornithological Society
- Member of other local nature conservation/recording bodies

It should be noted that the ecological value of a site is determined by many variables and there will always be the need for 'best professional judgement' in site selection. Selection should be based on reliable, up to date information.

Accordingly, these criteria should be updated periodically to reflect changes in:

- Distributions of habitats and species
- Local and national knowledge and understanding
- Biological recording and data availability
- Nature conservation in general

Criteria

These LWS site selection criteria have been created with reference to the following local and national nature conservation policies and guidance:

- Local - Sussex Rare Species Inventory
- Local - Sussex Biodiversity Action Plan Habitat and the evolving Sussex LNP biodiversity strategy
- National - Biodiversity 2020
- National – Natural Environment and Rural Communities Act 2006, Section 41, Habitats and Species of Principal Importance in England
- National - Ancient Woodland, as identified by County and District Ancient Woodland Inventories

- National – Local Sites Guidance (Defra, 2006)

The following criteria have been set by which the designation, modification or deletion of LWSs will be judged. Any site which meets the following list of criteria is eligible for selection as a LWS:

Habitat Criteria

CH1 Sussex Biodiversity Action Plan Habitat

“All areas of Sussex Biodiversity Action Plan habitat shall be eligible for selection.”

CH2 Habitat of Principal Importance in England

“All significant⁽¹⁾ areas of habitat of principal importance in England, as defined in section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, shall be eligible for selection.”

CH3 Ancient Woodland

“All sites considered to be ancient woodland, shall be eligible for selection”.

CH4 Sand Rock Exposures

“All significant areas of sand rock exposures and associated habitat shall be eligible for selection.”

CH6 Mosaic Habitats

Sites will be eligible for selection where:

(a) “A site comprising two or more sub-habitats, each of which just fails to be selected as a Site within its own main habitat criterion group or on species grounds.”

Or

(b) “Where a site that would not necessarily warrant selection on its own provides a significant and clearly identifiable extension to the habitat of an adjacent or nearby LWS or other statutory designed wildlife site (e.g. SSSI).

Consideration to other designated sites or land of nature conservation value in the vicinity will also be considered.”

CH7 Wildlife Corridors

“Where two or more LWSs are linked by additional habitat of a type that would allow the dispersal and interchange of species within each site, adding significant conservation value to the habitat or species, then these corridors will be eligible for selection with the LWS or potential LWS sites.”

CH8 Site expansion

“Areas of potential habitat in close proximity to existing habitat and receiving appropriate management may be eligible for selection.”

Species Criteria

CS1 Species Criteria

“Sites supporting significant populations or relic populations of internationally, nationally or locally rare species, or species assemblages, will be eligible for selection as a LWS, or may contribute towards eligibility for consideration under the habitat criteria. For these purposes,

'supporting' may be defined as sites that either directly support breeding populations of species or provide a significant ecological function for the life cycle of that species, including resident or migratory species to the Country or region.

Reference will be given to the following information:

- Sussex Rare Species Inventory
- Sussex Biodiversity Action Plan and evolving Sussex LNP biodiversity strategy
- Natural Environment and Rural Communities Act 2006, Section 41, Habitats and Species of Principal Importance in England"

⁽¹⁾ 'Significant' areas are those capable of providing a substantive contribution to the conservation of Habitat of Principal Importance in England, and/or sustaining viable species populations comprising Habitats of Principal Importance in England, and/or providing a genetic resource for species comprising Habitats of Principal Importance in England.

Bibliography

Local Sites Guidance on their Identification, Selection and Management, DEFRA 2006
Natural Environment and Rural Communities (NERC) Act 2006, Section 41, Habitats and Species of Principal Importance in England
Local Wildlife Site Selection Criteria, Essex Local Wildlife Sites Partnership, 2010
Guidance for the Selection of Sites of Nature Conservation Importance (SNCIs) in Surrey, Surrey Wildlife Trust, 2008

Appendix 1

Extract from: "Local Sites Guidance on their Identification, Selection and Management, DEFRA 2006":

Reference Criteria for the Selection of Local Sites

Size or Extent

The ability of a site to support a species depends, in part, upon its extent. The requirements of many species of animal for minimal areas for foraging and territories for breeding may preclude their survival within smaller areas of otherwise suitable habitat. The same may also be true of certain plant species where the long-term viability of populations may require a minimal extent of habitat free from adverse environmental influence, allowing for turnover within local populations. Although, for mobile species, including many birds, mosaics of different habitat features or elements at the wider landscape scale are essential, the presence of individual blocks of a particular habitat type of a minimal size can nevertheless be critical.

Where the interest of a site is an active natural process, such as shifting tidal flats, the site boundary should encompass the area of active process as well as any adjacent area to which the process will imminently spread.

Although larger sites can be critically important for supporting viable populations of certain species, smaller sites can also be important where species are able to use them as 'patches' of a larger habitat resource dispersed across the landscape. Small sites may also be the only locally available patches of accessible natural greenspace offering opportunities for the appreciation of nature.

Diversity

A key principle of nature conservation is to sustain the diversity of wildlife, habitats, geological and geomorphological features. The former includes maintaining genetic diversity within populations of animals and plants as well as the diversity of species and habitats. Some habitats are characteristically more species-rich than others. For example, unimproved calcareous grassland is considerably richer in plant species than heathland. However, each habitat type is characterised by its own range of species. Conserving the diversity that these different habitats represent, and the diversity of their respective floras and faunas, means effectively conserving the integrity of these contrasting environments, one richer in plant species, and the other poorer.

Conserving diversity at a landscape scale can involve maintaining habitats at different stages of ecological succession. This may mean arresting succession of a particular patch of habitat at an intermediate stage or allowing sufficient patches of habitat to proceed

through succession at staggered intervals such that at any one time different patches are at different stages of succession.

England contains a wide diversity of geological features and landforms from a range of eras within a relatively small area. Individual sites and features together contribute to this diversity. The sites in a Local Sites system should seek to reflect the diversity of features that characterise the geology of the area in question as together they provide the basis for understanding the processes that have built and shaped the resource over time.

Naturalness

Human activities past and present have had such an impact that even those parts of the landscape that seem least modified are now more usually described as 'semi-natural'. In this context, the concept of 'naturalness' is probably better considered not as the absence of human intervention or legacy within a site but the degree to which a site supports natural features or demonstrates active or past natural processes. Eroding coasts are dynamic features dominated by natural processes. In contrast, quarry exposures revealing rock strata betray past natural processes within what is a landscape feature clearly of human, industrial origin. Both significantly demonstrate 'naturalness' by revealing past or present natural process.

Within urban areas, natural processes of colonisation and succession can transform previously developed land into seemingly natural vegetation. But it is often the early stages of such natural recolonisation that, though less apparent, are more significant for the presence of rare or scarce species of conservation importance. Therefore, naturalness should be considered as much in terms of process as the presence of 'natural' features.

Rare or Exceptional feature

This is perhaps the most self evident of the criteria. The local loss of a rare species or habitat may result directly in the reduction in its wider geographical range. For species that are rare, local populations may represent an important part of the total species gene pool. The loss of a local population may result in the irreversible loss of genetic diversity, local races or subspecies and ultimately of species themselves. Exceptional geological features if lost are equally irreplaceable; the environments and processes that created them may no longer exist.

Fragility

Although some habitats and geological features are stable over long periods, others are more prone to change and so are at greater risk of being lost. Such change might be the successional change that occurs naturally or may be due to the direct or indirect impact of other influences or human activities. This may extend to include the influence of climate change. For example, some invertebrates require grasslands with short open turf with a good proportion of exposed soil. The cessation, or even the reduction in the intensity of grazing, could lead to the loss of species in relatively short periods of time. Similarly many sites such as peatlands are susceptible to erosion and damage from trampling and unmanaged access. Active conservation management is important in maintaining the condition of sites, countering adverse impacts and preventing the loss of ephemeral populations and habitats through successional change. Fragility should not be construed as susceptibility to development. It is the intrinsic sensitivity of habitats or features that should be considered rather than the site's likelihood to face development. Different types of habitat and geological feature have different sensitivities to change and damage. In

contrast, many woodlands are comparatively robust and may require little management to conserve their nature conservation interest over long periods.

Fragility is relevant to evaluation of sites because Local Site designation could aid the conservation of fragile habitats and features through prioritisation of land management resources.

Typicalness

Generally, Local Sites will not be typical of the landscapes in which they are found; their designation is likely to reflect the fact that they are special in some way. Rather, their value lies in them exemplifying a type of habitat, geological feature, or a population of a species, that is characteristic of the natural components of the landscape in which they are found.

Wildlife habitats and geological features play an important role in helping define a 'sense of place' or local distinctiveness. They represent the 'natural character' of an area, especially where this has been lost or eroded from the wider landscape. Similarly, sites may exemplify natural processes past or present whether geological or biological. In this way, Local Sites are likely to typify the best of the natural environment of an area.

Recorded history and cultural associations

Past investigation or recording of a site can add greatly to its value for understanding processes and change in the natural environment. Many sites also have links to historic events or have literary or other associations in art. Besides revealing environmental change (or stasis) over time such recording or portrayal can also reveal changes in perception of the natural environment and the economic value that it has been ascribed at different times. Because the natural environment has been extensively shaped and influenced by human activity, the natural features that we have inherited and which provide important components of regional and local distinctiveness also represent important parts of our cultural heritage. A good example of this is the relationship between local geology and building stone. Not only are many towns and cities dominated by buildings made of locally quarried stone, but the former quarries from which such stone came are commonly sites of local value for their geological or ecological interest.

Because Britain has played an important role in the history of Earth Science, many sites are of significance as the places where scientific concepts were first demonstrated.

Connectivity within the landscape

Besides being of intrinsic interest themselves and directly supporting wildlife within their boundaries, Local Sites also have an important role in supporting populations of species within the wider landscape. Such species may not depend on any single site or piece of habitat but rather require a habitat resource which is comprised of numerous patches which though dispersed, are accessible and are potentially parts of a functional network. Individual sites need to be considered in terms of the contribution they make to such networks; not simply the quantity of habitat they provide, but its geographical position. The quality of habitat and the nature of the surrounding matrix are also extremely pertinent considerations.

In considering the geological interests of potential sites, a relevant factor would be the degree to which their interest features contribute to understanding landscape-scale geological or geomorphological processes, past and present.

Value for Appreciation of Nature

The scale and cumulative impact of human intervention in the landscape, plus social changes, such as the decline in land based employment, have had a combined effect in reducing people's contact with nature and a high quality natural environment. There is growing evidence that the positive associations that people have with the concept of nature is reflected in benefits to people's well-being. Whilst there is an established history of recognising the intrinsic appeal or aesthetic value of nature manifest in particular places, the amenity and spiritual benefits provided by contact with nature has often been considered a subordinate concern. Sites which are important for the conservation of rare species or exceptional geological features, are rich in biodiversity or typify the natural character of an area will often be additionally important for providing people with the chance to experience and enjoy local wildlife and geology. In populous areas that are poorer in high quality natural environment, sites of lesser intrinsic ecological or geological interest may still be of substantive nature conservation value for the opportunities they provide for the appreciation of nature.

Although the absence of rights of access to sites can clearly affect the opportunities for experiencing, and close enjoyment of, the interest features within them; their protection and enhancement within the landscape can offer significant visual appreciation from neighbouring or more distant locations.

Value for learning

The value of statutory designated sites such as nature reserves, in providing opportunities for research and investigation into ecology and geology has been a long established and accepted principle in nature conservation in Britain. Today, there is an equal need to provide sites for local educational use to enable people of all ages to learn about and better understand the natural world around them.

Some sites may offer particular local opportunities for controlled research, investigation or experimental work. The ease with which people can reach a site, the safety of access and for use of the site, and the rights or permission for using the site will all be relevant considerations.

Mobile No.		
------------	--	--

Part B: Your Comments

A. Landscape Scale Approach

Question B1

Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes, a policy should be provided.

Some areas of the NIA, including some urban fringe sites contain priority habitats and species, and species included in the Local Biodiversity Action Plan (LBAP) should be included in a policy that protects them. Sites listed as stepping stones or wildlife corridors are essential for the connectivity of species so these should be recognised within the policy.

The following issues within policy QD18, and congruous with NPPF paragraph 117, regarding species protection is not addressed fully within policy CP10 and therefore should be incorporated:
“Regard will be given to the achievement of Biodiversity Action Plan Targets”
“Permission will not be granted for any development, including changes of use, that would be liable to cause demonstrable harm to such species and their habitats”

Question B2

If you think a policy is needed, what types of development should be included?

Some sites within the NIA, including some urban fringe sites, are not suitable for ANY development so developers must not assume that a policy which advises certain types of development are acceptable without undertaking full and comprehensive ecological and landscape assessments. Assessments should comply with BS42020 guidelines: Code of practice for planning and development.

The policy should robustly adhere to paragraph 118 of the NPPF which states “if significant harm resulting from a development cannot be avoided...then planning permission should be refused”.

Question B3

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes.

B: Nature Conservation, Geodiversity and Landscape Sites:

Question B4

How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

The council has a legal obligation under Section 40 of the NERC Act 2006 to have regard to the purpose of conserving biodiversity. NPPF paragraph 117 is clear in that policies should promote the preservation, restoration and re-creation of priority habitats. These points should be robustly adhered to under all hierarchies of designations.

This obligation should be adhered, to if a site without any specific designation is found to have priority habitats and species listed in the LBAP.

The hierarchy of designations should also include any site which has been proposed to be designated.

Sites without any specific designation should be included if they are wildlife corridors and are important to the connectivity of habitats or species.

Policies should also be guided by “Biodiversity 2020: England Biodiversity Strategy”

Question B5

Should there be a specific policy to address the general protection and enhancement of species?

Yes definitely.

As stated above, policy QD18 should be fully incorporated into CP10.

This policy should also include reference to translocation of habitats and species; in line with JNCC guidelines in their policy for Conservation Translocations of Species in Britain and make clear that translocation of species is not an acceptable alternative to in situ conservation.

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

The LBAP was included in the bid for the successful designation of Biosphere, and appropriate protection should be given to species listed within the LBAP.

Question B6

Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Some sites discussed in the review of 2013 were deselected merely because access was not available or requested; Meadow Vale (urban fringe site 42) was one of those sites. Based on up to date information regarding the biodiversity of Meadow Vale, the priority habitat and species within it; and the calibre of ecologists that have undertaken work and produced comprehensive reports for this site over the past couple of years, the Sussex Wildlife Trust has recommended it to be designated a LWS, as has the Sussex Botanical Recording Society.

There must be a method in which this site, and others, can be put forward to be adopted as LWSs when new information comes to light. The LBAP itself states that successful implementation depends on contributions from business, public and voluntary sectors.

Question B7

Are there any other sites or features that should be included or specifically addressed through planning policy? (E.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Yes, wildlife corridors and stepping stones, which are essential for the connectivity of species and habitats and should be included. They are an integral part of the biosphere.

Habitat **loss** and fragmentation was identified by the Millennium Ecosystem Assessment as one of five direct drivers of **biodiversity loss**.

C: Open Space, Local Green Space and Gateways to the National Park:

Question B8

Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Question B9

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Yes, Meadow Vale, Site 42, Land South of Ovingdean Road. This space is special to the local community and holds particular significance because of the richness of wildlife contained within it.

Question B10

Do you consider the following green spaces should be designated Local Green Spaces?

- **Benfield Valley;**
- **Three Cornered Copse**
- **Ladies' Mile Open Space**
- **Hollingbury Park.**

Yes –Benfield and Hollingbury are both partly within the SDNP, and the remainder should be designated as Green Space

Question B11

Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes, they provide links from the town centres to the Downs, and should be retained.

D: Are there any other biodiversity and open space issues?

Question B12

Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

To reiterate - As a public body, BHCC has a duty under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to *have regard...to the purpose of conserving biodiversity*. This MUST be the fundamental issue to be robustly adhered to in any policy where the ecology of a site is valuable. Up to date and adequate information must be provided about the biodiversity affected in any proposal.

All ecological surveys carried out, including those that were undertaken by LUC for the urban fringe assessments must be in compliance with the BS42020 guidelines: Biodiversity - Code of practice for planning and development. If new information has come to light since the Urban Fringe assessments then they must be looked at before being nominated for possible development. There

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

should be a mechanism in which this information can be submitted.

Further detailed landscape impact assessments should also be carried out on sensitive urban fringe sites, such as site 42, before being nominated for possible development.

The following schedule should also be taken into account:

“Biodiversity 2020: A strategy for England’s wildlife and ecosystem services”, which includes important objectives relevant to Brighton and Hove.

Foreword by Secretary of State - The Rt Hon. Caroline Spelman MP

“Ambition to halt overall loss of England’s biodiversity by 2020 ... longer term, to move from net biodiversity loss to net gain.”

Signed/typed*:	
Dated*:	September 21 st 2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

From:
Sent: 22 September 2016 14:39
To: PlanningPolicy
Subject: RE: City Plan Part Two - Scoping Consultation
Attachments: Representations (amended scheme).pdf

Dear Planning Policy team

I act for Saltdean Countryside and wish to object specifically to your proposed site allocation at land adjacent to 6 Falmer Avenue, Saltdean (Site 50 in the Urban Fringe Assessment). My objections are based on the following grounds:-

- The site is not a sustainable location for new development
- Its inclusion is not necessary and unwarranted to achieve compliance with Part 1 of the City Plan which focuses on delivery of brownfield sites
- The sensitivity and environmental constraints of the site are not compatible with an allocation for residential development
- It's development would be contrary to a whole range of local and national planning policies (see attached report which objected to the planning application that was ultimately rejected by your Planning Committee and is now subject of an appeal), as well as being at odds with the National Park Inspector's report who concluded that the site should remain within the National Park designation.
- The balanced assessment required when weighing the contribution of this small site towards meeting strategic housing needs against the significant environmental harm caused by its release is seriously questioned and should be challenged; the fact that this site has advanced at all indicates that your scoping criteria is flawed.

Focusing on your 'Housing' section only, I wish to address your questions, as follows:-

H1:- Yes, brownfield development is supported

H2:- The Council's assessment of the subject site (No 50) is flawed for the reasons set out above and should be deleted from the plan. (It is noted that the Council's latest SHLAA increases the capacity from 12 to 32; this is unjustified and premature in the light of the pending appeal determination).

H3:- Any alternative sites should be capable of making a meaningful contribution towards the Council's five year land supply position in weighing the planning balance between meeting objectively assessed needs against environmental constraints.

H4:- There is no need to be too prescriptive but rather general guidelines should be applied to achieve an appropriate mix of housing

H5:- Yes, that would be appropriate given the identified need.

H6:- No comment

H7:- Such a policy would be difficult to apply across the board because of the different environmental sensitivities and constraints involved in each case.

H8:- Yes; in particular, the contribution of bungalows to the housing stock should not be dismissed.

H9:- In some cases it may be appropriate to allocate sites specifically for specialist housing in order to meet objectively assessed needs

H10:- No comment

H11:- Yes; loss of existing housing stock should be resisted

H12:- All residential stock is valuable and should be protected

H13:- Yes; there should be requirement for outdoor amenity space

H14:- Yes; there is little point in providing space if it is not useable

H15:- Yes; the new national standards should be introduced for new housing

H16:- Where practicable this would be a desirable aspiration

H17:- No comment

H18:- HMOs can make a valuable contribution at the lower end of the market so in some cases it may be appropriate to protect them

H19:- Not necessary; encourage family homes in new build developments

H20:- No comment

H21:- More detailed consideration should be given to weighing the merits of small sites in terms of benefits and harm, especially in terms of achieving sustainable developments. Appropriate Urban Fringe sites should be of a strategic nature and not released on a 'ad hoc' basis.

I trust that you find these comments of assistance and look forward to receiving your formal acknowledgement. If there is a further EIP hearing scheduled to deal with these matters, including proposed site allocations, we would wish to attend accordingly.

Kind Regards

Director



Magenta Planning Ltd
Company No. 06772118

The information in this e-mail is confidential and is intended for the individual or entity named above. Access, copying or re-use of information in this email is unauthorised. If you are not the intended recipient please contact the sender. Although we have taken steps to ensure that this e-mail and attachments are free from any virus, please make sure in keeping with good computer practice that your system is protected to avoid the risk of introducing a virus through this communication.

From: PlanningPolicy [mailto:PlanningPolicy@brighton-hove.gov.uk]
Sent: 30 June 2016 11:43
Subject: City Plan Part Two - Scoping Consultation

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016

Dear City Plan Consultee,

City Plan Part Two – Scoping Consultation

I am writing to advise you that Brighton & Hove City Council has started work on Part Two of the City Plan and has published a Scoping Paper for consultation.

The City Plan Part Two will identify and protect smaller development sites for housing and other uses such as community facilities. The Plan will also include detailed planning policies which will be used to assess planning applications, in line with the overall approach set out in the recently adopted City Plan Part One.

The Scoping consultation is an important early stage in preparing the plan. You are invited to comment on the matters you think should be included in the City Plan Part Two and to also let us know if you have any sites you wish us to consider allocating for development in the Plan.

The Scoping Paper and accompanying Sustainability Appraisal Scoping Report are available to view and download from the Council's website at: www.brighton-hove.gov.uk/cityplan-part2 where the formal notification of the start of the preparation of the City Plan Part Two, further information and a summary of the Scoping Paper can also be found.

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

Responses can also be submitted:

- By email to planningpolicy@brighton-hove.gov.uk
- By post to Planning Policy Team, Brighton & Hove City Council, Room 201 Kings House, Grand Avenue, Hove BN3 2LS

The City Plan Part Two Scoping Document and accompanying consultation documents are also available to view at the customer service centres at Hove Town Hall and Bartholomew House, Brighton and at all city libraries*, during normal opening hours.

All comments must be received by the Council no later than 5pm on Thursday 22 September.

We look forward to hearing from you.

Planning Policy Team

** Please note that, due to its size, the Sustainability Appraisal Scoping Report is only available to view at Bartholomew House and Hove Town Hall Customer Service Centres, Hove, Jubilee and Portslade Libraries.*

If you wish to unsubscribe from the City Plan email alerter please contact us via planningpolicy@brighton-hove.gov.uk

APPLICATION No BH2014/03394 (Amended Scheme)
LAND ADJACENT 6 FALMER AVENUE, SALTDEAN, BRIGHTON

REPRESENTATIONS BY MAGENTA PLANNING LTD
ON BEHALF OF SALTDEAN COUNTRYSIDE

NOVEMBER 2015

magenta
planning

1. Introduction

Magenta Planning Ltd have been commissioned by Saltdean Countryside (SC, a group of approximately 30 local residents) to make further representations in respect of the current planning application at Land adjacent to 6 Falmer Avenue, Saltdean, submitted by Hyde New Homes, which has recently been amended so that the revised description of development now reads as follows:-

‘Demolition of existing house and stables and construction of 32 no. dwellings comprising of 4 two bedroom flats and 28 two storey two, three and four bed dwellings incorporating open space and landscaping works, parking and creation of access road from Falmer Avenue with other associated works. Creation of new pedestrian link between Falmer Avenue and South Downs footpath’.

The revised scheme is very similar to the previous proposals incorporating only a small reduction in the total number of proposed residential units from 36 to 32 (ie. four units). It therefore does very little, if anything, to help address the very serious concerns of the residents.

This report will restate and update the previous ‘in-principle’ objections set out in the Magenta report dated May 2015, adding an important reference to the Council’s duties under Section 62 of the Environment Act 1995 regarding the National Park issue. It also provides detailed commentary on the specific changes now put forward by the applicant. It can therefore be read as a comprehensive document which supersedes the previous report (as referenced above).

2. ‘In-Principle’ Objections

The application site comprises open and rolling grass land, bounded to the west and north by the South Downs National Park (SDNP). There is no existing vehicular access to the site and it immediately abuts the rear boundaries of residential properties along Falmer Avenue and Bishopstone Drive to the east and south respectively.

It lies outside of the urban settlement boundary and forms part of the open countryside; other than a stable block building and No 6 Falmer Avenue (required to manufacture an access to the site) it is free from any built form.

The proposals fail to respond to the planning principles set out in the National Planning Policy Framework (NPPF) and do not deliver sustainable development. It focuses solely on housing and therefore fails to deliver any other associated social or community benefits.

The site’s poor public transport accessibility means that it will be dependent on the private car with negative environmental implications for climate change. Furthermore, the proposals

will be hugely damaging to the intrinsic beauty of the countryside. As such the Framework's 'presumption in favour of sustainable development' can not be applied in this case.

The Framework sets out twelve core planning principles that should underpin the system. Of particular significance to the subject application is the Government's emphasis upon 'localism' and the system being genuinely plan-led *'empowering local people to shape their surroundings'*. It stresses that planning should *'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.'* Furthermore, it should contribute to conserving and enhancing the natural environment, and encourage the effective use of land by re-using land that has been previously developed (ie. brownfield land). It should also actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

The subject site is not a sustainable location for development; it has poor public transport accessibility and is not in close proximity to any local shops, services or infrastructure. It is also understood that the Saltdean primary school, albeit recently extended, is operating at full capacity and is not able to accommodate increased numbers. There is also a shortage of health services in the local area, with local doctors and dentists seriously overstretched.

The proposals offer no wider benefits to the local community whatsoever, but rather will cause serious harm to the intrinsic character and beauty of the countryside, as well as harming the amenities enjoyed by the surrounding residents.

Section 4 of the Framework deals with *'Promoting sustainable transport'*, stressing that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. It states that:- *'In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport'*. It goes on to stress that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The location of the application site, remote from public transport facilities, does not achieve these objectives. This continues to be highlighted by the high ratio of car parking provided by the proposals (as dealt with later in this report).

Section 7 of the document deals with *'Requiring good design'*, stressing that good design is a key aspect of sustainable development which is indivisible from good planning, and should contribute positively to making places better for people. In particular, it places emphasis on the need for developments to respond to local character and history, and reflect the identity of local surroundings and materials. Paragraph 64 states:-

'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

Paragraph 66 goes on to emphasise that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. The applicant has not done so and has pursued these proposals regardless of the widespread local opposition to them.

Section 11 of the Framework dealing with *'Conserving and enhancing the natural environment'* is also of particular significance. It requires development to contribute to and enhance the natural environment by protecting and enhancing valued landscapes (para 109). Given the site's relationship with SDNP, set within the open countryside, consideration must be given to the potential impacts on the landscape and visual amenity of the National Park. It is very important to note that the land had previously been identified as being part of the SDNP designation, on its merits, but due to a procedural irregularity and following a High Court Challenge it was excluded. SC continue to vigorously pursue this matter separately through other channels.

In this context, the Framework states that *'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'* (para 115).

Local Plan Position

The statutory development plan is the Brighton & Hove Local Plan adopted in 2005. The Council is however now well advanced with its new emerging City Plan (Part 1); this sets out the Council's overall strategic planning policies and is expected to be adopted before the end of 2015. The City Plan (Part 2) will deal with site allocations and detailed development management policies; the proposed adoption date is May 2018. These two principal documents will gradually replace the policies in the 2005 Local Plan as and when they become adopted.

In terms of the subject site, it lies outside of the settlement boundary and is not subject of any allocations for development; it is therefore subject of the Council's restrictive countryside policies. The whole site is designated as an Archaeological Notification Area with potential for prehistoric, Roman, and medieval remains.

It is referenced as Site No 50 in the Urban Fringe Assessment Study dated June 2014, as undertaken by Land Use Consultants, who were commissioned by the Council to specifically assess the potential contribution of the city's urban fringe sites to accommodate additional residential development. This concluded that the site had some limited capacity for low density residential development on its eastern half only (12 dwellings). This is not an adopted Local Plan document but forms part of its emerging evidence base. As such, only limited weight can be attached to it as a material consideration.

It is instructive that the Council's own assessment (undertaken in September 2013) found the site to be unsuitable for residential development due to the site being in close proximity to the National Park and the potential for significant negative impacts on the Park's special

qualities. This was consistent with the National Park Inspector's report (November 2008) which considered the land worthy of National Park status on its own merits.

Relevant development plan policies include:-

NC5 and NC6:- Restriction of development within countryside

QD1 and QD2:- Design Quality

QD4:- Design/Strategic Impact:- including preservation/enhancement of views across the Downs

QD27:- Protection of residential amenities

Emerging draft City Plan policies include:-

SA4:- Criteria for development in urban fringe locations

SA5:- Protection of landscape character of South Downs and requirement for built development to be consistent with the purposes of the National Park

The amended application proposals continue to be in conflict with all of these policies.

3. Landscape & Visual Impact

It is instructive to cite the National Park Inspector's assessment (as referred to above) at paragraph 7.159 of his report verbatim:-

*'The land in question is a square shaped parcel of land about 3ha in extent situated to the rear of houses fronting onto Bishopstone Drive and Falmer Avenue. It contains a wooden building that I understand is a stable but the majority of the land is under well mown pasture and it is all currently part of the AONB. A bridleway runs along the western boundary providing access into the wider countryside. Although a post and wire fence separates the site from the adjoining farmland, **to my eyes it reads as an integral part of the sweep of high quality downland that abuts the edge of the Brighton conurbation.** I understand the land in question is also entirely within an archaeological Sensitive Area. In sum I have no doubts that the land satisfies the designation criteria and should form part of the PSDNP'. (our emphasis in bold)*

The Inspector accordingly recommended that the subject land remained within the National Park designation.

There can be no doubt that this is a highly sensitive site in landscape terms which clearly forms part of the open countryside. It is not physically self-contained in any way but rather is intrinsically linked to the adjoining National Park/AONB land. The bridleway located along its western boundary acts as an important open gateway leading into the countryside beyond; development of the site would visually destroy this function and seriously harm the quality and intrinsic beauty of this location as enjoyed by its many regular users/walkers and visitors to the area alike.

Section 62 (Part III) of the 1995 Environment Act is therefore of fundamental importance to this case; it requires all public bodies to have regard to National Park purposes when performing any function which might affect a National Park. This includes decisions for activities that might affect a National Park's special qualities even if they are located outside the designated boundary. The legislation is very clear that where an Authority comes across a conflict between purposes when exercising its functions (such as determining a planning application), it **'shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.'** In this context, should the Authority be minded not to attach such weight and consider recommending approval, they would be failing in their duty under this legislation (ie. **Section 62 duty**). In such circumstances, where it is clear that the application gives rise to issues of national significance, the Secretary of State should be notified in respect of his utilising his 'Call-In' powers under Section 77 of the Town & Country Planning Act 1990 to determine it for himself.

The landscape commentary contained in the 2014 Urban Fringe Assessment finds that although the site has an urban edge character *'in topographical terms it is more sensitive, being located at the base of the ridge which is visible as a small window of open downland between skyline urban development when viewed from the centre of Saltdean. Any development within the site could diminish this window.'*

To subsequently conclude that the site has some limited capacity for housing is counterintuitive and at odds with both the Council's earlier 2013 assessment and the Inspector's findings regarding the National Park. Rather, as a piece of undulating topography of the wider downland landscape, the land should fall logically into the National Park boundary and the residents continue to pursue this as a separate legal matter. Notwithstanding the outcome of that legal process, this sensitive land should remain free from any development and not become a victim of sporadic urban sprawl.

In terms of bio-diversity, as highlighted by the applicant's Landscape Design Strategy, the application site is regularly mown which reduces its biodiversity value by preventing native meadow species from flowering. This is clearly a deliberate strategy by the owner.

The applicant's Landscape Visual Assessment is not accepted. To conclude that only 'moderate/major neutral' effects would result upon completion of the scheme in this highly sensitive landscape location must be seriously questionable and is not, in the opinion of my clients, a credible position for the applicant to adopt. Rather, the application proposals would cause serious and irreversible harm to the character of this sensitive landscape and would have a highly adverse significant effect; in layman terms, it would be catastrophic.

The amendments, including the marginal reduction in height (by 50cm) of units 2, 7 & 8 do nothing whatsoever to alleviate such an effect. The introduction of a new block of flats at the north east corner of the site will in fact be more harmful than the previous layout within a particularly sensitive location close to the National Park boundary. These specific revisions are dealt with further subsequently in this report under 'commentary on specific changes'.

The additional revised images provided in the relevant addendum report simply re-inforce the magnitude of the dramatic and adverse visual impact that the proposals will have on the landscape. It is noted that the applicant has applied additional landscape renderings to these images in an attempt to soften them up, but even if these unrealistic future images for mature planting to be established over the longer term were realised, the visual impact of the proposals would still be hugely damaging.

4. Design & Appearance

The applicant's Design & Access statement makes great play that the proposed scheme will provide a buffer role between the urban edge and the National Park, adding that there is somekind of existing messy urban edge that needs to be addressed. This is nonsense; the existing residents' gardens simply abut the subject open land in a way that is typical of many urban fringe situations. This existing relationship causes no harm whatsoever and the need for a buffer role as creatively alleged by the applicant has no substance to it. Moreover, the site can in no way be described as being either a logical or natural extension to the settlement, but it is being forced by the opportunistic existing owner proposing the demolition of No 6 Falmer Avenue as a manufactured access to the site, resulting in a quasi backland development situation.

The applicant's art deco inspiration for the design of the scheme, with references to the Saltdean library and Ocean hotel buildings, is remote and has little relevance to the application site itself or its immediate neighbouring suburban houses. Rather, it seems that random architectural elements have been borrowed from these other schemes and simply bolted onto the proposed 'box like' white buildings.

