

Subject: City Plan Part 2

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

Our concern is the possible proposal of Ingleside Stables and the Riding School Stables at the top of Bear Road. An obvious increase in traffic flow on one of the main routes in and out of Brighton. It has a 40 mph speed limit but this section is on a blind bend.

This road inherently suffers from fog and low cloud during the winter months. It has a history of accidents on this section of road for the above reasons.

Pedestrians wanting to cross and recross this section of road to exercise their pets on the adjacent land. Also mainly elderly and children wanting to crossover to the bus stop

The proposed number of new housing on these two sites would virtually link up with existing housing creating one dense suburb with no natural break.

It would blight the views and enjoyment for the many people who walk the South Down Way.

Something Brighton and its council are justifiably proud of.

Yours faithfully



Subject: City Plan Part Two - Potential development site
Date: 29 October 2020 12:36:56
Attachments: [image007.png](#)
[image008.png](#)

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

Dear Sirs

I write with reference to the above.

I have endeavoured to make comment on your web site but it has been quite difficult. Having said that I am fully supportive of the Plan and would be keen to bring forward a site we own as either a mixed use or PBSA scheme.

We have been approached by many developers and would anticipate that we could bring a project forward in the time frame of the next 3-7 years. One of our issues would be to find suitably alternative premises to relocate our business and to provide our Tenants the appropriate opportunity to do likewise.

The address is address is :

Albany house, New England Street, Brighton BN1 4GQ and the adjoining land at St James House New England Street, Brighton BN1 4GQ registered under title number SX 83575

Provided the Council are amendable to a tall building, the site could accommodate over 10 storeys high (the site across the road has recently been permissioned at 14 storeys and developers have approached about a PBSA of in excess of 500 units and this would translate into a mixed use scheme of shop/office on lower floors and 200 plus residential units.

The site was I believe referenced in the Part One and should be referenced again in Part Two.

Thank you for taking the time to read this submission

Brewers
DECORATOR CENTRES

Albany





The countryside charity
Sussex

CPRE Sussex

www.cpresussex.org.uk

30th October 2020

Brighton and Hove City Plan part 2 Proposed Submission Document

This is the formal response of CPRE Sussex, countryside charity, to the above consultation. CPRE Sussex works to enhance, promote and protect the Sussex countryside and the ability of local communities to enjoy and value the natural world. We support a democratic, plan-led system that creates vibrant and successful places for people and nature.

Our response is as follows;

Section A - Your Details

Name **(Required)**

What is your address?

What is your email address? **(Required)**

To promote, enhance and protect a thriving countryside for everyone's benefit

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568
Facebook : www.facebook.com/CPRESussex | Twitter : @cpresussex

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

CPRE Sussex

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"/>

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

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

DM22

Policy Title e.g. Housing and Accommodation

Landscape design and trees

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"/>

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.

CPRE Sussex supports policy DM22 as in line with the requirements of NPPF paragraph 170.

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.

N/A

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.

Policy Number (DM1 to SSA7)

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

DM38

Policy Title e.g. Housing and Accommodation

Local Green Space

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

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.

CPRE Sussex supports the inclusion of policy DM38 and the allocation of Hollingbury Park, Three Cornered Copse, Ladies' Mile and Benfield Valley as Local Green Spaces (LGS). However, we believe that Whitehawk Hill should be designated as a LGS and that the policy is not sound without this. Whitehawk Hill LNR meets the criteria set out in paragraph 100 of the NPPF. CPRE Sussex is concerned that the allocation of a development site on Whitehawk Hill LNR (policy H2) will set a damaging precedent which is not consistent with paragraph 174 of the NPPF.

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.

CPRE Sussex believes that the allocation of 'Land at and adjoining Brighton Race Course' is not sound and should be deleted from the plan. Additionally, the entirety of Whitehawk Hill LNR should be included in the list of Local Green Spaces. If the allocation is not deleted, we believe that the remainder of the LNR should be designated as a Local Green Space, as has been done for Benfield Valley.

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"/>
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(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.

CPRE Sussex wishes to attend the examination hearings so that we can present our views in this issue in more detail.
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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.

Policy Number (DM1 to SSA7)

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

DM40

Policy Title e.g. Housing and Accommodation

Protection of the Environment and Health – Pollution and Nuisance

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

	Yes	No
Legally Compliant	<input type="checkbox"/>	<input checked="" 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
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Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

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.

CPRE Sussex supports policy DM40, particularly point 'g' in relation to ensuring "outdoor lighting is well designed; low impact; efficient; the minimum necessary with an appropriate balance between intensity, fittings, height and structures; and, not cause unacceptable detriment to public and highway safety, biodiversity, in particular priority habitat and species, the night sky and the South Downs National Park International Dark Sky Reserve." We support protection of the dark skies of the SDNPA as believe that this is in alignment with the National Parks and Access to the Countryside Act 1949. However we question whether the word 'outdoor' should be removed so that this policy covers all lighting which may be intrusive?

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.

Remove the word 'outdoor' from this policy.

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.

CPRE Sussex wishes to attend the examination hearings so that we can present our views in this issue in more detail.

