

- The City Plan Part Two has been submitted for independent examination Y
- The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two Y
- The adoption of the City Plan Part Two Y

Please be aware that due to the process of having an Independent Examination, any information and/or responses made are not confidential. This means we need your name, or organisation name, so that the comments can be made available for the public inspection. Once your comments have been logged, all names, company names and associated comments submitted as part of the formal consultation process will be made available to view in due course on the council's website.

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[PINS Privacy Statement \(June 2019\)](#)

- I have read the PINS privacy statement above Y

Yours sincerely,

Planning Policy Team
Brighton & Hove City Council

E: planningpolicy@brighton-hove.gov.uk

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Subject: RE: City Plan Part Two (CPP2) Update

This email originates from outside of Brighton & Hove City Council. Please think carefully before opening attachments or clicking on links.

Dear Sir/Madam,

Thank you for consulting us on the City Plan Part 2. I have the following comments in bold below (relevant CPP2 text is included to provide context for my comments):

DM31 Archaeological Interest

Where the council has reason to believe, either from the archaeological assessment or from other evidence sources, that significant archaeological remains may exist, a suitable field evaluation and/or survey (e.g. for standing buildings and structures) will be required **pre-determination. [suggested additional text in red]**

2.239 The known areas of archaeological interest within Brighton & Hove are included within the Historic Environment Record (HER) as Archaeological Notification Areas (ANAs). **The identification of ANAs is a dynamic process that changes over time as new evidence comes to light and it is therefore important to check the HER for the latest areas.** Some heritage assets within ANAs, or even outside, might on further detailed investigation merit designation as a Scheduled Monument. **[the CPP2 West Area, Central Area and East Area maps that accompany the draft update include ANA data that is at least 2 years out of date so does not accurately reflect the current ANAs (there have been deletions and additions). I have recently submitted updated heritage mapping to BHCC and usually aim to do so at least once a year. I recommend that up-to-date GIS mapping is requested via [REDACTED] prior to issuing the next draft and/or final version of the CPP2. Up-to-date ANA mapping is publicly accessible via <https://escs.maps.arcgis.com/apps/webappviewer/index.html?> and it may be helpful to include this link in the CPP2, although this link is included on the BHCC website (<https://www.brighton-hove.gov.uk/content/planning/heritage/archaeology-heritage>).**

I hope this is helpful. Should you have any queries please do not hesitate to contact me.

Kind regards,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

eastsussex.gov.uk

Please note that members of the Archaeology Team are currently being deployed part time to other departments within ESCC and you may therefore experience longer response times. Thank you for your patience.

<https://www.eastsussex.gov.uk/community/emergencyplanningandcommunitysafety/coronavirus/>



Dear Planners & Councillors,

After discussions with local residents in Goldsmid, Hove Gold, is very concerned about how CPP2 affects the future of SSA3. While the area is ripe for sustainable redevelopment, locals feel that approved plans and forthcoming applications are a gross overdevelopment, in an unsustainable and uncharacteristic way. The amendments to CPP2 regarding Tall Buildings shows an unsuitable vision, anything above 6 storeys isn't suitable for this area and is completely out of character with the design principles that make Hove, Hove.

As you can see from the comments below, the sheer number of residential units (already at 150% recommendation) will create an enormously high population density, with little provision for amenities or infrastructure. Hove Gold would cite the applications on Lyon Close/Davigdor Rd which have not broken ground yet, and hope we can learn from the 'test case' of Artisan which has had issues with S106, selling to a Housing Association, and not even being fully occupied after 2 years.

With reference to SSA3:

- **CPP2:** Minimum of 300 residential units
 - **Comment:** There are 333 already built or approved, with a total pipeline of 478! HoveGold considers this massive overdevelopment with no need to continue this trend.
- **CPP2:** Proposals for tall buildings above 6 storeys
 - **Comment:** This area is not suitable for buildings over 6 storeys, so we strongly advise capping the size of buildings at 6 storeys maximum.
 - Approved applications are too tall already, and have been met with disapproval from locals with non, or borderline, compliance with BRE daylight and sunlight guidelines, light pollution, overlooking etc., in many cases
- **CPP2:** A co-ordinated master-plan approach
 - **Comment:** None of the recent applications have taken a wider view of the SSA3 area in context. Plans are approved 'stand alone' by the Committee*, however all

reference previously approved tower blocks (like P&H etc). That's why SSA3 is becoming so uncoordinated. (*the Chair of Planning specifically directed the committee members to only consider the Lyons Close development as a stand alone application and not in the wider context)

- **CPP2:** "Design Principles" for SSA3, created with the support of Design South East.
 - **Comment:** This workshop has a vision to stack em high, sell em cheap. Approved buildings have been high but expensive; resulting in hard to sell, unwanted flats and empty building sites. The Design Principles document is clearly unsuitable and should be revisited with consultation from the public.
- **CPP2:** Requirement for a high standard of design and amenity and a "coherent town-scape"
 - **Comment:** Recent plans have had very poor architectural design, and will create a canyon effect along Davigdor Road and within the development area.
 - Creation of additional office space has been approved, immediately after the approval of conversion of office space to residential space! This makes no sense
 - New buildings have little or no sympathy to existing Goldsmid architecture.
 - The 'Design Principles' document does not provide a vision for a coherent townscape, only highrise infill.
- **CPP2:** A mixture of dwelling type, tenure and size
 - **Comment:** the target for 40% affordable housing is almost always missed in applications and offset with S106/CIL
 - Not enough family housing is provided (usually high density 1-2 bedroom flats with no gardens)- proven to be unsuitable during COVID

Hove Gold approve of some of the recommendations (master-plan approach, coherent town-scape etc) but as this has not been historically achieved, we request an amendment on how it will be formally guaranteed during the application process?

We implore that before CPP2 is formally adopted, it is amended to take a lower impact approach to SSA3, with a maximum height of 6 storeys, reduced massing and family housing to help contain the unsustainable

impact on the local area.

Yours faithfully,

Hove Gold

www.hovegold.com

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28 October 2020

Proposed Submission CPP2
planningpolicy@brighton-hove.gov.uk
Sent by email only

Dear Sir/Madam

Subject: SDNPA response to Brighton & Hove Proposed Submission City Plan Part Two consultation (Regulation 19)

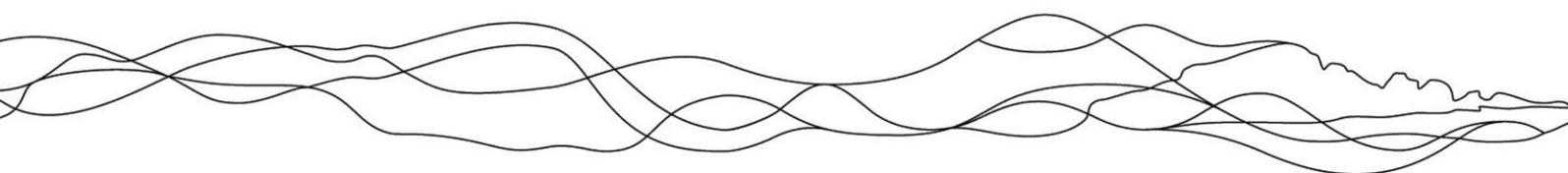
Thank you for consulting the South Downs National Park Authority (SDNPA) on your emerging Local Plan. We have a number of comments we would like to make that follow on from the response sent on the Draft City Plan Part Two July 2018 consultation. Thank you for the changes that have been made to policies and supporting text as a result of comments made by SDNPA at that previous consultation.

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.'

Duty to Cooperate

As set out in our previous response, the SDNPA has a set of six strategic cross-boundary priorities. I would like to take the opportunity to again highlight these which provide a framework for ongoing Duty to Cooperate discussions:

- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region's biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.



We have the following comments on **Section 2: Development Management Policies:**

DM19 Maximising Development Potential

Welcome the additional wording in the policy cross-referencing Policy SA5 – The Setting of the South Downs National Park.

DM24 Advertisements

Support wording in the policy respecting the setting of the SDNP.

DM25 Communications Infrastructure

Welcome continuing reference to development having to meet the criteria that there is no unacceptable impact on the setting of the SDNP.

DM34 Transport Interchanges

Support the additional sentence in the supporting text at paragraph 2.257 that impact on the SDNP will be considered when evaluating proposals.

DM37 Green Infrastructure and Nature Conservation

Support references in the policy to the Nature Improvement Area and explanatory footnote. Also support the wording in paragraph 2.279 regarding working in partnership with others including the SDNPA on a landscape scale approach to biodiversity and green infrastructure.

As a general comment, we would highlight the recent publication of the People and Nature Network¹ (PANN) (formerly known as the South Downs Green Infrastructure framework) which sets out how a wide range of partners can work together to plan positively for nature and natural services within and around the protected landscapes of the south east. The PANN includes Natural Capital Investment Area number 12 that covers Brighton and Hove. The PANN identifies a number of opportunities for enhancement of green infrastructure in this area. We suggest that reference could be made to the PANN within this policy. We welcome the opportunity to continue working with Brighton & Hove City Council on green infrastructure matters.

DM40 Protection of Environment and Health – Pollution and Nuisance

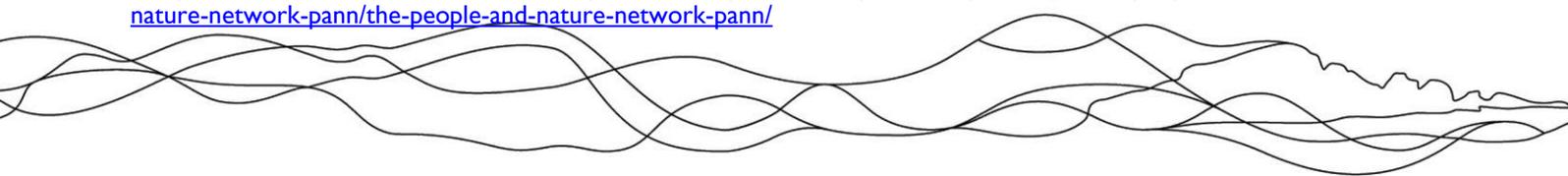
Support DM40 part g) referring to the South Downs National Park International Dark Sky Reserve and the use of outdoor lighting in development.

We have the following comments on **Section 3 – Special Area Policy, Strategic Site Allocations, Housing and Mixed Use Sites and other Site Allocations:**

Special Area SA7 Benfield Valley

Reiterate support: for bullet points 1 and 3 of the policy regarding connectivity through the site to the SDNP and creation of gateway facilities respectively; the wording in the supporting text on improving pedestrian and cycle links through the site including the north/south route; the site as a visually attractive gateway to the National Park, and the creation of a community/interpretation facility at Benfield Barn is welcomed.

¹ <https://www.southdowns.gov.uk/national-park-authority/our-work/partnership-management/people-and-nature-network-pann/the-people-and-nature-network-pann/>



SSA7 Land Adjacent to American Express Community Stadium, Village Way

Welcome the added wording at point b) that the design of the development provides visual connectivity to the SDNP.

Support the additions to the supporting text at paragraphs 3.56 and 3.58 regarding the site being a gateway to the SNDP and the design needing to reflect the setting of the National Park. It is suggested that the reference in paragraph 3.58 to the South Downs Integrated Landscape Character Assessment (SDILCA) includes the specific part of the document relevant to policy SSA7, that is Appendix A, Landscape Character Type A: Open Downland, A2: Adur to Ouse Open Downs (page A-16) <https://www.southdowns.gov.uk/wp-content/uploads/2020/10/South-Downs-Appendix-A-Open-Downland.pdf>

Adding the specific part of the SDILCA would be consistent with how the document is referenced in the supporting text for policy H2 Housing Sites – Urban Fringe, paragraph 3.75 and accompanying footnote.