The images provided by the applicant display rows of houses with little variation in their elevations and types, within an unimaginative and boring 'cul-de-sac' layout. They appear as monotonous and uniform boxes, which would be alien to the local area. The flat roofs are particularly out of character with the immediate locality and it is noted that these will be cluttered with photovoltaics rather than being used for sedum/green living roofs.

The first version of the proposals produced by the applicant at 46 units smacks of a crude and deliberate tactic to help justify an 'evolution of the scheme' and to be seen to be conceding something through the public consultation process. The reality is that the 10 houses previously shown within the central landscaped square was never going to be acceptable in terms of the density of the scheme and lack of amenity space provision. Whilst the change to flat roofs is perhaps understandable in the light of the extremely sensitive landscape and visual assessment issues, it creates its own design problem and tension, being a form that is completely out of character with the local area. In such circumstances, and in the context of an ageing local and national demographic, for the applicant's architects to simply reject bungalows as being an 'unsustainable form of development' is not a credible position to take. On the contrary, on the right sites and locations, such accommodation will inevitably have an increasingly important and valuable role to play.

The applicant's also stress the contribution made by the proposed landscaping and tree screens (ie. to the northern boundary) that will be incorporated into the scheme. These features will be at odds with the existing open character and uninterrupted nature of the downland landscape, with its open field boundaries. Similarly, the applicant's proposed 'Stella LED lighting' scheme involving numerous tall poles with flat rectangular grille tops will appear as incongruous and alien features spread throughout the scheme.

5. Traffic & Car Parking

The site is in an area of very low public transport accessibility with only two daily bus services serving the area. There is no local train station; the nearest being Brighton Station some 8.7km away, which as highlighted by the applicant's own transport consultants is almost a two hour walk away.

The applicant's proposed mitigation of producing a Residential Travel Plan providing advice on alternative modes of transport is of little practical use or value in such circumstances. The public transport alternatives are not realistic and even with the scheme's revised parking provision at 57 spaces (for 32 units), this still exceeds Council's standard. This is dealt with subsequently under 'commentary on specific changes', as is the applicant's new initiative to offer bus vouchers to new residents.

Other individuals within SC are dealing with traffic generation and pollution issues in more detail, not only in respect of the impact on Falmer Avenue but to the wider Deans. Contrary to the applicant's highway consultants' conclusions, this will demonstrate that there will be a serious and adverse cumulative impact on the local highways network.

It is instructive that the amended report produced by Robert West only considers the trips generated by the proposed development itself and ignores the impact of other large developments that are planned elsewhere in the local area. Without such a wider analysis it is not possible for the consultants to conclude what the real impact will be on the capacity of the local highways network.

6. Housing Supply Issue

The argument progressed by the applicant is flawed since it focuses solely on objectively assessed housing needs but ignores the environmental constraints faced by the Council; the Government's Planning Practice Guidance (web based tool launched in March 2014) is however clear that such constraints will need to be assessed when bringing evidence bases together to identify specific policies within development plans. Housing need on its own is not enough to justify building on such land.

Brighton & Hove Council are working hard on their new emerging Local Plan and there are numerous opportunities for development to come forward on suitable brownfield sites within sustainable and accessible locations. Whilst the Inspector's letter to the Council (13th Dec 2013) stressed that the Authority should '*leave no stone unturned*' in dealing with meeting its

housing needs, it would be both inappropriate and premature to approve development at the subject site.

In particular, it is instructive that the application site is not part of any strategic masterplan that would realise any wider community benefits as is possible with other urban fringe locations that present opportunities to logically link sites together as clusters. It would therefore not be in the public interest to release it, with the environmental harm caused and harm to residential amenities far outweighing any benefits that would be derived from it. Moreover, rather than development coming forward responsibly within the context of a 'plan led' system, the development of the subject site would result in an 'ad hoc' addition to the settlement with no strategic rationale or proper planning justification to support it.

It would also make the Council vulnerable to other opportunistic ad-hoc proposals coming forward outside of the Local Plan process. This would not be the correct way for the Council to properly plan for its present and future housing supply requirements.

7. Impact upon Residential Amenities

The amended housing layout proposed seeks to maximise the built coverage across the whole site, ignoring the advice contained in the evidence base (Urban Fringe Assessment) to the emerging Local Plan. Indeed, at 32 units, it seeks almost three times the quantum suggested in the June 2014 report. This results in a dense and mean layout with inevitable pinch points created with the rear boundaries of the gardens to the adjoining existing houses on Falmer Avenue and Bishopstone Drive.

Whilst some of the 'rear to rear' distances have been very slightly increased (they now range from circa 20m to 27.6m (excluding the 32m dimension provided to the rear of unit 24 which is an anomaly due to its particular corner siting and angled relationship), the resultant relationships do not reflect the low density character of the area and are more akin to those standards applied by London boroughs where there is a much tighter urban grain and typically much higher densities of development.

This is demonstrated in the applicant's amended drawing which also specifically annotates a selection of varying distances between the rear wall of the new houses to the adjoining boundaries of surrounding existing houses and the bridleway; these drop as low as 5.965m (with Bishopstone Drive) and 9.594m (with Falmer Ave). These are unnecessarily tight distances which will create mean and aggressive relationships with the existing residential dwellings. They result in a 'town cramming' effect caused by the applicant seeking to maximise profits rather than being driven by the sensitivities of the landscape and physical constraints of the site.

The residents of the existing houses that adjoin the application site currently enjoy an uninterrupted open outlook across this high quality landscape (worthy of National Park inclusion), which is of considerable value to them and forms an important part of their existing quality of life. The construction of houses in such proximity, with little space between, will present itself as a solid wall of development to the existing residents constituting a dramatic

visual change to their immediate surroundings. This will completely destroy their existing outlook. It will also result in a serious loss of their privacy and create an undesirable 'sense of enclosure' due to the tight 'cheek by jowl' relationships that will be created.

There is also likely to be increased noise and disturbance caused through the additional activity at the site. Light pollution, emanating both from the new houses and the proposed Stella lighting scheme, is also a serious concern.

8. Commentary on specific changes

The changes are summarised in the covering letter from Lewis & Co Planning dated 28th October 2015. Each are addressed in turn as follows:-

i) Reduction of 4 residential units (36 to 32)

This represents a token change only which is of no benefit whatsoever. Notwithstanding our position that the whole principle of this development is unacceptable, as pointed out within the applicant's Design & Access Statement the density of Saltdean as a whole is 17.4 dwellings per hectare, whereas the revised scheme has a considerably higher density of 23.5 dwellings per hectare. Moreover, the Council's Urban Fringe Assessment study dated 2014 concluded that the site had very limited capacity for low density residential development identifying a potential quantum of 12 dwellings only. The amended proposals are therefore 20 dwellings in excess of the conclusions of that report. Without prejudice to our 'in principle' objections, the proposed quantum represents a clear overdevelopment of the site, causing serious harm to both the character of the area and the amenities of local residents.

ii) Reduction of 25 car parking spaces (82 to 57)

Despite this significant reduction in parking spaces, the revised scheme is still not in accordance with the Council's standards. This simply serves to highlight the fundamental problem with the application site; it is not a sustainable location for development.

The amended report by Robert West (September 2015) accepts that *'the site is not well served by public transport with only one daily bus service (route 47) providing a direct route to Brighton'*. (para 3.10). It helpfully identifies Policy TR3 (Development in areas of low public transport accessibility) as being relevant in such circumstances. This states:-

'Planning permission will not be granted for development proposals that would generate an inappropriate level of car parking in locations that fall within areas of low public transport accessibility'

In terms of applying the Council's standards, the application site falls within the 'outer area' of the district where the standard is 1 space per unit, plus 1 space per 2 units for visitors. As such, the subject proposals generate a requirement for 48 spaces, so there is an over provision of 9 spaces. Whilst the highway consultants acknowledge that their proposed parking allocation exceeds the Council's standard, they seek to justify it on the basis that Saltdean has high levels of car ownership and on the lack of frequent public transport services.

This is no way to plan for achieving sustainable development in the district. They go onto state that the development will actually generate a demand for 60 spaces so at a reduced provision of 57 spaces this would not be enough to prevent displacement parking taking place in the surrounding streets.

This demonstrates the difficulties that the applicants have in getting the balance right between the policy requirements for car parking provision and the actual reality of the demand for car parking that would be generated in this inaccessible and poor location for public transport. It is simply not possible to do so without a much reduced scheme.

iii) Travel Information Pack to include bus ticket vouchers

The applicants propose to offer a £200 bus voucher for each household as an initiative to increase travel on local bus services. This is a quite bizarre, crude and very much misconceived response to the issue of providing sustainable transport initiatives; the investment needs to go towards improving the services themselves and into real sustainable transport infrastructure projects rather than what appears to be simply throwing money at the problem. People will simply not use the vouchers if they can't get a bus until an hour later!

iv) Replacement of houses in north east corner by a block of 4 flats

This 'block of flats' element will be totally out of keeping with the prevailing low density character of the area. It will appear as a very large unrelenting building mass, sitting uncomfortably within the rest of the houses, and will be extremely prominent in views from the National Park and adjacent footpath/bridleway. Its associated large gabion retaining wall (comprising crushed concrete infill) in this part of the site will also be visually intrusive and particularly unsightly from the National Park. The introduction of a block of flats is a wholly retrograde step.

v) Units 24-29 (previously 31-36) relocated further west

The applicants state that this has been done in order to achieve greater separation distances ranging from 25.05m to 32.17m away from the dwellings on Falmer Avenue. However, in the context of the existing situation and the open aspect currently enjoyed by the local residents effected, as well as the low density character of the area, these distances are still considered to be extremely mean. This particular amendment therefore goes nowhere near far enough to address the concerns of the residents who will back onto these new dwellings, with the resultant tight relationships creating serious problems of overlooking and loss of privacy. If the new properties are extended in the future, then these separation distances would be reduced still further. It is therefore assumed that the Local Planning Authority would, in the unfortunate event of it being supportive of the scheme, remove all permitted development rights accordingly. This point applies to all of the proposed dwellings across the whole site.

vi) Units in south west corner reduced from 6 to 4 (Units 11-14)

With the exception of unit 13, this change has not addressed the tight and unnecessarily mean relationships to the boundary in this corner of the site (ie 9.596m at unit 11; 10.193m at unit

12 and only 7.765m at unit 14). Poor quality, small rear gardens for the new residents of these units are created as a result.

- vii) Former units 21 & 22 replaced with one unit (Unit 15)

As above, this unit will have a very small rear garden, with only a 5.965m distance to the boundary. This creates an unnecessary 'pinch point' in the layout. It should be noted that the real back to back distance at this point is significantly less than the 21.263m provided on the applicant's plan since they have selectively measured it from the side of the new house where the distances taper away. This is misleading.

- viii) Height of units 2,7 & 8 reduced by 0.5m

A change of 50cm is negligible and will not materially lessen the massive visual impact that the proposals will have on this sensitive landscape. This is demonstrated by reference to the images contained within the applicant's additional Landscape and Visual Impact Assessment documentation.

- ix) New section in Design & Access Statement ('to demonstrate precedence')

The applicants have provided more written justification and additional photographs of other examples in an attempt to demonstrate the relevance of their own proposed architectural design, form and quality, in terms of its relationship with the Park. This demonstrates a fundamental misunderstanding of planning law which dictates that each case should be judged on its own individual merits. There is simply no justification whatsoever for an 'art-deco'/Spanish villa style of development in this part of Saltdean. Officers and Councillors should therefore give very little, if any, weight to this new material.

- x) Footpath widened from 1m to 1.5m

This appears to be a token gesture which will make no material difference to improving the quality of the scheme.

- xi) Changes to Access Road design

It is noted that there has been some minor design changes to the access road to improve circulation. Of more significance to the local residents however is the applicant's statement that the road will not be offered for highway adoption. This raises concerns over how refuse collection and highways maintenance will be managed by the applicant. No detail is provided by the proposals.

- xii) Landscape screening added between site entrance and neighbouring properties

The applicants are forcing an unnatural access by demolishing what is a perfectly good existing dwelling and effectively creating a backland development. The provision of a landscape buffer to the adjoining properties is therefore the very least that would be expected as design mitigation in such circumstances.

xiii) Introduction of 7 sheffield style visitor cycle stands

This is noted but the challenging topography of the locality including the very steep gradient of Falmer Avenue is hardly conducive to cycling as a realistic alternative means of travel.

xiv) Parking areas re-arranged to include more planting

This is noted but the coverage of built footprint and hardstanding relative to the soft planted areas in the scheme remains excessive. In particular the planted buffer zones between the rear of the new properties backing onto the existing properties in Falmer Avenue and Bishopstone Drive remain sparse and totally inadequate as a means of providing effective screening.

xv) New Air Quality Report (MLM Environmental)

The local residents are extremely concerned about this matter, given the existing sub-standard levels of air quality in the area. Of particular concern is the applicant's failure and apparent unwillingness to measure the cumulative impacts of the various new developments and associated traffic generation in the wider area. This is highlighted at Section 5.6 of this report which, consistent with similarly flawed methodology in the Robert West highways report, focuses solely on the traffic data and generation predictions resulting from the application proposals in isolation.

Contrary to the applicant's contention that the responsibility for this wider analysis lies with the Council (see Lewis & Co cover letter dated 28th October 2015), the duty is on the applicant to demonstrate that the impact upon air quality will be acceptable and this must include a cumulative assessment. Unless this work is undertaken, the results from any such assessment will be meaningless. They have failed to do this and as such the conclusions of the report (which states that the impact will be 'negligible') should be given very little, if any, weight by Officers and Councillors alike. SC will be making separate representations on this issue.

9. Conclusion

The application site comprises a sensitive greenfield site of high landscape value that reads as an integral part of the surrounding open downland countryside. It lies outside of the existing settlement boundary and judged on its own individual merits (rather than procedural irregularities) should be included within the National Park, as assessed by the previous Inspector.

The location of the site is remote from public transport connections and local facilities; it is unsustainable, as highlighted by the high provision of car parking that is proposed. Neither do the proposals satisfy the social; economic and environmental dimensions of sustainable development. The overall design is poor and there are no wider community benefits flowing from the development. Rather, serious harm will be caused both to the character of the countryside and to the residential amenities currently enjoyed by surrounding existing residents in terms of loss of outlook; privacy and a resultant sense of enclosure.

The application proposals are being advanced by the applicant outside of the Local Plan process and represent an ad-hoc; opportunistic and premature approach that should not be countenanced by the City Council. They are contrary to a whole range of Local Plan policies (both saved policies and emerging ones) as well as flying in the face of the 'Plan led' system advocated by the NPPF and its emphasis upon achieving sustainable development. In particular, they fail to meet the necessary policy criteria to justify development within urban fringe locations (Policy SA4) in that the site has not been allocated for development in a development plan document; a countryside location can not be justified; the proposal pays no regard the downland setting of the City; and there are a number of adverse impacts that have not been minimised or appropriately compensated for.

Notwithstanding the Council's Urban Fringe Assessment report (June 2014), SC contend that the principle of developing the application site is not acceptable under any circumstances and even if, the decision taker takes the June 2014 report into account as a material consideration, the quantum proposed by the application is almost three times that of the advice contained therein, representing a serious overdevelopment.

Furthermore, the housing supply argument advanced by the applicant is flawed since it fails to recognise the environmental constraints faced by the Authority and the numerous opportunities that exist to bring forward brownfield sites in more sustainable urban locations that can be delivered through the Local Plan process.

In conclusion, the application site is clearly not appropriate for major housing development and it is trusted that the proposals will be overwhelming rejected by the City Council accordingly. If the Local Authority is however minded to grant planning permission, it would be in conflict with its duties under Section 62 of the Environment Act, and it is clear that given the national significance of the issues involved, the Secretary of State should be notified in order to assess whether he utilises his 'call-in' powers to determine the application for himself.

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Biodiversity and Open Space

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Biodiversity and Open Space Summary:

Key objective is conserving biodiversity and enhancing the natural environment's multi-functional offer. The section invites comments on relevant matters including: 'landscape-scale' approach; the setting of criteria and hierarchy of sites; species protection; and, identification of additional open space, Local Green Spaces and National Park Gateways.

This form has two parts: Part A – Personal Details
 Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title		
Organisation	Brighton and Hove's Wildlife Forum	
Address		
Postcode		
Email Address	btnhovewildlife@gmail.com	
Telephone No.		
Mobile No.		

Part B: Your Comments

A. Landscape Scale Approach

Question B1

Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes. Policy document should be provided. Some areas of the NIA e.g. some urban fringe sites contain highly valued habitats and contain rare species. Any proposed development within the NIA must adhere to policy QD18, regarding species protection and harm to habitats, while taking into account priority habitats and species listed in the Local BAP.

Paragraph 117 of the NPPF states “promote the preservation, restoration and re-creation of priority habitats....linked to national and local targets”

It must be made clear in the City Plan that not all areas within the NIA are suitable for development.

Question B2

If you think a policy is needed, what types of development should be included?

All developments inside the NIA. Comprehensive ecological assessments, particularly in the case of sensitive urban fringe sites, should always be undertaken. Also great care should be taken to ensure architects are not permitted to overpower wildlife sites and open spaces. An example is Anston House, where the architects initial drawings greatly overpower Preston Park, and potentially cause lack of light and sunshine to trees and other flora.

Some sites within the NIA, including some urban fringe sites, are not suitable for ANY development so developers must not assume that a policy which advises certain types of development are acceptable without undertaking full and comprehensive ecological and landscape assessments.

The plan should robustly adhere to paragraph 118 of the NPPF which states “if significant harm resulting from a development cannot be avoided...then planning permission should be refused”.

Question B3

Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes.

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

B: Nature Conservation, Geodiversity and Landscape Sites:

Question B4

How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

**The council has a legal obligation under Section 41 of the NERC Act 2006 to promote the preservation, restoration and re-creation of priority habitats. This should be robustly adhered to under all hierarchies of designations. Council must also adhere to this obligation if sites without a specific designation are found to have priority habitats or species.
BHCC addressed this obligation with the adopted Local Biodiversity Action Plan. Any site which has species and habitats that are included in the LBAP should be included in the policy, including sites without formal designation
Policies should also be guided by “Biodiversity 2020: England Biodiversity Strategy”**

Question B5

Should there be a specific policy to address the general protection and enhancement of species?

**Yes. Hopefully these are already being used within existing government guidelines and LBAPS.
Policy QD 18 regarding species protection and harm to habitats, should be incorporated into CP10 and adopted as policy.**

Please see:

“Biodiversity 2020: A strategy for England’s wildlife and ecosystem services”

This includes important objectives relevant to Brighton and Hove:

Foreword by Secretary of State - The Rt Hon. Caroline Spelman MP

“Ambition to halt overall loss of England’s biodiversity by 2020 ... longer term, to move from net biodiversity loss to net gain.”

BHWF recommends: Seek to enshrine latter aim in our LBAP.

Question B6

Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Yes but new sites should be added where new information has become available. There should be a mechanism for putting forward and adopting new sites as they arise, and as happens with other councils.

This could include positively engaging with local wildlife conservation groups. BHWF has commented on the list of LWSs considered in 2013. If new information comes to light on any site then that site should be considered, up to date information must be used.

There were errors made in the data collation and there is still time to address these.

BHWF recommends: Putting people at the heart of biodiversity policy;

See recommended list of LWSs and LGSs below:

The list of LWSs should include

- 2 Cockroost Hill West | Yes
- 3 Cockroost Hill East | Yes
- 4 Mile Oak Fields | Yes
- 5 Southwick Hill East | Yes
- 6 Sidehill Scrub | Yes
- 10 Emmaus and St Nicholas | Yes
- 11 Foredown allotments | Yes
- 12 New Barn Farm Slope | Yes
- 13 Basin Road South | Yes
- 14 North Benfield Valley | Yes
- 15 Benfield Valley Central | Yes
- 16 Dyke Trail | Yes
- 17 St Helens Churchyard | Yes
- 19 Benfield Valley South | Yes
- 20 Round Hill | Yes
- 22 St Leonards Churchyard | Yes
- 24 Toad's Hole Valley | Yes
- 25 Dyke Road Strip | Yes
- 26 Waterhall Golf South | Yes
- 27 Waterhall Golf Central | Yes
- 28 Waterhall Golf North | Yes
- 29 Waterhall Farm Slope | Yes
- 30 Hove Park Reservoir | Yes
- 31 Casterbridge Farm | Yes
- 32 Sweet Hill | Yes
- 33 Waterhall Valley | Yes
- 3 Sweet Hill West | Yes
- 35 Waterhall East | Yes
- 36 Green Ridge & Coney Woods | Yes
- 37 Three Cornered Copse | Yes
- 38 Engineerium Grounds | Yes
- 40 Park Royal & High School | Yes
- 41 Cardinal Newman School | Yes

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

42 Highcroft Villas | Yes
 45 Station Road | Yes
 47 Redhill Sports Ground | Yes
 50 Hogtrough Bottom | Yes
 53 Withdean Park Copse | Yes
 54 Surrenden Field Copse | Yes
 56 Surrenden Crescent & Surrenden Road | Yes
 57 Parkmore Terrace Railside | Treat as if designated
 58 Argyle Road Copse | Treat as if designated
 59 Brighton Station North | Yes but name as: 'BRIGHTON GREENWAY'
 63 Dorothy Stringer Wildlife Area | Yes
 64 Patcham Court Farm | Yes
 66 Braeside Avenue Scrub | Yes
 67 Ewe Bottom | Yes
 68 Standean Cottage Down | Yes
 69 Deep Bottom & The Chattri | Yes
 70 Ditchling Road SW | Yes
 71 London Road Station | Yes
 72 Roundhill Copse | Yes
 74 Beaufort Terrace | Yes
 75 Burstead Woods | Yes
 76 Hollingbury Wood | Yes
 77 Hollingbury Golf Course | Yes
 78 Queensdown | Yes
 79 Wild Park | Yes
 80 39 Acres | Yes
 81 Ditchling Road | Yes
 82 Hollingbury Industrial Estate | Yes
 83 Coldean Lane Slopes | Yes
 84 Crespin Way Copse | Yes
 85 Watts Bank | Yes
 86 Hodshrove Wood | Yes
 87 North Bevendean Down | Yes
 88 Heath Hill Down | Yes
 89 South Bevendean Down | Yes
 90 Bevendean Horse Paddocks | Yes
 92 Bevendean Farm Slope | Yes
 93 Falmer Hill | Yes
 94 Land off Ashurst Road | Yes
 95 Westlain Plantation | Yes
 97 Land at Coldean Lane | Yes
 98 Stanmer Park South | Yes
 99 Stanmer Park North | Yes
 100 Stanmer Park East | Yes
 101 Lots Pond to the Ridge | Yes
 102 Cemeteries off Bear Road | Yes
 103 Stevenson Road Quarry | Yes

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

104 Land at Sea-Saw Way | Yes
 105 Maderia Drive Green Wall | Yes
 106 Volks Railway | Yes - AS ONE SITE
 109 Beach at Black Rock | Yes
 110 Brighton Marina | Yes
 111 Cliff Road Paddock | Yes
 112 Cliff Corner | Yes
 113 Sheepcote Valley North | Yes
 114 Sheepcote Valley South | Yes
 115 East Brighton Golf Course | Yes
 116 Mount Pleasant | Yes
 117 Ovingdean Church to Cattle Hill | Yes
 118 Roedean School Slope | Yes
 119 Copse at Woodingdean Cemetary | Yes
 121 Land at Bexhill Road | Yes
 122 Field East of Woodingdean | Yes
 122a Field E of Ravenswood Drive | Yes
 123 Scrub East of Woodingdean | Yes
 125 Happy Valley Downland | Yes
 126 Abinger Road Paddock | Yes
 127 Old Cottage Paddocks | Yes
 128 Meadow Vale Paddocks | Yes, but name as: 'MEADOW VALE'
 129 Long Hill | Treat as if Yes
 131 Ovingdean Hall | Treat as if Yes
 132 Rottingdean Pond | Yes
 133 Whiteway Lane | Yes
 134 High Hill | Treat as if Yes
 135 Balsdean Down | Yes
 136 Balsdean Down East | Yes
 137 Balsdean Downland North | Yes
 138 Saltdean | Yes
 139 Saltdean Vale | Yes
 140 Coombe Meadow | Yes
 141 Saltdean Chalk Pit | Yes
 142 Westfield Avenue | Yes
 Local Geological Sites should be identified, including:
 TQ20/121 The Goldstone, Hove Park
 TQ30/135 Stanmer Village
 TQ30/236 Black Rock, Brighton Marina
 TQ40/174b Coastal section: Friar's Bay to Brighton Marina

Question B7

Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

geological/geodiversity sites?)

Yes, we need green corridors, woodland, mature hedgerows, veteran trees and nature reserve areas, all of which are an important and integral part of the biosphere, and should be fully conserved, with the principle of ecosystem services as one underpinning philosophy. Efforts should be made to retain all trees and hedges. No trees should be destroyed without very careful consideration as to their age and condition. New tree planting can take many years to reach maturity.

BHWF recommends: Strong relationship to green corridors, Biosphere and other concepts, to ensure landscape-scale conservation underpins the LBAP and we get bigger, better and more connected (ecological networks), with the principle of ecosystem services as one underpinning philosophy.

Please note

“Biodiversity 2020: A strategy for England’s wildlife and ecosystem services”

Foreword by Secretary of State - The Rt Hon. Caroline Spelman MP

“Ambition to halt overall loss of England’s biodiversity by 2020 ... longer term, to move from net biodiversity loss to net gain.”

Earth science and Geomorphology aspects need to be included [Geodiversity]

Geomorphology (and ‘Geomorphological’) means geology, landscape and the earth science features. These physical aspects underpin the natural ecological and biodiversity features we see on the ground.

Locally important Geomorphological Features and a reference to Geological Conservation should be included.

Local Geological Sites should be identified, including:

TQ20/121 The Goldstone, Hove Park

TQ30/135 Stanmer Village

TQ30/236 Black Rock, Brighton Marina

TQ40/174b Coastal section: Friar's Bay to Brighton Marina

C: Open Space, Local Green Space and Gateways to the National Park:

Question B8

Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Question B9

Are there any green spaces that you think should be designated as a ‘Local Green Space’? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance)).

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Meadow Vale (TQ361041) should be confirmed as a LWS, as this was mis-decribed in 2013.
It also appears that London Road Station LWS is missing. And we recommend this be included.

Question B10

Do you consider the following green spaces should be designated Local Green Spaces?

- Benfield Valley;
- Three Cornered Copse
- Ladies' Mile Open Space
- Hollingbury Park.

Yes –Benfield and Hollingbury are both partly within the SDNP, and the remainder should be designated as Green Space

Question B11

Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes, they provide rare links from the town centres to the Downs, and should be retained at all costs. Urban fringe' sites provide local access to nature on what is really nearby downland countryside

D: Are there any other biodiversity and open space issues?

Question B12

Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

It must be ensured that any potential development site is closely monitored, and detailed Landscape Impact Assessments are carried out on all sensitive urban fringe sites.

The City is an island between the sea and the Downs, and is already full to capacity. No development should take place, or even be considered before detailed infrastructure improvements are in place.

To reiterate - As a public body, BHCC has a duty under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to *have regard...to the purpose of conserving biodiversity*. This MUST be the fundamental issue to be robustly adhered to in any policy where the ecology of a site is valuable.

It should be noted that CP10 states all development proposals should :-

1. a) Provide adequate up-to-date information about the biodiversity which may be affected;
Furthermore, all ecological surveys carried out, including those undertaken by LUC for the urban fringe assessments must be in compliance with the BS42020 guidelines: Biodiversity - Code of practice for planning and development.

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

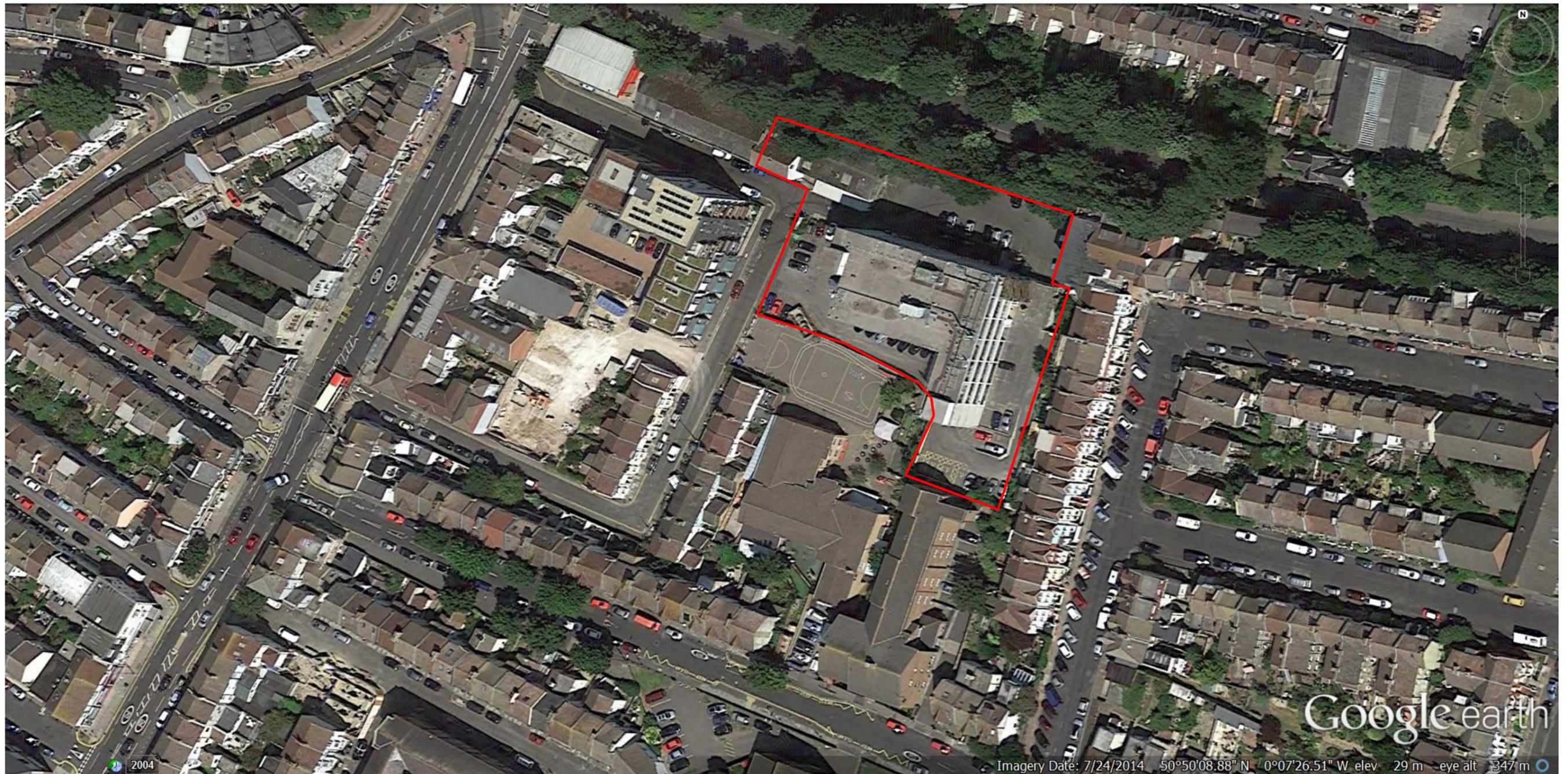
June 2016

Signed/typed*:	Brighton and Hove's Wildlife Forum
Dated*:	September 22 nd 2016

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.
Late comments will not be accepted.
Please email forms to planningpolicy@brighton-hove.gov.uk or post to:
Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016



22 September 2016

Deloitte LLP
Athene Place
66 Shoe Lane
London
EC4A 3BQ

Resp 170

Phone: +44 (0)20 7936 3000
Fax: +44 (0)20 7583 1198
www.deloittereal estate.co.uk

Direct phone: +44 (0)207 007 1237

City Plan Part Two: Scoping Document
Planning Policy
Brighton & Hove City Council
Room 201 King's House
Grand Avenue
Hove
East Sussex
BN3 2LS

Dear Sir/Madam,

Brighton & Hove City Plan Part Two: Scoping Document

Consultation Question Responses

On behalf of our client Select Property Group (SPG), I am writing to make comments on the Scoping Report for the Brighton & Hove City Plan Part Two (which I refer to in this letter as CP.2). The comments principally relate to Section 12 (Student Housing), but I also include comments on Questions H8 and H20 from Section 2 (Housing) and Question E12 from Section 3 (Economy and Employment).

Select Property Group and Vita Student

SPG is a global developer, retailer and operator of property investment brands. One such brand is Vita Student. Established in 2012, Vita Student is a provider of purpose built student accommodation (PBSA) with over 2,200 beds across eight residences in cities across the UK.

Vita Student accommodation provides high-end, self-contained apartments for student living, offering residents rooms of the very highest quality, communal facilities and 24/7 management by on-site staff and security. The market for this type of student accommodation is increasingly significant, driven largely by the growing number of international students coming to study in the UK.