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Policy Title e.g. Housing and Accommodation

Benfield Valley

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

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.

CPRE Sussex objects to residential development within the LWS at Benfield Valley. We do not believe that this is justified or compliant with national policy under paragraph 174 of the NPPF which requires plans to safeguard components of local wildlife-rich habitats including locally designated sites of importance for biodiversity.

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.

CPRE Sussex requests that the second paragraph of policy SA7, which relates to residential development, be deleted from the plan. The boundary of the Local Green Space should be extended to cover the whole of Benfield Valley.

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.

CPRE Sussex wishes to attend the examination hearings so that we can present our views in this issue in more detail.

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.

Section E **H2 Housing Sites – Urban Fringe**

Please only fill this section out once

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

- ALL SITES**
- Land at Oakdene, Southwick Hill / Land West of Mile Oak Road, Portslade
- Benfield Valley
- Land at and adjoining Horsdean Recreation Ground, Patcham
- Land at Ladies Mile, Carden Avenue
- Land to north east of Coldean Lane
- Land north of Varley Halls, Coldean Lane
- Land at and adjoining Brighton Race Course
- Land at South Downs Riding School & Reservoir Site
- Land north of Warren Road (Ingleside Stables)
- Land at Ovingdean Hall Farm & Land at Bulstrode / Ovingdean Farm
- Land adjacent to Ovingdean and Falmer Road, Ovingdean
- Land at former nursery, Saltdean
- Cluster at Coombe Farm and Saltdean Boarding Kennels, Westfield Avenue North, Saltdean
- Land west of Falmer Avenue, Saltdean

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

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.

CPRE Sussex objects to this policy and does not believe it is consistent with national policy or justified. The NPPF is clear that the planning system should establish coherent ecological networks that are more resilient to current and future pressures (paragraph 170) and that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 171). Further to this paragraph 174 is clear that plans should safeguard components of local wildlife-rich habitats including locally designated sites of importance for biodiversity. We object to all allocations which compromise Local Wildlife Sites and the overall coherence of ecological networks. We strongly object to the allocation of 30 dwellings on Whitehawk Hill Local Nature Reserve (site name ‘land at and adjoining Brighton Race Course’). This LNR is an exceptional site for wildlife and of high landscape, archaeological, historical and community importance.

The total number of dwellings allocated for these sites is small against the main housing target, yet the ecological and community value is significant. The CPP1 Inspector’s Report (February 2016) clearly states that the CPP1 does not allocate urban fringe sites and that decisions on whether individual sites should be developed, will be made through the process of preparation of the City Plan Part 2 (CPP2).

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.

Remove the following sites from policy H2

- Land at Oakdene, Southwick Hill / Land West of Mile Oak Road, Portslade

- Benfield Valley
- Land at and adjoining Horsdean Recreation Ground, Patcham
- Land north of Varley Halls, Coldean Lane
- Land north of Warren Road (Ingleside Stables)
- Land at Ovingdean Hall Farm & Land at Bulstrode / Ovingdean Farm

Delete the 'Land at and adjoining Brighton Race Course' from policy H2 and safeguard the site as a statutorily designated Local Nature Reserve.

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)

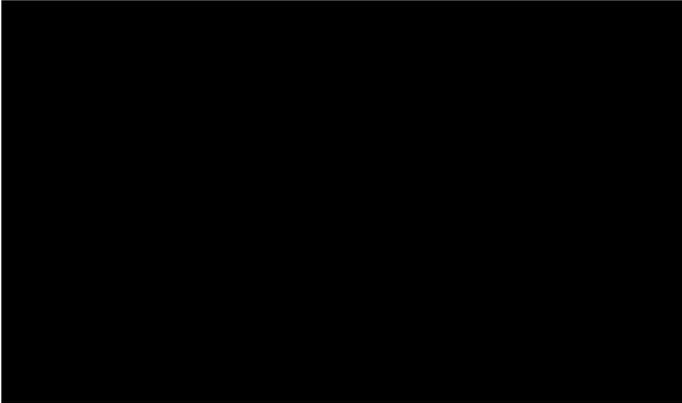
If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

CPRE Sussex wishes to attend the examination hearings so that we can present our views in this issue in more detail.

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.

CPRE Sussex wishes to participate in any examination hearings sessions relevant to any sections of the City Plan Part Two that we have submitted objections to. We wish to discuss our objections formally with the Inspector and respond to any additional evidence presented by other respondents.

Yours sincerely,



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.

The council will not share or publish postcodes or email addresses. BHCC will however have to pass on all contact details to the Planning Inspectorate (PINS) who will undertake the examination of the City Plan on behalf of the government. Details of the PINS privacy policy can be seen below. Please tick to reinforce that you have read this disclaimer and have read the PINS Privacy Notice below

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

<p>(Required) I have read the PINS privacy statement above</p>	<p>Y</p>
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Best regards

Planning Policy Team

City Development & Regeneration | Brighton & Hove City Council

First floor Hove Town Hall, Norton Road, Hove, BN3 3BQ

W: www.brighton-hove.gov.uk

Our customer promise to you

We will make it clear how you can contact or access our services | We will understand and get things done | We will be clear and treat you with respect

[Redacted signature block]

Subject: Comments on CPP2 Proposed Submission Stage

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

Following on comments on selected policies of the CPP2.