Also welcome that the wording about policy DM40, is now stated as a separate paragraph in the supporting text.

There is an opportunity to also seek improvements to existing walking and cycling connections to the SDNP through development at this site in accordance with point d) of SSA7. Suggested adding to the supporting text that contributions from development are sought to upgrade the crossing for cyclists at the Village Way/B2123 junction to improve links through the SDNP via the Falmer-Woodingdean shared use path.

Policy H2 Housing Sites – Urban Fringe

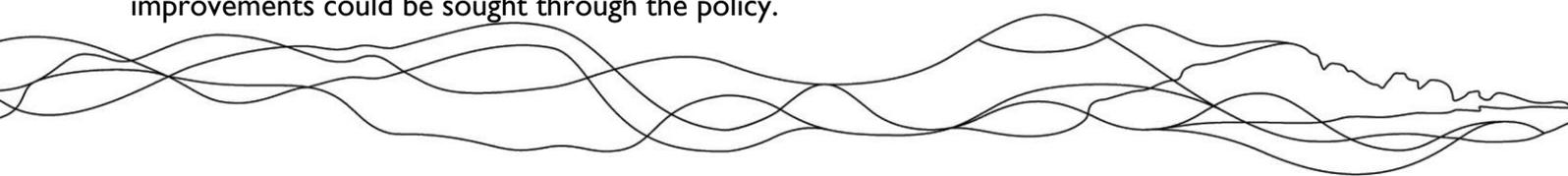
Welcome the cross referencing of policies SA4 and SA5 in the policy recognising the impact on the SDNP of the development of these urban fringe sites.

Also welcome the changed wording in the supporting text that a Landscape and Visual Impact Assessment will be expected as part of the background information at the planning application stage (paragraph 3.73) along with the importance of the setting of the SDNP in the design of development and reference to the specific parts of the SDILCA that are relevant to these urban fringe sites (paragraph 3.75).

Regarding the reference at paragraph 3.75 and the accompanying footnote, it should be noted that the SDILCA was updated in 2020 and the online links need to be amended. The SDILCA and an interactive map is on the SDNPA website at the following link: <https://www.southdowns.gov.uk/planning-policy/landscape-character-assessments/south-downs-integrated-landscape-character-assessment/south-downs-integrated-landscape-character-assessment-ilca-2020/>

The specific part of the SDILCA relevant to the urban fringe sites is Appendix A, Landscape Character Type A: Open Downland, A2: Adur to Ouse Open Downs (page A-16) <https://www.southdowns.gov.uk/wp-content/uploads/2020/10/South-Downs-Appendix-A-Open-Downland.pdf>

There is an opportunity at these urban fringe sites to improve existing, and create new, connections to the SDNP in accordance with point f) of the policy. For specific sites improvements could be sought through the policy.



Suggest adding to the supporting text that contributions from development at Land at Mile Oak Road, Portslade and Land at Overdown Rise, Mile Oak will be sought to improve and maintain existing A27 underpasses to the SDNP at Mile Oak Road and Ridge Close respectively.

West and East Maps

Welcome the changes to the Policies Maps with the boundary and area of the SDNP now shown.

Notwithstanding the above comments, we would like to wish you well in the progression of your Local Plan. If you have any questions on the content of this letter, please do not hesitate to contact me.

Yours faithfully

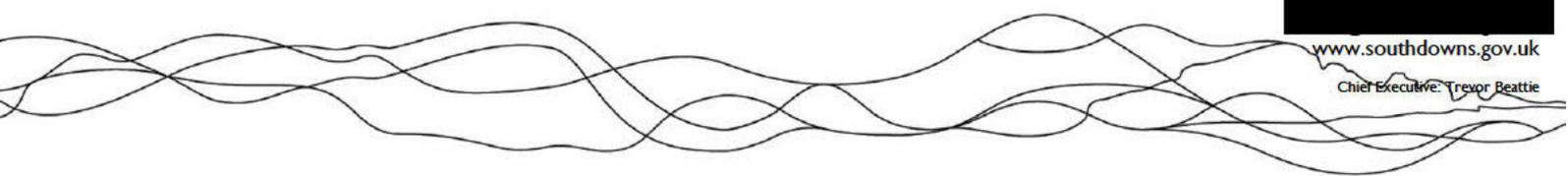
[Redacted signature block]

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

[Redacted name]

www.southdowns.gov.uk

Chief Executive: Trevor Beattie



From: [REDACTED]
To: [PlanningPolicy](#)
Subject: RE: CPP2 Consultation Response
Date: 28 October 2020 11:54:43
Attachments: [image002.png](#)

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[REDACTED]

Yes please keep SDNPA informed of the process for CPP2.
Please see responses below.

Best wishes

[REDACTED]

[REDACTED]



SOUTH DOWNS NATIONAL PARK

CELEBRATING 10 YEARS

[REDACTED]

[REDACTED]

As this stage of consultation is the statutory Reg. 19 stage, in order to help us process your email as formal representation to the City Plan Part Two, please could you also provide the following information:

Please let us know if you would like to be notified of any of the following (delete as appropriate);

[REDACTED]

The City Plan Part Two has been submitted for independent examination	Y
The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two	Y
The adoption of the City Plan Part Two	Y

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(Required) I have read the PINS privacy statement above	✓
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Yours sincerely,

[Redacted signature]

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[Redacted header]

Sent: 28 October 2020 10:16
To: PlanningPolicy <PlanningPolicy@brighton-hove.gov.uk>
Subject: CPP2 Consultation Response

This email originates from outside of Brighton & Hove City Council. Please think carefully before opening attachments or clicking on links.

Dear Colleague

Please find attached the South Downs National Park Authority (SDNPA) response to the Proposed Submission City Plan Part Two consultation.

I would be grateful if you could acknowledge that this email and attachment has been received.



SOUTH DOWNS NATIONAL PARK

CELEBRATING 10 YEARS

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From: [REDACTED]
Cc: [REDACTED]
Subject: RE: City Plan Part Two (CPP2) Update - FAO CPP2 Policy Projects & Heritage Team
Date: 23 November 2020 11:03:27

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For the attention of: CPP2 Policy Projects & Heritage Team

Consultation: City Plan Part Two (CPP2) Update

Highways England reference: #10904

Dear CPP2 Policy Projects & Heritage Team,

Thank you for your further email of 2nd Nov 2020 regarding the above consultation process. Please see below our responses to the further questions requested.

I trust this is of assistance and thank you for continuing to involve Highways England in the process.

Should you have any queries regarding this response, please contact us at:

[REDACTED]

[REDACTED]

[REDACTED]

Web: <http://www.highwaysengland.co.uk>

Please note that for the foreseeable future we are all working from home. All meetings will be via telephone, Skype or similar. We will continue to seek to work to our statutory and other deadlines. In case of IT or other issues, as a precaution, please copy all emails to PlanningSE@highwaysengland.co.uk . Thank you.

From: PlanningPolicy [mailto:PlanningPolicy@brighton-hove.gov.uk]

Sent: 02 November 2020 10:03

To: [REDACTED] PlanningPolicy

<PlanningPolicy@brighton-hove.gov.uk>

Cc: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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From: [REDACTED]

[REDACTED] October 2020 22:14

To: PlanningPolicy <PlanningPolicy@brighton-hove.gov.uk>

Cc: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: City Plan Part Two (CPP2) Update - FAO CPP2 Policy Projects & Heritage Team

This email originates from outside of Brighton & Hove City Council. Please think carefully before opening attachments or clicking on links.

For the attention of: CPP2 Policy Projects & Heritage Team

Consultation: City Plan Part Two (CPP2) Update

Highways England reference: #10904

Dear CPP2 Policy Projects & Heritage Team,

Thank you for your email of 30th July 2017 regarding the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective

stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of this plan, Highways England is interested in the potential impacts on the A23 and A27 in the vicinity of Brighton and Hove.

Having examined the above consultation documentation, we have the following comments:

Transport Topic Paper

- Highways England is continuing to liaise with Brighton and Hove City Council and their transport consultants Systra with regard to the supporting Transport Evidence Base. With regard to the Transport Topic Paper submitted, whilst Highways England has accepted the methodology, we have expressed concerns with the modelling undertaken that are still to be resolved. Until the outstanding matters relating to the modelling are resolved, Highways England is not able to accept the Transport Assessment in support of the City Plan Part 2 and therefore the CPP2 itself. Accordingly we are not satisfied that CPP2 will not have a detrimental impact on the Strategic Road Network (*the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109*).

Proposed Submission City Plan Part 2

- *DM34 Transport Interchanges (page 102)* – we note that text has been added to point d) as footnote 65, but this is now superseded and therefore should be updated as follows: *“the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109”*.
- *DM43 Sustainable Drainage (page 131)* – it is requested that further text is added as follows: *“Please note that for developments in close proximity to the SRN, applicants should consider the requirements set out in DfT Circular 02/13 whereby Highways England does not permit stormwater runoff into its highway boundary or its drainage network, while if there is an existing storm water connection from the development site into Highways England’s drainage network, Highways England may not allow continued discharge into its network following change of use of the site”*;
- *Special Area SA7 Benfield Valley (page 149)* – confirmation is requested that the Special Area does not encroach upon the highway boundary as this could impede essential highway works including safety maintenance works.
-
- *SSA7 Land Adjacent to American Express Community Stadium, Village Way (page 169)* – please note that proposals that could impact on the SRN will need consideration by Highways England, and in any event, due to the close proximity of the site to the SRN, Highways England will need to be consulted on any applications submitted.
-

- *H2 Housing Sites – Urban Fringe (page 178)* – we note that the following sites are located in close proximity to the A27 and therefore Highways England will need to be consulted on any applications submitted as they could impact on the SRN:
 - Land at Mile Oak Road;
 - Land off Overdown Rise;
 - Land at and adjoining Horsdean Recreation Ground;
 - Land at Ladies Mile;
 - Land northeast of Coldean Lane; and
 - Land north of Vardey Halls.

- *Table 6 - Residential Site Allocations, Table 7 - Mixed Use Site Allocations and Table 8 – Urban Fringe Allocations (pages 173-182)* – Highways England requires confirmation that the cumulative impact of the development sites has been included within the strategic modelling and therefore included within the junction mitigations. If not, further consideration of appropriate mitigation may be required.

Highways England will continue to work collaboratively with the City Council to resolve all outstanding matters to our mutual benefits.

Should you have any queries regarding this response, please contact us at:

[REDACTED]

[REDACTED]

[REDACTED]

Please note that for the foreseeable future we are all working from home. All meetings will be via telephone, Skype or similar. We will continue to seek to work to our statutory and other deadlines. In case of IT or other issues, as a precaution, please copy all emails to [REDACTED]. Thank you.

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[REDACTED]



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

28th October 2020

Dear Sir / Madam,

PROPOSED SUBMISSION OF THE BRIGHTON & HOVE CITY PLAN PART TWO - CONSULTATION UNDER REGULATION 19 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

154 Old Shoreham Road – Royal London Asset Management

We write on behalf of Royal London Asset Management in response to the current Regulation 19 Consultation for the Proposed Submission of the Brighton & Hove City Plan Part 2. Attached to this letter is the formal Response Form, which has been duly completed with comments provided in relation to Draft Strategic Allocation SSA4 and resultant inconsistencies with adopted Policy DA6 (City Plan Part 1), Draft Policy DM17 and draft Policy H1.