The increasing international presence is evidenced in the University of Brighton Strategic Plan Three Year Review, which reports that applications to the University of Brighton from priority countries (such as China and Saudi Arabia) increased by 50% between 2010/11 and 2013/14. Similarly, recruitment from Malaysia, Vietnam and Thailand increased between 2010/11 and 2013/14 on average by over 150%. The estimated contribution from international students at the University of Brighton alone in off-campus expenditure was estimated at £39.7 million in 2012/13. This generated 392 full-time equivalent jobs throughout the UK¹.

¹ Figures on economic impact are taken from "The Economic Impact of the University of Brighton", July 2014, published by Ursula Kelly, Iain McNicoll, James White and Viewforth Consulting Ltd.

International students account for around 70% of Vita Student's customers, with a high proportion of the remainder being occupied by postgraduates. In this respect, Vita Student targets a market that demands a higher standard of serviced student accommodation.

Vita Student developments include features that set them apart from mainstream private sector student accommodation and accommodation provided by universities. These features include:

- size – Vita Student units range in size from a standard single occupancy studio of 20 sq. m up to 40 sq. m duplex apartments, with a range of accommodation in between for double and twin occupancy;
- accommodation – the apartments have their own fully fitted high specification, Smeg-appointed kitchens and shower rooms, so are very different to standard en-suite and cluster accommodation. Tenancy agreements are also typically for a 51-week period, ensuring that there is a year round population on site;
- furnishings – the apartments are furnished to the highest standard, with class-leading quality fixtures and fittings;
- student hub – communal facilities are modelled on a four star hotel standard of provision including a 24 hour concierge/reception, a large lounge, a fully equipped gymnasium, study rooms, private dining rooms, cinema room, games and laundry rooms. On average, hub spaces are circa 1,000 sq. m in size;
- service - SPG has identified that students want more than luxury buildings and modern facilities. Students of today want a provider who truly understands their needs and treats them as a valued customer. Free grab-and-go breakfasts and free Vita Student hire bikes are provided in each residence and additional services such as laundry, ironing and extra cleaning are offered for a small charge; and
- experience – it is important to provide students with a premium cultural and social experience and foster a genuine community spirit and so every Vita Student residence has a busy social calendar of events to suit everyone, led by full-time locally resourced residence managers.

Importantly, SPG lets its apartments to students on the open market rather than as part of a formally agreed provision with a higher education provider. It also competes for tenants with private rental developments that represent realistic alternatives for its target student market.

Impeccable customer service ensures that Vita Student occupancy rates are high: in the 2014/15 academic year, Vita Student enjoyed 100% occupancy across its entire portfolio and a record breaking rebooking rate of 28%, compared to an industry average of 17%. This is significant given that only 50% of its residents were eligible to rebook as students for the next academic year. Developing a reliable and trusted brand, which delivers an excellent standard of service engenders customer loyalty: sustaining excellent occupancy rates.

These comments are submitted in the context of SPG's long-held ambition to develop a Vita Student facility in Brighton & Hove, in recognition of the city's expanding status as a centre for higher education and its ongoing success in attracting international students.

The University of Brighton launched an International College in 2011, and has increased its intake of international students in full-time education by 14% from 2014 to 2015. As identified above, applications to the university from priority countries has significantly increased in recent years. Universities operate in an increasingly competitive market, in which it is imperative that they actively seek to attract and retain students. The provision of high-quality PBSA will help to consolidate Brighton's existing efforts to attract

international students: providing accommodation options for students who require outstanding service and facilities, the likes of which are simply not available anywhere within Brighton & Hove currently. This will help to maintain Brighton's international reputation as a dynamic and exciting place to study, with resulting economic benefits to the city.

SPG is working with the owner of a site in Brighton & Hove, which will be brought forward through the planning process for a Vita Student facility. The site is located on Melbourne Street in the Lewes Road area that is recognised in Policy DA3 the City Plan Part One (CP.1) as "the city's academic corridor" where proposals will be supported that improve further and higher education provision. A plan of the site is enclosed.

The site is currently known as Enterprise Point. SPG's selection of the site followed an extensive process of assessing the best location to meet the needs of its target tenants, so that the benefits to the city are maximised by meeting the needs of students who are demanding a high-end accommodation choice. The Lewes Road area is the obvious choice for a facility such as Vita Student.

As described in this letter, SPG strongly believes that the Enterprise Point site should be allocated in the City Plan for PBSA, to help meet the significant unmet need for this form of accommodation in Brighton & Hove.

Question SH1

Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

SPG strongly recommends that Brighton and Hove City Council (BHCC) establishes a target for the delivery of purpose-built student accommodation (PBSA). The inclusion in the City Plan of a target is fully justified by the recognised need for PBSA. While we await publication of the City Council's "Brighton & Hove Student Housing Study", the tone of CP.2 is a clear acknowledgment of the importance to the City Council of the need to address the shortfall in supply, when it states:

"data suggests there is a significant unmet need in terms of targets for accommodating first year students in PBSA" (para 12.3)

"there will remain a significant unmet need for PBSA" (para 12.7)

CP.2 recognises that paragraph 50 of the NPPF states:

"To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, 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, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand"

The council's own evidence confirms the significant unmet need for student accommodation. CP.2 references the draft Student Housing Study (2016) saying that it is likely to demonstrate that despite site allocations in CP.1 for PBSA and additional development of PBSA on unallocated sites in the coming years, there is likely to remain a significant unmet demand for PBSA. As an important 'group in the community', the housing needs of students should be met in the same way as any other group, in accordance with the NPPF.

Furthermore, the importance of student housing is clearly recognised in the City Council’s Housing Strategy 2015, which identifies student housing as a ‘Priority One’ theme, and states:

“We need a wider range of affordable accommodation options for students to take pressure off the existing housing stock and we need to work with landlords to improve the quality of accommodation and ensure student housing does not cause disruption in our neighbourhoods.”

Deloitte Real Estate analysis has highlighted that the extent of the shortfall in PBSA amounts to 16,740 students. This analysis used 2014/15 data from the Higher Education Statistics Agency (HESA) and takes into account both present PBSA provision and pipeline supply.

	University of Brighton	University of Sussex	Private	Total
Student Population*	15,785	12,705		28,490
PBSA Bed Spaces**	2,073	4,413	398	6,884
PBSA Pipeline***	2,155	2,530	181	4,866
Residual for Alternative Accommodation	11,557	5,762		16,740

Table 1: Summary of Student Population Compared to PBSA Bed Spaces.

* Higher Education Statistics Agency 2014/15 data

** Based on information available on the University of Brighton and University of Sussex accommodation guides and BHCC Student Housing Technical Background Paper (June 2013)

*** Deloitte Real Estate research from BHCC planning applications and planning policy documents

These figures do not take into account anticipated growth from each University. The BHCC Housing Strategy (2015) estimates that there will be an increase of 9,000 students across both universities. This means that there could be approximately 25,000 more students than PBSA beds by 2020, if both current provision and pipeline supply are considered.

Where supply of PBSA is insufficient, students are forced to look for other accommodation. The BHCC Housing Strategy and Housing Technical Background Paper note that the under-supply of PBSA creates pressure on existing housing and instils a reliance on the private rented sector to plug the gap. Likewise, paragraphs 4.233 of CP.1 and 2.27 of CP.2 explain that the high number of HMOs in Brighton has come about in part because the supply of purpose-built accommodation has not matched the expansion of the student population.

Indeed, the 2015 Housing Strategy reports that residents of Brighton are concerned about the conversion of previous family homes into HMOs. The strategy identifies in it Priority 1 that it needs to improve the supply of family and student housing. Increasing the provision of PBSA in Brighton could help to achieve these objectives, by giving students alternatives to HMOs. The strategy states at page 9:

“We need a wider range of affordable accommodation options for students to take pressure off the existing housing stock and we need to work with landlords to improve the quality of accommodation and ensure student housing does not cause disruption in our neighbourhoods.”

This evidences that alongside concerns about the quantity of student housing available, the quality is also crucially important. The BHCC Student Housing Technical Background Paper (June 2013) highlights how areas concentrated with HMOs can have a negative impact on the broader community in Brighton: putting pressure on rents, impacting community cohesion, increasing levels of crime and raising amenity concerns. Vita Student accommodation is very carefully managed in order to avoid potential amenity concerns associated with HMOs and other PBSA.

Overall, it is considered that increased provision of PBSA would:

- help deliver a balanced supply of housing;
- meet specific requirements of students;
- help to reduce extra pressure on HMOs, family housing and private rented accommodation;
- minimise concerns about amenity.

Question SH2

Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

SPG strongly recommends that CP.2 should allocate additional sites for PBSA.

Paragraph 12.7 of CP.2 confirms that the current site allocations for PBSA and the additional development on unallocated sites will not meet demand, and that the trend of university expansion will increase the unmet demand.

Given that current BHCC allocations are unlikely to meet demand, it is critical that the council allocates additional sites. Extra allocations are especially important given the growing student body and the widening shortfall that will stem from this. The BHCC 2015 Housing Strategy explains that the Universities of Brighton and Sussex have plans to increase student numbers by 9,000 in the next five years.

In addition, it is vital that the City Council should enable sufficient land to come forward to meet the varying preferences of students. One of the four main principles of the City Council's Student Housing Strategy 2009-2014 (2009) was:

"To reduce the over-concentration of HMO in some neighbourhoods by promoting and enabling the appropriate development of purpose-built student accommodation at suitable locations within the city, that will appeal to the locational and residential preferences of students"

When considering further allocations for PBSA, SPG urges BHCC to consider the demographic make-up of Brighton's student population and provide a range of housing options to suit the diverse student body.

The British Council predicts 28,000 additional international students between 2011 and 2020. SPG has identified that international students commonly require high-quality accommodation and found that there is strong take-up on accommodation that offers this: Vita Student has an occupancy rate of 100% in its PBSA across the UK. It is important that BHCC allocates sites for PBSA to ensure that these students have housing options that cater to their needs.

Question SH3

Are there any locations/sites that could be considered for purpose built student housing development?

SPG proposes the allocation of Enterprise Point, Melbourne Street as a site for PBSA.

Notwithstanding that planning permission has previously been granted on the site for residential-led development, the site has many characteristics that make it suitable for student accommodation.

Most important is the site's location directly off Lewes Road, which is acknowledged as Brighton's 'academic corridor'. This location offers students immediate access to nearby university facilities, allowing students to walk and cycle rather than rely on Brighton's transport infrastructure. Policy CP21 of the CP.1 requires that sites "should be located along sustainable transport corridors, where accommodation is easily accessible to the university campuses"; Enterprise Point is a prime location in this regard.

Supporting the academic corridor is strategically important for BHCC. Policy DA3 (Lewes Road) of the CP.1 outlines its intentions to 'develop and enhance the role of Lewes Road as the city's academic corridor'. SPG considers that the development of PBSA at Enterprise Point would be entirely consistent with the City Council's vision for meeting the needs of its student population.

Delivering PBSA at Enterprise Point would add to the range of accommodation available around the universities, helping the council to achieve its aim of providing housing that meets the diverse needs of the Brighton population (Policy CP19- Housing Mix from CP.1). Given the growing numbers of international students (identified by SPG research) and their preference for high-quality accommodation, PBSA at Enterprise Point will ensure that there is suitable housing to meet their needs. Going forward, this will maintain Brighton's universities as attractive destinations for students from abroad.

Furthermore, the site's development for PBSA would maximise its use for accommodating priority tenure of housing in the city. Both CP.1 and CP.2 confirm the requirement to maximise use of brownfield sites. Greater use will come from the Enterprise Point site's use for PBSA than for the approved residential development which primarily promoted the refurbishment of the existing building.

BHCC planning policy for the Lewes Road concentrates guidance on the regeneration of Preston Barracks. The 2011 Lewes Road Planning Brief envisions that development in the area can support "the need to provide appropriate accommodation for the students" and strengthen "the links between the universities, business and local communities". SPG suggests that a PBSA development at Enterprise Point would complement the regeneration of Preston Barracks, adding to the vibrancy of the area and maintaining its reputation as a place for students to live.

Question SH4

Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

SPG supports the delivery of PBSA in locations well-connected to student services and activity. Pursuing a 'dispersed approach' for student accommodation could encourage unsustainable development.

SPG maintains that allocations should be focussed on the Lewes Road to offer students proximity to facilities and to maintain the university 'hub'. Policy CP21 of the CP.1 states that PBSA should be situated along sustainable transport corridors, where accommodation is easily accessible to the university campuses or other educational establishments by walking, cycling or bus. Developing sites around Lewes Road, where students are likely to be within walking distance of facilities, will minimise additional pressure on road congestion and public transport infrastructure.

Pursuing a dispersed approach to suitable locations, could increase the risk of intensifying HMO dependency in the Lewes Road area. If the council fails to increase the supply of PBSA in and around the university corridor, HMOs will continue to be in high demand. The council is taking measures to prevent this: for example, introducing the Article 4 direction that planning permission is required for changes of use to small HMO uses in some wards. This measure would be supplemented by the delivery of additional PBSA around Lewes Road. This approach is particularly important since demand for properties near the universities is likely to remain high.

Question SH5

What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

In pursuing a dispersed approach to PBSA site allocations, BHCC runs the risk of relegating students to pockets of the City not easily accessible from the university campuses (which would run contrary to Policy CP21's stipulation that student accommodation sites should be well-connected with student facilities). To mitigate this, BHCC would have to consider appropriate investment in transport infrastructure, to ensure that students are well-connected.

Alongside this, it is important to be mindful of demand for accommodation in locations further removed from university facilities. Without sufficient demand, site allocations further from the universities may be redundant.

Question SH6

How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Given the volume of PBSA coming forward with the regeneration of Preston Barracks, BHCC clearly has to be mindful of the cumulative impacts of PBSA development. Central to this is the impact of noise on local residents. As expressed in the CP.2 Scoping Document, 'retaining a degree of separation from existing residential areas' will be an important way of minimising noise disruption. Indeed, allocating sites for PBSA stand-alone buildings may minimise demand for student-lets and HMOs which are embedded in residential roads.

Similarly PBSA, by nature, has less impact on residential amenity. Vita Student offers accommodation which is secure, under full-time management and supervision, attractive and well-maintained. The quality of the building, its facilities and the support of staff encourage students to be respectful and well-behaved. The Building Residence Manager or Assistant Manager is on site from 7am to 11pm to ensure that there is always a member of the management team on hand to deal with any student issues that may arise.

Question SH7

Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Given that CP.2 recognises the significant unmet needs for student housing, SPG is concerned that the approach of Policy CP21 of CP.1 is in conflict with how the City Plan as a whole meets the diverse housing needs of Brighton & Hove.

In particular, SPG believes that the City Council should review its approach to criteria 6 and 7 of Policy CP21. As set out in the adopted policy, these criteria could result in the refusal of planning permission for appropriate PBSA projects which are proposed on previously identified potential housing sites or if there is not a formal agreement with an educational establishment within Brighton & Hove.

In a city where there are substantial pressures to balance the needs of the different groups of its community, the approach of Policy CP21 could be interpreted as placing too great a preference on residential developments, particularly as paragraph 2.14 of CP.2 confirms that the challenge for Part 2 of the City Plan will be to identify a sufficient mix of sites that can be allocated for housing so that different types of housing development can be delivered to help meet the city's range of requirements.

To avoid conflicts with these criteria, SPG strongly recommends that BHCC allocates sufficient land to meet the needs of its student population, and includes the Enterprise Point site in the new allocations.

Question H8

Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities?

For the reasons identified in Section 12 of CP.2 and elsewhere in this letter, it is important that BHCC considers the unmet need for student housing when addressing the needs of particular groups within the city's communities. These needs must result in an increase in site allocations for PBSA.

Question H20

Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

As explained in this letter, the provision of PBSA should be recognised as an opportunity to reduce the negative impacts of HMOs. Therefore, SPG confirms that this issue provides further justification for the application of sufficient sites for PBSA in the city.

Question E12

Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

SPG proposes that the Enterprise Point site should be allocated for PBSA. At present the site forms part of the Melbourne Street Industrial Area, which is identified in Policy CP3 as an employment site that BHCC would allow for "employment-led (residential and employment) mixed use development".

Given that planning permission has previously been granted for residential-led redevelopment of the site, SPG suggests that the site's allocation should reflect that it is proposed for alternative uses. As described above, SPG proposes that Enterprise Point is allocated for PBSA.

We would be pleased to discuss these comments with the City Council in an attempt to ensure that the City Plan Part Two's policy on student housing is sound.

Yours sincerely

Chief Planning Officer
Att: Planning Policy Team,
Brighton & Hove City Council,
Room 201 Kings House,
Grand Avenue,
Hove BN3 2LS

By Email

22 Sept. 2016

By email to: planningpolicy@brighton-hove.gov.uk

Dear Sir or Madam,

B&H CITY PLAN PART 2 – CONSULTATION

RE: MACKLEYS WHARF, ALDRINGTON / BASIN ROAD NORTH

1. Background

1. I write on behalf of Hopegar Properties Ltd. They 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).
2. Clearly this is a substantial landholding and constitutes a significant interest in the Port and surroundings.
3. 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). Subsequently a new consent was issued (BH2014/01064) which permits B2 use without a time limit.
4. My clients have asked me to comment on the City Plan Part 2 (Scoping document). Their interest in the proposals is in their longer term implications, and based on awareness of the Adopted City Plan Pt 1, the Port of Shoreham Masterplan and the Joint Area Action Plan for the area, being produced by your Council together with West Sussex and Adur District Councils.

2. Comments

1. My clients thank you for the opportunity to consider the scope of the City Plan Pt 2. I am instructed to ask you to consider a policy to protect existing industrial uses in the City such as their own property, described above, from possible conflicts which may arise.
2. Therefore, in response to your consultation question E12 they ask me to make the following points:

Response to Consultation Question E12

'Policy should ensure there is protection from new residents applying pressure on nearby business which may harm amenity. This should be done by requiring appropriate mitigation measures in new development.

'Existing employment uses should also be protected from pressure to reduce their activities when potentially more sensitive uses are allowed nearby.

The provisions of Planning Guidance (noise, para 006) and National Planning Framework Para 123 should be taken into account'

3. They look forward to seeing the next draft of Pt 2 of the Plan in Autumn 2017 and ask you to keep them advised of further progress with it and the JAAP for Shoreham Harbour as work continues

Yours sincerely,

Copies:

- 1) Client
- 2) File – Mackleys Wharf and PortZed



1 Eversholt Street
London
NW1 2DN

T: 020 7904 7247

E: elliott.stamp@networkrail.co.uk

22 September 2016

Planning Policy Team
Brighton & Hove City Council
Hove Town Hall
Norton Road
Hove
BN3 3BQ

Dear Sir / Madam,

Network Rail Consultation Response - Part Two of the City Plan Scoping Paper

I write in order to provide Network Rail's consultation response in relation to Part Two of the City Plan Scoping Paper.

Thank you for giving Network Rail the opportunity to submit representation in relation to the scoping paper.

Introduction

Network Rail Property plans and leads the delivery of projects for major station improvements, housing and commercial development, retail and railway arches. Our purpose is to transform and regenerate our transport hubs, property and land to improve services for passengers and surrounding communities, as well as contribute to the development and improvement of areas.

Over the last five years, Network Rail overseen billions of pounds of investment in Britain, and we have over 250 sites in the development pipeline from London to Leeds, Cardiff to Glasgow.

We work with the private and public sector to drive greater scheme investment. We prioritise direct developments, joint ventures and partnerships over land disposals, ensuring we maximise value and deliver real improvements - such as enabling the delivery of new homes and commercial developments which create thousands of jobs and boost Britain's economy.

We create exceptional places from our stations and property assets for passengers, businesses and communities. Through our activities we generate over £200m each year, which is reinvested back into the railway to create a better railway for Britain.

The Department for Communities and Local Government and the Department for Transport have specifically tasked Network Rail with reviewing all land and assets across the entire network in order to determine how many residential units can be delivered. Emphasis has been made on maximising residential provision on development sites as well as identifying any new opportunities.

In order to realise this development potential it is vitally important that opportunities are supported in Development Plan and supporting policy documentation, and therefore it is considered necessary on this occasion to make comments and put forward Network Rail's Brighton Combined Engineering Depot (CED) (Howard Place and New England Road, Brighton, BN1 3TU) for consideration in relation to Part Two of the City Plan.

Call for Sites - Question H3

Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

As part of the 'Call for Sites' exercise Network Rail would like to put forward its Brighton CED site for consideration in relation to Part Two of the City Plan.

Site and Surroundings:

Site Address: Railway Station Depot, Howard Place and New England Road, Brighton, BN1 3TU
Easting: 530784 Northing: 105280

Network Rail's Brighton CED site is located adjacent to the operational railway line to the north west of Brighton Railway Station. The site is set back from New England Road and is flanked by railway lines. The site is situated within a steep cutting with a cliff face located to the south of the site. Development at the site would therefore not have an adverse impact on the appearance and amenity of the surrounding area.

Please see below images and the attached 'Site Location Plan' which detail the location of the site.

Figure 1: Site Location Plan



Figure 2: Aerial Photograph of the site



The site covers an area of approximately 12,000 sq m / 1.2 hectares.

Network Rail's Brighton CED site currently contains;

- A two storey brick warehouse building with a pitched roof.
- A relatively large three storey brick office building. The buildings front elevation faces New England Road.
- A number of two storey maintenance sheds which are located to the rear of the office building.
- Paved areas used for access within the site and parking associated to the office and maintenance sheds.

Use:

The site is operated as operational railway land which falls within the Sui Generis use class.

Network Rail Operations team's currently occupy 70% of the site. Colas Rail, Govia Thameslink Railway (GTR) and the British Transport Police occupy the remainder of the site.

Access and Transport:

Vehicular and pedestrian access to the site comes via New England Road (B2122). A dropped curb provides vehicular access to and from the site.

The site is connected to the local road network via New England Road (B2122). To the east of the site New England Road connects to London Road / Preston Road (A270), while to the west of the site it joins the Kingsway (A259).

The site has good accessibility to public transport services, for instance the site is situated an approximate 9 minute walk from Brighton Railway Station. Furthermore, a number of public bus routes service the Seven Dial area which is situated to the west of the site.

Proposal:

Network Rail would like to put forward its Brighton CED site to be allocated for residential development.

The residential redevelopment of the site would look to be supported by relevant national and local planning policy.

Network Rail's Brighton CED site lies within the area covered by Policy DA4 'New England Quarter and London Road' development area.

Policy CP1 confirms that the council expect the 'New England Quarter – London Road' area to accommodate around 1185 new residential homes over the plan period 2010 – 2030.

Policy CP12 (Urban Design) of the City Plan explains that sites within 'Brighton Station / New England area' have the potential to accommodate taller developments (around six storeys in height).

Potential Density:

Network Rail considers that the site is situated within a residential urban location.

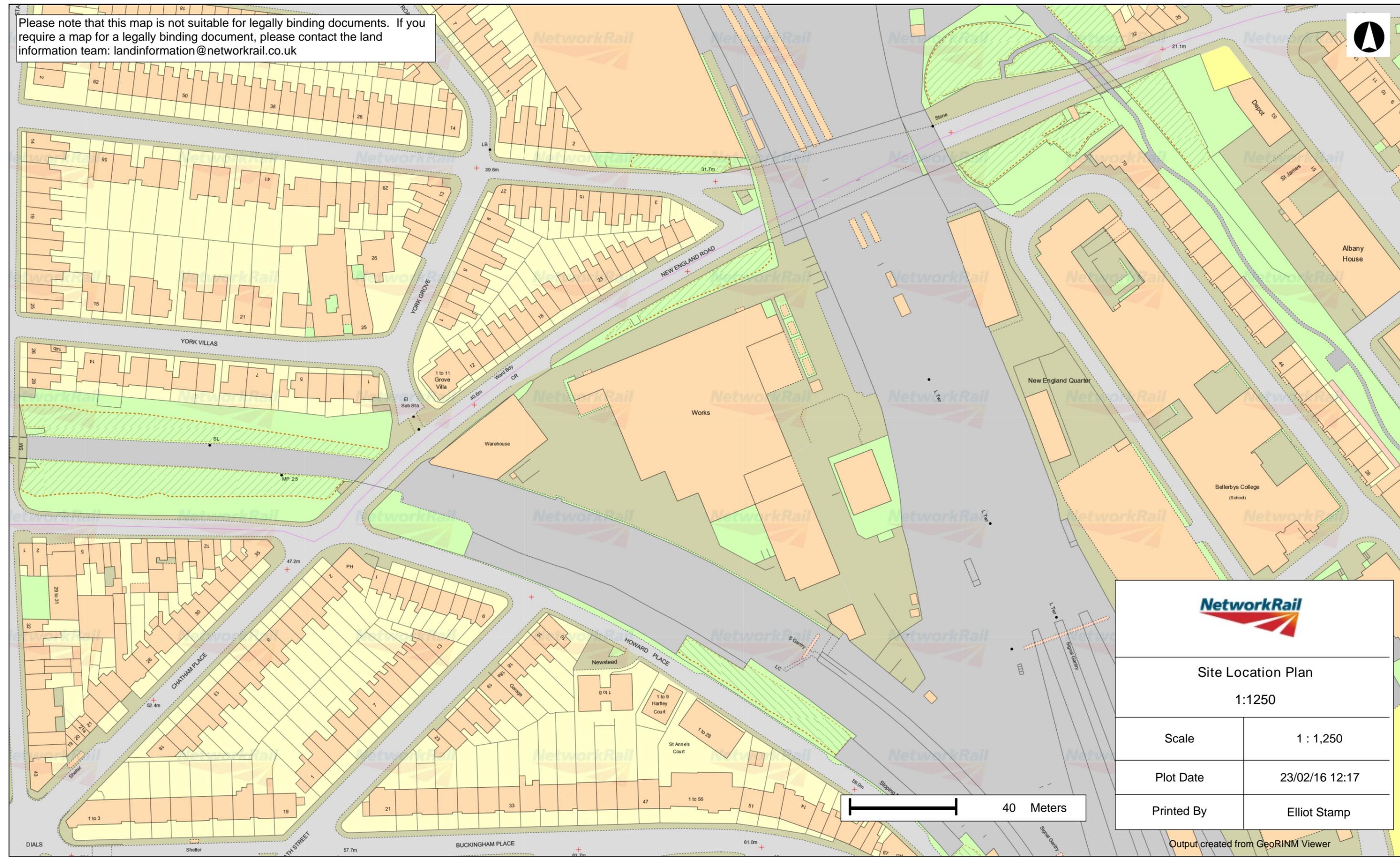
Given the sites location, size and relevant planning policy, it is anticipated that the site could potentially accommodate 100-130 residential units.

If you have any questions or require more information on any aspect of this consultation response please do not hesitate to contact me.

Yours sincerely

**Town
Planner**

Please note that this map is not suitable for legally binding documents. If you require a map for a legally binding document, please contact the land information team: landinformation@networkrail.co.uk



Site Location Plan

1:1250

Scale 1 : 1,250

Plot Date 23/02/16 12:17

Printed By Elliot Stamp

Output created from GeoRINM Viewer



COPYRIGHTS
 This product includes map data licensed from Ordnance Survey. © Crown copyright and database rights 2015 Ordnance Survey 0100040692.
 © Local Government Information House Limited copyright and database rights 2015 Ordnance Survey 0100040692.
 Contains British Geological Survey materials © NERC 2015
 The Five Mile Line diagrams are copyright of Waterman Civils and must not be passed to any third party.

Date: 22nd September 2016
Our Ref: 14.418/05.01

24 Southwark Bridge Road
London
SE1 9HF

Planning Policy Team
Brighton & Hove City Council
2nd Floor, King's House
Grand Avenue
Hove, BN3 2LS

T 0203 268 2018

Dear Sir/Madam,

City Plan Part Two Scoping Paper – Representations by Linden Homes and Cothill Educational Trust

We are writing on behalf of our clients in respect to the Council's City Plan Part Two Scoping Paper, specifically in relation to question H3 which asks whether there are any sites that should be included as housing allocations within the City Plan Part Two.

In response to this question we are promoting the allocation of the former St Aubyns School, Rottingdean for residential development. We have previously responded to the Council's call for sites in September 2015 and as such the site has been included within the most recent SHLAA for the delivery of 40 dwellings within the first five years of the Plan period (2016-2021)(SHLAA ref: 6073).

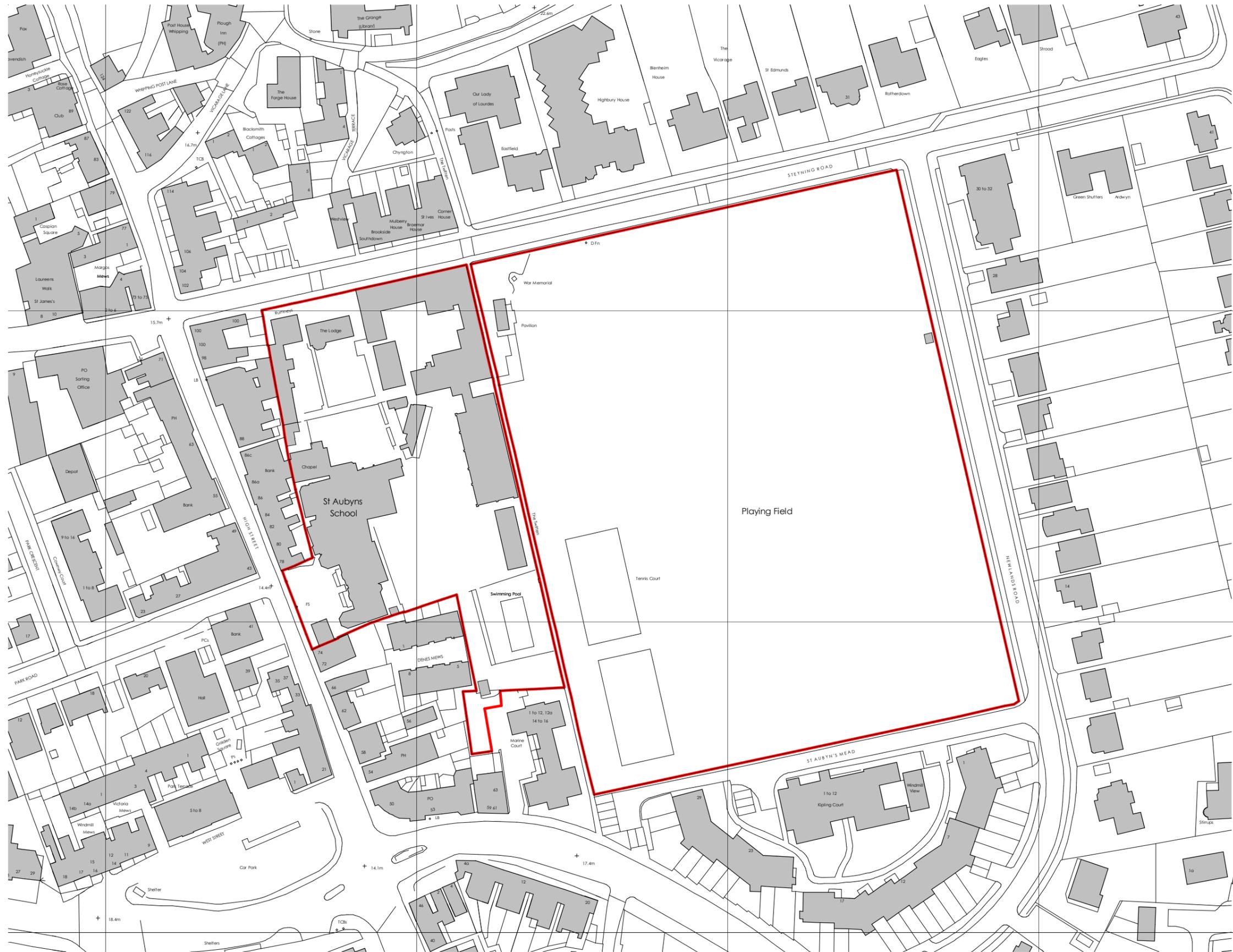
At the time of its publication the SHLAA noted that the site was the subject of current planning applications for its residential redevelopment to provide 48 dwellings together with a 62 bedroom care home (refs: BH2015/03108, 03110 & 03112). Whilst these applications were subsequently refused, the principle of developing on part of the former playing field to secure a viable development was agreed with the Council (paragraph 8.133 of the officers report). On this basis, we consider that not only should it be included as a housing allocation within the draft City Plan Part 2, when published, but it should also have a higher capacity of approximately 100 dwellings based on a residential only scheme and reflecting the principles established by the previous applications. To assist the Council, please find enclosed a site location plan showing the extent of the site.

I trust our comments will be taken into account by the Council in the preparation of its City Plan Part 2. In the meantime, should you have any queries then please do not hesitate to contact me.

Yours faithfully

**Associate
Director**





Disclaimer

This drawing is protected under the Copyright, Designs and Patents Act 1988. This drawing is protected by copyright of FLUID DESIGN. Promap Crown Copyright 2007. All rights reserved. Licence number 100020449

fluidesign is a trading style of FLUID Architecture Limited, which is a subsidiary of Fluid Design Group Limited. Registered in England No: 5190735. Registered Address: Oringbury House, Lewes Road, Forest Row, East Sussex, RH18 5AA

Sketch

This drawing is produced for SKETCH PURPOSES ONLY and is not to be used for construction.