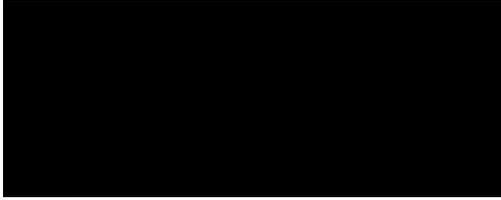
- DM22 Landscape Design and Trees - supported.
- DM37 GI and Nature Conservation - As well as ensuring a net gain in biodiversity is achieved, should also follow the mitigation hierarchy to ensure impacts are avoided, mitigated or as a last resort compensated.
 - DM37 C. The statement "unless allocated for development..." implies that adverse effects on allocated sites do not need to be mitigated/compensated; any adverse

impacts on protected/notable species/habitats, even if within allocated sites, should only be permitted if it can be clearly demonstrated that the mitigation hierarchy has been followed. Failure to do so would be contrary to the NPPF and BS42020:2013 and may potentially lead to an offence under wildlife legislation.

- Para 2.275. "...including cumulative and in combination impacts..."
- In relation to BNG, whilst it is anticipated that the Environment Bill will require a minimum 10%, Local Nature Partnerships across the South East are advocating a minimum BNG of 20%. To be fully implemented, this will need to set out in local planning policy. Will there be an opportunity to expand on this in the review of SPD11?
- Para 2.275 species and habitats of particular importance, should be species and habitats of principal importance, as listed under section 41 of the NERC Act.
- Para 2.276 The Natural Capital Investment Strategy was adopted by the Sussex LNP in October 2019.
- Footnote 75 - text is repeated.
- Para 2.278 NRN and LNRS will be a requirement under the Environment Act (when enacted).
- Para 2.280. Ecological surveys should be conducted in accordance with best practice guidance, including BS42020 and CIEEM Technical Guidance. Preliminary Ecological Appraisal (PEA) reports should not be submitted as part of a planning application unless it can be determined that the project would have no significant ecological effects, no mitigation is required and no further surveys are necessary; with the exception of such cases, the PEA report should be superseded by an Ecological Impact Assessment (EIA).
- Footnote 76 - SxBRC is the principal source for biodiversity information. The Booth Museum may hold additional information, specifically with respect to geodiversity.
- Para 2.281 Why is it necessary to state that SPD11 will refer to low-cost nature conservation features?
- Para 2.282. Nature based solutions to carbon storage and sequestration should also be sought, e.g. the protection/creation and management of woodland and hedgerows, wetland habitats etc.
- Para 2.285 Local Geological Sites are referred to throughout Sussex as LGS, rather than LGeoS.
- DM39 Development on the Seafront
 - Para 2.298 Development which generates a need for enhancements to defences should not be permitted if it would be detrimental to nature conservation, most notably the MCZ, SSSI and areas of coastal vegetated shingle.
- Low Carbon Opportunity Zones: the release of carbon from the loss of semi-natural habitats and the ability for semi-natural habitats to sequester and store carbon should be taken into account.
- H2 Housing Sites - Urban Fringe
 - Para 3.73 states that information required includes an Ecological Assessment including Protected Species Surveys. To align with best practice guidance and to streamline the planning process, applications should be informed by an Ecological Impact Assessment which should include details of any protected species surveys required and be clear and unambiguous as to the mitigation, compensation and enhancement measures that will be implemented. Multiple reports should not be provided.
 - Para 3.76 States that all sites identified in the 2014 UFA were subject to detailed

ecological assessments in the 2015 UFA. This not the case. Sites were subject to desktop studies and phase 1 habitat surveys to identify broadscale impacts and potential for protected/notable habitats and species. These studies cannot be classified as detailed surveys.

Kind regards



[eastsussex.gov.uk](https://www.eastsussex.gov.uk)



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

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You can visit our website at <https://www.eastsussex.gov.uk>

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If the reader of this message is not the intended recipient, please note that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error please notify the sender immediately.

Thank you in anticipation of your co-operation.

You can visit our website at <http://www.brighton-hove.gov.uk>

Please consider the environment, only print out this email if absolutely necessary.

[REDACTED]

Subject: Network Rail - Service Request Notification 201007-000026

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

This message is automated. Please do not respond to this E-mail as it will return to a mailbox that is not monitored.

[REDACTED]

[REDACTED] has now been closed. Please see below for the reasons for closure. If you require any further information or assistance please do not hesitate to contact our 24 hour helpline on [REDACTED] or visit our website at www.networkrail.co.uk

In order to improve the level of service we offer our customers, we would be grateful if you could take 5 minutes to complete a quick survey providing your views on how we have managed your service request. If you would like to participate in this survey then please [click here](#).

Thank you for your time.

Kind Regards,
Network Rail

Subject

Seeking Network Rail's views on the proposed submission city plan part two before its submitted

Question Reference # 201007-000026

- Date Created: 07/10/2020 07.39 AM
Date Last Updated: 02/12/2020 10.53 AM
Status: Closed

Response By E-mail (John Eccles) (02/12/2020 10.53 AM)

[REDACTED]

Regarding your request for Network Rail's views on the proposed City Plan, our Town Planning team have advised me that no representations from Network Rail are required.