In connection with these comments, we wanted to take this opportunity to formally submit an additional development site for the Council's consideration in the City Plan Part 2, which will go some way to helping meet the significant shortfall in housing provision when considered against the Objectively Assessed Need of 30,120 new homes required by 2030.

A description of the site and the type of development which could be accommodated on the site is provided below, as well as an assessment of how this aligns with the City Plan Part 1 and the emerging City Plan Part 2. This is accompanied by an Initial Design and Massing Study which has been completed by PRP Architects and which details the scale and density of a potential development.

154 Old Shoreham Road

The development site is located circa one mile northwest of Hove town centre and occupies a prominent corner position at the junction of Old Shoreham Road and Neville Road/Sackville Road. It has a site area extending to c. 0.7ha and currently comprises a double height retail warehouse, occupied by Furniture Village. The site is located immediately to the north of draft allocation SSA4: Sackville Trading Estate and Coal Yard.



The surrounding area is mixed in character with the trading estate located immediately to the south and east, comprising a mixture of industrial and trade. However, it is of note that a number of these units are vacant and that planning permission has recently been granted for the mixed-use redevelopment of the site, comprising 564 residential units, 260 care home units and B1, A1, A3, D1/D2 floors space (planning application: BH2019/03548 - Sackville Trading Estate).

The area to the west and north is predominately characterised by residential terraces and semi-detached houses, with a small unallocated retail parade across the junction on Old Shoreham Road. There is also a large public park, Hove Park, located to the north and other local facilities such as schools, supermarkets and some food and beverage units a short distance away.

The site is sustainably located in proximity to local amenities along the adjacent retail parade, nearby schools and park and also conveniently situated 0.3mile and 0.6 miles from Aldrington and Hove train stations, respectively.

The Proposals

Our Client has identified the site as having potential for redevelopment for a hotel (Use Class C1) and/or residential (Use Class C3), and commercial (Use Class E). To demonstrate this, initial design and massing studies have been undertaken and are included the accompanying report prepared by PRP, for a mixed-use development comprising a 100-bed hotel (Use Class C1), 40 residential units (Use Class C3), with ground floor commercial (Use Class E). This takes into account the surrounding area in terms of transport connections, amenities, urban grain and surrounding uses, as well as the recently approved Sackville Estate development to the south. The report demonstrates that a part 1, part 5, part 6 and part 9 storey building could be comfortably accommodated on site, on this prominent corner location.

Planning Policy

154 Old Shoreham Road falls within the boundary of the Hove Station Development Area as identified in Policy DA6 of the City Plan Part 1, which will accommodate the provision of 525 residential units, alongside the retention / replacement of existing employment floorspace and an additional 1,000sqm, by 2030. In terms of the emerging City Plan Part 2, it is proposed that the site is included at draft Policy H1 as a mixed-use site allocation. The provision of a hotel in this location is also fully supported by emerging Policy DM17, which identifies DA6 Hove Station Area as having potential for a new budget hotel.

Summary

In light of the above, it is clear that 154 Old Shoreham Road has significant potential for a mixed-use development comprising hotel and/or residential, and retail uses. This would align with adopted Policy DA6 and emerging Policy DM17 and it is therefore respectfully requested that the site be included in emerging Policy H1 of the City Plan Part 2, for allocated mixed-use development. In addition to the above, my Client is also progressing the proposal via the formal pre-application process.



I trust you have all you require to consider this proposal, but if you require any further information, please do not hesitate to contact me on the details provided at the top of this letter.

Yours faithfully,



Encl.
City Plan Part 2 Response Form
Initial Design and Massing Report, prepared by PRP Architects

City Plan Part Two - Proposed Submission Response Form (7 September – 30 October 2020)

Please Note

Policies in the Proposed Submission City Plan Part Two were agreed at Full Council on 23 April 2020. The Government announced amendments to the use classes in the Town and Country Planning (Use Classes) Order 1987 (as amended) on 21st July 2020 to come into effect on 1st September 2020.

The council notes that the changes to the use classes will require changes to be made in particular to Policies DM9, DM12, DM13, DM14 and DM15 of the City Plan Part Two to ensure the Plan is consistent with the changes to the Use Classes Order and effective.

It is proposed that the changes required will be dealt with through a separate focused public consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Further consideration will be given to the most appropriate time to carry out the focused consultation.

Section A - Your Details

Name (Required)

[Redacted Name]

What is your address?

[Redacted Address]

What is your email address? (Required)

[Redacted Email Address]

If you are responding on behalf of an organisation/individual, please provide the name of that organisation or individual below.

Royal London Asset Management

Please let us know if you would like to be notified of any of the following:

	Yes	No
The City Plan Part Two has been submitted for independent examination	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The adoption of the City Plan Part Two	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Due to the process of having an Independent Examination, any information and/or responses made are not confidential. This means we need your name, or organisation name, so that the comments can be made available for the public inspection.

Once your comments have been logged, all names, company names and associated comments submitted as part of the formal consultation process will be made available to view in due course on the BHCC website. BHCC will not share or publish postcodes or email addresses. BHCC will however have to pass on all contact details to the Planning Inspectorate (PINS). Details of the PINS privacy policy can be seen here.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810383/Privacy_Statement_-_ROW_V2.pdf

Please tick to reinforce that you have read this disclaimer and have read the PINS Privacy Notice

Please Tick (Required)

Yes

Your Representation

Please fill in the relevant sections for your representation(s).

Section C should be completed for policies DM1 to DM46, SA7, and SSA1 to SSA7. If you want to comment on more than one of these policies, please copy and paste section C) for each policy

Sections D to G should be completed for policies H1, H2, H3 and E1. Please only fill out sections D-G) once.

Section H should be completed for supporting documents. Please only fill out section H once.

Section B CPP2 Introduction

**Do you have any comments on Section One 'Introduction' of the City Plan Part Two?
(Please reference the page and paragraph number)**

No

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Section C Representations on policies DM1 – DM46, SA7, SSA1 to SSA7
If you want to comment on more than one policy, please copy the questions from this section and paste below your representation on each policy

Policy Number (DM1 to SSA7)

Please use separate sheets for each policy that you wish to comment on

SSA4

Policy Title e.g. Housing and Accommodation

Sackville Trading Estate and Coal Yard
--

1. Do you consider this policy is: (tick as appropriate)

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

	Tick
Positively Prepared	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

In the following boxes, please explain why you think the policy is unsound and/or not legally compliant, and set out any changes you feel should be made to make it sound and legally compliant.

Please note: As there will not normally be a subsequent opportunity to make further representations please include all the information, evidence and supporting information necessary to support/justify your representation and the suggested change(s) to the policy.

After this stage, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination. If you have additional material such as maps or photos that you are unable to submit using this form please contact us by email at planningpolicy@brighton-hove.gov.uk

3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.

The Brighton and Hove City Plan 1 identified an objectively assessed housing need of 30,120 dwellings up to 2030, but only identifies a capacity for 13,200. As such, the City Plan Part 2 is

City Plan Part Two - Proposed Submission Response Form (7 September – 30 October 2020)

required to deliver considerable additional housing and this should be borne in mind when considering the following representations.

Draft Policy /Allocation SSA4: *Sackville Trading Estate and Coal Yard*, covers an area which sits within the wider DA6: Hove Station Development Area within the City Plan Part 1. However, it is not considered that the two policies entirely align and that Draft Policy SSA4 could preclude other sites within the wider DA6 Development Area from coming forward and making a meaningful contribution towards the housing shortfall.

In considering Development Area DA6 in the City Plan Part 1, the Policy sets a number of development criteria for delivery by 2030 including a target of 525 residential units across the identified area (at Part B). Within this Development Area, the Conway Street Industrial Area allocation is identified for delivering 200 of the 525 residential units (Part C of the Policy), which leaves just 325 units for the remainder of the Development Area.

City Plan Part 2 draft Policy SSA4 which is also within the Development Area DA6, allows for delivery of a minimum of 500 residential units which clearly exceeds the residual 325 units identified above. In addition, this does not consider other developments in the locality which have recently been permitted, for example the Kap Ltd. development approved last month for 148 dwellings (planning ref: BH2018/03356). This is fully reflected in the Brighton and Hove Strategic Land Availability Assessment Update (2019) which identifies that the Hove Station Development Area DA6 is estimated to provide 856 dwellings up to 2030, as opposed to the 525 identified in the City Plan Part 1.

Whilst we appreciate the above policy figures are set as a 'minimum', it is considered that more can be done within draft Policy SSA4 to clarify that this allocation alone will result in an exceedance of the housing delivery targets set in Development Area DA6 (City Plan Part 1) and to expressly allow for further exceedance if other sites in the Development Area come forward for residential development, either solely or as part of a mixed-use development.

In light of the above, it is not considered that the City Plan Part 2 in general and Policy SSA4 more specifically are ***Positively Prepared or Justified***, as they do not go far enough in supporting and delivering the Objectively Assessed Housing Need of 30,120 dwellings to 2030, when the City Plan Part 1 only provides for 13,200 new homes. As such, we consider the plan ***Unsound***.

4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.

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

The City Plan Part 2 should provide an update to the City Plan Part 1 DA6 allocation, to reflect the latest SHLAA (2019) position, which estimates 856 dwellings to 2030 as opposed to the current 525.

In addition, this update should consider other sites within the Development Area such as the Kap. Ltd development (identified above). The City Plan Part 2 should also consider other sites within the Development Area which could contribute to the housing supply, including a site

City Plan Part Two - Proposed Submission Response Form (7 September – 30 October 2020)

which my client wishes to be considered: 154 Old Shoreham Road. Please see accompanying covering letter and attached “Initial Design and Massing Report”, prepared by PRP Architects in support of this.

5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)

	Tick
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in the hearing session(s)	<input checked="" type="checkbox"/>

(Please note you may be asked at a later point to confirm your request to participate)

6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

To fully explain the inconsistencies with the City Plan Parts 1 and 2 and to respond to any questions on forthcoming sites within the Development Area, particularly the development site proposed by my client.

Please note: The Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to make a representation on another policy (DM1 – DM46, SA7, SSA1 to SSA7) please copy and paste the questions from this section below.

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Section C Representations on policies DM1 – DM46, SA7, SSA1 to SSA7

If you want to comment on more than one policy, please copy the questions from this section and paste below your representation on each policy

Policy Number (DM1 to SSA7)

Please use separate sheets for each policy that you wish to comment on

DM17

Policy Title e.g. Housing and Accommodation

Opportunity Areas for new Hotels and Safeguarding Conference Facilities

1. Do you consider this policy is: (tick as appropriate)

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

In the following boxes, please explain why you think the policy is unsound and/or not legally compliant, and set out any changes you feel should be made to make it sound and legally compliant.

Please note: As there will not normally be a subsequent opportunity to make further representations please include all the information, evidence and supporting information necessary to support/justify your representation and the suggested change(s) to the policy.

After this stage, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

If you have additional material such as maps or photos that you are unable to submit using this form please contact us by email at planningpolicy@brighton-hove.gov.uk

3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.

The allowance for a hotel within Development Area DA6 is wholly supported and we recognise that the Visitor Accommodation Study Update (2018) identifies the need for a further 2 hotels by 2022, with longer terms forecasts increasing to 4-8 hotels. It is proposed my Client's site, 154 Old Shoreham Road, should be considered for hotel development as part of a mixed-use scheme, in accordance with our accompanying letter and Design and Massing Study.