This drawing illustrates a sketch proposal only and as such is subject to detailed site investigation, including ground conditions/contaminates, drainage design and planning/density negotiations. The layout may be based upon an enlargement of an O.S. sheet or other small scale plans and its accuracy needs to be verified by survey. CDM Regulations have not been fully considered.

Rev	Description	Date



Oringbury House, Lewes Road,
Forest Row, East Sussex, RH18 6AA
t: +44(0)1342 822272
e: studio@fluid-design.co.uk
www.fluid-design.co.uk



Client: LINDEN HOMES & COTHILL
EDUCATIONAL TRUST

Project: St Aubyns School,
76 High Street,
Rottingdean,
Brighton, BN2 7JN

Title: Site Location Plan

Status: Sketch

Scale: 1 : 1250 **Date:** 04/02/15

Revision: **Sheet:** A3

Drg No: FD 14 - 1132 - 50 -SK



City Plan Part Two: Scoping Document,
Planning Policy,
Brighton & Hove City Council,
Room 201 King's House,
Grand Avenue,
Hove, East Sussex,
BN3 2LS

22 September 2016

Dear Sir/Madam,

THE CITY PLAN PART TWO SCOPING DOCUMENT

I am writing in response to the consultation on the City Plan Part Two Scoping Document and enclose below responses on behalf of my client.

Question H1 - Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period?

The National Planning Policy Framework (NPPF) in its core planning principles states that, "Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area..." And that plans should, "set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities."

The NPPF also expects the local plan to meet the full, objectively assessed needs for market and affordable housing in the housing market area, "including identifying any key sites which are critical to the delivery of the housing strategy over the plan period."

The Planning Practice Guidance which accompanies the NPPF sets out what inputs and processes should lead to a robust assessment of land availability. When looking to allocate brownfield sites care should be taken not to overlook other undeveloped land that may be more readily available than the brownfield sites. Allocating brownfield sites in preference of other sites may not provide the best way to deliver the urgently needed housing in the City in a timely manner.

Question H2 - The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

The Urban Fringe Studies carried out fail to take account of the urgent need for housing provision in the City. In doing so the assessors have not been able to strike the required balance between the identified constraints and the need for housing sites.

In addition to the above it is considered that the assessors should take into account submissions from landowners and their agents which are site specific and often more detailed than those carried out as part of the Urban Fringe Studies.

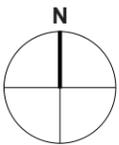
Question H3 - Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

It is considered that the site known as Land at Wanderdown Road in Ovingdean should be included as an allocation within the City Plan Part Two. I enclose a plan of the site with this letter. This site has previously been submitted as part of the 2015 SHLAA Call for Sites.

Should you have any queries in relation to this response please do not hesitate to contact me.

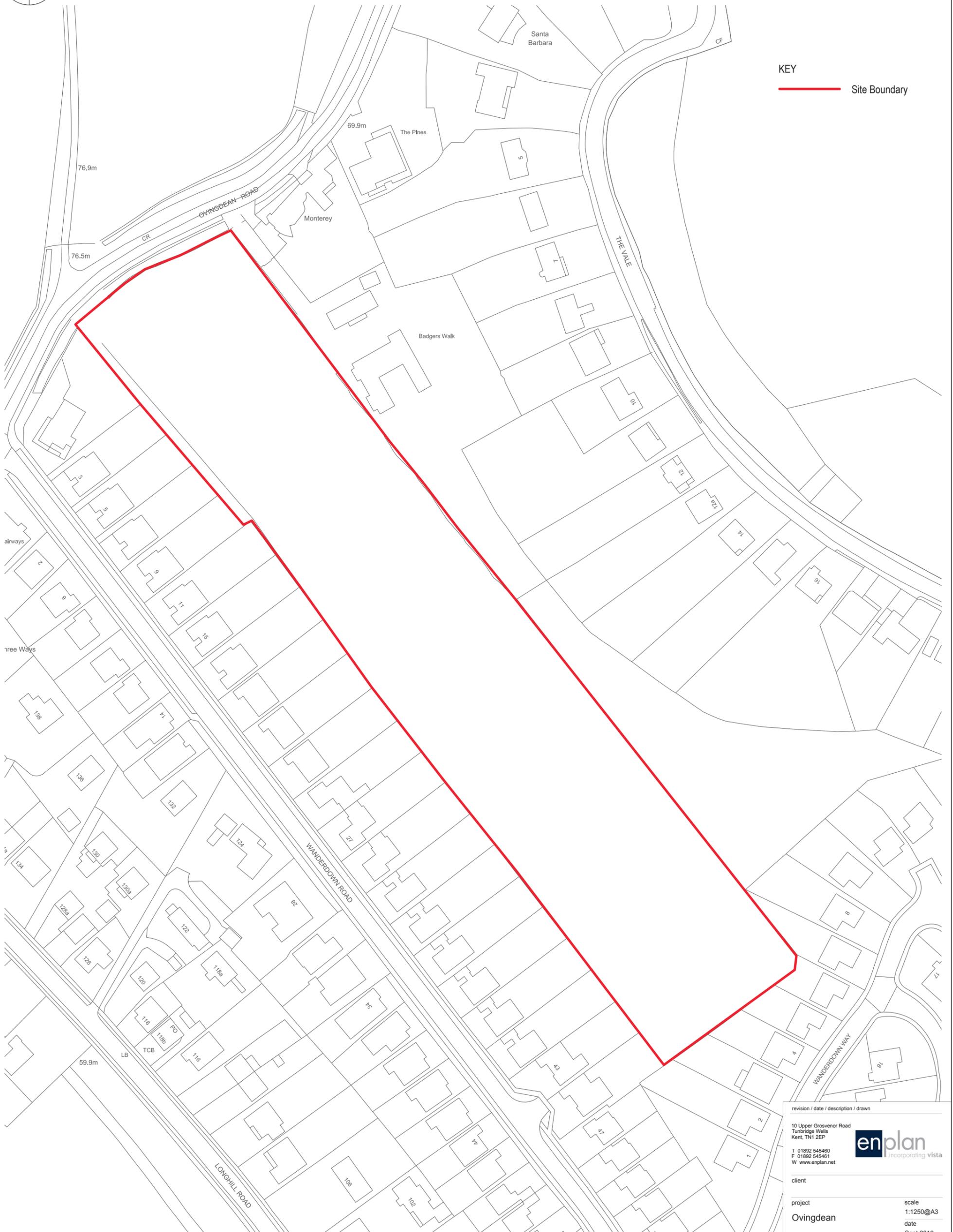
Yours sincerely,

Director



Note:
The material contained in this document has been reproduced from an Ordnance Survey map with permission of the Controller of Her Majesty's Stationery Office. Crown Copyright Licence number AL100035542

KEY
 Site Boundary



0 10 20 50m



revision / date / description / drawn

10 Upper Grosvenor Road
 Tunbridge Wells
 Kent, TN1 2EP
 T 01892 545460
 F 01892 545461
 W www.enplan.net



client

project
Ovingdean

scale
 1:1250@A3
 date
 Sept 2016

title
Site Location Plan

drawn
 JDSP
 checked
 PRV

drawing number

02-591-002

revision

DO NOT SCALE FROM THIS DWG | DRAWING SUBJECT TO COPYRIGHT ©

Our ref:
Your ref:

Planning Policy
Brighton & Hove City Council

~~Elizabeth Gleave~~
Elizabeth Gleave
Assistant Spatial Planning Manager
Bridge House
Walnut Tree Close
Guildford GU1 4LZ

Direct Line: 0300 470 1064

22 September 2016

By email only: planningpolicy@brighton-hove.gov.uk

Brighton & Hove City Plan Part Two Scoping Consultation: 30 June to 22 September 2016

Dear Sir or Madam

Thank you for inviting Highways England to comment on the Brighton & Hove City Plan Part Two (CPP2) Scoping Consultation. Given the nature of our representations, comments have been set out in this letter rather than in representation forms.

As you are aware, Highways England's interest relates to the motorway and all-purpose trunk road network, which is collectively known as the strategic road network (SRN) which we manage on behalf of the Secretary of State. In the case of Brighton & Hove City Council, our interest relates primarily to the A23, A27 and associated junctions.

Our assessment of local plans is guided by, *inter alia*:

- National Planning Policy Framework
- Department for Transport Circular 02/13 *The Strategic Road Network and the Delivery of sustainable Development*; and
- Highways England's *The strategic road network: Planning for the future: A guide to working with Highways England on planning matters*

Overall, in accordance with national policy, Highways England looks to the Council to promote strategies, policies and land allocations that will support the operation of a safe and reliable transport network and alternatives to the car. Highways England stands ready to assist the Council as the plan progresses.

We have already reviewed and agreed the Transport Assessment of the City Plan impacts on the SRN. The assessment process identified issues and appropriate junction mitigations on the A27 trunk road. We agreed the A27 mitigations as part of the Strategic Transport Assessment work carried out by consultants JMP and revised in June 2014 to reflect the delivery target of 13,200 dwellings by the end of the plan period 2030.

General

We note that there are very few mentions of the strategic road network (SRN) within the CPP2 scoping document. As such, we ask that the SRN is referenced in the CPP2 document, especially in relation to the Transport and Travel section and in relation to new development where relevant.

The City Plan Part 1 (CPP1) policies CP7 on infrastructure, and CP9 on transport, set out the Council's aspirations. The CPP2 should make clear what development will or won't be permitted and the criteria this is based upon. In particular, the role of the SRN should be made clear and how the impacts and indeed cumulative of development will be assessed. We are happy to work with you to assess whether national Transport Assessment guidance needs to be augmented for Brighton and Hove. It should be specified that Transport Assessments will be required for any development that could affect the safety or operation of the SRN, not just major developments.

We note that your Council are yet to implement a Community Infrastructure Levy (CIL). In accordance with DCLG guidance, any development contributions towards SRN improvements should be secured via Section 278 agreements, and not via Section 106 or a CIL Reg123 List. The use of Section 278 agreements will enable multiple sites to contribute if appropriate, and also secures the Secretary of State's position by ensuring that 100% of contributions go towards the SRN improvement. The impact of the full quantum of development upon the SRN has already been agreed with us as well as the identified mitigation schemes required to accommodate development traffic. However the threshold size of development that should be required to make a financial contribution to those mitigations needs to be determined. Mitigation schemes must be financially deliverable which includes identifying those sources of funding. Equally, consideration will need to be given to the timing of these mitigations in relation to the delivery of the City Plan.

The CPP1 Inspector's Report highlighted that implementation and monitoring was vague and this should be addressed by CPP2. In particular, CPP1 Annex 1 (Implementation and Monitoring) is not clear regarding what will be monitored, when and how with regard to the SRN, or what happens as a result (for example, triggers for action and what that action might be as mentioned above).

CPP2 questions

The CPP2 includes a series of questions regarding what CPP2 should cover. In addition to the general points made above, our comments below are in relation to these questions.

Question H1

Highways England supports the council's intention to allocate suitable brownfield sites for housing through CPP2 as long as they are accompanied by a Transport Assessment

or Transport Statement and Travel Plan, assessing the impact on the SRN where relevant.

Question H2

Highways England would like to see transport considered in establishing whether there is housing potential on some of the city's urban fringe sites as part of CPP2.

Questions H4, H5, H6 & H7,

It would seem that it would be appropriate for the council to ensure that development delivers to the identified needs of the city and type and mix of dwelling throughout the area may be better specified from the outset so there is no ambiguity or risk that the identified needs are not met. However, in introducing such policy care will need to be taken to ensure that the assumptions used in the Strategic Transport Assessment are not exceeded as this is likely to have a noticeable effect upon trip / traffic generation.

H9, H13, H20 and H21

As per comments above for H4, H5, H6 & H7 the introduction of policy to meet the City's housing need should ensure that it would not result in the assumptions made in the Strategic Transport Assessment being exceeded in terms of traffic generation.

Question R11

Highways England supports the designation of local centres associated with large scale housing developments in order to reduce external trips and potential impact on the SRN.

Questions R15 and R16

In relation to R15 and R16, Highways England would have concerns if markets were provided on the urban fringe in proximity to the A23 and A27 Strategic Road Network without careful consideration of impacts upon the SRN and mitigation measures as required.

Questions TR1, TR2, TR3 and TR15

Highways England would like to see specification that significant developments in the city plan area should assess the impact on the SRN, along with developments that are in close proximity to the SRN. Brighton and Hove City Council and Highways England have agreed that mitigation schemes are required and therefore it should be stressed that development will be required to fund those schemes. As well as Transport Assessments, we would also like to see specification for all new major development schemes to submit a Travel Plan, with associated thresholds for the size of development that should prepare a Transport Assessment and Travel Plan. Please note that the Highways Agency (as referenced in the CPP2 scoping document) has now been replaced by Highways England.

Questions TR4 and TR9

Highways England would support a policy to secure developer contributions related to the quantum of development to fund the identified SRN improvements that are required

to deliver the development in the City Plan. Contributions towards SRN improvements should not be through CIL but as Section 278 agreements.

Questions TR5 and TR6

Highways England would like to see more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans as it is not specified in the City Plan Part One.

Question TR7

Highways England would support policy/guidance setting out how new development will assist in promoting and enabling more active travel.

Questions TR13 and TR14

Highways England would have concerns about the location of such sites (park and ride, lorry and coach parks) in the vicinity of the strategic road network, and thus requests that it is specified that any such sites would need to be supported by a Transport Assessment that fully assesses the impact of such sites on the SRN.

Question SH5

In considering policy for high density housing near to the urban fringe in closer proximity to the A27 and A23, care should be taken to ensure that this does not exceed the assumptions made within the Strategic Transport Assessment. Policy which goes beyond those assumptions will need careful consideration and potentially amended mitigation in order to address any further impacts upon the SRN.

I hope that the above comments are helpful to you. We are happy to meet your Council to discuss the City Plan and to work with you on what needs to be included. Please contact us if you would like to discuss the comments above or to arrange a meeting.

Yours faithfully,

From:
Sent: 22 September 2016 16:01
To: PlanningPolicy
Subject: Brighton & Hove City Plan Part 2 Consultation

Dear Brighton and Hove City Planners,

Brighton & Hove City Plan Part 2 Consultation

Thank you for the opportunity to comment on the Brighton & Hove City Plan Part 2. We support the aims and objectives of the Plan that are relevant to the Environment Agency's remit on water resources, water quality, biodiversity and flood risk. We have some detailed comments specifically on Scoping Paper 8 Addressing pollution, water and energy resources, and also the Sustainability Appraisal Scoping Report. We would like to see stronger reference made to pollution prevention in reference to Sustainable Drainage Systems and control through appropriate design and mitigation in addition to flood risk.

Scoping Paper 8: Addressing pollution, water and energy resources.

QP1: A Polluted Land and Buildings policy should address the potential impact of redevelopment on groundwater quality. There are a number of Source Protection Zones (SPZs) underlying parts of the city which must be protected from pollution as a result of new development. There are some SPZs which you have covered in your Sustainability Appraisal as being important for drinking water supply, particularly in the Lewes Road area which has a focus for growth in the City Plan Part 1.

8.10 We support this paragraph and the thorough explanation of water resource and their quality.

8.11 We support the recognition to protect SPZs and your intention to seek higher water efficiency standards.

QP3: We suggest splitting this into two policies which will make more explicit your intention to address water pollution specifically.

QP5: We would support a policy which protects the quality and potential yield of water resources.

8.19: We support that the plan seeks to ensure the timely delivery of necessary waste water treatment infrastructure to support the new development proposed in the Plan. In this regard, our answer to QP8 is yes. It would be helpful to have a policy which seeks to secure the necessary infrastructure in time for the new development, however it could be combined in an overarching infrastructure policy.

8.21-8.23 We support the inclusion of Sustainable Drainage Systems (SuDS) as a requirement to avoid the impacts of surface water flooding in the context of our incident response role, now that the city has taken over the lead responsibility for surface water flooding. We recommend that the Plan recognises that the type of SuDS method must be appropriate for the location, specifically in relation to the protection of groundwater quality. Soakaways in SPZ1 for example are unlikely to be appropriate from a water quality perspective. We recommend that the wording covers pollution prevention and control through appropriate design and mitigation in addition to flood risk.

Sustainability Appraisal Scoping Document

We support the inclusion of Objectives:

1. To protect, conserve and achieve a net gain in biodiversity
7. To improve water quality
8. To reduce the risk from all sources of flooding to and from development.

Objective 7: Decision making criteria could refer to appropriate SuDS measures to make sure the location of the new development is considered and appropriate SuDS methods are implemented. This is especially important in areas covered by SPZ1. It could also include the provision of timely and necessary waste water treatment infrastructure to support new development. Making sure waste water is adequately managed will help to protect and improve water quality.

Objective 8: We recommend that that you include an indicator which relates to decisions made in accordance with advice on surface water flooding from the Lead Local Flood Authority, now the we are not able to comment on surface water aspects of development proposals.

The ChaMP project mainly covers rural and urban water quality and the Scoping Document covers the ChaMP objectives quite well.

Please contact me if you would like to discuss any of the points raised in our comments.

Kind regards,

Planning Specialist
Sustainable Places | Solent and South Downs Area | Environment Planning and Engagement
Environment Agency | Guildbourne House | Chatsworth Road | Worthing | BN11 1LD

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.

We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Click [here](#) to report this email as spam



Planning Policy Team
Brighton & Hove City Council
Room 201
Kings House
Grand Avenue
Hove
BN3 2LS

22 September, 2016

Dear Madam / Sir,

Response to Brighton & Hove City Plan Part 2

On behalf of Brighton & Hove Friends of the Earth (BHFOE) I would like to welcome the chance to comment on the scope of the City Plan Part 2. BHFOE is generally supportive of the planning process which helps protect and define local communities and their localities. Its specific comments are listed under the headings contained in the scoping document.

Housing

BHFOE generally welcomes the new report on development in the urban fringe, but it is concerned that where development takes place it should maximise the amount of development on a particular site, taking into account the report's conclusions and the site sensitivities.

It is concerned that low density development is perceived as being low impact development and therefore has often been recommended for development in the urban fringe in the second urban fringe assessment report. This is not always the case. More often, the siting, landscaping, planting, design of the development, including its height above ground and the use of green walls and roofs can be more important factors in whether the development will be low impact or not. A high density development, sensitively designed could actually be of low impact.

Given that the amount of land available is a finite resource, and housing need is so pressing, it is incumbent upon the planning process to deliver as much housing, preferably genuinely affordable, as possible. BHFOE is concerned this may not happen in the current circumstances. It would like to see the housing densities reviewed with a challenge to

developers to bring forward innovative designs for higher density developments which would address the site specific concerns listed in the urban fringe assessment.

BHFOE welcomes the recommendation in the second urban fringe assessment not to develop site 18, Hollingbury Park. This site is totally unsuitable for development, not least as it is a park and is widely used by the surrounding population which is drawn from many wards. This latter point was a key omission in the previous urban fringe assessment along with errors in the calculation of the access to green space for residents of Hollingdean.

Economy and Employment

BHFOE is concerned about the shortfall in employment land and the need to make the best possible use of land that is developed in a sustainable and high quality way. One area, where it would like to see more focus on is restricting car parking in new developments and using the land for more productive purposes such as housing or employment.

One example where more development could be accommodated for offices is on the Preston Barracks site, replacing some of the 600 car parking spaces proposed there. Given that this site is on one of the most accessible transport corridors in the city, which also suffers from congestion, this would be an opportunity to tackle two issues at once: reducing road traffic and congestion whilst increasing employment land.

BHFOE is supportive of extending the Article 4 directive to include further offices which otherwise could be lost for housing. The Council needs to have some measure of control or it cannot plan effectively.

BHFOE is also concerned at the pressure to allow retail on out of centre and out of town industrial estates. New retail, and even existing retail, apart from local facilities, should be focussed on the city centre and if appropriate around the edge of centre in existing retail centres. However, this isn't happening and one example is the loss of space at Hollingdean Depot where a Malpass Markets has been established. This is in completely the wrong place and the store should have been made to move into an existing retail area, which would have been more accessible. This site, for example, doesn't even have a pavement into it.

The loss of employment land at Hollingbury is also to be regretted and the Council should develop a policy to bring those sites back into employment use and certainly not to allow further conversion to retail. BHFOE is concerned that otherwise, retail uses could be sought for the Argus building and other non-retail sites at Hollingbury, generating more car traffic, whilst undermining existing retail centres and being poorly served by other forms of transport.

If these sorts of locations had the retail elements reduced or removed from them, they would open up space for employment uses and help reduce the pressure that is driving some businesses out of the city.

Retail and town centre uses

While BHFOE supports simplification of the City Plan, this does need to be balanced with policies that can actually support and protect the characteristics of the various types of shopping areas within the city. Where these shopping areas have evolved BHFOE would agree that their boundaries should be amended. However, just because an area isn't doing so well,

isn't a reason to remove it from these designated areas, as the area could just be going through a dip before it is reinvested in or even reinvented. Or it could just be an indication that more effort is needed to get investment into a particular area, including improving the public realm and reducing car traffic.

Equally, if new sites are developed that contain what are likely to become important local centres that reduce the need to travel, such as could happen in Toads Hole Valley, then these areas should be protected and included in any list of local centres.

As mentioned in the previous section, BHFOE is concerned at the amount of retail outside of defined shopping centres and the impact that this is having on employment land. It believes more effort needs to be made to move this retail into established centres when opportunities arise and to prevent further out of centre and out of town units springing up.

Transport

While the current transport policies cover a lot of areas, one topic that the Part 1 document is weak on is air pollution, despite some improvements being made to the draft plan. Since Part 1 was drafted, there have been developments in air pollution which warrant it receiving more attention in Part 2. Apart from the VW scandal since the Part 1 Examination and the acknowledgment that real world emissions are often far higher than their test results, the Government is back in the High Court on the 18/19th October to defend its Air Quality Plan, which many observers are highly critical of. As a consequence it is highly likely that more urgent and stronger action will be required to reduce air pollution to below legal limits 'as soon as possible'.

New development in or close to the Air Quality Management Zones should be required to have a neutral or positive impact on air quality, not simply minimise or mitigate such impacts as this could still lead to an increase in pollution. Given the legal requirement to reduce illegal levels of air pollution 'as soon as possible', this issue should carry far more weight in the City Plan than it currently does.

The City Plan should also look at the impact of particulates and not just in relation to EU levels, but also the World Health Organisation's recommended limits, and the increasing awareness that there are no known safe levels for these chemicals.

Linked to this, there is a need to reduce road traffic in central areas, which will not only produce a better environment, but will improve people's health and quality of life and boost the local economy by improving the public realm, while also freeing up roads for those who really need to use them.

Whether it is done in Part 2 or a standalone SPD or guidance, more emphasis needs to be given to promoting active travel in line with the Government's Cycling and Walking Investment Strategy. The only concern with putting the policy or guidance elsewhere is whether it will then be taken notice of by developers and the Council's development control team. Even if it is acknowledged in planning applications, it could be seen as a lower priority, as is currently the case.

One example is Anston House, which is currently going through the planning process. While substantial cycle parking is proposed, very little is being provided for visitors, and that for

residents is down at the back of the basement car park, through at least two sets of doors. Its location will dissuade many from using the facilities. In addition, little thought has been given to how cyclists might then use the surrounding streets, despite the inadequacies of the cycle facilities in Preston Road.

Allied to this, consideration needs to be given to charging points for electric bikes which are likely to see their popularity increase as they become more affordable and reliable. They offer a real solution to many who previously might not have considered cycling as they increase the range people can travel and allow the less mobile to get up and down hills much more readily. Charging points for bikes need to be made a requirement in any new policy or guidance.

In conjunction with larger developments, BHFOE would like to see greater priority and detail being given to Travel Plans, ensuring that they are carried out, are robust and are then put into practice.

BHFOE is opposed to permanent park & ride sites in Brighton & Hove or the South Downs National Park, as they would waste scarce land which is urgently needed for new housing or for employment uses, or would cause great harm to the National Park. Research has also shown that park & ride can undermine existing public transport services and increase carbon emissions.

If park and ride is to be development north of the National Park, there might be an opportunity to link it with land already used for parking such as at Hickstead. However, any such development should also be seen as an opportunity to reduce city centre parking so that any de-congestion benefits are truly realised in the longer term. Without this link, congestion will continue to blight the city centre and any drop in city centre traffic and congestion will be temporary.

More widely, greater effort is required to seek improvement to rail services serving the city both to London and along the coast. The city requires a railway that serves the needs of the city, not Network Rail. Included in this is the need to restore a link to Uckfield and through to Tunbridge Wells, which would not only help provide greater resilience to the rail network with an alternative route to London, but would also open up access into the heart of East Sussex and Kent. Improving these linkages would strengthen the local economy.

Biodiversity and Open Space

BHFOE supports the removal of area 18, Hollingbury Park, from the list of sites suitable for development, as outlined under the Housing section. However, it would also like to see this area, including the local woodland, designated as Local Green Space as it is important for local people and is not extensive in area.

BHFOE also supports making Ladies Mile Open Space and Three Cornered Copse Local Green Spaces as these are both important local spaces and fairly self-contained. BHFOE is less sure how designating Benfield Valley as a Local Green Space would work given that at least part of it is likely to be developed. What is important is that a wide green corridor is maintained, and where necessary improved upon, up to the National Park.

BHFOE believes that the various biodiversity designations need to be rationalised and brought up to date and that areas proposed as Local Nature Reserves but not yet designated, such as

Wild Park and the surrounding area, need to see their designations completed. Having a consistent terminology for referring to these sites will help people understand them and their importance. At present, the situation is rather confusing.

The setting of the National Park is important but it is also essential that people can easily and safely access it too. At present, many of the gateways into the National Park are not clearly identified, can often be unattractive, exuding a feeling of being forgotten or unloved. Identifying a network of primary and secondary gateways, along with ways in which they can be improved, would be useful. It would help residents gain a greater understanding of the National Park and give those who currently feel excluded, or that it's not for them, greater confidence to go out and explore the countryside.

Higher profile gateways would also be good for boosting tourism, particularly if these gateways were linked to pedestrian and cycle routes emerging from the city centre. Linking them to bus routes and stops would also encourage more visitors to venture out onto the South Downs. All of this would help broaden the city's appeal, strengthening its tourism offer and thus boosting the local economy.

Design

Any policies on design should emphasise the need to have active frontages and to improve the public realm. Pedestrians and cyclists need to have clear, attractive, safe and convenient access to and through developments. This is sometimes called permeability and is essential to encouraging more walking and cycling. Designs which include stopped up roads, or closes, should generally not be permitted unless they have pedestrian and cycle links through them.

Greater thought also needs to be given to encouraging, or requiring, developments to have south facing roofs to enable solar panels to be fitted, either as part of the development or at a later date. Without this sort of design requirement it will be much harder to achieve increases in renewable energy generation that are likely to be needed to cut carbon emissions. BHFOE would like to see greater encouragement for more innovative housing with very low energy and water use.

Green roofs and walls also need to be given prominence in line with the area's designation as a UNESCO Biosphere and guidance on how to incorporate these into new developments would be helpful in this respect.

I trust that this is clear but should you require any further information please do not hesitate to get in touch.

Yours sincerely,

Planning & Transport Campaigner

The Brighton and Hove City Plan Part 2 -Scoping Paper Consultation

EAST SUSSEX COUNTY COUNCIL RESPONSE – SEPTEMBER 2016

Thank you for the opportunity to comment on the Brighton and Hove City Plan Part 2 Scoping Paper Consultation. The following are officer comments from East Sussex County Council (ESCC). If you have any queries on the County Council's comments please contact:

Strategic Economic Infrastructure Team
Communities, Economy & Transport
East Sussex County Council

Index of Chapters and Consultation Questions:

- **2. Housing**
- 3. Economy & Employment -Please note that our Chapter 3 response will be sent in due course
- 4. Retail and Town centre Uses –No comments to make
- **5. Tourism**
- **6. Transport and Travel**
- **7. Biodiversity and Space**
- **8. Addressing pollution, water and energy resources**
- **9. Design**
- **10. Heritage**
- 11. Community facilities - No comments to make
- 12. Student accommodation -No comments to make
- **13. Traveller accommodation**
- **Sustainability Appraisal Scoping report**

Chapter 1 Introduction

Abbreviations list (p2)

Ecology comment:

The glossary should be amended to include LWS (Local Wildlife Sites) and LGS (Local Geological Sites).

SNCIs (Sites of Nature Conservation Importance) are now referred to as LWS to be consistent with Defra guidance and RIGGS are now LGS.

Chapter 2 Housing

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

Landscape comment: Supported as this will reduce the pressure to build on greenfield and urban fringe sites.

Ecology: Yes

H2 NO COMMENTS TO MAKE

H3 NO COMMENTS TO MAKE

B: Housing mix – dwelling types, sizes and tenures

H4 NO COMMENTS TO MAKE

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Ecology: This should be a site-specific decision rather than an over-arching policy. Although the Urban Fringe Assessment may have identified sites with potential for development, the ecology assessments to make these recommendations have of necessity been high level and broad brush. The specific impacts on ecology, and whether or not they can be sufficiently mitigated, cannot be ascertained without detailed site assessments. In some cases, it may be that although potential for development was identified through the UFA, in reality, development cannot be undertaken without significant harm to biodiversity.

H6 NO COMMENTS TO MAKE

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Landscape comment: The development of a green infrastructure strategy for the city would identify existing open space provision in relation to the existing and new residents. This will help to identify where new provision is required and whether all new developments actually need to provide onsite open space and whether provision is already met in the local area.

Ecology: Yes.

H8, H9, H10 NO COMMENTS TO MAKE

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Ecology: Yes.

H12: NO COMMENTS TO MAKE

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Landscape comment: Some private and defensible space should be considered especially for family dwellings. Imaginative design could provide this as roof terraces and extended balconies. Shared private space for groups of residents could also address this need. In lower density suburban housing private space should be of a specified minimum size and orientated to have sun at least part of the day.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Landscape comment: Yes

Ecology: Yes. Where possible, spaces should be designed to be multifunctional, e.g. providing biodiversity, climate change adaptation and flood risk management benefits as well as amenity.

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Landscape comment: Yes

H16, H17, H18, H19, H20, H21 NO COMMENTS TO MAKE

5. TOURISM

A: The Seafront

T1, T2 & T3: NO COMMENTS TO MAKE

T4: Do you have any other issues for this topic area to consider?

Landscape comment: Policies need to ensure that built development and the associated public realm on the seafront are of suitable high quality design to ensure conservation and enhancement of the unique character of Brighton's seafront.

6. Transport and Travel

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

Transport comment: Whilst it is probably not necessary to include a detailed policy, CP9 currently does not even mention air quality within the opening text, whilst it does mention other benefits which the policy will provide. We would suggest this needs to be amended given the greater emphasis the government has more recently been placing on the linkages between air quality and transport policy.

From an ESCC perspective; whilst air quality is referred to in the supporting text (4.98), it may be useful to include reference to the AQMA areas within the city, and the need to engage with adjoining authorities in regards to the relevant actions and measures that could have implications across local authority borders, i.e. Rottingdean AQMA

TR2 & TR3 NO COMMENTS TO MAKE

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Landscape comment: Policies need to ensure that built development and the associated public realm on the seafront are of suitable high quality design to ensure conservation and enhancement of the unique character of Brighton's seafront.

TR5, TR6, TR7, TR8, TR9, TR10, TR11, TR12, TR13 NO COMMENTS TO MAKE

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Transport Comments: This is a potential solution that could be explored, but from an ESCC perspective we would want any site specific transport facilities located within the county to provide benefits for both the county and the city, to enable both local member and community support to be achieved.

The mechanisms to enable this option to be explored are either already in place or are being developed. With Brighton & Hove City Council and East Sussex County Council being members of the Coast 2 Capital Local Enterprise Partnership, which is a strategic body to support local growth, for ESCC this includes Newhaven and with its Enterprise zone status. There is also likely to be greater opportunities to potentially explore through any potential Devolution Deal with the 3SC area or through the establishment of a sub-National Transport Board for the South East and the need to work across the wider area to deliver strategic transport infrastructure.

- F: Are there any other issues relating to transport/travel issues?

Transport Comments: ESCC welcome the inclusion of the policy CP9a. ‘Working with adjoining authorities, the Highways Agency, businesses and public transport operators to improve and provide cross-boundary sustainable transport links.’ The Policy wording should be amended to refer to Highways England rather than the Highways Agency and should also include Network Rail as a strategic transport infrastructure provider.

It may be worth also mentioning the Coast 2 Capital Local Enterprise Partnership within Policy CP9 1a given the opportunities which this provides to support local growth across the LEP area, particularly Newhaven from an ESCC perspective.

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

A policy for ensuring the effective and efficient management of cross-boundary transport movements by all road users along the A259 corridor which runs from Brighton and Rottingdean into Telscombe Cliffs, Peacehaven and Newhaven should be considered within Part 2 of the City Plan.

7. BIODIVERSITY AND SPACE:

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Ecology: It is considered that this is appropriately addressed within CP10 and CP16 in Part 1, although it should be noted that CP16 refers to the 2014 UFA; the UFA was updated in 2015.