I hope this information is helpful.

Kind Regards

[REDACTED]
Auto-Response By (Administrator) (12/10/2020 12.52 PM)

Your service request has been assigned to our team to investigate further. They will report back shortly with their findings and your local contact and communities team will be in contact to confirm the next steps in due course.

Kind Regards,

Network Rail Team

Customer By Post [REDACTED] (07/10/2020 07.39 AM)

Letter received and attached. Seeking Network Rail's views on the proposed submission city plan part two before its submitted.



Registered charity no. 271138

29 October 2020

Brighton Society comments on City Plan Part 2 consultation

Housing

DM1 Housing Quality, Choice and Mix

Agree, but as quoted, the problem of changing needs as families grow should be addressed. How can new buildings on new housing developments be extended to cater for a growing family?

What proportion of the new housing developments approved recently contribute to the 50% requirement referred to above for 3 or 4-bed houses? The lack of new homes being approved for new dwellings of those types is we suspect the main problem which needs to be addressed for C3

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 (ie 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.

Para 2.11 Add: "small scale horticultural uses"

Para 2.13: Add: "external storage for bicycles, garden tools and furniture etc".

DM2 Retaining Housing and residential accommodation (C3)

Agree, but:

Para 2.17: *"Where it can be demonstrated that there has been a material change of use from a residential use e.g. to a holiday let, then this policy may be used for enforcement purposes. The intensification of such uses on a permanent basis can harm the residential amenity or character of the locality due to levels of activity that cause excessive noise and disturbance to residents."*

Change 'may' to 'will'. As we mentioned previously.

Also: It is unlikely the Council will achieve this aim, however. The private student rental sector along with other private lets will continue to affect residents' quality of life and reduce choice as to where they would like to live due to the high number of homes being converted. The intensification of such uses on a permanent basis can harm the residential amenity or character of the

locality due to levels of activity that cause excessive noise and disturbance to residents.

The amount of private rented properties in Brighton & Hove is 21% - with an average rent of £987pm - twice as high as the national average, along with c5,000 HMOs.

The Council should lobby the government to change the policies on No Fault Evictions, Permitted Development Rights and Council Tax and Business Tax exemptions. The Council is losing millions of pounds with these exemptions.

If the average expected rates on c5,000 HMOs are, say, £1,600pa the loss to the city is £8m.

Para 2.17: It is estimated that another 2,500 are private rentals such as holiday flats and houses, party houses, Airbnb, Uber etc

Efforts should be made to ensure that a significant change of use such as a holiday let or AirBnB be made subject to a planning application or Article 4 direction throughout the city.

Para 2.19 Could not the Council be more pro-active in discouraging second homes and holiday lets in the City, to bring as many housing units as possible into full time use by local people?

Why is there no information on how many properties in the city are second homes and/or vacant? What is the Council's Empty Property Service Plan? It needs to be explained.

DM3 Residential conversions and the retention of smaller dwellings

Agree

DM4 Housing and Accommodation for Older Persons

Agree, but

Add to the list a-g the desirability of older people remaining within the same neighbourhood should they move to smaller or more specialised accommodation (eg sheltered housing or care homes). Older people and those with mobility problems also need to be located at or near ground floor levels.

These considerations imply that potential sites for such developments should be specifically identified on a neighbourhood basis, or a proportion of housing suitable for the elderly should be identified within larger housing developments within those neighbourhoods, in order to meet the need.

Given the 41% increase in the numbers of older people this is a critical housing requirement which needs to be set out more clearly.

2.29 Are there enough incentives within the City Plan to make it attractive to developers to provide housing for older persons? Why would they do that when

they could probably make more money providing 2-bed flats on the upper levels of tall buildings for young professionals?

2.31 What would the age restriction referred to in this paragraph be? Regarding the communal meeting lounge, this needs to be a requirement for clusters over a certain size, say more than 10 dwellings.

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

Agree

DM6 Build to Rent Housing

Agree, but

Para 2.44 Open spaces omitted. Why? As the densities of housing and additional people living within the city increase, the demands on public open space will become even more critical. More funding from Section 106 and/or CIL funds is desperately required.

Para 2.48 *The policy seeks to ensure that developments offer longer term tenancies of at least 3 years to all tenants whether paying market or affordable rent Should be a minimum of 3 years, not at least 3 years.*

Para 2.5 *The study demonstrates that, subject to the variables tested, build to rent schemes in the city are capable of supporting up to 20% affordable units provided at discounted rents at least 20% below equivalent local market rents. However, greater levels of discount would be required to deliver units that are genuinely affordable to most of those eligible to join the council's housing register, Therefore in negotiating the affordable element of build to rent schemes, the council will consider the trade-off between the number of affordable units to be provided and the level of affordable discount that may be achieved.*

Does this mean that however hard the Council tries with a 'trade-off' the amount of affordable units will be reduced? Looks like it.