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4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.

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

N/A

5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)

	Tick
No, I do not wish to participate in hearing session(s)	<input checked="" type="checkbox"/>
Yes, I wish to participate in the hearing session(s)	<input type="checkbox"/>

(Please note you may be asked at a later point to confirm your request to participate)

6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

N/A

Please note: The Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to make a representation on another policy (DM1 – DM46, SA7, SSA1 to SSA7) please copy and paste the questions from this section below.

Section D H1 Housing Sites and Mixed Use Sites

Please only fill this section out once

Which site(s) does your representation refer to? (Tick all that apply to your submission)

- ALL SITES**
- Former St Aubyn's School, 76 High Street, Rottingdean
- Land between Marine Drive and rear of 2-18 The Cliff, Brighton
- 25 Ditchling Rise / rear of 57-63 Beaconsfield Road, Brighton
- 60-62 & 65 Gladstone Place, Brighton
- 76-79 & 80 Buckingham Road, Brighton
- 87 Preston Road, Brighton
- Eastergate Road Garages, Moulsecoomb, Brighton,
- Land between Manchester Street/Charles Street, Brighton
- Preston Park Hotel, 216 Preston Road, Brighton
- George Cooper House, 20-22 Oxford Street, Brighton
- Old Ship Hotel (garage), 31-38 Kings Road Brighton
- Saunders Glassworks, Sussex Place, Brighton
- 2-16 Coombe Road, Brighton
- Outpatients Department, Royal Sussex County Hospital
- Whitehawk Clinic, Whitehawk Road, Brighton
- Buckley Close garages, Hangleton
- Former playground, Swanborough Drive, Whitehawk
- Former Hollingbury Library
- 29-31 New Church Road, Hove
- 189 Kingsway, Hove
- Kings House, Grand Avenue, Hove
- Victoria Road Former Housing Office (adj Portslade Town Hall), Victoria Rd, Portslade
- Land at the corner of Fox Way and Foredown Rd, Portslade
- Smokey Industrial Estate, Corner Church Road, Lincoln Rd & Gladstone Rd Portslade
- Land south of Lincoln Street Cottages, Lincoln Street, Brighton
- Hove Sorting Office, 88 Denmark Villas, Hove
- Former Belgrave Centre & ICES, Clarendon Pl, Portslade (Site SP2 in JAAP Policy CA3)
- Wellington House (Site SP3 in JAPP Policy CA3)
- City College, Pelham Tower (and car-park), Pelham Street
- 71 - 76 Church Street, Brighton
- Post Office site, 62 North Road, Brighton
- 27-31 Church Street (corner with Portland Street)
- Former Dairy Crest Site, 35-39 The Droveaway, Hove
- Kingsway/Basin Road North (site AB4 in JAAP policy CA2)
- Prestwich House (Site SP1 in JAAP policy CA3)
- Regency House, North Street, Portslade (Site SP4 in JAAP policy CA3)
- Former Flexer Sacks, Wellington Road, Portslade (Site SP5 in JAAP policy CA3)
- Church Road/Wellington Road/ St Peter's Road (site SP6 in JAAP policy CA3)

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Station Road site, Portslade (Site SP7 in JAAP policy CA3)

1. Do you consider this policy is: (tick as appropriate)

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Meets the Duty to Co-Operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

	Tick
Positively Prepared	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

In the following boxes, please explain why you think the policy is unsound and/or not legally compliant, and set out any changes you feel should be made to make it sound and legally compliant.

Please note: As there will not normally be a subsequent opportunity to make further representations please include all the information, evidence and supporting information necessary to support/justify your representation and the suggested change(s) to the policy.

After this stage, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

If you have additional material such as maps or photos that you are unable to submit using this form please contact us by email at planningpolicy@brighton-hove.gov.uk

3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.

As identified above, the Brighton and Hove City Plan Part 1 identifies an objectively assessed housing need of 30,120 dwellings up to 2030, but only identifies a capacity for 13,200. As such, the City Plan Part 2 is required to deliver considerable additional housing.

Policies H1 and H2 identify specific housing delivery sites. However, with all the sites combined the number of dwellings anticipated for delivery comes to just 2,500, which still falls far below the 30,120 homes required. In addition, there are sites which have recently been granted planning permission for housing developments, which are not included within Policy H1 such as Kap Ltd. development approved last month for 148 dwellings (planning ref: BH2018/03356). This type of site should be allocated to support future development should the permission lapse before implementation.

It is considered that further sites are required in order meet this substantial shortfall and that the Council should undertake a more robust review of development sites to identify further

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opportunities for meeting the identified housing need. Without this, the plan cannot be said to be **Positively Prepared** or **Effective** and is considered **Unsound**.

4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.

The City Plan Part 2 should also consider other sites which could contribute to the housing supply, including a site which my client wishes to propose: 154 Old Shoreham Road. Please see accompanying covering letter and attached “*Initial Design and Massing Report*”, prepared by PRP Architects.

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

5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)

	Tick
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in the hearing session(s)	<input checked="" type="checkbox"/>

(Please note you may be asked at a later point to confirm your request to participate)

If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

To present and respond to any questions on forthcoming sites within the Development Area, particularly the development site proposed by my client.

Please note: The Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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Representations must be made between Monday 7th September and 23:59 on Friday 30th October 2020.

The completed Word Form can be emailed to planningpolicy@brighton-hove.gov.uk or posted to: Proposed Submission CPP2, Policy Projects and Heritage Team, Brighton & Hove City Council, First Floor Hove Town Hall, Norton Road, BN3 3BQ.

Legal Compliance

Legally compliant means asking whether or not the plan has been prepared in line with statutory regulations, the 'duty to cooperate' and legal procedural requirements. There are five areas to consider when looking at whether or not the Plan is legally compliant. These are:

- *Is the Plan consistent with the Council's production timetables known as the Local Development Scheme (LDS)?*
- *How has the community been involved in the process and has the Council met its Statement of Community Involvement (SCI)? Details of how the plan has been prepared are set out in the Statement of Consultation.*
- *Does the Plan meet the requirements for content and consultation set out in the Town and Country Planning (Local Planning) Regulations 2012 and the Planning and Compulsory Purchase Act 2004?*
- *Does the Sustainability Appraisal (SA) Report accompanying the Brighton & Hove City Plan Part Two form a suitable assessment of the sustainability of the Council's proposals and follow the relevant legislation and guidance?*
- *Has the Council complied with the Duty to Cooperate? This is addressed in the council's Duty to Cooperate Statement.*

The government's tests of Soundness

- **Positively prepared** - *the plan should be prepared in a way that meets the need for housing and other development, including infrastructure and business development.*
- **Justified** – *the plan should be based on evidence, and be the most appropriate strategy for the city when considered against other reasonable alternatives.*
- **Effective** – *the plan should be deliverable; the housing and other development should be capable of being carried out.*
- **Consistent with national policy** – *the plan should enable sustainable development and be consistent with the policies in the National Planning Policy Framework (NPPF).*



Furniture Village, Hove

Initial design and massing report

Proposed submission for the Brighton and
Hove City Plan Part 2

October 2020

Wider area: Location map

The site is located to the west of Brighton, a short distance to the north of Hove town centre and approximately one mile from the coastline.



Wider area: Important routes

The site is located on Old Shoreham Road which is one of the principle east-west routes leading to and from the centre of Brighton. The other principle east-west routes are Kingsway, which runs along the seafront and Church Road, set one road back from the seafront.

The railway also carves its way east-west across the area. In addition, important routes run north-south connecting with the seafront. The site lies at an important intersection of east-west and north-south routes.



Wider area: Urban & suburban characters

The image on this page illustrates clear distinction in street pattern and density found within the local area. To the south of Old Shoreham Road there is a more regular, tightly packed street pattern, with fewer areas of open space, giving the area an urban character.

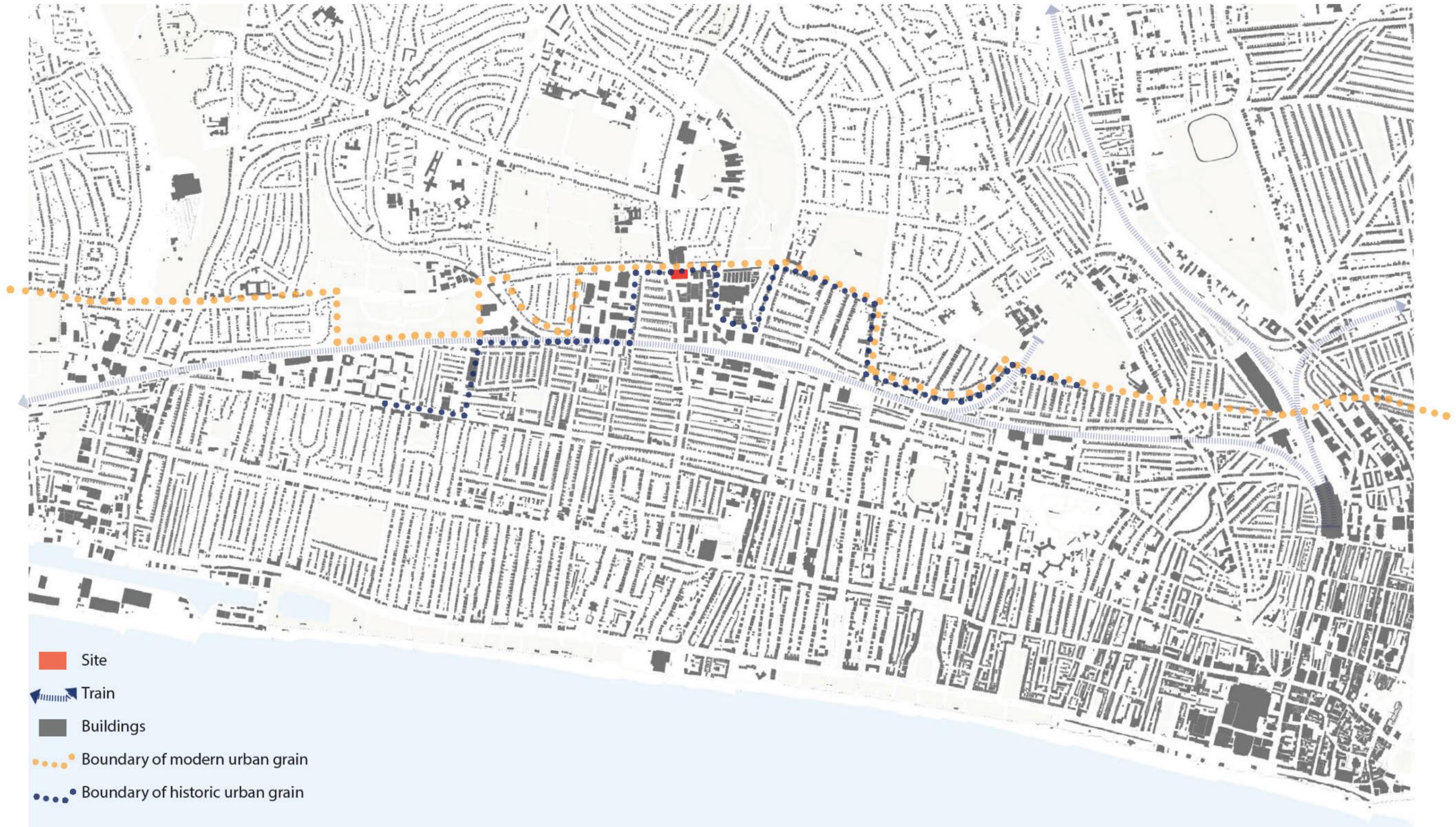
In contrast, the area to the north of Old Shoreham Road, has a looser more organic street pattern, with more open space, giving the area a suburban character. The site is located at an important juncture of these character areas provides an opportunity to signal the edge of the urban character area.