B2: NO COMMENTS TO MAKE

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Landscape and Ecology comment: Yes as the nature of working at a landscape scale is that it is cross boundary as is the connecting Green Infrastructure (GI). The South Downs National Park Authority (SDNP) Green Infrastructure Strategy includes the entire area of districts which are partially in the SDNP boundary. The East Sussex Green Infrastructure study (available at <http://sussexlnp.org.uk/projects.php?Biodiversity#Biodiversity>) covers the entire county and we acknowledge the connectivity with West Sussex and Brighton and Hove.

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

Landscape comment: Not clear what is meant by landscape sites in this context, the only landscape designation I am aware of is SDNP. The borough does have a character assessment which can be used to identify local character as can the South Downs Integrated Character Assessment for areas in the SDNP.

Ecology: Yes. Criteria could include the presence of notable habitats and species (e.g. habitats and species of principal importance as identified under S41 of the NERC Act 2006, priority UK BAP habitats and species etc). These criteria would be applicable across all sites and will include sites that are not designated if notable habitats and/or species are present.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Ecology: Yes. This should offer protection to species that may occur outside designated sites. Enhancement opportunities should focus on species listed as a priority under the B&H BAP, e.g. swifts, peregrines, starlings, white-letter hairstreak, hornet robberfly etc. Enhancement measures are often relatively simple and cost effective. Further guidance is provided in SPD 11, although it should be noted that this document is in need of a review. Such a review should be undertaken in conjunction with the development of the City Plan.

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Ecology: Yes. Planning decisions are currently undermined by the fact that the SNCI system is seemingly out-of-date.

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Landscape comment VP: Registered Parks and Gardens and other historic designed landscapes of note as well as veteran and other significant trees e.g. mature elms.

Ecology: As above, sites that support notable habitats and/or species should be specifically addressed to provide protection outside designated sites, as should sites with notable geological and/or geomorphological features (Local Geological Sites/LGS, formerly known as RIGGS).

- C: Open Space, Local Green Space and Gateways to the National Park:

B8: NO COMMENTS TO MAKE

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Landscape comment: The following list is not comprehensive but some of those adjacent to the East Sussex boundary and ones I am familiar with:

- Land west of Ditchling Road and east of Carden Park
- Hollingbury Golf Course
- Falmer Pond and Associated open space
- University of Sussex playing fields and other open spaces
- The open space between Mill Road and Westdean including Patcham Place rec. and associated woodlands.
- Waterhall and Braypool recreation areas and pitches.
- Sheepcote Valley

B10: Do you consider the following green spaces should be designated Local Green Spaces?

Benfield Valley

Three Cornered Copse

Ladies' Mile Open Space

Hollingbury Park

Landscape comment: Yes: All of them

Ecology: Yes, although some of these are already LWS. Designation as Local Green Space should ensure that no harm is done to the biodiversity interest through increased access.

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Landscape comment: Yes: All of them and possibly others from the list above.

D: Are there any other biodiversity and open space issues?

Ecology: It should be recognised that there may be gaps in knowledge and understanding of the natural environment of Brighton and Hove, as it is for heritage. Habitat and species data is not comprehensive, and is often only collected as a result of targeted surveys relating to proposed developments.

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

Landscape comment: The open space and areas of biodiversity value need to be considered as multifunctional Green Infrastructure (GI) rather than separating the functions.

Ecology: Only that it should be recognised that some areas of green space may require restricted access if increased access would be detrimental to the interest of notable habitats and/or species.

8. Addressing Pollution, Water and Energy Resources:

A: Polluted Land and Buildings

P1, P2, P3 NO COMMENTS TO MAKE

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Landscape comment: By ensuring that all new development has the highest standard of technology for low impact, efficient and sustainable lighting. Minimum lighting should be provided as required for public safety.

P5, P6, P7, P8 NO COMMENTS TO MAKE

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Ecology: To maximise the multiple benefits offered by SuDS, they should be appropriate to the local environment, targeting habitats and species of known importance in the area. East Sussex County Council has produced guidance on SuDS which may be of benefit (<https://eastsussexgovuk.blob.core.windows.net/media/1995/guide-to-sustainable-drainage-systems-in-east-sussex2.pdf>) as have the RSPB and the WWT (http://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf).

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

Ecology: As the City Council is responsible for planning seaward to mean low water, and the MMO is responsible for planning landward to mean high water, there is a significant overlap which must be fully recognised and integrated between the two plans. This overlap is seldom recognised within the terrestrial environment; additional policy guidance would clarify the situation and ensure that developments are compliant with both plans.

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

Ecology: The City Plan should recognise and integrate with policies within the Shoreline Management Plan.

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Ecology: Yes. Vegetated shingle is an internally important and globally restricted habitat for which Sussex is a national stronghold. In addition to the biodiversity interest, healthy shingle beaches offer natural coastal protection. There are three remaining areas of vegetated shingle within Brighton and Hove, but there is also capacity for expansion given sympathetic management which includes resistance to encroachment.

P13, P14, P15, P16, P17, P18, P19

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

Ecology: Yes.

P21 NO COMMENTS TO MAKE

9. Design & Amenity

A: Place Making

D1, D2 NO COMMENTS TO MAKE

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

Landscape comment: Yes to all of the points above. Design should be informed by townscape character analysis specific to specific areas of the city.

D4 NO COMMENTS TO MAKE

D5: Are there any other design issues that this policy should provide guidance on?

Ecology: Opportunities to incorporate biodiversity enhancements into design should be sought, e.g. requirement for biodiverse (not sedum) roofs, green walls, use of swift and bat bricks, sensitive lighting, rain gardens etc.

D6, D7, D8, D9 NO COMMENTS TO MAKE

10. Heritage

General comments and suggested changes from County Archaeologist

County Archaeologist

Paragraph 10.1 –Page 62: ‘dating from the Palaeolithic’ ...the earliest surviving monuments are of Neolithic date but there is important Palaeolithic and Mesolithic evidence within the plan area.

Paragraph 10.5 –Page 62 (Footnote no. 82) –Suggest changing the wording of Footnote 82 as follows: ‘These are areas that have been defined by the County Archaeologist as part of the Historic Environment Record (HER). These areas are judged to have city and county wide importance for archaeological interest based on known designated and un-designated heritage assets. Areas outside ANAs may also have archaeological interest for presently unknown or un-recorded heritage assets above and below ground’.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

County Archaeologist: I consider that one strategic policy for the historic environment and heritage would be suitable and in line with the NPPF as long as there is the recognition within the policy of the different types of heritage asset (both designated and non-designated). An SPD (or as Historic England in their guidance *The Historic Environment in Local Plans* suggest a ‘heritage topic paper’ might be a useful way of providing supporting detail to a single heritage policy. Such a paper could expand on the role of the Historic Environment Record (HER) in providing a dynamic evidence base for understanding the significance and value of the heritage to present and future communities. Consideration should also be given to targeted Development Management Policies for the historic environment of the City which reflect the particular nature of the City’s heritage (e.g. for each of the main chronological periods as well as the different asset types) and expand upon the NPPF policies.

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

County Archaeologist: The key longer term heritage issues, with respect to archaeological and historical interest include the need for a review of the Archaeological Notification Areas so that they reflect the full range of heritage assets and are linked to clear research questions which can be reviewed and updated. Potential archaeological sites need to be identified and targeted for research investigations where threatened. The historic environment services and Historic Environment Record (HER) need to be adequately funded and maintained. Archaeological displays and archives need to be supported at Brighton Museum for public benefit and resources provided to ensure the infrastructure to manage existing and future archaeological archives. An ‘active’ approach is recommended where the process of archaeological assessment, evaluation, mitigation, dissemination of new information and archiving and display is underpinned by a coordinated approach by museums, education providers including local schools and universities, amenity

societies, local government heritage staff and curators and private sector representatives with the aim of ensuring high quality archaeological work for public benefit. There is much new to be discovered and new stories to be told about the archaeology and history of the City.

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

County Archaeologist: Yes, though the answers to this question are complex and would need to be set out in something like an SPD and/or with regard to archaeology by a review of Archaeological Notification Areas.

Landscape comment: Registered Parks and Gardens and other undesignated historic designed landscapes.

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

County Archaeologist: I would recommend leaving most of the detail to an SPD and keeping the policy documents short and clear.

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

County Archaeologist: The answers to this question are complex and should be addressed in something like an SPD. A City Research Framework, focussing on each chronological period and key themes (so that it is in line with the South East Research Framework) would aim to define the gaps in our understanding and provide strategies for addressing those gaps (e.g. through local society research with volunteers or through developer-funded projects secured through the planning system).

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

County Archaeologist: Current national policy is good and useful but could be applied more effectively with regard to issues of archaeological interest through a detailed review of the key issues for each period from the Palaeolithic through to the present day as noted above. Within an SPD more detailed policy objectives for each chronological period and for each asset type could then be set out along with information about the recommended approaches. Some of this work has already been undertaken at a county level through the production of Standards for Archaeological Work (Chichester District Council, East Sussex County Council and West Sussex County Council, 2015). Advice on and templates for Heritage Statements and how to consult with the Historic Environment Record (HER) have also recently been adopted for the City area.

HR7: What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

County Archaeologist: Ensuring the HER is kept up to date with extended links to a wider range of data (e.g. documentary records) which can help provide an understanding of the significance of any particular heritage asset and its setting.

Landscape comment: Where these are surrounded by open spaces the conservation and enhancement of the open spaces including appropriate management of these spaces e.g. the setting of the fountains in the Old Steyne and Valley Gardens.

Local pressures and vulnerabilities

HR8, HR9, HR10, HR11 NO COMMENTS TO MAKE

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

Landscape comment: Conservation of historic streetscape features, removal of clutter and inappropriate street furniture, incorporation of high quality modern features and innovative new art works in keeping with the historic character. High quality and consistent maintenance: An example of where lack of maintenance is detracting is the lack of upkeep of the bespoke Brighton railings in the Old Steyne and the use of modern guard rail elsewhere in this area. The need for guard rails in modern streetscape should be reviewed in accordance with guidance in Manual for Streets.

HR13 NO COMMENTS TO MAKE

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

County Archaeologist: I am not sure a specific policy is required but certainly I think there should be an objective to enhance as well as conserve all heritage assets including parks and gardens.

Landscape comment: Yes

E: Any there any other heritage issues?

HR15: Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

County Archaeologist: To support the City Plan's heritage strategy it would be useful to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk. In particular these should include provision of local capacity for the storage of, and public access to, archives resulting from archaeological and/or historical investigations and dissemination of historic environment information for public/school education and research, including museum displays for popularisation of archaeological discoveries.

13. Traveller Accommodation

Traveller Accommodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

Ecology: It would depend on the ecological impacts.

TA2, TA3, TA4 NO COMMENTS TO MAKE

Sustainability Appraisal Scoping report

Please indicate which topic or topics you would like to comment on?

1. Biodiversity, Flora and Fauna

Ecology comments

2. Water Quality and Resources

3. Soil, Waste and Land Resources

4. Air Quality and Transportation

5. Climatic Factors and Flooding

6. Cultural Heritage, Landscape and Open Space

Landscape comments

7. Population, Human Health & Inequalities

8. Housing & Community

9. Local Economy, Employment, Skills and Education

Landscape comment:

Cultural Heritage, Landscape and Open Space

The baseline assessment covers all topics and issues relevant to landscape and open space in the borough.

The Sustainability Assessment Objectives are supported and address the threat and opportunities relevant to the plan.

The decision making criteria are thorough and comprehensive in terms of conservation and enhancement of landscape and townscape.

Section 3.63.12 refers to listed Parks and Gardens where the correct designation is Registered Parks and Gardens as this is distinct from listing.

Ecology comments:

Question 2a

3.12.1 (Key Documents, Page 13) Additional documents include the East Sussex GI Study, OPDM Circular 06/2005, and BS42020:2013 *Biodiversity - Code of practice for planning and development*.

Question 3: Baseline data, Indicators and Appendix B

Q3. Yes

Q3a. Appendix B lists the amount of habitat that was provided through new development but does not state how much was lost and therefore there is no figure for net gain.

Paragraph 3.14 (Likely Future Baseline, page 21) -The baseline review should recognise gaps in knowledge and understanding. Habitat and species surveys are not comprehensive, and data is lacking with respect to identifying trends over time.

Other Ecology comments

Paragraph 3.11.1 (Biodiversity & Geodiversity) -Indirect impacts to habitats and species, e.g. disturbance, increased recreational pressure, and increased predation, should also be recognised.

Paragraph 3.13.21 (Geological Sites, page 20) -RIGGS (Regionally Important Geological and Geomorphological Sites) are now referred to as Local Geological Sites (LGS) in line with Defra guidance on Local Sites.

Paragraph 3.15 (Key Sustainability Issues, page 21) -It should be recognised that not all sites that support priority habitats and/or species are designated.

21st September 2016

Planning Policy Team / Neighbourhood Planning
Planning & Building Control
Brighton & Hove City Council
2nd Floor
King's House
Grand Avenue
Hove
BN3 2LS

Our ref: BCC LP1

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

Dear Sir/Madam

RE: BRIGHTON AND HOVE CITY PLAN PART TWO REPRESENTATIONS

We write on behalf of ourselves, St William Homes (SWH), in response to the Councils consultation on the Brighton and Hove City Plan Part Two.

St William Homes are a joint venture company formed by the Berkeley Group and National Grid Property Holdings (NGPH). The joint venture business has been established to lead regeneration of decommissioned and redundant gasholder sites across London and the south-east. The Berkeley Group brings substantial experience of redeveloping complex regeneration sites and has the ability to deliver a significant number of new homes.

St William Homes have an interest in the emerging City Plan Part Two as the Joint Venture plans to regenerate the Brighton Gas works on Boundary Road, BN2 5TJ, which is currently owned jointly by National Grid properties and Southern Gas Network (SGN). The site is included in City Plan Part One DA2 Brighton Marina, Gas Works and Black Rock Area site allocation.

We write in response to the City Plan Part Two and have responded to specific consultation questions which relate to St William Homes.

The consultation responses are outlined in the table overleaf.

Housing

Consultation Question	St William Homes Response
<p>Question H1 Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? <i>(NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).</i></p>	<p>SWH supports the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two.</p> <p>SWH encourage the council to designate new housing allocation sites and review the existing site allocations and reconsider the proposed densities. This will ensure all brownfield sites in the City Plan are maximised to meet housing targets.</p> <p>It is crucial to optimise density where appropriate on urban brownfield sites in order to relieve pressure on surrounding green belt land and green field sites. Intensification of development on brownfield sites is more appropriate to meet the City Council's housing targets and protect the green belt and South Downs National Park.</p>
<p>Question H2 The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?</p>	<p>It is important that the council reviews the existing site allocations and reconsiders the proposed housing densities. The existing site allocations need to be optimised to increase housing numbers to meet the 5 year housing supply.</p>
<p>Question H3 Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?</p>	<p>SWH would support the site allocation DA2 Gas Works site to be allocated for a proposed housing site.</p> <p>The DA2 Gas Works site is allocated for 2,000sqm of business floor space (proposed to the north of the site), a minimum of 85 residential units and some ancillary retail development. The land uses and quantum for this brownfield site, surrounded by predominantly residential uses should be reconsidered and addressed the Local Plan. SWH consider that this site should be allocated for a predominant residential scheme.</p>

	<p>SWH has reviewed this site in detail and considers the site to have potential to achieve a much higher housing density which will help to achieve the councils 5 year housing supply.</p>
<p>Question H4 Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?</p>	<p>The housing site allocations should be a general criteria-based type of planning policy to allow flexibly for any changes in the market/local demand during the Local Plan period. It is critical that developers land can respond to current market conditions and provide a mix of homes that are suitable for demand and are not set by a specific range of dwelling types and sizes. A criteria-based approach will create a more flexible policy which would ensure the longevity of the Plan.</p> <p>It is important that housing mix is negotiated on a site by site basis to respond to the characteristics of different sites. Criteria based planning policy will better respond to the varying nature of sites and will allow for changes in the local market so that developers can respond to any changes appropriately.</p>
<p>Question H5 On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?</p>	<p>Family sized housing should be encouraged on appropriate sites and negotiated on a site by site basis to respond to the specific sites characteristics.</p>
<p>Question H6 Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?</p>	<p>To ensure longevity of the plan and to ensure that delivery is not stifled, the Council should adopt a flexible market led approach. The current drafting is considered to be too over prescriptive.</p>
<p>Question H7 Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?</p>	<p>SWH strongly supports the introduction of additional policy to ensure that new development maximises site potential and avoids under-development of sites. It should be for the applicant to demonstrate that the capacity of a site is optimised whilst considering the local context.</p>

<p>Question H8 Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?</p>	<p>No, the City Plan Part 2 should not seek to address the accommodation needs of particular groups within the city's communities. This should be dealt with in a generic housing mix policy which allows flexibility for housing mix to be addressed on a site by site basis.</p>
<p>Question H9 Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?</p>	<p>SWH object to the council allocating locations for specific housing needs. Such an approach this could create physical segregation of particular groups. It would be more appropriate to promote the inclusion of specialist housing within developments to create genuine balanced mixed communities. The need for specialist homes should be identified on a site by site basis led by an up to date Strategic Housing Market Assessment. The current drafting is considered to be too over prescriptive.</p>
<p>Question H13 Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?</p>	<p>SWH does not support a policy in City Plan Part 2 for provision of appropriate outdoor private amenity space. The principles of successful outdoor private amenity space should be set out in supplementary guidance. In addition, it should be negotiated on a site by site basis and for the applicant to demonstrate that any potential demand generated from development is met.</p>
<p>Question H14 Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?</p>	<p>Clear and concise guidelines stating the issues that will be considered will be helpful for developers and will encourage schemes to include appropriate private amenity space within their design. It is more appropriate to set out these issues within a Guidance document rather than a Development Plan policy.</p>
<p>Question H15 Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?</p>	<p>In line with the Governments Technical Standards review the space standard can only be applied within local plan policy where there is '<i>evidenced local need</i>' and where the viability of development is not compromised. On this basis, it is considered that a flexible approach should be applied and the national space standard should not be introduced within a Development Plan policy but contained within supplementary guidance.</p>

<p>Question H16 Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?</p>	<p>No, if the council wish to take such an approach it should be outlined in guidance and not Development Plan policy.</p>
<p>Question H17 Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?</p>	<p>There needs be flexibility on meeting the national technical standards based on viability and need.</p>
<p>Question H21 Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?</p> <p>NB: This consultation also includes separate sections on Student Housing and Traveller Accommodation.</p>	<p>The City Plan Part Two should seek to achieve higher residential densities which will help to achieve housing targets within existing urban and settlement areas. The plan should focus on maximising development on brownfield sites in order to reduce the pressure for green belt release or green field development. Furthermore, intensifying the development of brownfield land will ensure delivery of housing to meet the 5 year housing supply.</p> <p>The Plan should take into consideration the viability associated with brownfield development as often these sites can have high costs associated with them.</p>

Economy and Employment

<u>Consultation Question</u>	<u>St William Homes Response</u>
<p>Question E1 Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?</p>	<p>The site allocation DA2 Gas Works has been identified for approximately 2,000sqm of business floor space (to the north of the site), a minimum of 85 residential units and some ancillary retail development.</p> <p>SWH would support a review of this site allocation and an intensification of the housing density and omit the need for any business floor space. SWH have reviewed this site and concluded that the sustainable City edge location and proximity to open green spaces and amenities lends itself to housing rather than business use. The site has potential to deliver a comprehensive high quality housing</p>

	scheme which will help to meet the Council's housing targets on previously developed land.
--	--

Retail and Town Centre Uses

<u>Consultation Question</u>	<u>St William Homes Response</u>
Question R7 Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?	The City Plan Part Two should include a special retail policy focussed to the south of Marine Parade.
Question R8 Alternatively, could changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?	A separate more general frontage policy will allow flexibility and will be more effective in addressing future patterns of retail habits within the context of a longer term planning policy.
Question R16 Are there any sites that might be considered for allocation for a permanent market use?	The council should promote meanwhile uses on allocated sites to establish activity and community uses on sites prior to development. Meanwhile uses can be very effective at community engagement and can be a useful tool to boost local interest and excitement for the development proposals on sites.

Tourism

<u>Consultation Question</u>	<u>St William Homes Response</u>
Question T1 Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?	The DA2 site allocation for the gas works includes housing provision to the south of the site only. SWH would support a review of this. As stated previously in these written representations, high level analysis has been undertaken which suggests that the site should deliver a high number of new homes. This is a City edge location, outside the retail core area or any designated employment area and therefore lends itself to residential uses as opposed to business/commercial uses. Allocating this site for housing with a maximised density would meet local housing targets whilst maintaining the current green belt boundary and reducing reliance of unsustainable green field sites to meet needed housing growth.

Transport and Travel

<u>Consultation Question</u>	<u>St William Homes Response</u>
<p>Question TR1</p> <p>Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?</p>	<p>Policy CP9 is sufficient.</p>
<p>Question TR3</p> <p>If you consider a more detailed policy is the best option, what might be your preferred approach, for example:</p> <ul style="list-style-type: none"> • A single focused policy on air quality and noise - Introduce a new sustainable transport policy with a set of criteria against which new development (by size/scale of development) should be assessed? • A Zonal approach to air quality and noise – identify priority zones for air quality and noise improvement that will include a set of criteria against which new development will be assessed and identifies priorities for mitigation via future developer contributions/CIL payments. • An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria. 	<p>SWH does not support any of the three approaches outlined in the question, principles for air quality, noise and transport should be set out in guidance. The introduction of such policies would be onerous and could impact on the viability of developments which in turn would have a detrimental effect on the delivery of new homes.</p>
<p>Question TR4</p> <p>Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?</p>	<p>SWH does not support CIL being referred to in the City Plan Part 2. Any provision for developer contributions/CIL should be in line with the regulation 123 list, it is therefore inappropriate for the council to include this in the City Plan.</p>

	Issues such as improved air quality, reduced noise, cycling, walking, better public realm and sustainable transport should be outlined in planning guidance.
<p>Question TR5</p> <p>Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?</p>	It is not necessary for policy to require more clarity. The submission, thresholds and content for Transport Assessments, Statements and Travel Plans should be agreed on a site by site basis during pre-application discussions between the Council and the Developer.
<p>Question TR6</p> <p>If yes, could this be provided through a policy in Part Two of the City Plan or would this be better provided through planning guidance (Supplementary Planning Document or Planning Advice Note)? Can you please explain why?</p>	The additional policy is not deemed to be necessary as outlined in response to Question TR5 above.
<p>Question TR7</p> <p>Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?</p>	The council should promote active travel in planning guidance not in the City Plan Part Two.
<p>Question TR8</p> <p>Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?</p>	There is already sufficient policy on active travel through existing policy including CP9, CP18 and CP7 of the City Plan Part 1.
<p>Question TR9</p> <p>Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?</p>	It is not necessary to have a further general transport mitigation policy in the City Plan Part 2 as the key transport policies are outlined in the City Plan Part 1. As stated previously it is inappropriate for the council to include developer contributions/CIL in the City Plan Part Two.

<p>Question TR10 Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?</p>	<p>SWH does not support CIL being referred to in the City Plan Part 2. Any provision for developer contributions/CIL should be in line with the regulation 123 list, it is therefore inappropriate for the council to include this in the city plan.</p> <p>Any priorities for equality, mobility and accessibility should be outlined in planning guidance.</p>
<p>Question TR12 Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?</p>	<p>SWH supports clear and concise policy, in order to streamline the City Plan to ensure its effectiveness existing policies should be reduced and any remaining planning matters should be addressed through planning guidelines.</p>

Biodiversity and Open Space

<u>Consultation Question</u>	<u>St William Homes Response</u>
<p>Question B1 Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?</p>	<p>City Plan Part One addresses biodiversity policy appropriately with policies CP10 and CP16. There is no further need to provide a policy guide for the types of development that may be appropriate within the NIA in City Plan Part Two.</p>

Addressing Pollution, Water and Energy Resources

<u>Consultation Question</u>	<u>St William Homes Response</u>
<p>Question P1 Are there any planning issues that you consider a Polluted Land and Buildings policy should address?</p>	<p>The Polluted Land and Buildings policy should address high remediation costs for brownfield land and the effect this will have on development scheme viability.</p>

<p>Question P3 Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?</p>	<p>No, any issues with air, land, and water pollution control and noise nuisances should be addressed in planning guidance not policy.</p>
<p>Question P5 Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?</p>	<p>It is not necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development. This should be outlined in planning guidance not policy.</p>
<p>Question P6 Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?</p>	<p>SWH considers that there is sufficient national policy.</p>
<p>Question P13 Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?</p>	<p>Any principles to incentivise delivery of low carbon and renewable energy should be outlined in planning guidance not policy. The amendment of section 43 of the Deregulation Bill which will be implemented later this year prevents Local Authorities from setting energy or water efficiency standards through planning policy.</p>
<p>Question P15 Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?</p>	<p>SWH does not support the council identifying and allocating sites for renewable and low carbon energy generation, storage or networks. The amendment of section 43 of the Deregulation Bill which will be implemented later this year prevents Local Authorities from setting energy or water efficiency standards through planning policy.</p>
<p>Question P17 Should a renewable energy policy be explored for City Plan Part 2?</p>	<p>SWH does not support the council identifying and allocating sites for renewable and low carbon energy generation, storage or networks. The amendment of section 43 of the Deregulation Bill which will be implemented later this year prevents Local Authorities from setting energy or water efficiency standards through planning policy.</p>

<p>Question P19 Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?</p>	<p>Policy and clarifications in support of district heating should be implemented through supplementary planning guidance.</p>
<p>Question P20 Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?</p>	<p>SWH does not support the council exploring energy efficiency for smaller developments and those in existing buildings.</p> <p>SWH does not support the council identifying and allocating sites for renewable and low carbon energy generation, storage or networks. The amendment of section 43 of the Deregulation Bill which will be implemented later this year prevents Local Authorities from setting energy or water efficiency standards through planning policy.</p>

Design and Amenity

<u>Consultation Question</u>	<u>St William Homes Response</u>
<p>Question D2 Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?</p>	<p>Yes, the Place Making Policy should incorporate guidance on new and emerging design issues, this will in turn establish a sound set of place making principles for which developers can assess their designs. The place making principles should be outlined in planning guidance not policy.</p>
<p>Question D5 Are there any other design issues that this policy should provide guidance on?</p>	<p>No – it is considered that further detail on design should be set out in a SPD as guidance and should not be contained within a Development Plan policy.</p>
<p>Question D6 Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?</p>	<p>The protection of amenity should be addressed by a single consolidated policy.</p>
<p>Question D8 Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?</p>	<p>No – it is considered that further detail on design should be set out in a SPD as guidance and should not be contained within a Development Plan policy.</p>

Heritage

<u>Consultation Question</u>	<u>St William Homes Response</u>
Question HR8 Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?	There is no need for a policy on 'Heritage at Risk' as policy CP15 is sufficient.

St William trust that their comments will be duly considered as the City Plan Part Two is finalised. Should you wish to discuss these comments or require any further information please do not hesitate to contact myself or my colleague,

Yours sincerely

Head of Planning

COMMENTS BY LCE architects ON CITY PLAN PART 2 SCOPING CONSULTATION

21 September 2016

1. Housing

- 1.1 The latest version of the Brighton and Hove City Council commission to GL Hearn to produce 'The Objectively Assessed Need for Housing: Brighton and Hove' produced in June 2015 found that the Brighton and Hove area has a need for 30,120 new homes over the City Plan period to 2030. This equates to 1,506 new homes per annum. This gives some perspective to CPP1 policy CP1 (Housing Delivery) outlining that the Council will make provision for at least 13,200 new homes to be built over the plan period 2010 to 2030, equating to 660 dwellings per annum, a target that has not been met in any year in the period 2010 to 2015. We believe this target should be considerably increased in CPP2.
- 1.2 In view of such numbers, it is absolutely vital that the provision of housing is an overarching policy that takes precedence over everything else and must rely on good design to establish high density and efficient use of land. The Council should as an immediate priority identify sites and adjust those policies which effectively hinder achieving higher densities. In the City centre this must include a revision of the tall buildings policy and a really close look at conservation policies which should be applied more selectively in areas of lesser significance.
- 1.3 For the provision of family housing it is essential that more houses are situated on the urban fringe by providing higher densities that has historically been the case in suburban locations. The Urban Fringe Assessment 2014 was at a strategic level supporting CPP1; for CPP2. A far more rigorous and realistic detailed analysis is required to fully understand each sites full potential.
- 1.4 We entirely agree that new development should maximise site potential in order to avoid underdevelopment of housing sites which will help restore confidence in the planning system.
- 1.5 Consider change of use to housing on employment sites that have remained empty for two years.

2. Economy and Employment

- 2.1 The city needs new fit-for purpose employment facilities. Consideration should also be given to location of these facilities, specifically workshops, industrial units and warehousing, particularly where new and innovative initiatives are being offered. We would suggest that many existing employment uses are in outdated locations, attracting heavy vehicles right into the central parts of the city. We believe the council should start thinking about new built industrial and warehousing complexes at the periphery of the city set in a high quality environment.

2.2 The search for sites should be similar to that for peripheral housing sites that were undertaken by the council in 2015 and the council could look at its own land holdings to implement such an approach. With such locations inner city warehousing could be freed up for much needed high density urban redevelopment.

3. Tourism

3.1 A much more ambitious plan is required for the seafront.

3.2 If a conference centre is to be built at Black Rock, the budget must include a purpose built rapid transit system such as a low capital monorail system with hybrid electric cars.

3.3 A new West Pier should be built to create a more substantial destination to the i360. Consideration should be given to creating the new conference centre in a new pier to keep the facility central, which in many ways could be a better option than the Black Rock location.

4. Transport & Travel

4.1 Consideration should be given to a much more comprehensive park and ride provision.

4.2 The City is lucky enough to have 10 railway stations within it, or very close to it, on very good north/south and east/west axes. Significantly more should be made of the existing infrastructure by the introduction of suburban rolling stock and new signalling to create a new local transit system.

4.3 Consideration to additional provision of electric car infrastructure and the implications of driverless vehicles needs to be given in the second half of the planned period.

4.4 'Boris Bike' and Electric Bike schemes to be encouraged.

4.5 Encouragement of Electric Buses.

5. Biodiversity and Open Spaces

5.1 The principal problem at the urban fringe in relation to access to Open Space is the poor accessibility to the National Park. Brighton and Hove's Open Space Study states that NSN space "has been calculated by excluding most sites beyond the A27 due to poor accessibility" (point 8.7). With the serious constraints the City has on sites for development, the priority must be to improve the quality and accessibility of the existing Open Space not create new space at the expense of housing and employment land. This is a real missed opportunity which must be readdressed!

5.2 The City is blessed with a 11km long “park” along its seafront and a 1627km² of National Park on its northern boundary. In addition 40% of the Borough is within the National Park and the whole City sits within a UNESCO Biosphere. This must give clues as to the strategy concerning Open Space. Childrens’ Play Areas and Sport facilities must increase with an increase in population but with other amenity space the emphasis must be on improvements to access, given the current provision. Any new open space should not be by way of new “green wedges” in the urban fringe, but in creating more space where it is needed such as pocket squares with new developments in the City Centre.

5.3 We support the Hove Civic Society’s initiatives with street tree planting and sculpture plinths.

6. Design

6.1 There needs to be only one consolidated policy to address all amenity issues. The emphasis with any new development should be for the designer to prepare a rigorous analysis of development in the context of the site and the wider environment in support of any application, not bind it up in endless policy.

6.2 More emphasis needs to be placed on the spaces between buildings and the public realm.

6.3 Many of our planning decisions are made around the perceived need for conservation. Conservation is a balance between preserving the special character, quality, and significance of the historic place and facilitating change in a way that sustains it into the future. A more pragmatic approach is required e.g. preservation of the front of our Regency terraces is essential, but the same is not true of the rear, and yet the same rules are applied.

7. Heritage

7.1 The City is blessed with a fine historic environment but the large numbers of conservation areas are afforded a similarly high level of protection in the city. We believe that many conservation areas are drawn too widely which means that there is unnecessary protection around them including a too prescriptive approach in terms of visual impact from new surrounding developments. A much more qualitative approach is required to assess the extent of “setting” and “impact”. Not all conservation areas are equal, nor is the context of each site equal within a conservation area.

7.2 Equally with listed buildings, the setting must be judged by reference to the character and quality of the listed building itself, rather than being considered in the abstract.

8. Student Accommodation

8.1 It is important to establish a target for student housing, a more flexible policy in relation to the use classes between student accommodation and residential housing.

RJC/JB/CS/PD9875

email: jon.bradburn@montagu-evans.co.uk

22 September 2016

City Plan Part Two: Scoping Document
Planning Policy
Brighton & Hove City Council
2nd Floor
King's House
Grand Avenue
Hove
BN3 2LS

By post and email: planningpolicy@brighton-hove.gov.uk

Dear Sir or Madam

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
BRIGHTON AND HOVE CITY COUNCIL CITY PLAN PART TWO SCOPING DOCUMENT CONSULTATION
(JUNE 2016)
REPRESENTATIONS ON BEHALF OF CREST NICHOLSON**

On behalf of our client, Crest Nicholson, we submit representations to Brighton and Hove City Council ("BHCC") in respect of the City Plan Part Two Scoping document (June 2016). Crest Nicholson have been selected by BHCC as the Council's preferred development partner for the redevelopment of the King Alfred Leisure Centre ("KALC") Site, Kingsway.

Context for Representations

The Brighton and Hove City Plan Part One was adopted in March 2016 and sets out the strategic policy framework to guide new development across the City over the plan period to 2030. The City Plan Part Two will form the second part of the Brighton and Hove City Plan and will provide the development management and site specific policies for the City.