Management issues. Increasingly developers are claiming that they cannot find anyone to manage affordable housing within developments and use commuted payments instead. This process needs to be clarified, including details of how such funds are to be spent on providing the numbers of affordable dwellings the commitment to which the developer has avoided. This sum should include the additional market value of the extra units released by the relaxation of the obligation.

DM7 Houses in Multiple Occupation (HMOs)

Agree, but

Para 2.65 states that the 20% level is considered appropriate for assessing wider neighbourhood areas with indirect impacts that affect the character of communities (for example a decreasing demand for local schools and changes in types of retail provision) rather than the specific impacts on individual properties that the existing other criteria in this policy and CP21 are intended to address.

Unfortunately this consideration is too late. Where there is a decreasing demand for local schools and loss of local shops it is simply because certain areas of the city are now devoid of local families who have moved away, owing to the increase of HMOs.

DM8 Purpose Built Student Accommodation

Agree, but

Para 2.73 states: Pelham Street remains undeveloped and without an extant permission but is still considered as one of the five sites for new development.

It should be noted that Pelham Street has approval for residential use (see BH2020/00550). Should Pelham Street be removed from the list of five sites?

Additionally, could conditions be implemented that students in PBSA stay for three years while at university, bearing in mind the facilities provided? It is common for students to stay in PBSA in some areas, such as York.

Design & Heritage

DM18 High Quality design and places

Opening statement of DM18 - the problem with terms such as “a sense of place, and the visual quality of the environment”, is that they are abstract and highly subjective. Therefore the reasoned justification can only be seen as a marketing exercise – fine words, but will they have teeth?

We asked this question in our response to the draft City Plan Part 2 citing the (then) recent examples of Circus Street, Preston Barracks, and the Edward Street development, and concluding on the basis of those that the answer had to be emphatically **NO**.

The concerns we expressed then about the Draft City Plan 2 have not been answered in this final version.

Since then we have seen applications approved for ugly, boxy 18 storey developments at Ellen Street Hove, up to 15 storeys at Anston House, 18 storeys at the Longley Industrial Estate, a huge development of high buildings up to 15 storeys on the Sackville Trading Estate Hove, (which we termed Croydon-on-Sea), large buildings up to 10 storeys on the Peacock Industrial Estate, not to mention the massive Marina project which is now the subject of an appeal.

Where will it stop? When will the city planners finally say enough is enough? How many tall buildings are too many before the historic character of the city is terminally damaged?

The importance and value of our city's urban heritage, its 34 conservation areas, and its 3500 listed buildings is being gradually compromised and increasingly threatened by massively out of scale developments.

This is the section of City Plan 2 dealing with design and heritage and it doesn't even ask these sorts of questions. In fact the first time the word 'heritage' is used in this Design and Heritage section is 16 pages further on in the section dealing with advertisements; the next one is 25 pages on and then only in relation to “Locally Listed Heritage Assets”.

The only gesture to the importance of our historic urban landscape appears as an afterthought in DM29 below. We make the appropriate comment there.

Has the expression “urban heritage” no relevance in this document? Yet it is the most important element in this city which needs to be protected.

The scale of these threats and the apparent inability of the Council to do anything about them make a nonsense of the platitudes set out in this section of City Plan Part 2.

The Introductory section on page 63 sets out four key design aspects:

- (a) local context and urban grain;*
- (b) scale and shape of buildings;*
- (c) building materials and architectural detailing.*

- (d) *the spaces between and around buildings taking into account:*
- (i) *purpose and function;*
 - (ii) *access and linkages;*
 - (iii) *uses and activities; and*
 - (iv) *comfort, image and sociability.*

These design priorities are threatened by a number of factors not mentioned in the draft.

- (i) First, the impact of the tall buildings policy, which risks harm to the city's heritage and landscape in terms of excessive height and scale with consequential detrimental effects on views of and from key parts of the city, including the detrimental effect on the city's heritage assets.
- (ii) Secondly, the inadequacy of planning policy on all tall buildings in general - for example, up to now the lack of proper Urban Design Frameworks and studies which would examine the context of sites for tall buildings, and the preferred design parameters within which tall buildings can be suitably designed in relation to and in sympathy with their surroundings.

We are aware that a consultation document on the UDF SPD has been issued within the past week and we will be commenting on that draft in due course.

Also we question the need for tall buildings – density is the important issue. See our comments on this issue in item DM19 below.

- (iii) Thirdly, the impact of the National Planning Policy Framework (NPPF), and the effects this is having on the Council's ability to control its own planning policies.

In particular we are concerned about the obligation the NPPF imposes on Local Authorities to balance public benefits and harm, and the likely detrimental effects of this on Heritage considerations, such as Conservation Areas and Listed Buildings and our historic urban landscape in general.

- (iv) Fourthly, we are concerned about the influence of external sources of design advice, for example the regional design panel, whose judgements could be said to reflect more typical international and national trends - rather than being based on local knowledge, appreciation of the existing urban context, the historical importance of much of the central area of the city and the traditional patterns of development appropriate to the historic character of many areas of Brighton & Hove.
- (v) We would like to see the criteria which govern the key design aspects set out in (a), (b), (c) and (d) above, protected against such threats, and their importance relative to those threats clarified and stated within policy DM18.
- (vi) Any discussion of local context (para 2.148), should include a reference to 'polite relationships'. This is particularly important as a general principle to be applied when it comes to reviewing the effects of new developments on existing urban environments.