Wider area: Urban grain

The image on this page illustrates built form versus open space in the local area and further demonstrates the difference in density and urban grain from north to south. The built form to the south of Old Shoreham Road is much more densely arranged and urban in character when

compared to the suburban character north of the road. The proposed development should relate to the urban character area it sits within.



Site: Local context

The site is located a short distance from Hove and Aldrington Railway Stations which provide local and regional transport connectivity. To the north across Old Shoreham Road is Hove Park, a public open space for leisure and sport.



Site: Local context



1. Hove Station



2. Hove Park



3. Hove Recreation Ground



Surrounding context: Transport

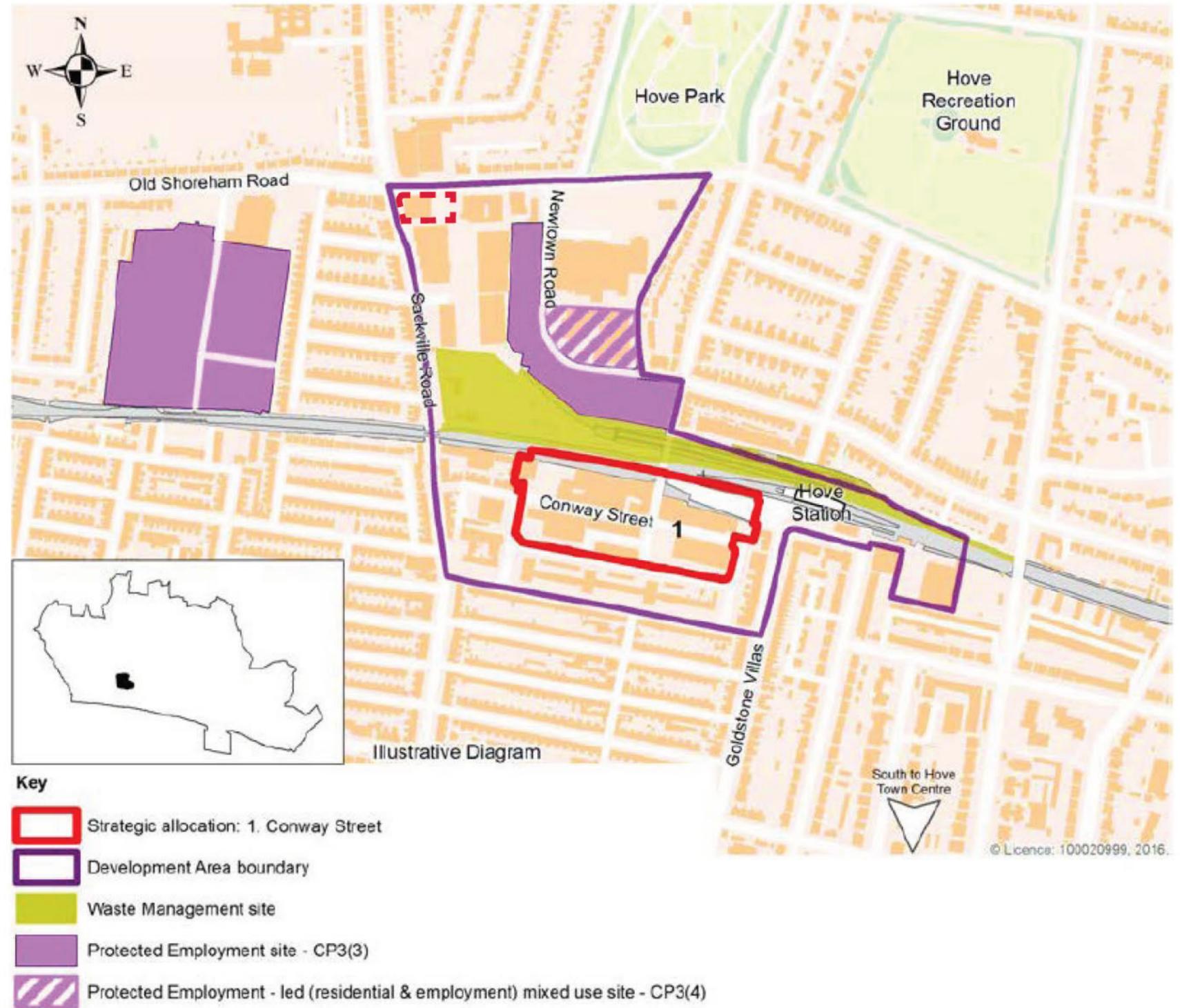


Emerging context: DA6 Hove Station Area

The site is located within Development Area 6, Hove Station Area as identified in the Brighton & Hove City Plan Part One. The strategy for the development area is 'to secure the long term regeneration opportunities around the Hove Station area and enable its development as an attractive and sustainable mixed-use area focussed on employment. The aim is to secure the creation of a high-quality employment environment that will attract investment and new employment opportunities for the city and promote the efficient use of land through, predominantly employment and residential, mixed use developments.'

The following objectives are set out in City Plan Part One;

1. Promote and coordinate employment focussed mixed-use regeneration of under-used land and buildings that offers flexible employment space and high-quality design of an acceptable height, mass and scale that takes into account impacts on factors such as townscape, strategic views and infrastructure (see CP12 Urban Design);
2. Ensure that development takes account of and improves the public realm and townscape particularly in the Conway Street area and the industrial/retail frontages along Sackville Road, Old Shoreham Road and Goldstone Lane;
3. Ensure that development takes account of and contributes to the appropriate provision of public open space and essential community services and provides environmental, biodiversity, pedestrian and public safety improvements particularly around the Conway Street area.
4. Enhancing the sustainable transport interchange at Hove Station by improving the walking and cycling network in the wider area, improving permeability within the area, encouraging accessibility improvements over the railway at the station, strengthening north-south connections across the railway and beyond the area and east-west connections along Old Shoreham Road;
5. Continuing to encourage more efficient use of under-used sites whilst retaining/replacing employment floorspace, protecting employment sites in accordance with CP3 Employment Land and undertaking measures to create employment opportunities for local communities;
6. Maintaining and strengthening the creative industries business cluster in the area by seeking to ensure a range of appropriate workshops, office space, studios, storage and other premises remain affordable and available for use by this business sector;
7. Ensuring development connects to the water distribution and sewerage system off-site at the nearest point of adequate capacity. Development must address surface water flooding risks and incorporate appropriate surface water drainage measures (see CP11 Flood Risk);
8. Protecting groundwater sources from pollution to the satisfaction of the Environment Agency;
9. Creative use of development to integrate new green infrastructure including green space, accessible green roofs, green walls and other features which support Biosphere objectives;
10. Development within this area will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and to either connect where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network.



Surrounding context: Uses



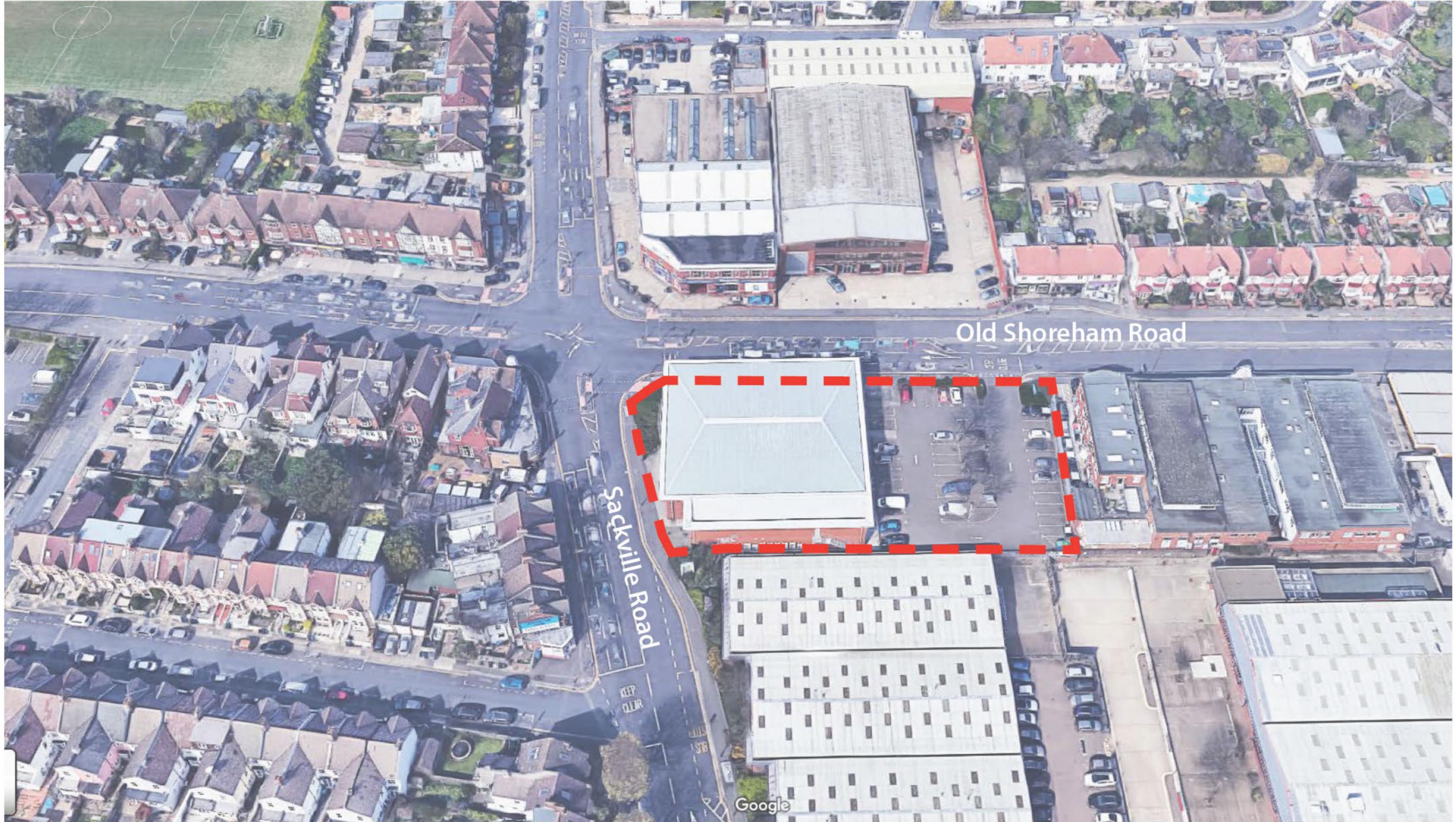
Surrounding context: Open Space



Site: Aerial photo

The site is currently occupied by a large format Furniture Village store and associated parking. To the south, east and north are further large-scale commercial units. Across Sackville Road to the west and south west are streets of terrace housing dating from the 19th century.

Further north of Old Shoreham Road the street pattern becomes more suburban and houses are less densely arranged. There is a clustering of local shops, services and commercial space along Old Shoreham Road and at the intersection of roads.