Section 1: Introduction of the Scoping document states:

"The role of the City Plan Part Two is to support the implementation and delivery of City Plan Part One; to build on the strategic policy framework; to identify and allocate additional development sites and to set out a detailed development management policy framework to assist in the determination of planning applications. Once adopted, the policies in City Plan Part Two will replace the remaining 'saved' policies from the 2005 Local Plan."

The Scoping document forms the first formal stage of consultation of Part Two of the City Plan.

As per the document's introduction, Part Two of the City Plan provides an appropriate opportunity for the Council to set policies which provide clarity and certainty to facilitate the delivery of key sites identified in Part One through outlining key development parameters and expectations.

This is particularly important for sites such as the KALC which have yet to come forward for development, despite long-term allocations, as clear, up-to-date guidance from the Council will be key to delivery.

King Alfred Leisure Centre

Crest have been selected as the preferred development partner for the KALC site on the basis that the wholesale regeneration of the site will deliver a new focus for the western end of Brighton Seafront, anchored

by new high quality leisure centre that will help to enhance Hove and Brighton sea front and bring the communities of Brighton and Hove together.

The KALC site is in dire need of redevelopment to provide modern facilities that best suit the needs of the community, as recognised in City Plan Policy SA1(c)(1), and the King Alfred/RNR Planning Brief SPG (2002). However, the SPG guidance is dated and predates the publication of the NPPF.

The KALC site is one of the most prominent allocated seafront sites that is to come forward for development scale. **Question T2** of the consultation document asks whether there is sufficient guidance in the City Plan Part One to assess planning applications that come forward on the seafront.

We are of the opinion that this is not the case, and further policy is sought in relation to the KALC site to provide sufficient policy guidance for the determination of any future application.

The City Plan Part One policy for the site sets broad land use principles, however, it lacks the certainty and detail required to guide the form of development. The City Plan Part Two provides a suitable opportunity to provide this detail to ensure that the site comes forward in an appropriate manner and ensuring that there are no conflicts between the different policies of the plan.

Detailed Site Specific Policy

There is an opportunity through the City Plan Part Two to adopt a detailed site specific policy which identifies how BHCC's development plan policies should be applied. This creates an opportunity for the Council to take in to account the site's constraints and issues associated with delivering a new leisure centre when considering issues such as viability and affordable housing, setting lower levels than may be applicable on sites which are not encumbered with high costs.

This should outline parameters which align with those set by the development partner brief. This could be applied flexibly. For example, making reference to the requirement for affordable housing but acknowledges the need for a planning balance in terms of the re-provision of a state of the art leisure centre.

In line with the Council's adopted and emerging policy aims, it is suggested that this policy builds upon the City Plan Part One, and could be worded as follows:

"The King Alfred Leisure Centre site shall be brought forward in line with the strategic allocation set out in City Plan Part One Policy SA1 (c)(1). In considering applications for the site, the Council will:

- a) *Support the delivery of high density housing.*
- b) *Take in to account the cost and community benefit of delivering a new high quality leisure centre when considering affordable housing provisions as part of an open-book viability assessment.*
- c) *Support the delivery of very tall buildings (above 20 storeys) on this site where justified in townscape terms.*
- d) *Require assessment of townscape views from the following locations:*
 - (i) *Brighton Seafront*
 - (ii) *West Lawns*
 - (iii) *St Aubyn's*
 - (iv) *Hove Street*
- e) *Require the delivery of a new public square as a facility for the site.*
- f) *Seek to ensure that where practical active frontages are provided to provide animation to the surrounding street and seafront and to limit opportunities for antisocial behaviour.*
- g) *Include flood protection measures and Sustainable Urban Drainage techniques.*
- h) *Seek the inclusion of additional community uses to create a community hub.*
- i) *Seek improvements for coach drop-off to support the leisure centre.*
- j) *Seek predominantly one and two bedroom units on site which are better suited to a flatted form of development.*
- k) *Any proposed retail/commercial space should be of a scale that supports the leisure centre and residential scheme.*
- l) *Expect the inclusion of Biosphere principles throughout the scheme.*

- m) *Expect the scheme to improve north-south permeability across the site.*
- n) *Expect the inclusion of flexible business space.”*

Housing

Section 2 of the Scoping document considers the issue of housing and delivery in the City. Generally, we support the key housing policy areas identified in the document, particularly as the KALC site presents a significant housing allocation which will deliver a large proportion of the city's housing target over the plan period.

Question H1 and H7

Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period?

Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

To align with national planning policy themes, it would be beneficial for the Part Two to include a housing policy which supports the principle of high density development in locations which are centrally located and can be accessed by public transport.

However, density should be just one measure of a development and should not dictate the final form. Ultimately high quality design should be sought, and this should be the tests against which a scheme's suitability should be considered.

There is a danger that density policies can be applied mechanistically and design should be guided by local character and opportunities, rather than being set to certain housing levels.

If the Council does propose a density policy with set targets, it should be recognised both in policy and supporting text that these densities can be exceeded where justified through high quality design.

Question H4

Should proposed housing site allocations in City Plan Part Two seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

It is acknowledged that specifying a range of dwelling types and sizes would be useful to inform schemes on housing site allocations and details of a preferred unit mix for sites could be included.

In our experience, having a policy which sets a specific mix can cause difficulties in the planning process and prohibits some developments from coming forward.

We support the Council setting out a target mix, but this should not be overly prescriptive otherwise schemes cannot respond to their individual circumstances. For example, it is reasonable to believe that there will be centrally located flatted schemes coming forward where it would be impractical or inappropriate to have family sized units

Having a target unit mix within a policy's supporting text would provide the Council with sufficient control over the form of development coming forward, and developers sufficient flexibility to ensure that the right scheme comes forward in the right location. It also allows for schemes to respond to the most up-to-date housing needs data, as the identified need will change over the plan period. This approach future-proofs the policy, removing the need to revisit policies at a later date.

Question H13 and H14

Should housing policies in City Plan Part Two include a requirement for the provision of appropriate outdoor private amenity space?

Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Whilst a degree of private amenity space is normally required, policy should not seek to set minimum standards for how or where this should be provided within schemes. This will provide schemes with the flexibility required to allow them to take in to account individual site opportunities and constraints. For example, there may be heritage considerations which limits the design of the abuilding in relation to balconies, opting for communal space as the better design solution. There will also be situations where a site's proximity to existing areas of open space and associated facilities can be utilised to offset any undersupply on site if constraints limit the required inclusion.

Question H15 and H16

Should City Plan Part Two seek to introduce the new nationally described space standards for new housing development?

Should City Plan Part Two seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

We would support the adoption of the nationally described space standards into the City Plan Part Two. Whilst the higher optional technical standards could be introduced into the City Plan Part Two, reference should be made to these being optional and not mandatory to avoid conflict with national guidance.

It may be the case that space standards change over time, and it may therefore be preferable to make reference to the national standards rather than enshrining them in policy. This would also provide an opportunity to introduce a new Housing SPD which can provide greater clarity on a range of housing issues, including unit sizes and amenity space. This has successfully worked in London and the City has the potential to follow suit to ensure that high quality units are provided.

The City's preferred approach to the delivery of wheelchair user dwellings could also be included within the City Plan Part Two (or associated supplementary guidance). This must recognise that private units that meet lifetime homes standards can be delivered to an adaptable, rather than adapted, standard to assist with viability and sales. .

Transport and Developer Contributions

Questions TR4, TR8, TR9 and TR10 discuss transport related initiatives such as travel plans and questions how these are best implemented – via policy, developer contributions or a CIL payment.

We are of the opinion that City Plan Part One Policy CP7 and Community infrastructure Regulations 122 and 123 provide sufficient guidance on this matter and Part Two of the City Plan does not need to set new policy in this regard.

The issue with travel initiatives is that they are most effective when they are able to respond to specific requirements of a site and the scheme in question. Trying to standardise the approach in policy would be ineffective and arguably would not be justified as it may not represent the most appropriate strategy for solving the issue.

We do not support the inclusion of such policies and would suggest that this is an appropriate area for supplementary guidance which can provide further clarity on what the Council would seek on these matters.

Design and Amenity

Question D9

Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

In terms of building heights and townscape considerations, currently City Plan Part One Policy CP12 deals with this on a general basis. It also identifies areas with potential for taller developments including the Western Seafront / Kingsway of which the KALC site is located. There is also an adopted supplementary guidance note (SPGBH 15) which specifically provides guidance on tall building development in the city.

To align SPGBH 15 and the City Plan Part One design policies, it would be useful to include a detailed building heights and townscape policy within the City Plan Part Two which considers key views within the city and promotes high quality design for tall building development. This policy should also support increased building heights and density on brownfield sites where high quality design is being achieved.

Heritage

Question HR11

Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

Designated heritage assets are protected by Statute and the City Council has a legal obligation to protect or enhance them. We are of the opinion that there is no need for a design policy for historic areas as there is already protection in place through legislation and this does not need to be duplicated.

It would be more appropriate to include heritage commentary within in a city-wide design policy which would allow for a more balanced view on approaching high quality development which comes forward in a heritage context. Some contemporary architecture is well suited to such locations and can benefit the longevity and public understanding of heritage assets.

Area specific policies have the potential to constrain such forms of development where a wider urban design and quality discussion would be more appropriate. This approach would also provide guidance to schemes coming forward which are in the setting of assets and what would be required of them.

Community Facilities

Question CF3

What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

One of the primary points for assessing proposals for new community facilities is the cost associated with doing so. These facilities play an important role in social wellbeing and the provision of facilities a standard that can deliver this role must be recognised by the Council.

The community quite rightly expects developments to deliver facilities to the highest standard, ensuring that meets the community's needs both now and in the future. However, the cost of doing this is extremely high and scheme viability must be paramount.

In accordance with paragraph 173 of the NPPF, a scheme's viability should not be put at risk by being over burdened by policy requirements of planning obligations. This must be recognised by the Council when assessing development proposals for new community facilities and it noted in policy that other requirements of the City Plan will be applied flexibly to ensure that facilities are delivered.

Question CF4

Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

As noted above, we are of the opinion that the KALC site warrants a separate and unique policy if the site is to come forward in an expedient manner and deliver a new high quality leisure centre.

This leisure centre will play an important role as a lynch-pin on the seafront between the communities of Brighton and Hove.

A specific policy relating to the delivery of this community facility – as well as recognition as to what is required of it – should be included in the plan to promote and facilitate its delivery, as suggested on page two of these representations.

Question CF5

Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

Crest's partnership with The Starr Trust on the KALC site has raised awareness of other community facilities required in Brighton, including the need for community and business space that can be hired for different uses and for different periods on a flexible basis.

The KALC scheme presents a unique opportunity to deliver a community hub, not only with the new leisure centre facilities, but other opportunities that can meet the needs of other aspects of the community. This will help to ensure that the scheme becomes part of the daily life of residents and provides a variety of reasons to visit this location.

This further enhances the need for a detailed site specific policy for the KALC site to facilitate its development.

Closings

In summary we broadly support the overarching strategic objectives set by the City Plan Part Two Scoping document and highlight that the redevelopment of the KALC site has a crucial role in delivering the objectives of both Part One and Part Two of the City Plan

We do recommend that Part Two of the Plan includes detailed policies which will guide developers to ensure allocated sites are delivered across the plan period and meet the Plan objectives. In particular, we recommend that a site specific policy is introduced for the KALC site to allow it to come forward with a policy context that provides the upmost clarity.

We trust these observations are useful at this consultation stage. We look forward to viewing the next stage of the City Plan Part Two and hope that this responds to our recommendations.

Should you require any clarification of the issues raised in this letter, or wish to meet to discuss the points raised in further detail please do not hesitate to contact Chloe Saunter or Jon Bradburn at this office.

In the meantime, we reserve our client's ability to attend the future Examination in Public of this document and request that our contact details are included in the Council's consultation register.

Yours Faithfully,

MONTAGU EVANS LLP

City Plan Part Two – Scoping Consultation

30 June – 22 September 2016



Biodiversity and Open Space

Response Form

Thursday 30 June until
5pm Thursday 22 September 2016

Biodiversity and Open Space Summary:

Key objective is conserving biodiversity and enhancing the natural environment's multi-functional offer. The section invites comments on relevant matters including: 'landscape-scale' approach; the setting of criteria and hierarchy of sites; species protection; and, identification of additional open space, Local Green Spaces and National Park Gateways.

This form has two parts: Part A – Personal Details
 Part B – Your Comment(s).

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title		
Organisation	The Vale Residents Committee	
Address	Ovingdean	
Postcode		
Email Address		
Telephone No.		
Mobile No.		

Part B: Your Comments

A. Landscape Scale Approach

Question B1

Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes it should provide a policy. Proposed development within the NIA – which includes some urban fringe sites – should adhere to policy QD18 and include comprehensive assessments of priority habitats and species listed in the Brighton & Hove Local Biodiversity Action Plan. Development should go ahead only if it can be demonstrated that there will be overall gains in biodiversity.

Question B2

If you think a policy is needed, what types of development should be included?

All development.

Question B3

Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes.

B: Nature Conservation, Geodiversity and Landscape Sites:

Question B4

How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

Sites that are currently undesignated but that contain species or habitats listed within the LBAP should also be included.

Question B5

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please [email](mailto:planningpolicy@brighton-hove.gov.uk) forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

Should there be a specific policy to address the general protection and enhancement of species?

Yes and Policy QD 18, whereby "permission will not be granted for any development including changes of use that would be liable to cause demonstrable harm to such species and their habitats" should be fully incorporated.

Question B6

Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes locally designated SNCI's should be updated with the more publically understandable name. There should also be a system for including additional sites that meet the criteria in the future.

Question B7

Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Yes, all of the above examples. Nature reserves, wildlife migration corridors and wildlife stepping-stones from one area to another, should also be included.

C: Open Space, Local Green Space and Gateways to the National Park:

Question B8

Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Question B9

Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

Yes, Urban Fringe Sites 41, 42 and 43. They are all local character green spaces supporting biodiversity. Sites 41 & 42 are particularly special in terms

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

of landscape, their relationship with the SDNP, the village of Ovingdean and the other 'Deans'. Site 42 comprises rare grassland and species.

Question B10

Do you consider the following green spaces should be designated Local Green Spaces?

- Benfield Valley;
- Three Cornered Copse
- Ladies' Mile Open Space
- Hollingbury Park.

Yes, all.

Question B11

Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes.

D: Are there any other biodiversity and open space issues?

Question B12

Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

More extensive Landscape Impact Assessments than those included in the 2015 LUC study should be carried out on urban fringe sites before they are designated as suitable for development. Site 42 is particularly sensitive in this regard.

Signed/typed*:	
Dated*:	22-09-16

Thank you for taking time to complete this questionnaire

All comments must be received by 5.00pm on Thursday 22 September 2016.

Late comments will not be accepted.

Please email forms to planningpolicy@brighton-hove.gov.uk or post to:

Planning Policy Team, Room 201 Kings House, Grand Avenue, Hove, East Sussex, BN3 2LS

June 2016

From:
Sent: 22 September 2016 17:09
To: PlanningPolicy
Subject: City Plan Part Two Scoping Paper - Consultation

Planning Policy Team
Brighton and Hove City Council
planningpolicy@brighton-hove.gov.uk

City Plan Part Two Scoping Paper - Consultation

I am writing in response to the current consultation on the City Plan Part Two Scoping Paper, and would like to thank you for the opportunity to provide comments.

Having reviewed the Scoping document and its contents, I wish to provide general comment upon the housing chapter, specifically in relation to consultation questions H1, in relation to Brownfield Sites; and H2, the 'range of considerations' which have been used, to date within the 2014 and subsequent 2015 Urban Fringe Assessment studies.

It is acknowledge that there is a need within the City to provide additional housing numbers. The National Planning Policy Framework (NPPF) identifies 12 core planning principles. Point 8 of the principles states:

"encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value"

As indicated in Question H1, I support the allocation of suitable brownfield sites through the City Plan Part Two is in general conformity of the NPPF, and believe that this should be carried out pro-actively to ensure that all brownfield sites are considered to provide an increased density of development given the need for new housing within the city. The promotion and allocation of such sites, would potentially remove the requirement for development on the identified fringe sites, other than then larger strategic parcels of land within the urban fringe which have been identified.

As such I am in general support of this approach.

Turning to question H2, the 2014, and subsequent 2015 Urban Fringe Assessment studies were carried out in response to the Inspectors initial comments relating to the City Plan Part 1, whereby she instructed the Local Planning Authority to "look down every rabbit hole" in an attempt to locate new sites for sustainable housing.

The studies identified 5 broad areas of constraint, these being, open space, landscape, heritage, ecology, and environmental considerations. The sites identified have been assessed on this criteria.

I believe that limited weight should be afforded to the studies. The allocation of these site should undergo a more rigorous assessment, and public consultation prior to their allocation. Further studies which should be carried out prior to allocation should include, highways impact, infrastructure capacity, and a sustainability appraisal of a site in comparison to alternative sites.

The highways assessment should consider such issues as, existing road capacity, potential access arrangements, highways safety, on street parking, and proximity to local modes of sustainable transport.

An existing infrastructure survey should be carried out to indicate if there is sufficient capacity within the existing public utilities and services for the allocation. These should

include, mains water and sewerage, gas, electricity and broadband services. This is essential as increased housing numbers will impact upon the existing public utilities and services provided, as well as many of the sites are by definition 'urban fringe' sites whereby it may be difficult or financially prohibitive to provide such services.

Coupled with a survey of existing infrastructure an assessment of the overall sustainability of the site should be undertaken having regard to alternative sites against the three limbs of sustainability as identified within the NPPF; economic, social and environmental. Only then should a site be allocated.

In conclusion I am supportive of the allocation of suitable brownfield sites through the City Plan Part Two, as detailed in H1 but this should be carried out pro-actively providing increased densities given the need for new housing within the city, and reducing overall reliance upon sites within the 'urban fringe'.

In relation to question H2 additional factors should be considered and the sites subject to public consultation prior to their allocation. These should include highways impact, infrastructure capacity, and a sustainability appraisal of the site in comparison to alternative sites. Full consideration of these issues would identify if these site are appropriate for allocation in the emerging City Plan Part Two.

I would like to be kept informed of the next stages of public consultation and would be keen to provide additional input into the formulation of the City Plan Part Two.

Current Concerns about HMOs

Tracey Hill, lead member for private rented sector housing 21st September 2016

The Article 4 Direction and adoption of Part 1 of the City Plan has been effective at limiting the proliferation of HMOs. Nevertheless they continue to be a major concern of residents due to:

- Continued conversion of HMOs in areas which are below the threshold
- Developers continuing to “sneak in” HMOs in areas which are already above the threshold
- Existing HMOs in all areas being reconfigured to fit more people

Below are some notes and questions about some of these issues.

Upsizing

Because it's more difficult to convert a residential house into an HMO, developers are looking to grow their yields by including more occupants within existing HMOs.

They are building extensions and loft conversions, generally all at the same time, to maximise space, and sub-dividing bedrooms and reducing communal areas right down to a minimum.

If a property is legitimately operating as a C4 HMO, it can go up to 6 occupants without planning permission for change of use. We need to assume this will eventually happen to the majority of our HMOs, which will have a big cumulative impact on balance within communities. Once permission has been given for a sui generis HMO, there is no upper limit in planning terms to the number of occupants.

Sui generis HMOs without planning permission

Using a list of all HMOs in the city with a licence for 7 or more occupants, I have checked this list against the planning applications register. HMO licensing goes back to 2006 and established use is 10 years. Looking only at properties where the first application for a licence was after 1st January 2007, or the 308 HMOs, only 31 specifically have planning permission. While there may be some good reasons for some of this, it does seem that a large number of large HMOs across the entire city do not have planning permission. Some proactive enforcement work has been done in this area.

Please investigate the list to identify any possible reasons why some HMOs are not in the planning applications register and look into resourcing more substantial proactive enforcement work.

Living space

A number of applications for C4 or sui generis HMOs have been refused on the grounds that the rooms are too cramped or there is not enough inside space or the design of the rooms is problematic. These always seem to be successfully appealed, because we do not have any minimum room size. Also, an HMO licence has generally already been given and this is cited by the applicant as evidence that the property is spacious enough to accommodate that number. We need to align ourselves better, as it does make little sense to refuse a planning application on the basis of room size if the HMO licence, which is based on minimum room sizes, has been granted. This is an area which will increasingly be tested as developers try to shoe-horn as many tenants as possible into

their properties. Examples of successful appeals: 41 The Crestway Brighton BN1 7BX BH2015/04020, 189 Hollingdean Terrace, BH2015/01417.

Please look at the grounds for refusal on the basis of room size and dimensions, and analyse appeal decisions to see how we can strengthen our effectiveness.

Continued growth

There is no upper limit to the number of occupants of a sui generis HMO, in planning terms. That means that once permission has been given for a sui generis HMO, there are no further controls Planning has to limit the number of occupants. That should be borne in mind for all sui generis HMO planning applications. The HMO licensing team need to be aware that licensees will be wanting to build up the number of occupants, and some will need to be pushed back.

To date, how often has an HMO licence applicant been told that the number of intended occupants is too many for the building?

Upsizing from C4 to sui generis HMO.

We are using the 10% policy to evaluate these but some developers are arguing that it isn't valid if the property is already an HMO. They are saying that upsizing an existing HMO does not increase the percentage of HMOs, which is of course true, but upsizing does have an impact on balance within the community, particularly as it is happening so often. At least two refusals have been overturned on appeal with this argument (89 Upper Lewes Road Brighton BN2 3FF BH2014/02977, 9 The Crescent Brighton BN2 4TB BH2015/02442)

I would like to be sure that we are making our point as comprehensively and effectively as possible when giving the local authority response to appeals, including the following points:

- Our policy is for all C4 and sui generis HMO applications, regardless of current or former use.
- The objective is the balance within communities and not simply the number of HMOs, which is a mechanism by which we aim to control the balance, not the end in itself.
- Many properties in some areas are being extended, and the cumulative impact on balance of population is real.
- Developers are adopting a staged approach, applying for planning permission or certificates of lawfulness for C4 use first and then immediately applying for sui generis HMO use which has often already started. In this case, their use of the C4 use class is simply as a stepping stone when their real intention is to develop a larger HMO.

Please review the successful appeals to see what we can learn from them. Do we need to clarify the policy itself to avoid this happening? What was the local authority submission on these appeals? Is there more we can do to support our policy when submitting to the Planning Inspectorate?

Appeal documentation

Most of the appeal documentation is not available online, in particular the appellant's appeal itself, the local authority response and any other comments. Not being able to see these documents makes

commenting on a planning appeal difficult. If it's an appeal against an enforcement notice, the only published information anywhere is the entry in the enforcement register.

Can we look into making appeal documentation more readily available so that commenting on appeals is easier for residents?

Certificates of Lawfulness

I want to question whether we need to or should be giving certificates of lawfulness for existing C4 use when there is strong evidence that another use will shortly begin. Strong evidence is: tens of thousands of pounds worth of rebuilding work; a letting agency which has been commissioned and is already advertising the property; an HMO licence for 7 or more occupants has been applied for and paid for. The applicant should be submitting a planning application instead. Some developers are using the certificate of lawfulness for C4 use to claim later that the 10% rule does not apply when they submit an application for sui generis use, on the grounds that it was already an HMO. But C4 was never the intended use: it is being used as way of trying to circumvent the 10% policy.

Can we refuse a certificate of lawfulness on these grounds, or in some way require an applicant to apply for planning permission for the intended use instead?

HMO impact on the wider community

There is some debate about whether this effectiveness when considering the impact on a wider community of a high proportion of HMOs, Moulsecoomb being a very good example. Numbers at the local school is one example. Another is noise in the street, which cannot be tackled through the EHL team but is a nuisance where student tenants are coming home in the early hours, even for people who don't live near them. Parking also impacts on nearby streets.

Some areas of the Lewes Road are being impacted not only by HMOs but by purpose-built student accommodation in close proximity. There is no planning policy which takes this into account because purpose-built student accommodation is not classed as HMO use.

Can we look at adding to the 50m rule something else which takes into account the broader impact? Can we look at something which takes into account the cumulative impact of HMOs and purpose-build student accommodation?

In Southampton they have introduced a regulation where if there is already an HMO on one side of a residential property, there cannot be another HMO on the other side, to prevent people from being "sandwiched in". There may be a lot to learn from the experiences of other local authorities in cities/towns with a large private rented sector and pressure on supply due to universities and growing populations generally.

Can we consider the Southampton approach? And can we undertake a study of other towns and cities with a similar Article 4 Direction and density policy to ours, to see what we can learn?

(I have previously suggested hosting a one-day conference on private sector housing for local authorities which face some of the same challenges that we do. Such an event could include a substantial element on planning including how planning regulation helps to manage the private rented sector.)

Intention

Over and over again we hear about properties where substantial work has been done and tenants have moved in before any action can be taken. It then takes at least a year for the process to work through, even in an area where the density is already well above 10%. It has been stated that some investigation would be done into whether any action can legally be taken where there is a clear intention, ie major works being done, property being marketed, HMO licence applied for.

Can we look again at whether anything at all can be done if there is a strong intention?

Future Use

Because developers can convert into an HMO before applying for planning permission, there are now properties which have been converted but cannot be used as HMOs because an enforcement notice has been served. There is a danger that these properties will not be returned to family use but will be used for other purposes such as short term lets or party houses. These may have an even worse impact on communities than HMOs, and makes it even more important to try and find a way of acting sooner before an HMO conversion actually takes place.

Is there a way of specifying that when a notice is served prohibiting use as an HMO, we can state that the property must be returned to its former use?

Planning Policy Team
Brighton and Hove City Council

planningpolicy@brighton-hove.gov.uk

Brighton
East Sussex

22 September 2016

Dear Sirs,

City Plan Part Two Scoping Paper - Consultation

I am writing in response to the current consultation on the City Plan Part Two Scoping Paper, and would like to thank you for the opportunity to provide comments.

Having reviewed the Scoping document and its contents, I wish to provide general comment upon the housing chapter, specifically in relation to consultation questions H1, in relation to Brownfield Sites; and H2, the 'range of considerations' which have been used, to date within the 2014 and subsequent 2015 Urban Fringe Assessment studies.

It is acknowledge that there is a need within the City to provide additional housing numbers. The National Planning Policy Framework (NPPF) identifies 12 core planning principles. Point 8 of the principles states:

"encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value"

As indicated in Question H1, I support the allocation of suitable brownfield sites through the City Plan Part Two is in general conformity of the NPPF, and believe that this should be carried out pro-actively to ensure that all brownfield sites are considered to provide an increased density of development given the need for new housing within the city. The promotion and allocation of such sites, would potentially remove the requirement for development on the identified fringe sites, other than then larger strategic parcels of land within the urban fringe which have been identified.

As such I am in general support of this approach.

Turning to question H2, the 2014, and subsequent 2015 Urban Fringe Assessment studies were carried out in response to the Inspectors initial comments relating to the City Plan Part 1, whereby she instructed the Local Planning Authority to "look down every rabbit hole" in an attempt to locate new sites for sustainable housing.

The studies identified 5 broad areas of constraint, these being, open space, landscape, heritage, ecology, and environmental considerations. The sites identified have been assessed on this criteria.

I believe that limited weight should be afforded to the studies. The allocation of these site should undergo a more rigorous assessment, and public consultation prior to their allocation. Further studies which should be carried out prior to allocation should include, highways impact, infrastructure capacity, and a sustainability appraisal of a site in comparison to alternative sites.

The highways assessment should consider such issues as, existing road capacity, potential access arrangements, highways safety, on street parking, and proximity to local modes of sustainable transport.

An existing infrastructure survey should be carried out to indicate if there is sufficient capacity within the existing public utilities and services for the allocation. These should include, mains water and sewerage, gas, electricity and broadband services. This is essential as increased housing numbers will impact upon the existing public utilities and services provided, as well as many of the sites are by definition 'urban fringe' sites whereby it may be difficult or financially prohibitive to provide such services.

Coupled with a survey of existing infrastructure an assessment of the overall sustainability of the site should be undertaken having regard to alternative sites against the three limbs of sustainability as identified within the NPPF; economic, social and environmental. Only then should a site be allocated.

In conclusion I am supportive of the allocation of suitable brownfield sites through the City Plan Part Two, as detailed in H1 but this should be carried out pro-actively providing increased densities given the need for new housing within the city, and reducing overall reliance upon sites within the 'urban fringe'.

In relation to question H2 additional factors should be considered and the sites subject to public consultation prior to their allocation. These should include highways impact, infrastructure capacity, and a sustainability appraisal of the site in comparison to alternative sites. Full consideration of these issues would identify if these site are appropriate for allocation in the emerging City Plan Part Two.

I would like to be kept informed of the next stages of public consultation and would be keen to provide additional input into the formulation of the City Plan Part Two.

Yours Sincerely

From: 22 September 2016 21:30
Sent: PlanningPolicy
To: City Plan Part 2 - scoping consultation
Subject:

Dear Planning Policy

I have tried repeatedly today to submit the following work via the web portal dealing with the 'scoping consultation' but to no avail.

I'm sorry that not all answers in the material below are prefixed by the 'Question headers' you built into the online form but some have been lost in the transform to this format.

Yours

[Free to Explore: Brighton & Hove Open Door 2016, 8 to 11 September - a part of Heritage Open Days.](#)

[The Regency Town House - Recipients of the Heritage Open Days 'Creative Minds' award for extending the focus of the national HODs programme.](#)

City Plan Part 2 - scoping consultation, response from Nick Tyson and The Regency Town House project

Economy & Employment

1) The guidance for this section says a key objective is supporting local businesses and building on the success of the city's local and regional economy.

I would like to suggest that we build on the success of other local and regional economies. In particular, local and regional economies with significant heritage assets and the foresight to have developed these so as to make a significant financial contribution to local coffers. The economies of cities like Bath, York and Edinburgh receive substantial income from what is often termed 'heritage tourism', the idea of bringing visitors into a location and keeping them there over a protracted period - by virtue of the heritage interpretation made locally. Remarkably, despite having one of the strongest architectural and historical offers in the UK, B&H has almost entirely missed out on this opportunity. Our Councillors and Officers see the Royal Pavilion as the single offer the City has to make and this as a 'day trip' option only. The hotels, restaurants, tour guides, etc, of our area all miss out on the

funds that could be spent by visitors staying for days rather than hours because of the lack of a heritage tourism focus. We need to change this as fast as possible and compete for the income on offer.

2) One final thought, with an entirely different focus.

We have one of the highest densities of listed historic buildings in the UK. Yet, none of the formal training institutions within the city educate building professionals to work within the 'heritage estate'. At the end of a three-year degree course, our universities graduate surveyors with 1.5 hours of experience surveying historic buildings. Our tech colleges produce heating engineers but not lead plumbers; gypsum plasterers but not people who understand lime technology. If we are to get on top of caring for our built heritage, we need to find a way of providing young professionals with the right skills for the job. BHCC should engage with this issue far better than at present and either drive reform or provide appropriate in-house (or directly-contracted) training opportunities. Building professionals with special skills earn more each year than their counterparts without these, e.g., lead plumbers earn more than heating engineers. Given this, the right education could improve the financial standing of locals, a boon for the local economy overall. Much more joined up thinking please BHCC, lets see some policy issues that relate to employment in this area!

Tourism

The economies of cities like Bath, York and Edinburgh receive substantial income from what is often termed 'heritage tourism', the idea of bringing visitors into a location and keeping them there over a protracted period - by virtue of the heritage interpretation made locally. Remarkably, despite having one of the strongest architectural and historical offers in the UK, B&H has almost entirely missed out on this opportunity. Our Councillors and Officers see the Royal Pavilion as the single offer the City has to make and this as a 'day trip' option only. The hotels, restaurants, tour guides, etc, of our area all miss out on the funds that could be spent by visitors staying for days rather than hours because of the lack of a heritage tourism focus. We need to change this as fast as possible and compete for the income on offer.

Design

It is difficult to think of a single historic property/site that has been demolished and replaced by a modern structure of quality. Asking residents, post the loss of a historic site, inevitably results in a wish for the return of the former structure. We need to find ways of taking delivery of truly high quality design when we loose older buildings.

The setting up of the recent 'Design Panel' may or may not help. If it's membership is to be led by those wedded to 'new build' at any price, it's role in helping improve the quality of architectural fabric around the town will amount to nought. The Panel needs to be balanced to have credibility - and to ensure that it does not simply further alienate local people from their Council.

Heritage Issues - Consultation questions

Question HR1

Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

Yes, there should be specific policy approaches for each type of heritage asset. Certain key approaches are likely to be shared but each asset type will require unique considerations.

Question HR2

What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

- 1) Risks to the Georgian/Regency/Victorian architecture and related developments that define the city as a major heritage location**

- 2) Dilution of the above heritage by poor quality new build.**

- 3) Compromise of the historic low-rise skyline by inappropriately located tall build.**

- 4) Ongoing compromise of the listed architecture through neglect and mis-repair. The Council does not currently have the manpower or expertise to oversee the proper care of the historic estate and steps are urgently needed to overcome this problem.**

5) BHCC seems to believe it largely fulfils its 'heritage role' via a focus on the Royal Pavilion. It must come to see that the other major historic properties/terraces/estates of the city are equally important AND that they too offer great opportunity.