The subsequent paragraphs **2.150 – 2.159** while well-intentioned, are yet further examples of toothless generalisations waiting to be ignored by developers.

Paras 2.152 to 2.157 (discussing the design of spaces), don't even mention the desirability of sunlight. We pointed out this omission in our response to the first draft – but it has been ignored.

In relation to paras 2.157 and 2.158 (artistic element) this paragraph should make quite clear the difference between 'art' and 'graffiti'. Graffiti is unacceptable and epitomises social decline and promotes vandalism of our historic environment. Art does precisely the opposite.

We have drawn attention to the lack of reference to graffiti. Since then, the problem of graffiti despoiling our public spaces has become considerably worse. But there is still no mention of the problem in this document.

Para 2.159 - "*design review service*" – we previously asked about the meaning and relevance of this item. Would it involve local knowledge and expertise? Would it include for example, the Conservation Advisory Group? This document does not deal with the question.

DM19

Para 2.161 - we consider the densities quoted are generally too low. In most recent planning approvals for large scale developments the densities achieved have been far higher.

We have proved in our own design studies - for example on Anston House - see <http://www.brighton-society.org.uk/tall-buildings-debate/> - that high densities can be achieved with low-rise solutions (with a maximum of 10 storeys, and mostly less than that), approaching 400 dwellings per hectare (dph).

Elsewhere in the city – for example on the fringe sites - much greater numbers of dwellings than set out in the City Plan could be achieved by merely raising the figure of 50 dph to 55 dph.

As an aside this would be a much more effective way of increasing the number of dwellings in the city than by permitting more tall buildings. For example a typical tall building – say one of the three towers in the Anston House scheme – would have three flats per floor. So five storeys would have fifteen flats – the difference between a 10 storey building and a fifteen storey building.

So let's assume that 20 fifteen storey buildings might be built between now and 2030. If they were only 10 storeys this would result in 300 fewer flats (15 x 20). This is a drop in the ocean compared with the figure of 13,200 new dwellings required in the city – about 1.7% of the total. Tall buildings are not necessary – increasing the figure of 50dpu to 55 would provide far more houses – of the type actually required – family houses, rather than a relatively small number of small flats on the upper floors of tall buildings.

A precedent for low-rise high density development exists already in the city:

the most densely populated neighbourhood in Brighton & Hove is the area between Western Road and Lansdowne Road in Hove, bounded by York Road to the east and Lansdowne Street to the west. It consists mostly of 5 – 6 storey Victorian terraces, usually with semi-basements. At 315 persons per hectare this area is also the most densely populated area in the south-east outside London (*Brighton & Hove City Snapshot Summary of Statistics 2014*).

That equates to 31,500 persons per sq. kilometre. For comparison, several arrondissements in central Paris vary between 28,000 to 42,780. Manhattan is only 27,826.

The numbers can be achieved without resorting to tall buildings.

Para 2.163 – 2.164 (engagement and consultation). When applicants for major, significant or ambitious Developments publicly present pre-application plans and outline designs, enabling local residents and other relevant interests to comment and discuss openly and directly with them, the results of the consultations need to reflect accurately the proximity or immediacy of those affected, the depth and strength of feeling or opinion voiced or recorded and the seriousness and preponderance of those views.

Recent public consultations have tended to take the form of a tick box questionnaire, asking only loaded questions. An example was the recent application for the Gateway development on Kingsway in Hove overlooking Aldrington Basin. This is an extract from the questionnaire:

- *Do you like the appearance and form of the revised development proposed?*
- *Do you support the need for providing more homes in this part of the city?*
- *Do you support the need for providing new office and other commercial units in this location that will create new jobs for the city?*
- *The majority of the revised scheme is ground floor plus six storeys in height rising to ten storeys. (ie 1 + 10 = 11) Do you agree that taller elements of the scheme above six storeys are acceptable?*
- *Do you agree that new facilities such as a gym, roof top restaurant and café will benefit the area?*
- *Overall, do you support the proposed mixed-use redevelopment of the site?*

Pretty loaded questions – how the developers expect to get a fair response based on questions like that is anybody's guess. That isn't a proper public consultation. When we tried to find out the results, we were told they would only be made available after the planning application was lodged. That is a travesty of a public consultation.

Para 2.157 – consultation with neighbours is not often done and invariably leads to conflicts between neighbours. Confirmation of consultation with neighbours should be a requirement accompanying all planning applications and a report on those consultations (including on any subsequent amendments), and the outcome of those consultations should be a requirement accompanying **any** planning application. This could actually save officer time by reducing the likelihood of potential conflicts.

DM22 Landscape Design and Trees

3rd para (p.73) - what is meant by “national importance”? How is that expression defined?

In the case of existing and potential green spaces, including public land, whose basis and essence is *grass*, consideration should be given to the risks of over-exploitation by temporary functions, events and structures which damage the endurance, health, appeal and amenity of the grass. See also our comments on Policy DM30 – Registered Parks and Gardens.