Site: Photos



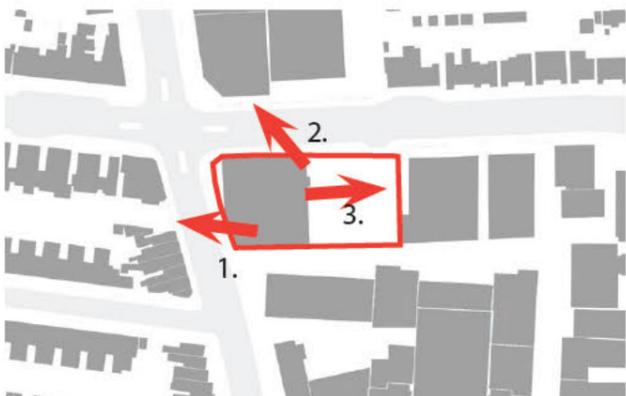
1. Sackville Road looking west



2. Old Shoreham Road looking north

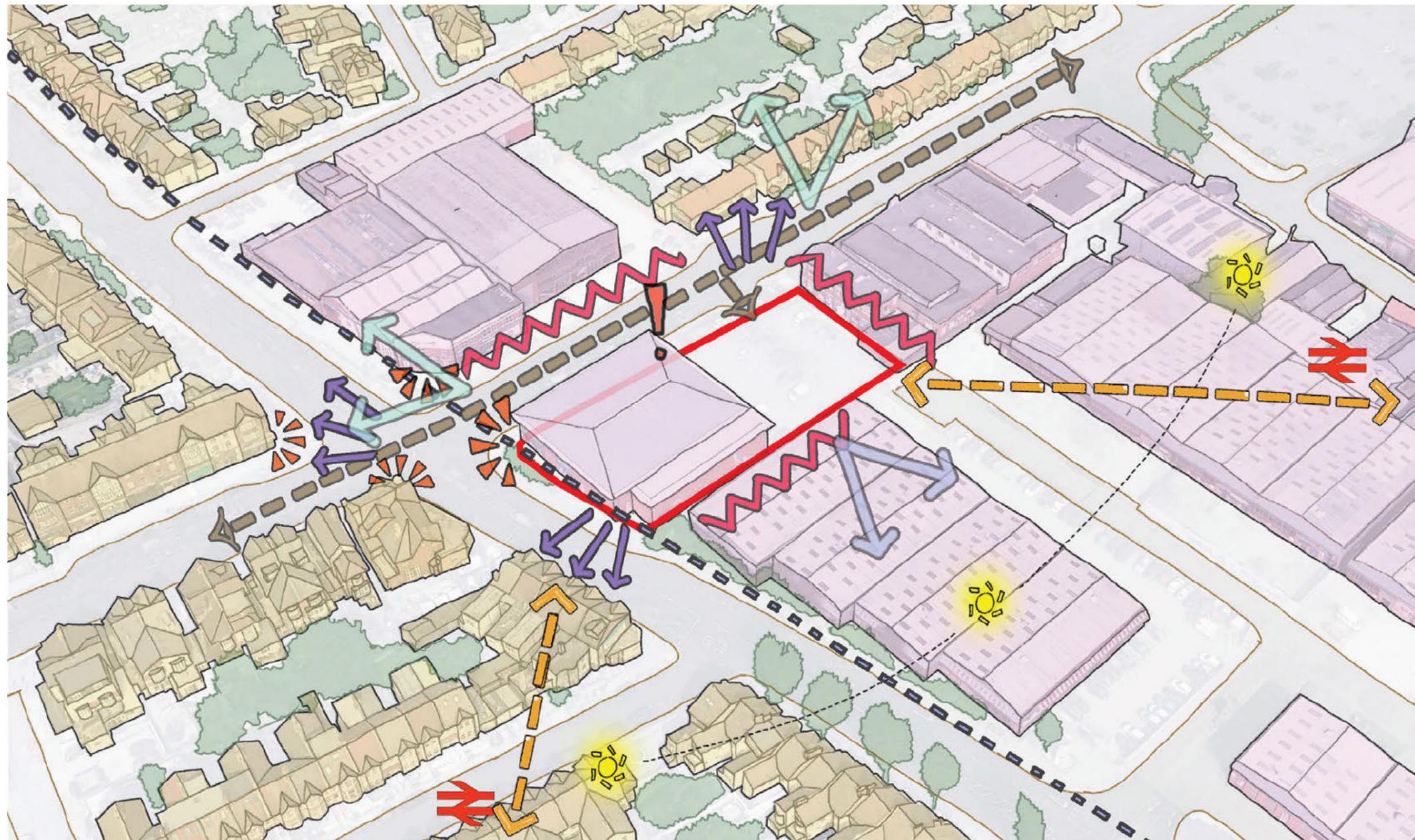


3. Site looking east



Constraints & Opportunities

The diagram on this page illustrates the constraints and opportunities associated with the site.



Constraints

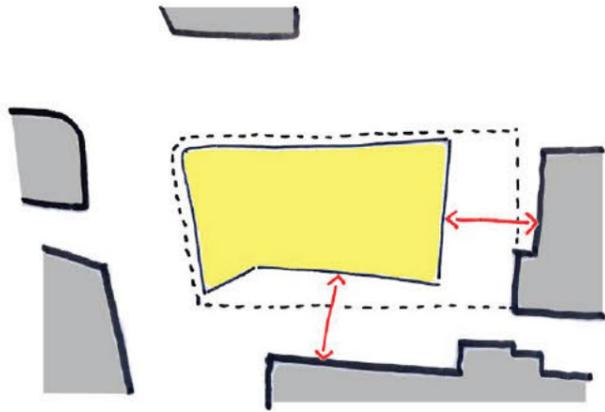
-  Sunpath
-  Noise and pollution
-  Overlooking-Daylight-Sunlight
-  Access point from road
-  Building line
-  Industrial
-  Residential

Opportunities

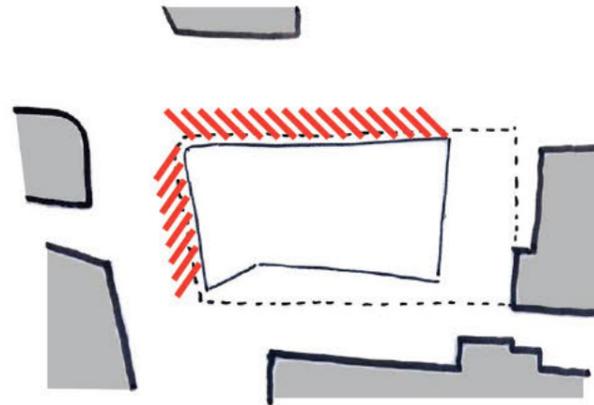
-  Views of parks
-  Views of sea
-  Opportunity for height
-  Key corner
-  Proximity to station

Proposed scheme: Narrative diagrams

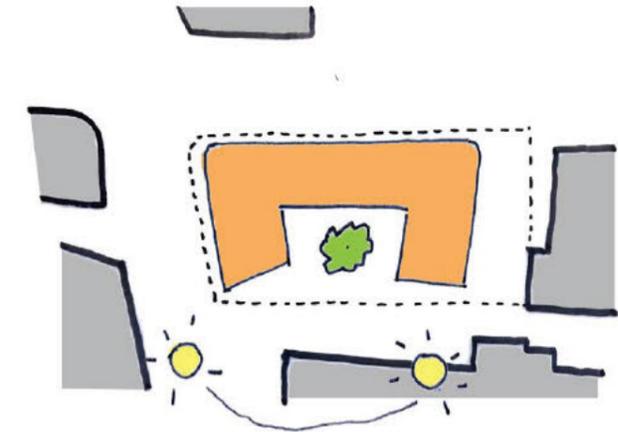
1. Offset from neighbouring buildings



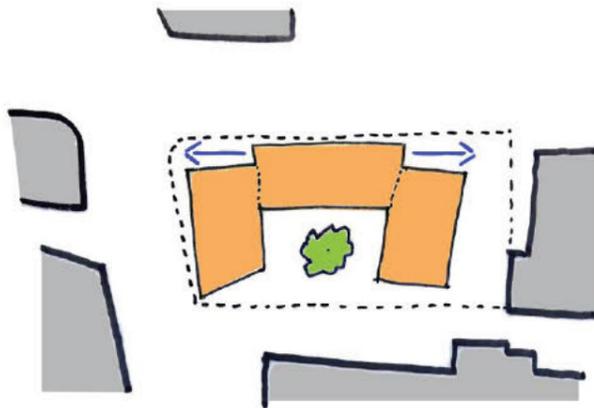
2. Active frontages



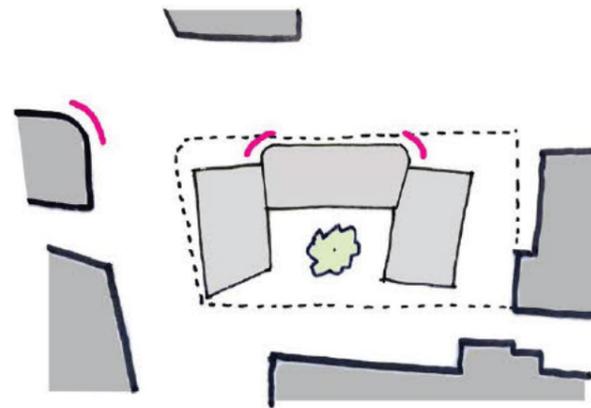
3. South facing courtyard



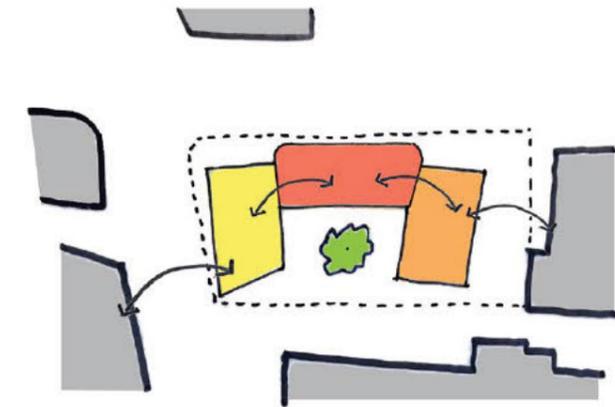
4. Sculpting the massing and reducing north facing



5. Sculpting key corners



6. Stepping building heights



Surrounding context: Heights

The building heights in the local area range predominantly from 2 to 4 storeys in height. However, there is an opportunity for high-quality taller buildings which can take advantage of regeneration sites. The recently consented scheme on the Sackville Trading estate (BH2019/03548) illustrates this with building heights up to 10 storeys.