6) A stop to the developments that compromise the marine view for pedestrians, these sites diminish the centuries old reputation of the promenade as the finest in Europe

7) Ensuring that LBC applications arrive at BHCC with adequately researched and written documentation. At present the Council seems prepared to accept completely inappropriate statements made without any meaningful research effort whatsoever. This makes a mockery of the fact that, 'National planning policy requires that in making decisions on proposals affecting heritage there needs to be sufficient understanding of their importance and 'significance'

8) BHCC must improve the quality of its 'Design Briefings' if local architectural heritage is to be protected. All too often, such briefings have resulted in serious harm being perpetrated to the heritage.

9) Requiring the departments of BHCC to better liaise over heritage management of city held assets and to far better manage works to such assets. The appalling outcome of the Bandstand repair works, the repairs to Brunswick Square railings, the Pepperpot repairs, etc, all evidence the failings of the current systems. Currently, there is no means to hold senior officers/Councillors to account. This needs to change.

10) On an entirely different heritage focus - Improvements to the inshore seabed; to re-establish the rich marine environment present before 'industrial' dragging or 'bottom trawling' was established.

Question HR3

Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

Yes. Besides the RP estate, Kemp Town, Brunswick Town, Adelaide/Palmeira, Regency Square and the smaller seafront terraces and related squares (in particular those on M Parade. Also, the seashore, etc, as stated above.

Question HR4

How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

Guidance and governance should appear in whichever document type is better equipped to ensure that aspirations/requirements are fully realised. At the moment, lip service is paid to numerous heritage concepts but, all too often, they are then put to one side.

Question HR5

What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

- 1) The role played by our architectural heritage and local history in establishing and maintaining the city's reputation as a desirable location.**

- 2) The opportunity to the local economy of coherent exploitation of heritage tourism**

- 3) How to introduce new development so as to further enhance the status of the city as a desirable location for living and visiting**

- 4) The status of our listed architecture, is it in sound condition, is it as listed, etc?**

Question HR6

How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

Address the issues above and develop coherent analyses. National policy is insufficient to meet the needs of our internationally important architectural heritage.

Question HR7

What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

- 1) The need to maintain the historic waterfront/promenade**

- 2) Severe erosion pressure caused by the marine environment and high speed winds.**

- 3) Current juxtaposition of important heritage assets next to very poor quality modern architecture/settings.**

- 4) The tendency towards dismissing historic areas as of little value because today we see them in a run down condition. National and international guidance encourages us to recognise the desirability of returning such areas to an improved condition - reflecting the associated historic significance. Unfortunately, this almost never happens in B&H and instead structures are lost to redevelopment or diminished by the juxtaposition of yet more poor quality development.**

- 5) Overuse of traffic signage. This is a problem in relation to post-mounted displays but is especially so in relation to signage applied to road surfaces. Residents living in historic areas mostly look down to street level, where they see swathes of yellow and white markings. They would be prosecuted, were they to apply such markings to their listed buildings, why does the Council despoil whole areas with such markings?**

Question HR8

Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

The disastrous situation regarding Marlborough House evidences the weakness of CP15, a much tougher stance is urgently needed.

Question HR9

What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

Lack of knowledge within BHCC Planning and Conservation team.

Overwork of the few staff with relevant knowledge.

Insidious unregulated repair works to historic properties made using inappropriate modern materials.

The general lack of knowledge about how to care for historic properties evident in both occupants and local builders.

The timidity of the Council to offer proper maintenance advice and guidance about the performance of local building firms.

Question HR10

Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

Yes. We urgently need a policy that provides for abundant low cost energy for the maintenance of historic properties – most likely derived from a tidal of ground source.

We need far better research as to what steps can be taken to safely improve historic building performance in relation to energy efficiency.

We need to be better aware of flood risks to the historic architecture sited to the west side of the city

Question HR11

Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

Specific design policy for historic areas is needed.

Question HR12

What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

The styles, materials and methods deployed in manufacture. Some of this should feed through into new design, to tie together the old and new.

Question HR13

Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

Better maintenance of Brunswick Square and Terrace properties to enhance the wider care of the B Town estate

Question HR14

Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

Yes, in particular, the returning of the communal spaces in the Georgian/Victorian estates to their correct period detailing. At present, we have late 19th C design in Regency gardens, etc.

Question HR15

Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

It is difficult to think of a single historic property/site that has been demolished and replaced by a modern structure of quality. Asking residents, post the loss of a historic site, inevitably results in a wish for the return of the former structure. We need to find ways of taking delivery of truly high quality design when we loose older buildings.

The setting up of the recent 'Design Panel' may or may not help. If it's membership is to be led by those wedded to 'new build' at any price, it's role in helping improve the quality of architectural fabric around the town will amount to nought. The Panel needs to be balanced to have credibility - and to ensure that it does not simply further alienate local people from their Council.

We have one of the highest densities of listed historic buildings in the UK. Yet, none of the formal training institutions within the city educate building professionals to work within the 'heritage estate'. At the end of a three-year degree course, our universities graduate surveyors with 1.5 hours of experience surveying historic buildings. Our tech colleges produce heating engineers but not lead plumbers; gypsum plasterers but not people who understand lime technology. If we are to get on top of caring for our built heritage, we need to find a way of providing young professionals with the right skills for the job. BHCC should engage with this issue far better than at present and either drive reform or provide appropriate in-house (or directly-contracted) training opportunities. Building professionals with special skills earn more each year than their counterparts without these, e.g., lead plumbers earn more than heating engineers. Given this, the right education could improve the financial standing of locals, a boon for the local economy overall. Much more joined up thinking please BHCC, lets see some policy issues that relate to employment in this area!

BHCC supported heritage bodies, such as the CAG, currently see their remit as limited by officer guidance, so that issues such as works to the interiors of listed structures are considered 'out of bounds'. As BHCC officers already do not have the time to consider such issues, restricting consideration by the CAG makes no sense whatsoever. Ways must be found to improve oversight of works to listed properties and to make better use of bodies such as the CAG.

The recently introduced strategy (Listed Building Heritage Partnership Agreements) of allowing appropriate organisations to take on an oversight role in relation to their heritage management activity should be developed further, to enable suitably qualified organisations to minimise demand upon BHCC and to potentially, guide others in the delivery of heritage management.

From: Longhill Woodland Group <
Sent: > 23 September 2016 08:56
To:
Subject: City plan 2 consultation - IT issues

Hi Liz

I was halfway through completing Longhill Woodland's response to BHCC's City Plan 2 yesterday when I had a serious IT issue with my computer and was unable to operate the mouse. It wasn't until much later on last night and after seeking help I was able to get the machine working again but sadly I was unable to complete the submission, I got a message saying The event is not currently available for consultation. To be honest I thought we'd have until midnight last night, not 5pm.

I appreciate you're probably not able to open the survey again just for me (or are you?) but I feel absolutely terrible that **1564 people signed a petition asking BHCC to designate Land Rear of Longhill Road (UFA site 43) as inappropriate for development** and that might not be taken into account when drafting City plan 2.

These people are relying on me to report their views, I have emailed them all twice over the last 2 weeks suggesting they comment but it's likely they are expecting **me** to make sure these points are made.

We are also extremely concerned about **Site 41 – Land at Wanderdown open space where developers have been ignoring the LWS status** and woodland TPO when carrying out clearance, so we wanted to suggest BHCC more powers to stop developers preparing land for development and destroying beautiful woodlands without prior consent or ecological considerations. This, as you know has happened extensively at Land East of Longhill Close (part of site 43 - Land rear of Longhill Road)

And finally we are passionate about the recently identified **Wildlife Corridor** that runs between Beacon Hill and Happy Valley and want BHCC to recognise the importance of this ecological connection between two parts of the South Downs National Park and that it should be protected.

I think you know that we've tirelessly campaigned since Oct 2014 to try to protect green space in the Deans and I am absolutely horrified that this might be wasted if we're not able to comment on City plan 2, although I understand it's going to be years until this is firmly in place.

Ideally I would like to be able to complete the survey, but if this isn't possible then I would be so grateful if you could take into account the points above.

Please let me know what you think,

Kind regards,

On behalf of Longhill Woodland Group

'No inappropriate development. Ever'

Protect Longhill Woodland!

 [@longhillclose1](https://twitter.com/longhillclose1)

 [Longhill Close Woodland](https://www.facebook.com/LonghillCloseWoodland)

Hi There.

I am the lease holder for Roedean café & Mini Golf Course. I have recently (1st Sept 2015) purchased the Café & Golf course for an incredibly large sum of money (enough to purchase a house).

I was not informed by the council, the councils agents and not even by my solicitors that there was a possibility that part of the golf course could be taken from me.

To take nearly a quarter of the golf course would completely undermine the use of the course and turn it from a 16-hole course into a 12-hole course which is totally unacceptable.

It would also be a great loss of a very important facility to the local residents of Brighton considering that Rottingdean Golf Course has already closed leaving this as the only non-membership course in the area.

I would like to object in the strongest way possible that the plans relating to study area L13/E11 site 37 are not put forward. We have already joined forces with Roedean Residents association and If it is put forward for development we will put up an almighty fight.

We have also found out recently that the golf course was given to the council free of charge by a lady that lived above the golf course and that the agreement was that it should be used as a recreational Area only.

We have literally thousands of customers who are infuriated by the idea that Brighton & hove council would even consider taking away a quarter of the golf course and placing 24 houses on it.

I ask you therefore to not use the Golf course or put forward the site for possible planning for housing.

Regards

Owner Roedean Café & Mini Golf Course

Brighton & Hove Economic Partnership [BHEP]
 Response to the Brighton & Hove City Plan, Part 2 Scoping Paper, September 2016

REF	POLICY DETAIL	BHEP RESPONSE
3	Economy and Employment	
	<p>The council and its partners want to support local businesses in the city and further build on the success of the city's local and regional economy. The role for CPP2 is to identify further sites to ensure employment land delivery is maintained across the plan period.</p> <p>The key issues for the CPP2 are:</p> <ul style="list-style-type: none"> • Identifying further sites and opportunities that could deliver a range of size and type of new office developments; • Whether a mix of employment uses can help deliver more office delivery in the city; • Whether further protection is needed for some types of employment and in some areas of the city; and • Whether there are any opportunities to bring forward new industrial floorspace in the city. 	<p>Fully Support but note comments below</p> <p>Do the employment land forecasts that underpinned City Plan Part 1 continue to accord with anticipated job growth? With Permitted Development acting as a market intervention, has the supply of employment space changed?</p> <p>Whilst CPP2 acknowledges meeting demand across the Greater Brighton City Region, with our neighbours, does CPP2 do enough to outline the reasons as to why particular uses such as Industrial are not particularly suited to the locality to the same extent as such uses are suited to more established industrial estates within the City Region? More importantly, is the counter proposal to this made clear i.e. what is proposed to take up the space that would have been Industrial Use?</p> <p>An enterprise zone / intensification area should be considered for locations that have been the focus of promotion in order to provide regeneration. Areas such as London Road, which has benefitted from regeneration initiatives, can capitalise further by such an allocation. In cases such as this, the topographical merits of areas must be considered and if applicable, Tall Buildings Zones be included to incentivise higher densities.</p> <p>Whilst it is the case that the city benefits from a rich CDIT and start up contingent, co-working, micro space, maker space and creative space will not be for all occupiers. Consideration must be given to meeting the needs of all prospective occupiers; a flexible approach is key – particularly linking the two through 'move-on' space, to accommodate SMEs in middle-stage of growth.</p> <p>Whilst considering mixed-use development as an enabling feature for</p>

schemes containing office space is encouraged given that speculative office development continues to face challenges in viability, it is also important to support the creation of employment space. The prioritisation of employment use in key employment areas should be supported.

In locations that allow, planning policy should avoid being too rigid in specification, to safeguard and promote new opportunities; this is vital in order to avoid policy-making / development briefs that are counter-cyclical to the market.

The Role of Permitted Development is acknowledged, given the housing shortage that the city faces. However, the Article 4 Direction has proved to safeguard vital office space within the city. Consideration must be given to formal recognition of design that promotes future proofing of developments, so that retrospective changes to either use class is more appropriate and acceptable to meet market demands, in future. Such an approach will also help to prevent office space from falling behind in standards of specification, given that it will also allow for easier and more appropriate sub-division of space. The same approach should be considered to promote the capacity built into structures to allow for additional storeys in future (STP and should Tall Buildings Guidance evolve, for instance).

Has the local authority considered its own estate to a great enough extent, to meet some of these needs? Do the densities in these spaces provide the most efficient use of land?

Consideration must be given to connectivity of infrastructure with employment sites. Transport for London uses 'PTALs' (Public Transport Accessibility Level). In the event of poor PTAL ratings, supporting infrastructure should be encouraged.

2	Housing	
<p>The council wants to improve the supply of housing in the city and particularly the supply of more affordable housing and housing for key groups such as families and older people. The city's housing target is for 13,200 new homes to be provided by 2030.</p> <p>The key issues for the CPP2 are:</p> <ul style="list-style-type: none"> • The need to identify and allocate further housing sites; • The need to make full and effective use of the city's brownfield sites for new housing but in addition some urban fringe sites will also need to be allocated for housing in CPP2; • How to make sure that new housing development meets local needs for housing - particularly in terms of a mix of housing sizes and types and housing for particular groups in our communities e.g. family housing and housing for older people; • Introducing space standards and standards for access and adaptability in new housing; and • How to manage houses in multiple occupation (HMOs) around the city and how to address some of the negative impacts associated concentrations of HMOs. 		<p>Support but note comments below</p> <p>Consideration should be given to flexible interpretation of nationally described space standards to ensure that innovative forms of development, that justify exception in policy, can continue to be explored and delivered (i.e. modularised housing models).</p> <p>Has enough evidence been produced to outline the levels of second home ownership in the city?</p> <p>Whilst it is acknowledged that mixed-use development will potentially increase numbers of homes, this should not be at the risk of loss in good quality and standards of employment space. If mixed-use development takes place, prioritisation of the dominant uses within a building in applicable areas should be made.</p> <p>Innovative models, methods and mechanisms of housing delivery are encouraged to improve the efficiency of housing supply. This requires recognition from CPP2 in order to encourage inward investment to come forward.</p>
12	Student Accommodation	
<p>The city's two universities and other educational establishments make an important contribution to the city's economic and cultural life. However, there is a need to consider further opportunities for purpose built student accommodation and particularly to consider different locational options both around the city and within the wider sub-region.</p> <p>The key issues for the CPP2 are:</p>		<p>Support but note comments below</p> <p>The Economic Partnership supports the requirement for more purpose built student accommodation. Careful consideration should be made as to the locations in order to ensure a balanced mix of communities; this relates to the over-intensification of areas not conducive to student housing in some cases, which puts communities at risk. The requirement needs to be addressed as a Greater Brighton City Region rather than</p>

	<ul style="list-style-type: none"> • Whether to establish a target for the amount of student housing needed to be met through purpose built student accommodation; • Whether there are any additional sites or locations that could be considered for purpose built student accommodation; • Whether to seek a more dispersed approach to locations for purpose built student accommodation away from the Lewes Road academic corridor; and • How can the cumulative impacts of purpose built student accommodation be assessed and mitigated. 	<p>within the boundaries of Brighton & Hove. A considered and planned transport network to support this is key; and will provide opportunities to explore 'student village schemes' in areas in the region, that will provide employment-generating activity.</p> <p>Developable land immediately neighbouring the university campuses should be the first consideration for further development.</p>
<p>4</p>	<p>Retail and town centre uses</p>	
	<p>Making sure shopping centres remain attractive and vibrant places that businesses want to invest in and people want to visit and use for shopping and socialising is key to the city's success as a place to live, work and visit.</p> <p>The key issues for the CPP2 are:</p> <ul style="list-style-type: none"> • Whether some of the city's shopping centre 'boundaries' need changing; • Whether different approaches are needed to manage the mix and balance of retail uses in shopping centres; • Whether there are 'special' retail areas (e.g. the Lanes and the North Laine area, the Marina and/or the seafront) that might need their own type of planning policy; • Where new 'local centres' could be designated through CPP2; • Whether some local shopping parades should be protected because they have an important neighbourhood value; and • Whether there is scope for any additional permanent markets in the city. 	<p>Support but note comments below</p> <p>Careful consideration should be given to retail parades that have negatively changed as a result of permitted development legislation; planning policy should prioritise the rebalance of retail parades in such instances. In particular areas, such as the Old Town, consideration may be required in respect of an Article 4 direction to further protect balance of uses; however this should not be prohibitive to exceptional cases that justify a wider public benefit (i.e. the introduction of a use that will in turn support neighbouring uses through additional footfall and trade capacity).</p> <p>Whilst it is acknowledged that Brighton Lanes and the North Laine has unique unit sizes that are not necessarily defined in national or local policy and as such, may be require unique recognition; flexibility in planning policy is important in keeping the city agile and accessible to growth. With the same approach, new A1-A3 units that are developed should be positively encouraged to be adaptable and retro-adaptable in order to future proof for a variety of uses.</p> <p>Whilst it is acknowledged that alfresco dining is popular and a great asset to central Brighton in areas such as Gardner Street, careful consideration should be made to the other uses (i.e. other A1) that may be negatively</p>

		<p>impacted by this; such consideration will be useful when implementing further use of outside space in other parts of the city centre.</p> <p>Designation of Preston Street as a local centre / A1-A3 area, to improve and control investment into the street. This will improve access to investment from the Local Transport Plan.</p> <p>Despite challenges faced with the London Road Market, it is clear that Markets do have a place in the city and can offer a useful source of economic benefit and diversity for trade / start-ups.</p>
5	<p>Tourism</p>	
	<p>Part One of the City Plan already sets out how improvements to the city's existing tourism facilities and new tourism facilities will be encouraged and supported. It provides an overarching strategy for the Seafont and allocates major development sites (e.g. King Alfred and Black Rock).</p> <p>The key issues for the CPP2 are:</p> <ul style="list-style-type: none"> • Whether there are any further seafont development sites that could be allocated through CPP2; • Whether further planning policy is needed to guide seafont development proposals; and • How further hotel accommodation in the city could be accommodated should need be identified. 	<p>Support but note comments below</p> <p>Given that footfall transgresses key retail areas towards the seafont, it is important to fully understand permeability and the benefit that a city centre masterplan for wayfinding will bring to businesses and tourists alike.</p> <p>Planning policy that positively encourages further investment into Madeira Drive (between The Marina and The Pier) should be welcomed and will complement the Black Rock proposals. A robust transport plan will also be required, to justify no loss of trade in respect of any reapportionment of uses from the Old Town to Black Rock.</p>
6	<p>Transport and Travel</p>	
	<p>Transport and travel is a key issue for Brighton & Hove. We need to facilitate and accommodate planned development by providing an integrated, safe and sustainable transport system to improve air quality, reduce congestion, reduce noise and promote more active travel around the city.</p>	<p>Support but note comments below</p> <p>The promotion of more uses of sustainable transport is important including finding ways of introducing behavioural change, better facilities and restricting parking permits, in certain locations.</p>

<p>The key issues for the CPP2 are:</p> <ul style="list-style-type: none"> • Whether more detailed policy might be required to help address air quality and noise issues; • Whether more guidance is needed regarding requirements for Transport Assessments, Statements and Travel Plans; • Whether further policy or guidance is required which would help promote and enable greater active travel; • How to secure improved mobility and access for an many forms of transport as possible; and • Whether there might be any justification for any site specific allocations to meet identified sustainable transport priorities. This could include, for example, facilities for park and ride and coach and lorry parking. 	<p>In certain parts of the city, there is an inadequate level of parking provision that has the potential of prohibiting business growth.</p> <p>PTALs (Public Transport Access Levels) can be utilised to help determine how much parking is appropriate for certain types of development.</p> <p>Consideration must be given to promoting the improvement of rail capacity, within CPP2.</p> <p>Smart technology should be explored and encouraged to improve efficiency of public transport, car clubs, cycling and parking.</p> <p>Coach and lorry parking should be explored in locations that have lower intensity within the daytime (when the parking is typically required); flexible solutions with bus depot, under utilised car park locations for instance, should be considered.</p>	
<p>11</p>	<p>Community Facilities</p>	
<p>The term 'community facilities' is used to describe a wide range of facilities and local services including those required for health, education, social and cultural well-being. There is a need both to plan for new community facilities and to protect existing facilities where important needs are being met.</p> <p>The key issues for the CPP2 are:</p> <ul style="list-style-type: none"> • The range of community facilities to be addressed through CPP2; • The need to respond to recent legislation and initiatives, including the Community Right to Bid, Assets of Community Value and Neighbourhood Plans; • Potential approaches for planning policy to address different types of community facility; and • Whether there are any sites that could be considered for community facilities through CPP2. 	<p>Support but note comments below</p> <p>Community facilities should be approached strategically, positioned near to hub areas of activity if not already located. Furthermore, encouragement of a balance / mix of uses in proximity to a community facility should be made.</p> <p>The provision of community infrastructure should be implemented prior to the completion of development that funds it, subject to viability.</p>	

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	190
Response Date	13/09/16 09:44
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Retail and town centre uses
	. Design
	. Heritage
	. Call for sites

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

I support this proposal.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

A new secondary school Park and ride

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Old gas works East Brighton

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

Specifying a range could be restrictive but there also needs to be a limit on studios coming forward

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

Yes, at least half

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Yes a minimum density should be applied

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

No - could restrict use of site/ability to bring it forward at all

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

No, see comments as above

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No, see comments as above

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Depends what you mean. Re-provision might ultimately provide more units as long as minimum densities are applied.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

No

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Balconies are not the answer to everything - some alternative provision is required. Balconies effectively get used as storage space far too often.

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Of course

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

If possible but viability must also be a consideration.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

No

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

No

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Left to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

No

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

No

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

No

A: Boundaries of Primary and Secondary shopping frontages

R1: Should City Plan Part 2 seek to amend / remove some less successful sections of defined shopping frontage from designated shopping centres?

I'm not sure what you mean by this question - if the business is functioning then no.

R2: Are there successful stretches of shops (not currently protected) that should be included in defined primary or secondary frontages of defined shopping centres?

?

B: Updating Retail Frontage Policies

R3: Would it be better to have a single policy setting out the criteria for changes of use in Primary and Secondary Frontages within all defined shopping centres rather than separate policies for each type of centre in the retail hierarchy?

No

R4: Should there be policy to restrict the loss of large retail units (more than 1,000sqm which includes all retail trading floors) in Primary Frontages?

No

R5: Do we need a separate policy for special retail areas such as the North Laine and the Lanes or could these areas be dealt with by a general frontage policy?

Separate

R6: Should policy seek to restrict changes of use to new large A3/A4 uses to service seated customers only?

Yes

C: Brighton Marina – Special Retail Area Policy

R7: Should Part 2 of the City Plan have a special retail area policy for the Marina? If yes, what criteria should be considered in the policy?

Yes - this place is awful

R8: Alternatively, should changes of use within the Marina area be addressed through a general frontage policy as set out in section d) below?

Yes

D: Local Centres and Parades

R9: Is there a need for a separate policy for assessing changes of use in local centres and parades?

Yes

R10: Alternatively, could there be a general policy to assess changes of use in these and other retail areas in the city which fall outside of town/district centre designations? (e.g. the seafront)

No

R11: Should Part 2 designate any additional local centre's coming out of large scale housing developments such as at Toads Hole Valley?

Yes

E: Important Local Parades

R12: Should Part 2 of the Plan seek to name some local parades in the city as 'Important Parades' due to their neighbourhood significance? If so, which ones?

No

F: Individual Shops and Small Clusters of Shops outside Protected shopping centres and parades

R13: Given changes to the GDPO, is there a need for policy to protect shops and parades outside of existing centres? Should the City Plan Part 2 include a policy that covers larger shops over the 150sqm threshold of the GDPO?

No

G: Floorspace above shops and commercial premises

R14: Should the City Plan Part 2 include a policy to guide appropriate uses for floorspace above shops and commercial premises in shopping centres outside of the Central Brighton Area?

No

H: Markets

R15: What are the key criteria that should be taken into account when assessing proposals for additional permanent markets?

Viability

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Yes

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

Definitely not.

D3: Are there other streetscape and/or new, emerging design issues apart from those identified above that should be included in a Detailed Place Making Policy?

No

B: Extensions and alterations

D4: Should the Extensions and Alterations Policy incorporate aspects of SPD12 and should the policy seek to supersede it?

Supersede

D5: Are there any other design issues that this policy should provide guidance on?

No

C: Protection of Residential Amenity

D6: Should the protection of amenity be addressed through a single consolidated policy? If not, can you explain why and suggest an alternative approach?

No

D8: Would it be appropriate for an amenity policy to explore parameters for assessing the effective use of sites?

No

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

No

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

No

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

Give equal weight to new buildings

HR3: Are there important groupings of heritage assets that require a site-specific policy approach? (e.g. the Royal Pavilion estate).

No

HR4: How much detail should be in the City Plan policies and how much should be left to other documents, such as Supplementary Planning Documents or planning briefs?

Little detail

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

Over protection

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

More flexibility

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

No

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

No

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

No

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

No

HR13: Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

No

HR14: Is there a need for policy on historic parks and gardens that seeks enhancement as well as conservation?

No

E: Any other heritage issues?

HR15: Can you think of any other policy issues that relate to heritage (not already covered in the sections above) that you think City Plan Part Two should seek to address?

No

Please indicate which topic or topics you would like to comment on?

Current use(s)

Old gasworks East Brighton

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	191
Response Date	20/09/16 10:42
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Transport and Travel
	. Biodiversity and Open Spaces
	. Community facilities
	. Student accommodation

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

There is no housing at present which is designed and allocated for autistic adults and young people.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

No. Self build favours the middle class and not those in greatest housing need.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes but remember that some disabilities are invisible - such as autism - you still need to design for those.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Leave to the market

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

More detail

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

Again you are forgetting that not all disabilities are visible - how could you make shopping easier for autistic people?

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

The cycle paths need to be more clearly marked - perhaps use green tarmac?

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Encourage developers and others to use bird and bat boxes and to put beehives on flat roofs of big buildings

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

Create open space so that Mighell St again joins Edward St. Make this a path for cyclists and pedestrians and line with plants and trees - very few trees on Edward St at present.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

B. Site Allocations for Community Facilities

CF5: Do you have any evidence of the need for any community facilities in the city that are not currently identified? Are you aware of sites that may be suitable to meet those needs?

The Carlton Hill area has no community facilities

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes, why always site them in the poorer areas?

Please indicate which topic or topics you would like to comment on?

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	192
Response Date	21/09/16 11:13
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	. Housing
	. Economy & Employment
	. Transport and Travel
	. Biodiversity and Open Spaces
	. Addressing pollution, water and energy resources
	. Student accommodation
	. Traveller accommodation
	. Sustainability Appraisal Scoping Report
	. General comment

A: General housing (Use Class C3) supply and additional site allocations

H1: Do you support the council's intention to allocate suitable brownfield sites for housing through City Plan Part Two and thereby safeguard their use for housing development over the Plan period? (NB: Brownfield Site Registers will convey a 'permission in principle' for suitable sites but sites on the register will not have the development plan status that goes with a formal site allocation).

No - sites should be used for whatever is most appropriate and sometimes that will be work space.

H2: The 2014 and 2015 Urban Fringe Assessment studies have already looked at a range of considerations (open space, landscape, heritage, ecology and environmental considerations) in establishing whether there is housing potential on some of the city's urban fringe sites. Are there other (i.e. different) assessment considerations that City Plan Part 2 should also consider to guide the allocation of urban fringe sites?

Hollingbury Park should be protected from development and made part of the National Park.

H3: Are there sites that you are aware of that you would like to see put forward as proposed housing site (Use Class C3) allocations in City Plan Part Two?

Kings House and any other sites no longer needed by the council should be developed by the council as 100% affordable housing rather than selling them off for expensive flats that would not address housing need in the city (through an owned but separate development company) The corridor along Preston Park is the perfect place to allow high rise residential development and I don't see a need to limit the size of the towers. If the architecture is exciting (and not the usual cheapest option usually proposed in the city) then that could add a lot of housing without too much negative impact and could create an exciting new urban landscape in the city. Blackrock should be used for housing and the

Brighton Centre left where it is to protect conferencing in the city which will be decimated if the current Blackrock development plans go ahead.

B: Housing mix – dwelling types, sizes and tenures

H4: Should proposed housing site allocations in City Plan Part 2 seek to specify a range of dwelling types and sizes or should this be left to a more general criteria-based type of planning policy?

The way this question is worded is jargon and not clear. What is criteria-based type of planning policy? New developments should be designed to create a social mix of people of different ages and income rather than the standard 2 bed flat developments that seem to be what developers want to build in the city. Developments should include more affordable housing and the city council should use the planning system to be creative about reducing social and age segregation - such as Finish example of older people and students living together and helping each-other.

H5: On urban fringe site allocations, should the City Plan Part 2 seek to secure a specific proportion of family sized housing given the city's lack of suitable sites for family sized housing?

More important in my opinion is that the council should address the constant and increasing loss of family homes through conversion of family homes to students and then ensuring they are converted back to family homes once Planning has taken enforcement if they are in contravention of the Article 4 Direction. Developers want to build expensive executive homes, but these are out of reach of most of the people in housing need so any requirement for family sized houses should ensure they are not expensive executive homes.

H6: Can you think of other ways in which City Plan Part Two could help to ensure that a good mix of housing gets delivered in the city?

Locate new student accommodation across the city and improve transport to University from places like Hove. The bus journey from Hove to Falmer takes over an hour and so students choose not to live there, concentrating studentification around Lewes Road and forcing families out of the area.

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

Whilst I agree in principle with this idea, people need outside space. Often the first thing to go when you talk about maximising site potential is gardens and communal green space. Also, new developments need to include parking. It's too easy for developers to get away with not providing parking, but that just spreads cars to surrounding streets. Any new policy needs to retain outside space, communal space and parking requirements.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

Yes. It should definitely not be left to the market because all that would be built is expensive flats and executive homes.

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Definitely yes. Self build projects in the city are fantastic and should be encouraged.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes. The council should take pro-active enforcement against developers converting family homes to student HMOs where they know they are in contravention of Article 4. Once a home is converted, there is no requirement to convert it back to the same number of bedrooms, so even if enforcement is taken, the former family homes are not converted back and become party houses, short term lets and other non-family homes. The Article 4 Direction should be amended to require the developer to convert back to the same number of bedrooms as the house had before conversion.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Family homes, especially in areas where student numbers are increasing and forcing families out.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Yes

H14: Should such a policy provide guidance on the issues that will be considered when assessing whether appropriate amenity space has been provided to ensure it is useable and accessible?

Yes

G: Access and space standards in new housing development.

H15: Should City Plan Part 2 seek to introduce the new nationally described space standards for new housing development?

Yes, if they are reasonable. If the national standards allow small pokey rooms, then the Plan should set standards higher than the national standard. New purpose built student developments should be designed so they can be converted to other use when student numbers collapse in the future.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

No

H17: Are there any other issues in relation to the national technical standards for new housing development that you would like to see addressed in City Plan Part 2?

Parking should be included in all developments.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

No HMOs should be limited through the policy and not protected.

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

Yes and the Article 4 Direction should be amended to require developers of illegal HMOs back to family homes (eg through requiring them to return them to the same number of bedrooms). In areas exceeding 10% of HMOs, policy should be introduced to help re-balance communities by encouraging the conversion of HMOs back to family homes (recognising that landlords get more rent from HMOs so the market will not lead to this happening on its own).

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Proactive enforcement on HMO conversions if there is a clear intention and the developer is one of the 'usual suspects' Naming and shaming developers who knowingly ignore Article 4 Direction knowing they can get away with it.

Are there any other housing issues?

H21: Can you think of any other policy issues that relate to new housing development (and are not already covered in the sections above) that you think City Plan Part Two should seek to address?

Designing communities where people talk to each other and make relationships with their neighbours to help take the burden of care off the council in the face of reducing budgets, increasing social and age separation and inequality. Introduce more robust policies to prioritise local need over London escapees / commuters and foreign investors.

A: Offices

E1: Are there additional sites/clusters of sites that could deliver a range of size and type of new office floorspace that you would like to be considered as office site allocations through the preparation of City Plan Part Two?

Yes

E2: How can we better support the delivery of office sites in the city?

Stop them being developed into residential use. Use redundant council buildings to be small business cheap office space.

E3: In light of the permitted development right (which allows offices to be converted to residential use) becoming permanent, should the council's office to residential Article 4 direction be expanded? Which other office clusters should be included?

The whole city should be covered.

B: Mixed Employment Areas and mixed use allocations

E4: Should the City Plan Part 2 seek to identify new mixed use site allocations and indicate a range of appropriate 'other' employment uses such as education and training uses and private healthcare uses alongside B1a office use?

No

E5: Are there any sites you are aware of that would be suitable for mixed use employment uses and that you would like to see considered for allocation through City Plan Part 2?

No

E6: Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

Yes

E7: Are there existing mixed employment areas that need a specific protection policy or is the approach set out in City Plan Part 1 at CP3.5 sufficient?

No

C: Industrial

E8: Are there any opportunities to identify and safeguard land/site for a new industrial estate in the city? If yes, where?

No

E9: Are there opportunities to intensify existing industrial estates to bring forward new industrial floorspace? If so, which estates?