DM23 Shop Fronts

We generally support these policies.

But in relation to para 4, (p.77) we suggest that the option proposed of a “public art commission” should be deleted. This is an open invitation for a so-called ‘graffiti artist’ to impose his ‘art’ on the community. We have quite enough of that in the city as it is.

DM24 Advertisements

In our response to the first draft, we questioned the relationship between advertisements and graffiti. We said - “if graffiti is signed, is it an advertisement? It would then need to have planning approval. That would be interesting. Though whether Planning Enforcement would ever get around to addressing the question is open to doubt.”

Since then we have had the ██████ affair where (without permission), he applied his name prominently on a large mural on the Gelato Gusto at 2 Gardner Street in the North Laine.

It **was** interesting. Initially the council claimed it was his signature and therefore wasn’t an advertisement; we then showed what his actual signature looked like and the Council had to admit the mural did constitute an advert and it was removed.

In spite of our previous reservations (entirely valid as it turned out), there appears to be no specific reference to clarification on this point in DM24.

DM25 Communications Infrastructure

We support this policy, though should there not be a reference in this item to the subjection of these communication cabinets to art, advertising, decoration, graffiti and visual abuse? Or a cross-reference to the topic in which public art and graffiti is considered?

Who owns them – should the owners not be responsible for maintaining them and cleaning off graffiti, tagging and advertisements in line with the Council’s graffiti strategy?

DM26 Conservation Areas

This section appears to have been considerably watered down since the first draft. That is a highly retrograde step and seems to reflect a regrettable lack of interest in Heritage and Conservation priorities.

Para 1 – the phrasing of this paragraph seems to indicate a presumption in favour of permission. We think the word “only” should be inserted (2nd line) between the words “will” and “be”, so it reads: Development proposals within conservation areas..... will **only** be permitted.....

DM26 should also make it clear that applications will not be permitted where they would be detrimental or cause harm to the character of the Conservation Area.

item b – include the term “important architectural references” to the list of relevant criteria.

item j – things like paving, kerbing, landscape elements and lamp posts should be specifically referred to and included in this item.

A statement **must** be included to insist that in all cases a Heritage Statement is to be submitted with all planning applications in conservation areas together with contextual information to show how the existing streetscape is affected by a particular proposal. Currently some do, but sometimes they don't.

It is noticeable that the applications where this information is not provided tend to be the worst in terms of quality of design as well as presentation.

Here is our suggestion: *“In all cases a heritage statement must be submitted to describe the significance of any heritage assets affected. Where there is no adopted character statement for the area, the applicant will be **required** to carry out an appraisal of the area and submit this in addition to the heritage statement. This appraisal should be proportionate to the scope of the proposal.”*

Para 189 of the NPPF states that: *“In determining applications, local planning authorities should **require** (our emphasis) ... an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*

Policy DM26 should acknowledge the fact that many Conservation Character Statements need to be updated and improved. Recent Character Statements such as those for the Old Town and Queen's Park have set new, much higher standards than those Character Statements which were written say twenty years ago.

Para 2.207 *“The council will support the removal of buildings that have been identified in a character statement as harming the conservation area”*. Is there a case for extending this to say ‘the removal or transformation of buildings’?

Generally - Should there not be some discussion and guidance about the priorities and definitions set out in the NPPF in terms of “harm” and the relative values in terms of balancing “harm” to conservation assets as against perceived “benefits” in

terms of matters such as housing or jobs etc. In other words, at what level does conservation stand in the list of “benefits”? Above public benefits such as jobs and housing targets, or below?

DM27 Listed Buildings

Para 1 – the phrasing of this paragraph seems to indicate a presumption in favour of permission. We think the word “only” should be inserted (2nd line) between the words “will” and “be”, so it reads: Proposals involving the alteration, extension, or change of use of a listed building..... will **only** be permitted.....

DM29 The Setting of Heritage Assets

This is probably one of the most important sections of the whole Design and Heritage section. Its location in the document after Locally Listed Heritage Assets implies it is lowest in the pecking order of heritage priorities, whereas it really deserves to be at the highest level.

Brighton & Hove in terms of its historic built environment, is one of the most important heritage cities in the country. It has almost 3,500 listed buildings and 34 conservation areas, mostly in the central area of the city. In fact you could almost say that the whole of the central part of the city is one big conservation area.

Nothing in this section even begins to acknowledge or recognise this vitally important fact.

It follows that developments in the relatively few parts of the central city which are not conservation areas – particularly large-scale developments - are bound to have some effect on one or more of the 34 CAs – and the bigger the development, the more conservation areas are likely to be substantially affected.

So the setting of new developments is incredibly important and the design and scale of new development needs to be controlled in order to minimise any detrimental effect on the city’s historic character and scale, its skylines, its landscape and seascape and its historic building heritage from massively scaled developments and tall buildings which might have such a detrimental effect on the character and scale of the city.

This context needs to be stated clearly and firmly in Policy DM29. Para 2.227 is the closest it gets to describing the importance of setting – but the paragraph ends with the ridiculous conclusion that “this policy does not therefore preclude a bold architectural approach where appropriate”.