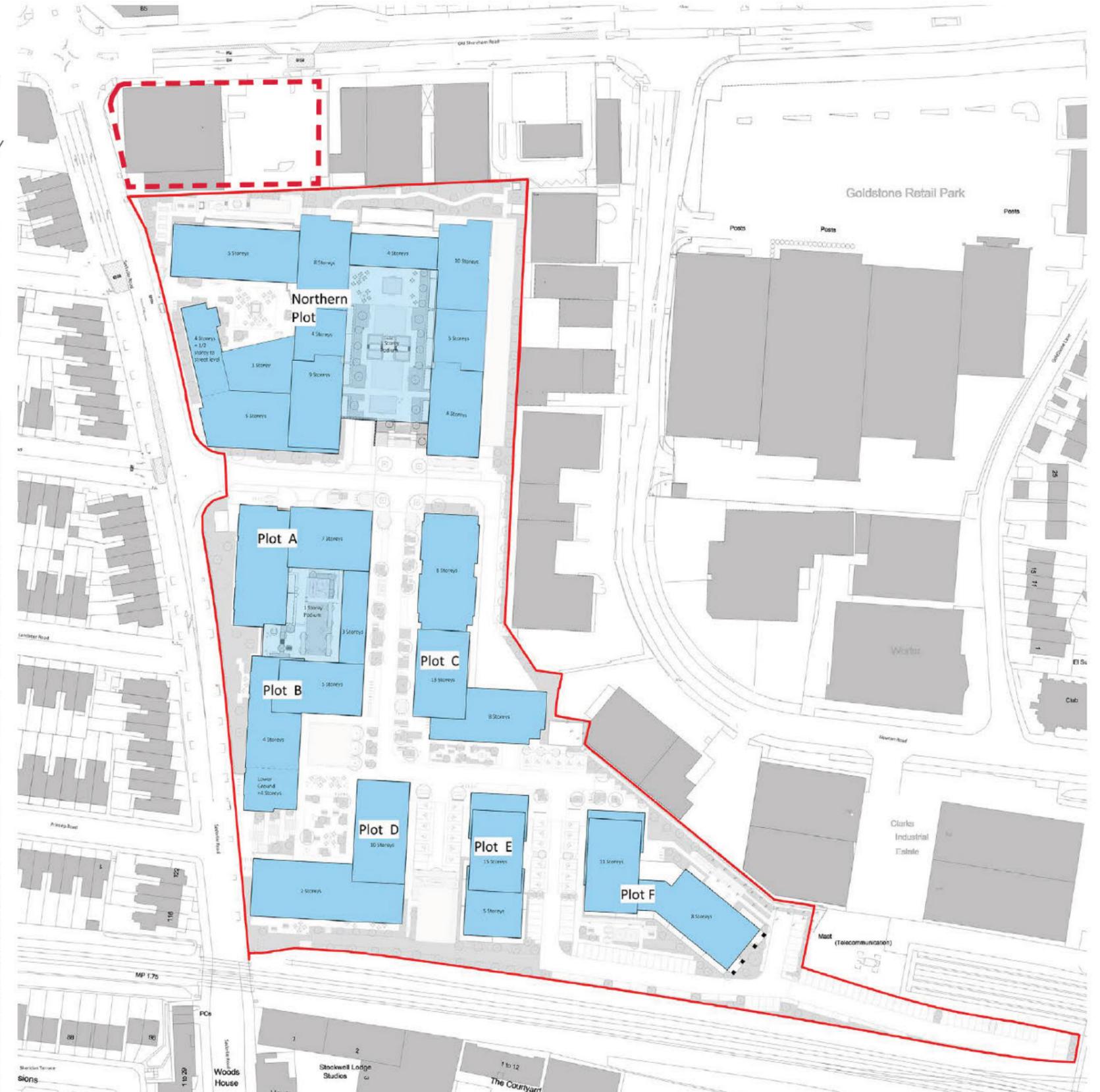
- 1 storey
- 2 storeys
- 3 storeys
- 4 storeys
- 5 storeys
- 6 storeys
- 7 storeys
- 8 storeys
- 9 storeys
- 10 storeys



Emerging context: Sackville trading estate

The area to the south of the site is known as Sackville trading estate and on 6th Aug 2020 consented was granted for;

Demolition and comprehensive redevelopment of Sackville Trading Estate and Hove Goods Yard, comprising 'build to rent' residential units (C3) with associated internal and external amenity provision; a care community (C2) together with associated communal facilities, flexible office accommodation (B1); flexible retail floorspace (A1 and/or A3) and community/leisure floorspace (D1/D2); car and cycle parking; integrated public realm; and vehicular access via existing entrance from Sackville Road.



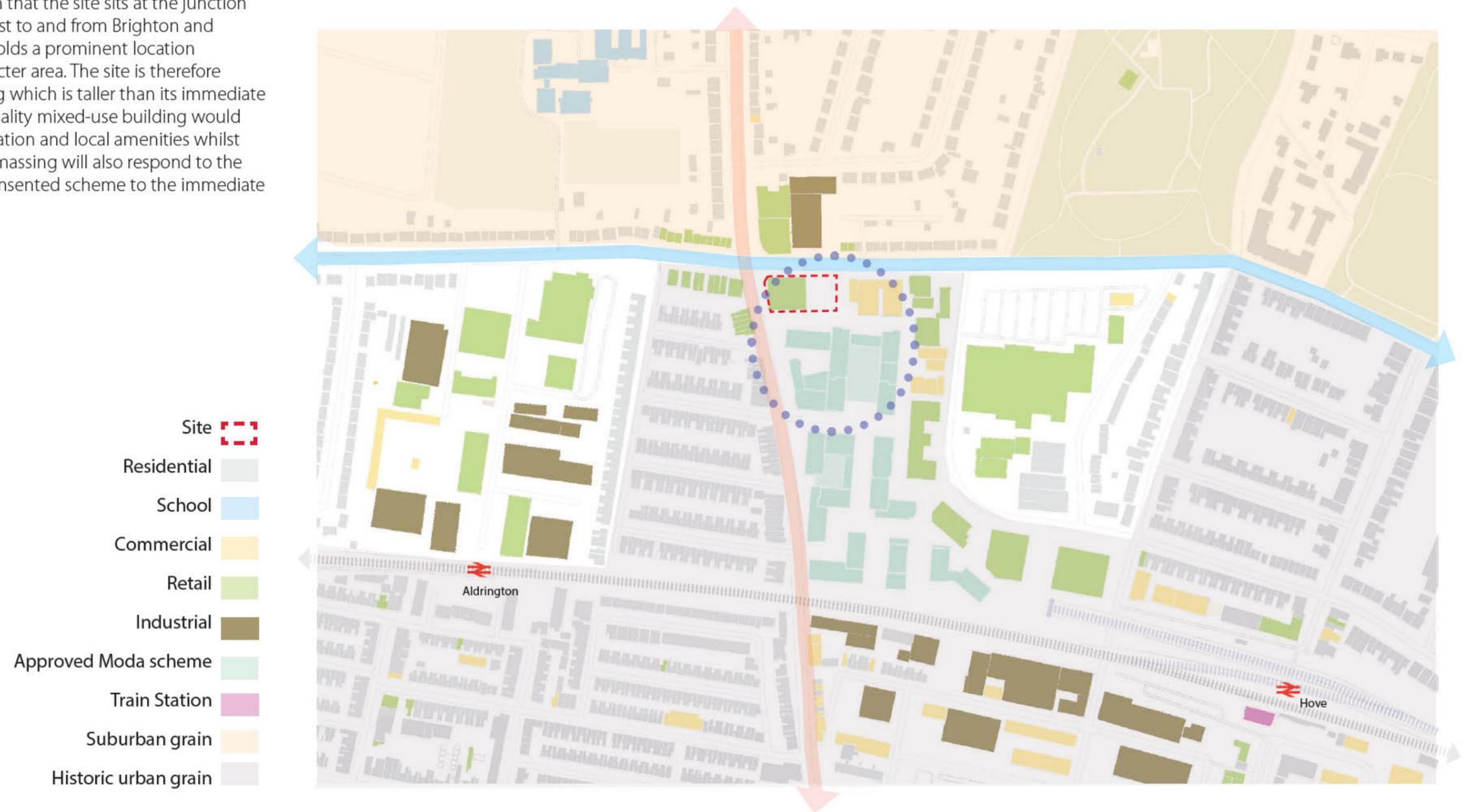
Proposed scheme: Completing the cluster

The proposed massing responds to the heights of the consented Sackville Trading estate scheme. The proposed tall building is slender in proportion and marks the prominent corner together with the start of the urban character area. The massing steps down to respond sensitively to neighbouring building to the west, south and east.

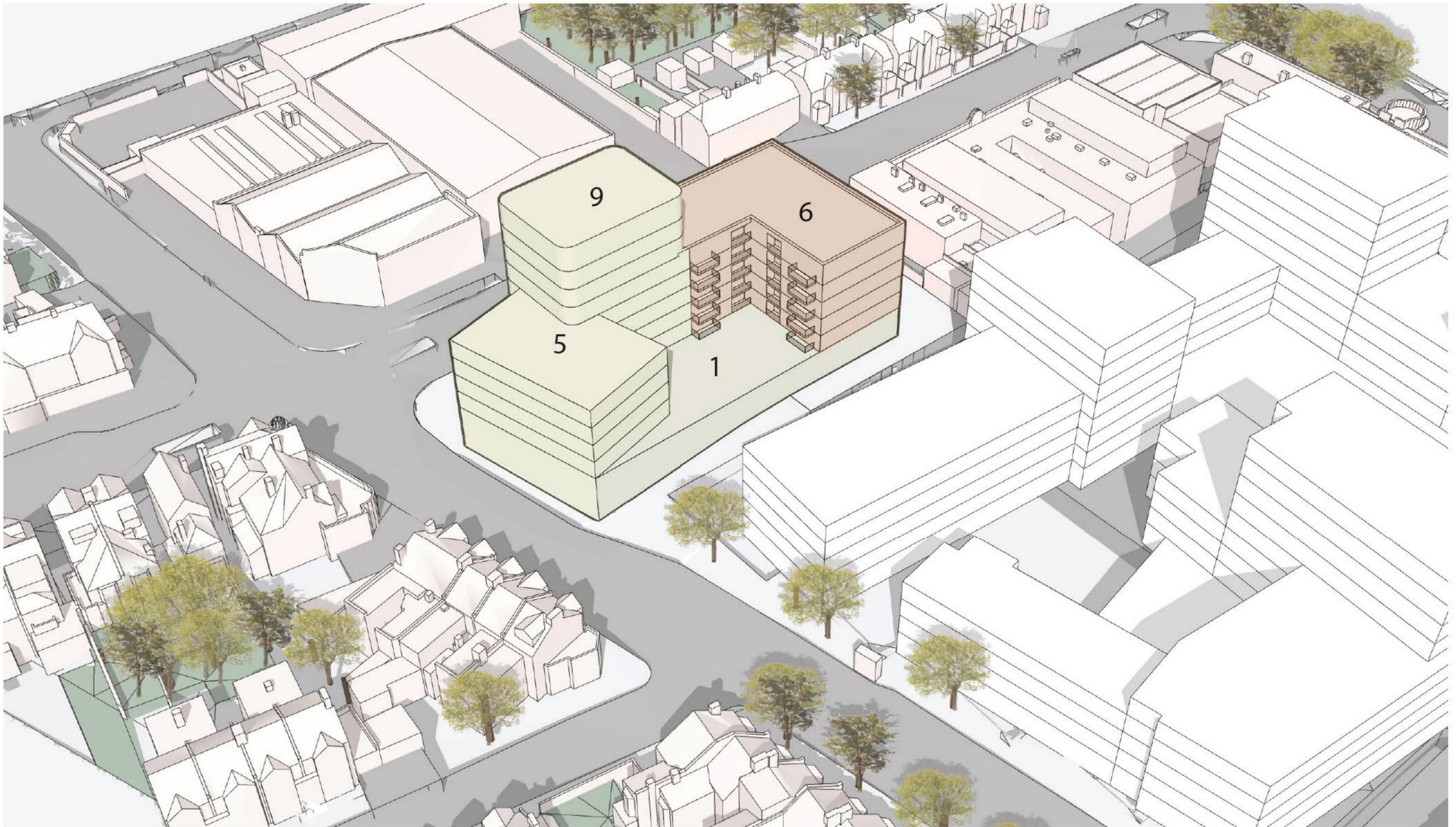


Surrounding context: Tall building narrative

The urban design analysis has shown that the site sits at the junction of important routes running east-west to and from Brighton and north-south to the seafront. It also holds a prominent location marking the start of the urban character area. The site is therefore considered appropriate for a building which is taller than its immediate surroundings. The proposed high-quality mixed-use building would take advantage of the accessible location and local amenities whilst making efficient use of the site. The massing will also respond to the emerging building heights of the consented scheme to the immediate south of the site.