Yes, but the rent needs to be cheap to encourage new manufacturing businesses to locate in the city.

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

Yes

E11: Are there any other opportunities to bring forward new industrial floorspace in the city?

The empty warehouses along the coast to the West

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

No

A: Transport, Air Quality and Health

TR1: Do you think there should be more detailed policy on transport/travel and air quality and noise issues or is Policy CP9 in Part 1 of the City Plan sufficient?

No, but buses should not all be routed through Churchill Square.

TR2: What issues could a more detailed policy include that are not already covered by Policy CP9?

Reducing transport time from the West of the city to the universities to spread students more widely across the city

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Traffic jams in the city have increased over the last few years. Any policy should be aimed at reducing traffic jams and not punishing drivers.

B: Transport Information requirements for New Development/Uses

TR5: Should policy require more clarity regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans?

Assessments, statements and plans don't mean anything as most people with cars will keep them and park them in surrounding roads if the development does not have parking spaces provided.

C: Active Travel

TR7: Is there a need for a new policy in City Plan Part 2 to set out how new development will assist in promoting and enabling more active travel? Or, is this better delivered through new planning guidance (SPD or Planning Advice Note)?

No

TR8: Is there already sufficient policy on active travel through existing policy including CP9 Sustainable Transport, healthy city policy (CP18), developer contributions/CIL policy (CP7) and guidance (Developer Contributions Technical Guidance)?

Yes

TR9: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. cycling, walking, better public realm, improved air quality and noise levels, sustainable transport?

No

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

No

TR11: Should Shopmobility be incorporated into a new policy focused on equality/mobility accessibility for disabled people or public realm/developer contributions policy?

No

TR12: Should the amount or content of existing policies be reduced and these matters addressed through planning guidance?

Yes

E: Sustainable Transport Site Allocations

TR13: Are there any site allocations required in City Plan Part Two that would be suitable to provide the sustainable transport facilities described above? If yes, can you explain why they are required both in terms of city priorities and any evidence of need?

Yes

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

The city should stop persecuting drivers and should make the buses cheaper to encourage people to use them.

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

This question is written in jargon and is not understandable to anyone who is a non-expert.

B2: If you think a policy is needed, what types of development should be included?

See B1

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes

B: Nature Conservation, Geodiversity and Landscape Sites:

B4: How should the City Plan Part Two set out criteria-based policies to distinguish between the hierarchy of different nature conservation designations? For example, could a single policy establish appropriate criteria relative to a hierarchy of designations? Please indicate what you think would be appropriate criteria.

See B1. The phrase 'criteria relative to a hierarchy of designations' is just waffly council-speak and so I can't answer as I don't understand the question.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes

B6: Should the City Plan Part Two update the locally designated SNCIs in accordance with the 2013 SNCI technical review and rename them Local Wildlife Sites?

Yes

B7: Are there any other sites or features that should be included or specifically addressed through planning policy? (e.g. Ancient woodland, aged/veteran trees, local geological/geodiversity sites?)

Alotments should be protected from development because of their biodiversity value and they should be managed in such a way to encourage biodiversity.

C: Open Space, Local Green Space and Gateways to the National Park:

B8: Are there sites/spaces that you feel should be allocated as new open space? If yes, please indicate the site, its current use and the type of open space you feel it should form. Suggestions regarding alternative methods for securing, managing and maintaining are also welcome.

?

B9: Are there any green spaces that you think should be designated as a 'Local Green Space'? (Please provide clear location details and how the space meets the NPPF criteria outlined above (e.g. why it is special and of local significance).

?

B10: Do you consider the following green spaces . Hollingbury Park should be designated Local Green Spaces?

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes Hollingbury Park should be part of the National Park

A: Polluted Land and Buildings

P1: Are there any planning issues that you consider a Polluted Land and Buildings policy should address?

No

B: Land Stability

P2: Should the City Plan Part Two include a development management policy regarding unstable land or is this sufficiently addressed by national planning policy guidance and through Building Regulations?

No

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

One policy

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

?

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

Yes, and manage farms owned by the council for biodiversity and food growing.

P6: Is a detailed policy still required to address the location or storage of hazardous substances or is there sufficient national policy and guidance?

?

P7: Are there other pollution issues that the City Plan should address?

The city streets should be cleaned more regularly.

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

No

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Yes, including preventing building houses in their gardens to maintain local drainage.

F: Coastal/ Marine Planning

P10: Is there sufficient policy guidance in the City Plan Part 1 (in terms of the need to protect and enhance the marine environment) to assess planning applications that come forward on the seafront?

Yes

P11: Is there a need for further policy guidance to ensure adequate and maintained coastal defences and to ensure that development in the coastal zone takes account of the particular conditions experienced within the area?

No

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

Yes

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Yes

P14: Are there any types of energy that should be particularly supported e.g. community energy or particular technologies?

Anaerobic Digestion and district heating

P15: Having regard to the findings of the Renewable and Sustainable Energy Study 2012 should City Plan Part 2 seek to identify and allocate sites for renewable and low carbon energy generation, storage or networks?

Yes, especially anaerobic digestion and district heating

P16: If yes, what sites should be investigated for energy uses? (taking into account the areas with opportunity indicated in the 2012 Renewable and Sustainable Energy Study)

Yes, especially anaerobic digestion and district heating

P17: Should a renewable energy policy be explored for City Plan Part 2?

Yes

P18: What factors should be considered when exploring this approach?

Anything that increases capacity

P19: Should the City Plan Part 1 policy CP8 be supplemented with further clarification/policy in support of district heating? Or, could this best be dealt with in a supplementary planning document?

Yes

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

Yes

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

Planning requirements on sustainability should cover extensions and permitted development as well as new development

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Yes

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

Yes

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

Toads Hole Valley

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Yes

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

Transport - need to create bus routes from Hove and other places that go out onto A27 for a quick route to Falmer rather than going through the city centre.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

Purpose built is better than students living in family homes converted to HMOs so it should be encouraged.

SH7: Are there any other issues regarding student accommodation that would like to see addressed in City Plan Part 2?

Amend Article 4 Direction on HMOs to force developers to convert back to original number of bedrooms if illegally converted. Proactive enforcement if there is a clear intention to convert a family home to a HMO BEFORE students move in. Charge landlords for waste management.

Traveller Accomodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

Whatever works to persuade them not to occupy parks.

TA2: Should new site provision be public site provision, or private or both?

Whatever works to persuade them not to occupy parks.

TA3: Should future pitch requirements for Traveller Accommodation be addressed through City Plan Part 2 or would this matter be better addressed through a separate Development Plan Document?

Whatever works to persuade them not to occupy parks.

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

The way that travellers behave in the parks is not fair or acceptable and the current approach is not working. The council needs to do more to prevent travellers occupying parks and if that means investing in new sites, then that should be done.

Please indicate which topic or topics you would like to comment on?

- . 1. Biodiversity, Flora and Fauna
- . 2. Water Quality and Resources
- . 3. Soil, Waste and Land Resources
- . 4. Air Quality and Transportation
- . 5. Climatic Factors and Flooding
- . 6. Cultural Heritage, Landscape and Open Space
- . 7. Population, Human Health & Inequalities
- . 8. Housing & Community
- . 9. Local Economy, Employment, Skills and Education

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? No

Q3b.

If 'No' please provide details

More needed on energy efficiency

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new “Decision Making Criteria” have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new “Decision Making Criteria” have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new “Decision Making Criteria” have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new "Decision Making Criteria" have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations? Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies? Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations? Don't know / not sure

Q6b.

If 'No' please suggest changes

There are too many questions in the sustainability section and they all require the consultee to read other documents. It would have been good to include some questions on things that average people could answer on what they think are important

Context Review and Appendix A

Q1a. Are there any other documents that should be referred to as part of the Context Review? Don't know / not sure

Baseline Data, Indicators and Appendix B

Q2a. Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes? Don't Know / not sure

Sustainability Issues

Q3a. Does the Sustainability Issues section adequately address the main issues? Don't know / not sure

SA Framework (1)

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new “Decision Making Criteria” have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q4a. Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations?

Don't know / not sure

SA Framework (2)

Q5a. Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

Don't know / not sure

SA Framework (3)

Q6a. Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

Don't know / not sure

Please let us know if there are any other issues you would like us to consider for the City Plan Part Two?

The council needs to strenghten enforcement on illegal HMOs to maintain a mix of families and students.

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	193
Response Date	22/09/16 13:09
Status	Submitted
Submission Type	Web
Version	0.1

Which section do you want to make comments on?

- . Tourism
- . Heritage

A: The Seafront

T1: Are there any further seafront development sites, in particular in the area East of Palace Pier to Brighton Marina, that need to be allocated?

I say no to that new swimming pool. Not needed or wanted. We have Saltean Lido

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

B10: Do you consider the following green spaces should be designated Local Green Spaces?

HR13: Are there any specific sites that have such great potential to enhance a conservation area that they warrant a specific heritage policy?

Saltean Lido

Please indicate which topic or topics you would like to comment on?

Comments For The City Plan Part Two.

I feel compelled to express my feelings, in due respect, of the lack of understanding from the officers in charge of compiling the forthcoming policies in relation to the issues surrounding the density of HMO's in the Ward of Moulsecoomb & Bevendean.

It became apparent very early on that residents living, working, paying taxes etc, people that have lived here all their lives; have very little significance or ultimate say in what is being proposed as the consultation has arguably reached a minority of the residents within the ward.

I have and my family have lived in Brighton all my life over fifty years, the early years spent in Bear Road, attending Coombe Road School and St Albans Church. The whole area was an affordable thriving community; the school at that time was renowned for its choir. Giving regular choir concerts in the Church of St Alban and at Bevendean Hospital. The area was safe, people knew each other, helped each other, you could walk down every road and know who the residents were.

The Preston Barrack site was the pride of Lewes Road you knew spring was on its way when the cherry blossom frontage of the building was in full bloom. On Armistice from the site; the parade proudly marched to the Old Steine. That building has been left to slowly erode over the years, until it (what a surprise had been taken over by the universities) I personally thought that site would have made a wonderful children's hospice, when there were desperate calls for a site to be found some ten years ago.

The past twenty years has seen this once thriving community being eroded away; and the schools of Bevendean & Coombe Road struggling with numbers, the Churches closing, loss of shops, doctors surgery's and amenities, leading to a fundamental loss of community. The family houses that had been once 'loved' deteriorating; gardens that had been lovingly tended to becoming a designated rubbish area. This started in the Coombe Road area and spread rapidly to Bevendean and surrounding areas. With the same detrimental effect.

I think that two or three public meetings should have been held especially for the residents of East Brighton, views should have been sought from more of the population of these areas: Door to door surveys or something of that nature. Please revisit your policies and take into consideration that this area is now at student saturation point.

This is so important for the future of this ward, I urge to the officers making these policies and amendments to reconsider their stance of the value of the universities and students and value the longstanding residents and community anchors who also add value to the city and of these once 'much loved' communities.

September 21st 2016

Comment

Event Name	City Plan Part Two - Scoping Paper
Comment ID	195
Response Date	03/09/16 16:06
Status	Processed
Submission Type	Web
Version	0.1

Which section do you want to make comments on?	<ul style="list-style-type: none"> . Housing . Economy & Employment . Retail and town centre uses . Tourism . Transport and Travel . Biodiversity and Open Spaces . Addressing pollution, water and energy resources . Design . Heritage . Community facilities . Student accommodation . Traveller accommodation . Sustainability Appraisal Scoping Report . Call for sites . General comment
---	---

C: Making full and effective use of sites

H7: Should City Plan Part Two introduce additional policy to ensure that new development maximises site potential (subject to appropriate criteria) and avoids the under-development of housing sites? If so, what might be appropriate planning considerations to include in such a policy?

No. This will be exploited to create high rise 2 bedroom unaffordable investment flats.

D: Housing for key groups in the city

H8: Should City Plan Part 2 include development management policies which seek to address the accommodation needs of particular groups within the city's communities? For example, policies to specifically address and support housing options for older people; for families and for people with specialist housing needs?

Yes. All new developments should be able to accommodate members of the entire community (not students), subject to rules about noise and anti social behaviour. No ghettos.

H9: Is it appropriate for site allocations in City Plan Part 2 to specifically seek to address different housing needs? For example, would it be appropriate for some sites to be identified for older person's

housing or for family housing or for specialist needs housing? Or, should this be left to the market to decide?

If by 'the market' you mean developers, then of course the council must address. They won't. Why can't these groups be accommodated together?

H10: Should policies and/or site allocations specify that development sites should also make provision for self-build plots and custom build housing?

Not unless it's an affordable and sustainable option that won't create extra disturbances for neighbours.

E: Retaining housing

H11: Should policies in City Plan Part 2 resist the loss of housing from within the existing housing stock?

Yes, but some common sense required, the loss of some ramshackle unmaintained studio flats owned by absent landlords in return for a decent local business premises isn't necessarily always a bad thing.

H12: Are there any particular types of housing which you think should be protected e.g. self-contained dwellings (flats and houses), family homes and residential accommodation for those with various support needs ?

Family homes and residential. Affordable homes.

F: Private outdoor amenity space in new housing development

H13: Should housing policies in City Plan Part 2 include a requirement for the provision of appropriate outdoor private amenity space?

Depends. Case by case.

H16: Should City Plan Part 2 seek to introduce the higher optional technical standards for 'access and adaptability' in new housing and an appropriate proportion of wheelchair user dwellings?

Yes.

H: Houses in Multiple Occupation (HMOs)

H18: Should the City Plan Part 2 include a policy that seeks to protect existing HMOs? Or, should the loss of HMOs be a matter left to the market?

Why do they need protecting?

H19: Should the City Plan Part 2 seek to include a policy that encourages the conversion of existing HMOs to family-sized dwellings?

If people can afford to buy and convert they will. If the policy involves encouraging landlords by rewarding them then no. They make enough money.

H20: Are there any other ways that the negative impacts associated with concentrations of HMOs could be further mitigated through planning policy?

Enforce the rules on noise and anti social behaviour CITY wide, including rubbish for all householders. Nothing is ever done.

E2: How can we better support the delivery of office sites in the city?

We seem to have two choices. Massive shiny expensive blocks, unsuitable for anything that deviates from standard admin or ramshackle shared spaces, mostly all owned by a select few, where one can rent the minimum space. Affordable spaces for suitable for creative industries, music, makers, engineers who do not fit on a noisy / dirty / traditional industrial estate are few and far between.

E6: Is there a need for a specific policy to promote/ guide the provision of specific types of employment building types such as managed starter units, live/work or co-working space, and creative industries workspace or is there sufficient guidance in the City Plan Part 1 at CP2?

Creative industries (not digital as that requires generally just office space)

E10: Should the council consider introducing an Article 4 direction to protect strategic industrial estates and business parks from the new permitted development rights to residential use?

Yes.

Are there any other employment issues?

E12: Can you think of any other policy issues that relate to employment (not already covered in the sections above) that you think City Plan Part Two should seek to address?

There is a massive gap between small spaces and large workspaces. That makes the difference between micro and SME companies expanding and creating jobs or having to stick with the freelancer / contractor model as these people do not require space in workplace. This is fine for short term but doesn't build sustainable future for employers or employees. Freelancers (talking about young people starting out, NOT better off people who've decided to quit the day job and scale down the hours because they can afford to) often don't get mortgages or work references to rent or buy property.

D: Local Centres and Parades

R9: Is there a need for a separate policy for assessing changes of use in local centres and parades?

We don't need any more betting shops.

F: Individual Shops and Small Clusters of Shops outside Protected shopping centres and parades

R13: Given changes to the GDPO, is there a need for policy to protect shops and parades outside of existing centres? Should the City Plan Part 2 include a policy that covers larger shops over the 150sqm threshold of the GDPO?

Yes.

H: Markets

R15: What are the key criteria that should be taken into account when assessing proposals for additional permanent markets?

Preference of the immediate neighbouring community.

I: Are there any other retail issues?

R17: Are there any other retail and town centre issues that should be addressed through City Plan Part 2?

Obligations to keep clear pavements. Some parts of town almost impassable in summer. Obligations to keep to reasonable levels of noise and disruption (building works etc).

B: Visitor Accommodation

T3: Should further need for hotel accommodation be identified, how best should this be accommodated within the Central Brighton area?

It shouldn't.

Are there any other issues relating to tourism?

T4: Do you have any other issues for this topic area to consider?

Check Air BNB. A large amount of Brighton listings are people who say they are managing the property 'in partnership' with hotels. Sometimes 5 or 6 flats all 'owned' by the same person. It's companies using property as commercial accommodation, making a mockery of any intentions you have of increasing permanent housing stock and enjoying the profits without any of the restrictions or fire regulations.

TR3: If you consider a more detailed policy is the best option, what might be your preferred approach, for example:

An Holistic approach – a single policy combining health, safety, air quality and noise priorities relating to transport and travel in the city that may combine zones and criteria.

TR4: Is there scope for a general transport mitigation policy in the City Plan Part 2 linked to developer contributions/CIL to cover a number of issues, e.g. improved air quality, reduced noise, cycling, walking, better public realm, sustainable transport?

Yes. Don't assume we are all able / willing to cycle. Walking requires pavements not covered in signs and scaffolding, lighting, and the presence of a policeman occasionally or indeed any form of crack down on aggressive begging and anti social behaviour would encourage more people to walk or use buses.

D: Increasing Equality, Mobility and Accessibility

TR10: Should there be a new transport/travel policy that is focused on equality/mobility accessibility in Part 2 of the City Plan? Or, can this be addressed by a wider/general policy on public realm and/or developer contributions/CIL that address priorities for disabled people and other important matters?

Wider.

TR14: Should the solution to providing site specific transport facilities for Brighton & Hove involve looking across the wider city region (beyond the boundary of Brighton & Hove)?

Yes.

F: Are there any other issues relating to transport/travel issues?

TR15: Are there any other transport / travel matters that should be addressed through a policy in Part Two of the City Plan?

Transport, both in and out of the city and for residents with the city needs to be considered and confirmed adequate or extras paid for as part of large event planning permissions.

A: Landscape Scale Approach

B1: Should the City Plan Part Two provide a policy to guide the types of development that may be appropriate within the NIA or is this appropriately addressed within policies CP10 and CP16 in Part One of the plan?

Yes it should.

B2: If you think a policy is needed, what types of development should be included?

I'd rather not see any, but I'd prefer clear guidance that won't be abused.

B3: Should the City Plan Part Two include a Green Infrastructure landscape scale approach that reflects the joint work led by the South Downs National Park Authority with other authorities?

Yes.

B5: Should there be a specific policy to address the general protection and enhancement of species?

Yes.

B10: Do you consider the following green spaces should be designated Local Green Spaces?

- . Benfield Valley
- . Three Cornered Copse
- . Ladies' Mile Open Space
- . Hollingbury Park

B11: Should the City Plan Part Two identify and promote the sites listed above as gateways to the South Downs National Park?

Yes.

D: Are there any other biodiversity and open space issues?

B12: Can you think of any other policy issues that relate to the natural environment (not already covered in the sections above or topic areas) that you think City Plan Part Two should seek to address?

The beach. Most beaches are a haven for wildlife rather than a large dustbin.

C: Pollution and Nuisance Control

P3: Should the City Plan Part Two address air, land, and water pollution control and noise nuisance issues separately or in one combined policy?

Combined / holistic.

P4: How can the City Plan Part Two support the South Downs National Parks Dark Skies Initiative?

Look at intelligent lighting solutions.

P5: Is it necessary to have a detailed policy to protect the quality and potential yield of water resources to guide all future new development?

Yes.

P7: Are there other pollution issues that the City Plan should address?

Noise. There are few protections, especially for tenants of older buildings who have no sound proofing or double glazing, cannot request it and cannot replace noisy white goods. The option to call the council at 2am on a Friday or Saturday only if neighbours / holidaymakers / holiday lets are partying and then wait in pyjamas for a visit is not a useful solution for most people. Add to this continuous scaffolding (often from 7.30am 6 days a week) / all day building works / gangs of screaming drunks. We all assume that we are in a city and have to suffer 24 hour noise pollution, but we shouldn't.

D. Water and Waste Water Infrastructure

P8: Is it necessary to have a detailed policy to support the provision of water and wastewater infrastructure and co-ordinates development with its provision?

Yes.

E: Sustainable Drainage

P9: Given the existing national guidance and approach, is it necessary to have an updated policy on sustainable drainage in the City Plan Part Two?

Only if it doesn't include building conversions / increase in occupancy / commercial holiday lets as well as new build.

P12: Is there a need for further policy regarding the presumption against encroachment onto the shingle beach?

No.

G: Low carbon and renewable energy

P13: Should City Plan Part 2 include further policy to incentivise delivery of low carbon and renewable energy?

Yes.

P20: Should targets for energy efficiency be explored for City Plan Part 2 for smaller developments and those in existing buildings?

Landlords will not pay for insulation etc. Most tenants cannot afford and as they are generally in short term lets with no security, why should they? The majority of rented accommodation is in urgent need of insulation and decent modern heating and plumbing. This could save so much power and water.

H: Are there any other issues that relate to this topic area?

P21: Are there other pollution, water resource or low carbon and renewable energy matters that you think City Plan Part 2 should seek to address?

Generally, the transient nature of a large proportion of central Brighton residents and the lack of interest in anything except their monetary yield of landlords means that both groups care little about pollution, recycling or conservation. Why not try and address this first?

A: Place Making

D1: Should City Plan Part Two include a Place Making Policy that complements those set out in City Plan Part One by focusing on the assessment of proposals on a street/site scale?

Yes.

D2: Should the Place Making Policy seek to incorporate guidance on new and emerging design issues such as expert review and integrated infrastructure design?

Yes.

D: Are there any other design issues?

D9: Can you think of any other policy issues that relate to the design of new development (not already covered in the sections above) that you think City Plan Part Two should seek to address?

Future issues of anti social behaviour to existing community caused by intent to short term let without local management or rent as commercial holiday let.

A: Policies for different types and groups of Heritage Asset

HR1: Should there be a specific policy for each type of heritage asset? (e.g. listed buildings, conservation areas, archaeological sites etc.) If not, what other approach could be taken?

Yes

HR2: What are the key local heritage issues with long term implications that need to be addressed in the Part 2 policies?

Dilapidation and lack of maintenance of listed buildings, see recent balcony incidents.

Evidence and Understanding

HR5: What are the gaps in our knowledge and understanding of the heritage of Brighton & Hove?

I expect many know nothing of it unless it's covered as a school project. The majority of tourists, students and contract workers you encourage to the area don't seem to be informed or encouraged to take an interest either.

HR6: How could policy accommodate and overcome those gaps in knowledge? Is current national policy sufficient?

Clearly not.

HR7: What are the particular factors in Brighton & Hove that may be especially relevant to the setting of heritage assets?

Views. To and from the sea views. Upkeep of surrounding areas. Getting people to care. This means creating communities.

Local pressures and vulnerabilities

HR8: Is there a need for a policy on 'Heritage at Risk' or is policy CP15 in City Plan Part 1 adequate in this respect?

Yes.

HR9: What are the greatest threats to the special appearance and character of the city's Conservation Areas and how can policy in City Plan Part 2 address these threats?

Landlords lack of interest in sympathetic conversions. Lack of checks on standards / quality of work or even standards of accommodation. Tenants in longer term more secure contracts could play a huge part in helping maintain these buildings with support.

HR10: Is there a need for specific policy on energy efficiency and flood protection measures as they may impact on heritage assets?

My rented flat in a listed building is currently leaking in 3 rooms and has large cracks in the walls. It gets patched up because actual repair work costs money and landlords won't pay. Eventually this building and hundreds like it will fall down. Which in a way I suppose will solve your problems.

Opportunities for enhancement

HR11: Should there be specific design policy for historic areas and heritage settings or could this be covered within city-wide design policy?

There should be specifics for distinctive areas.

HR12: What is key to the local distinctiveness of Brighton & Hove's historic areas and how should this be promoted or reinforced through policy?

Additions must be sympathetic, in style and height, and colour.

CF3: What are the key issues for assessing development proposals for new community facilities? Should policy seek new community uses to meet a variety of community needs?

Policy should ask the existing community what is required plus assess development on case by case basis, eg. will it be 50 x 1 bedroom flats? These tenants probably won't be around to use a children's playground but they will require a GP surgery and a way to get to the shops. Not necessarily on bicycles. Force developers to take some responsibility for creating real communities with developments for a variety of people, old, young, families, single. Schools, shops, public transport and safe green spaces. Don't allow developers to choose what they throw in to get planning permission.

CF4: Are there any types of community facility that due to their particular nature might warrant a separate/unique policy?

Pubs and clubs.

Student Housing

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

Only if on / near campus and taken into account as available for tourist accommodation during holidays (so less need for extra hotel rooms). The purpose built student accommodation in places like Kings College London serves both purposes excellently and is a great source of reasonably priced rooms for tourists. They also provide security and an element of control of anti social behaviour, something that could be welcomed here, for student tenants and their neighbours.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No, it should seek to deter landlords from unsuitable areas though.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

No. Unless it could be done on a small scale with greater community involvement and actual penalties for anti social behaviour.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

Students and universities seem to encourage a student experience based on the quality of nightlife and want to take no responsibility for problems with noise, rubbish, relationships with neighbours and building relationships with existing communities. If they could, it would be wonderful to be more integrated. If residents had any recourse whatsoever (that didn't take 12 months) for problem neighbours, they would be much keener. Perhaps priority for mature students and those with families to the outside areas. Lots of non students would be very glad to be nearer to and have a chance to benefit from academic facilities like events spaces and sports pitches. Perhaps these could be shared across a wider area also so that both parties gain from the deal. And there is no reason why students shouldn't commute. Everyone else has to.

Traveller Accommodation

TA1: Is it better to try and make traveller site provision for smaller individual family-sized sites (e.g. 3-5 pitches) or larger sites (e.g. 10-15 pitches) that can accommodate a number of families?

I'd ask them. If they won't use the existing facilities at least find out what they will use.

Are there any other issues relating to Traveller accommodation?

TA4: Are there any other issues regarding Traveller Accommodation that you would like to see addressed?

It's fine to provide accommodation, but the other side of that is to swiftly move them away from illegal sites. Can't have it both ways.

Please indicate which topic or topics you would like to comment on?

- . 1. Biodiversity, Flora and Fauna
- . 2. Water Quality and Resources
- . 3. Soil, Waste and Land Resources
- . 4. Air Quality and Transportation
- . 5. Climatic Factors and Flooding
- . 6. Cultural Heritage, Landscape and Open Space
- . 7. Population, Human Health & Inequalities
- . 8. Housing & Community
- . 9. Local Economy, Employment, Skills and Education

August 31, 2016

Planning and Policy Team

Brighton and Hove City Council

Town Hall

Grand Avenue, Brighton

Dear Sir/Madam: I am responding to the plans posted online of proposed future residential developments in the Brighton area, and specifically for site 32a at the top of Bear Road and to a lesser extent 32. I grew up at 11 Bellevue Cottages, where my Father still resides, and own 8 Bellevue Cottages. I believe this row of 11 Cottages, developed by the Head of the then new Brighton General Workhouse, using similar building materials, not long after the Work house opened in 1866, are a uniquely unspoilt street, with unmade road, no street lights and original form of the workers' cottages intact. They deserve consideration as a designated historic site. The houses have never received any such interest or attention in the past, and very often ignored completely, as when the slip road connecting Bear Road with Warren Road and used by residents when driving, was closed without notice by the council with gates erected at each end (maintenance having ceased some years before that).

The proposed new build homes at the rear of the street will have a major impact on Belle Vue Cottages, as the new homes would be immediately behind half of them. There would be a major increase in light pollution, where the current street emits almost none. The new homes would be viewed from many locations including the hills all around the valley of Bevendean and from the Warren Road approach to Race Hill. They would vastly change the character of the area from that of semi-rural to developed hill top. There is no amount of careful landscaping that can hide the addition of these homes, viewable from many miles around.

My uncle, George A. Hillman, used to operate Windmill Farm that covered the whole hill from Reservoir down into Bevendean, with land under lease from Brighton Council, until that lease was terminated in 1960. At that time it was made known by the council that they wanted the land kept in an open state with no buildings, and he had to demolish many stone and wood farm buildings that had been erected in the previous 60+ years that he and his Father George H. Hillman leased the land. When they vacated the land, there were no buildings of any type

north of the northern wall that runs at the end of the Water Reservoir. The few buildings south of that line were a corrugated group of huts for a saw mill and the small riding stable at the front paddock with a few stables. In the last 20 years, there has been a huge expansion of metal barns both north and south of this line, to the point where the whole rear landscape behind 11 Bellevue Cottages, until recent years an open field, is now covered with huge metal buildings (see photo from rear of house). People also reside in a trailer home on the site; likely unauthorized. A number of letters were written to various planning and permitting offices of the council, who owned the land, in the early 2000's by my sister (copies enclosed), with no action taken to stop or remove the buildings, except to seemingly acknowledge it was not permitted. These unsightly buildings, so overwhelming, when walking up the rural track from Bevendean, and when driving/walking from Woodingdean on Warren Road, though more rural in nature than residential homes would be, have been allowed to developed with no thought or apparent oversight, spoiling the open views of the hilltop. All within recent years.

One of the implied reasons that residential development would not have much impact under the proposed plan, is that there are already buildings on the site. This is historically inaccurate, as any aerial photograph of the land from the 1970's or even later will prove that the land was open and had a more rural view. The council has allowed its tenants to change the rural view without oversight and now uses this change to go further and recommend building homes on what should be preserved as open hilltop land.

Rather than building homes at this site, I believe the nature reserve, now in place to the north of the site, should be extended into the whole of 32A site, with the removal of all buildings north of the boundary wall of the reservoir. The smaller stable paddock and stables could remain at the Bear Road side of the property. There must be many other sites other than the Brighton Racecourse area in which more homes can be built, and the Council needs to focus on building in valleys, rather than 32A, 32 or other sites on this important and open stretch of hill tops, that are so visible for miles around from other points of the City.

Yours sincerely,

Planning Policy Team
Brighton and Hove City Council
planningpolicy@brighton-hove.gov.uk

J Austin
Brighton
East Sussex

22 September 2016

Dear Sirs,

City Plan Part Two Scoping Paper - Consultation

I am writing in response to the current consultation on the City Plan Part Two Scoping Paper, and would like to thank you for the opportunity to provide comments.

Having reviewed the Scoping document and its contents, I wish to provide general comment upon the housing chapter, specifically in relation to consultation questions H1, in relation to Brownfield Sites; and H2, the 'range of considerations' which have been used, to date within the 2014 and subsequent 2015 Urban Fringe Assessment studies.

It is acknowledge that there is a need within the City to provide additional housing numbers. The National Planning Policy Framework (NPPF) identifies 12 core planning principles. Point 8 of the principles states:

“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”

As indicated in Question H1, I support the allocation of suitable brownfield sites through the City Plan Part Two is in general conformity of the NPPF, and believe that this should be carried out pro-actively to ensure that all brownfield sites are considered to provide an increased density of development given the need for new housing within the city. The promotion and allocation of such sites, would potentially remove the requirement for development on the identified fringe sites, other than then larger strategic parcels of land within the urban fringe which have been identified.

As such I am in general support of this approach.

Turning to question H2, the 2014, and subsequent 2015 Urban Fringe Assessment studies were carried out in response to the Inspectors initial comments relating to the City Plan Part 1, whereby she instructed the Local Planning Authority to “look down every rabbit hole” in an attempt to locate new sites for sustainable housing.

The studies identified 5 broad areas of constraint, these being, open space, landscape, heritage, ecology, and environmental considerations. The sites identified have been assessed on this criteria.

I believe that limited weight should be afforded to the studies. The allocation of these site should undergo a more rigorous assessment, and public consultation prior to their allocation. Further studies which should be carried out prior to allocation should include, highways impact, infrastructure capacity, and a sustainability appraisal of a site in comparison to alternative sites.

The highways assessment should consider such issues as, existing road capacity, potential access arrangements, highways safety, on street parking, and proximity to local modes of sustainable transport.

An existing infrastructure survey should be carried out to indicate if there is sufficient capacity within the existing public utilities and services for the allocation. These should include, mains water and sewerage, gas, electricity and broadband services. This is essential as increased housing numbers will impact upon the existing public utilities and services provided, as well as many of the sites are by definition 'urban fringe' sites whereby it may be difficult or financially prohibitive to provide such services.

Coupled with a survey of existing infrastructure an assessment of the overall sustainability of the site should be undertaken having regard to alternative sites against the three limbs of sustainability as identified within the NPPF; economic, social and environmental. Only then should a site be allocated.

In conclusion I am supportive of the allocation of suitable brownfield sites through the City Plan Part Two, as detailed in H1 but this should be carried out pro-actively providing increased densities given the need for new housing within the city, and reducing overall reliance upon sites within the 'urban fringe'.

In relation to question H2 additional factors should be considered and the sites subject to public consultation prior to their allocation. These should include highways impact, infrastructure capacity, and a sustainability appraisal of the site in comparison to alternative sites. Full consideration of these issues would identify if these site are appropriate for allocation in the emerging City Plan Part Two.

I would like to be kept informed of the next stages of public consultation and would be keen to provide additional input into the formulation of the City Plan Part Two.

Yours Sincerely