Proposed scheme: *View from south-west*



View from South-West

Proposed scheme: Uses

The proposed scheme provides a mix of uses that are appropriate to its location and which will help regenerate the local area. The mix of uses include a commercial unit facing onto Sackville Road, together with a 100 room hotel and 40 residential apartments.

Commercial



Hotel



Residential



Proposed scheme: Ground floor plan

Ground Floor

Q. Are you able to include a short sentence here stating that the proposed schem is mixed-use comprising commercial/retail, hotel and residential, by way of an introduction to the floor plans?



Proposed scheme: Typical floor plan

Typical Floor

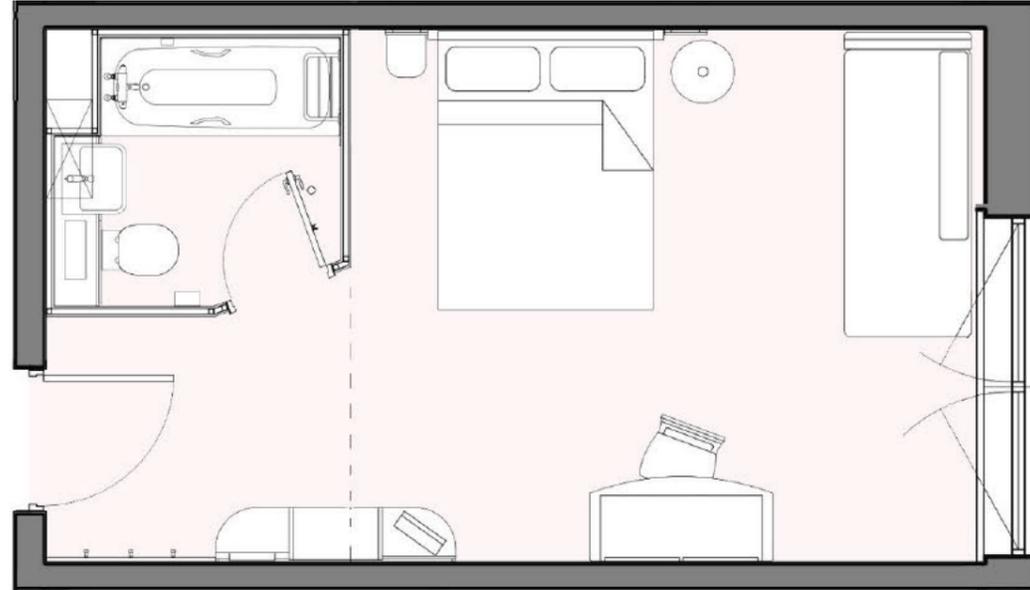


Proposed scheme: Upper floor plan

Upper Floor



Proposed scheme: Hotel room



Hotel room 25 sqm



Courtyard by Marriott Oxford South

Proposed scheme: Typical unit



2B3P

Proposed scheme: Accommodation schedule

Hotel							
LEVEL	Room A	Room B	Total Rooms	Rooms NIA m ²	Rooms and circulation GIA m ²	Back of House GIA m ²	Front of House GIA m ²
	25m ²	32m ²					
Ground	0	0	0	0	59	235	156
Level 01	14	3	17	446	616	17	
Level 02	14	3	17	446	616	17	
Level 03	14	3	17	446	616	17	
Level 04	14	3	17	446	616	17	
Level 05	7	1	8	207	295	8	
Level 06	7	1	8	207	295	8	
Level 07	7	1	8	207	295	8	
Level 08	7	1	8	207	295	8	
Total Rooms	84	16	100	2612	3704	334	156
%	84%	16%					
	100				Total GIA:	4195	

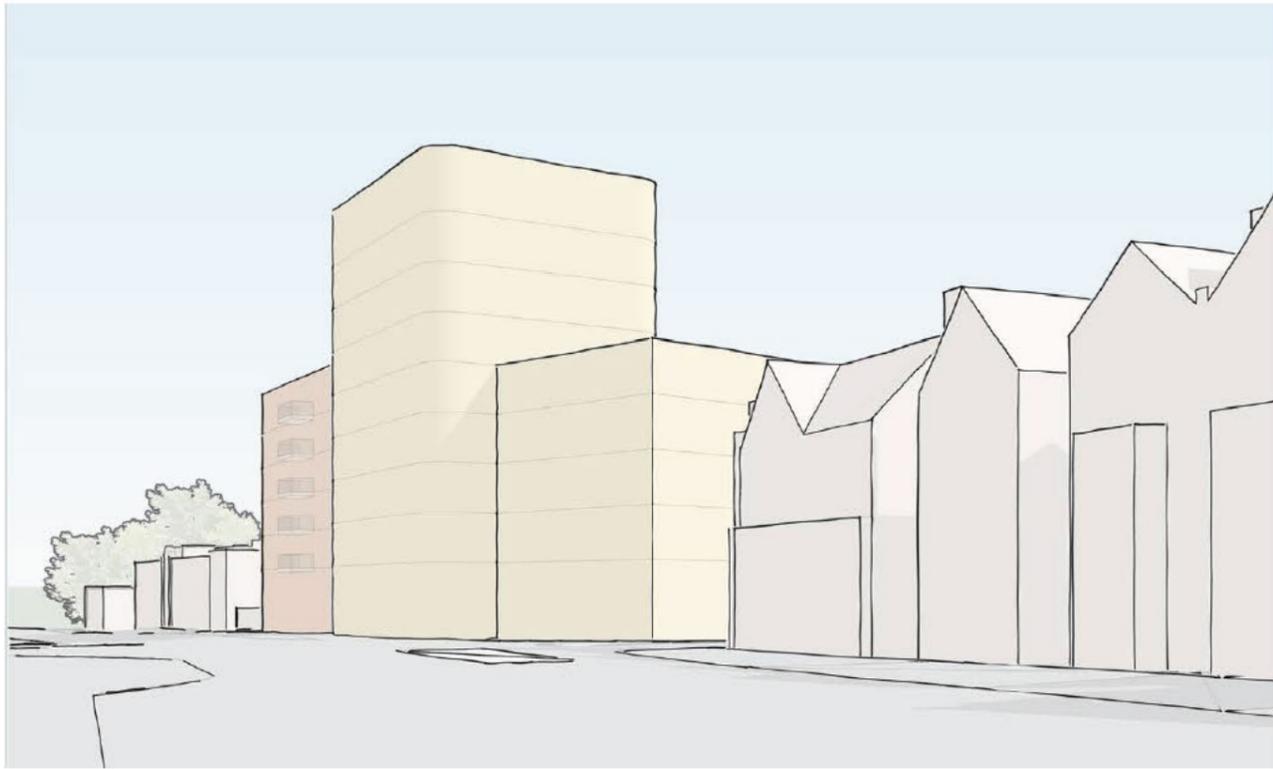
Residential								
LEVEL	Studio	1B	2B3P	2B4P	3B5P	Total	Residential NIA m ²	Residential GIA m ²
	39m ²	50m ²	61m ²	70m ²	86m ²			
Hab rooms	1	2	3	3	4			
Ground	0	0	0	0	0	0	0	317
Level 01	1	2	3	2	0	8	462	567
Level 02	1	2	3	2	0	8	462	567
Level 03	1	2	3	2	0	8	462	567
Level 04	1	2	3	2	0	8	462	567
Level 05	1	2	3	2	0	8	462	567
Total Units	5	10	15	10	0	40	2310	3154
Total Hab Rooms	5	20	45	30	0	100		
%	13%	25%	38%	25%	0%	100%		
	40							

Retail	
LEVEL	Retail GIA m ²
Ground	274
Total	274

Parking	
LEVEL	Retail GIA m ²
Ground	569
Total	569

Total parking spaces 30+12=42

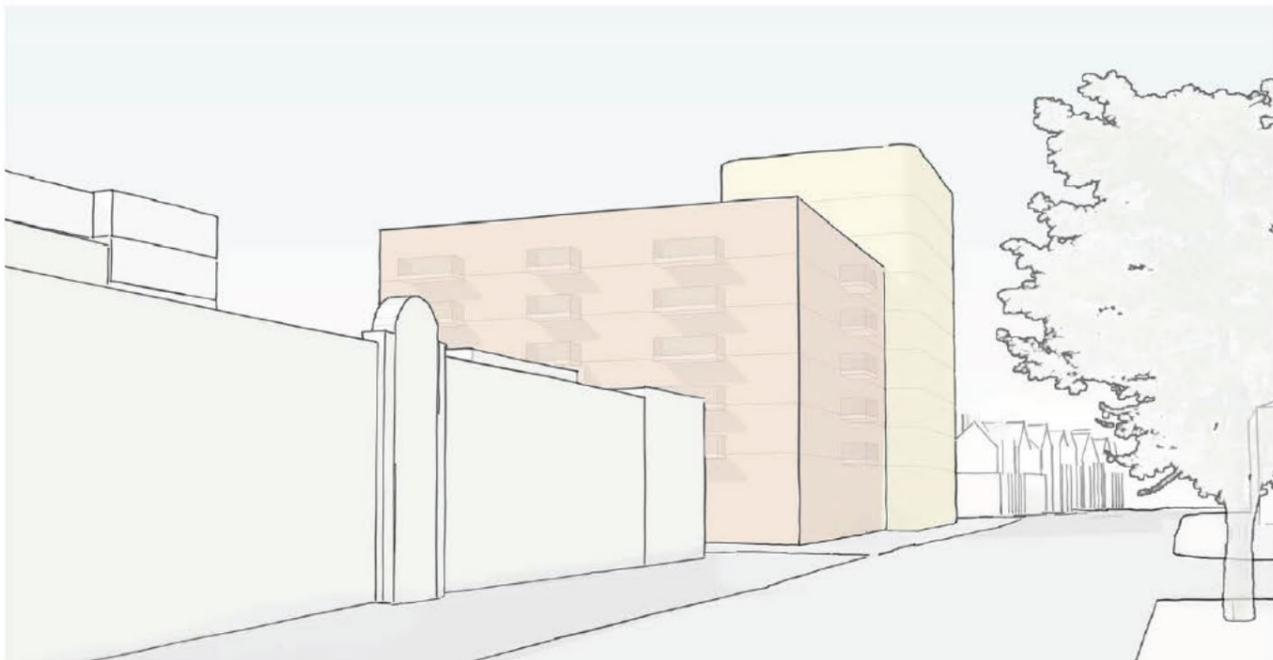
Proposed scheme: Massing views



1-View from Old Shoreham Road



2-View from Sackville Road



3-View from Old Shoreham Road



Proposed scheme: *Massing* references

The proposed massing seeks to respond to Brighton & Hove's character, albeit in a modern and appropriate way. Brighton & Hove's prominent buildings, such as the Brighton Harbour Hotel and Embassy Court confidently express the corners of their massing. The proposed tall building directly references this, softening the key corners to create an interesting and characterful form.



Embassy Court



Queens Hotel



Brighton Harbour Hotel



The Grand Brighton Hotel