If any statement might encourage developers to come up with unsympathetic and out of scale design solutions this would be it.

A statement saying exactly the opposite is required. Sadly the Planning Dept appears to be blissfully unaware of the importance of the heritage assets it is responsible for protecting, and which are within its care.

This whole section of the policy needs to be completely re-written and the most important priorities reflected in both the layout order and the text.

DM30 Registered Parks and Gardens

We consider that temporary events should be precisely that. Where they exceed six weeks they begin to have a detrimental effect on the Park or Garden. The word “temporary” should be qualified to mean a maximum period of six weeks from beginning to end of the temporary use.

In addition, a statement setting out what investigations have been carried out on the feasibility of using alternative sites and locations for temporary events must be carried out and included as part of a planning application for a temporary event prior to that application being lodged.

The statement that “*The production of management plans for registered parks and gardens and the implementation of identified enhancement works will be positively encouraged*” is inadequate. It should be “required”.

See also our comments on DM22 above

DM32 – The Royal Pavilion Estate

Comments as for DM30.

Section 3 - Special Area Policy, Strategic Site allocations, Housing and Mixed-Use Sites and other Site Allocation.

We have commented on the following proposals.

SSA1 Brighton General Hospital Site

We support the proposals to make the Hospital Site a Conservation Area. The aim to progress this proposal should be included.

SSA5 Madeira Terrace and Madeira Drive

Reference is made to the inclusion of a "Boutique Hotel" as part of the restoration of the terrace. This is inappropriate - how can a hotel be incorporated as part of the Listed Terrace? This seems to hark back to a developer's idea to bury the terrace inside a hotel. A boutique hotel could only be constructed if the terrace was just being used as a floor area within the hotel. Madeira Terrace is a national historic structure and burying part of the terrace within a modern building would be entirely unacceptable in terms of its listing and historic value. Any reference to a "Boutique Hotel" should be deleted from this section.

There is a statement to consider the feasibility of re-opening the staircases and lift connecting Marine Parade and Madeira Drive. There should be a far stronger statement – better to state that the lift and staircases will be re-opened as part of the restoration of the terrace.

H2 Housing Sites – Urban Fringe

Object to inclusion of following Sites;

Land at and adjoining Horsdean Recreation Ground, Patcham.

Reason: Downland designated as an area of outstanding natural beauty. Would result in destruction of numerous trees and adversely affect wildlife. It would significantly change the setting of the recreation ground and surrounding area.

Land at and adjoining Brighton Racecourse.

(Objection does not include housing adjacent to Lodsworth Close).

Reason for objection. Proposed small pockets of housing on the ridge line would be extremely detrimental to views of the Downland setting of this part of the city. Detrimental effect on ecology and wildlife of this sensitive area.

Land at South Downs Riding School and reservoir site

Reason: Site is on the ridge line of Downland and would cause a severe detrimental intrusion to views of the ridgeline from the north and west. Historically, past developments in Brighton have avoided any building on the ridge lines to preserve the setting of the Downs. This policy existed throughout the development of the estates built following the 2nd World War and this successful policy of ensuring that

Brighton & Hove's Downland setting is maintained intact should not be jeopardised by proposed developments such as this.

Land north of Warren Road (Ingleside Stables).

Reason: Site is on the ridge line of Downland and would cause a severe detrimental intrusion to views of the ridgeline from the north and west. Historically past developments in Brighton have avoided any building on the ridge lines to preserve the setting of the Downs. This policy existed throughout the development of the estates built following the 2nd World War and this successful policy of ensuring that Brighton & Hove's Downland setting is maintained intact should not be jeopardised by proposed developments such as this.

[Redacted]

[Redacted]

Subject: City Plan Part 2 - Benfield Valley - representation from Councillor Dawn Barnett

Follow Up Flag: Follow up

Flag Status: Flagged

Switch-MessageId: bb1016ddb53240859a09cbfa57d2a118

To whom it may concern,

Councillor for Hangleton & Knoll, Cllr Dawn Barnett [Redacted] would like her comments regarding Benfield Valley and City Plan Part 2 as recorded in this interview on Latest TV to be considered as a submission to City Plan Part 2 consultation process: <https://www.youtube.com/watch?v=q6mZsFYWBPO>

Regards,

[Redacted]

[Redacted]

Subject: RESPONSE TO CITY PLAN PART TWO

Attachments: CITY PLAN PART TWO+ARTS, CULTURE, COMMUNITY.docx; EMPLOYMENT AND RETAIL SECTION+CITY PLAN (Autosaved).docx; CITY PLAN PART TWO+ENVIRONMENT AND TRANSPORT.docx; CITY PLAN PART TWO+HOUSING.docx; PLANNING SECTION+CITY PLAN TWO.docx

Follow Up Flag: Follow up

Flag Status: Flagged

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

Dear Sir or Madam,

Please find enclosed the response from Brighton and Hove Liberal Democrats to the City Plan Part Two. I would be grateful if you could acknowledge this response and refer to either Brighton and Hove Liberal Democrats or B & H Liberal Democrats in all Council papers that refer to these comments about the City Plan,

The responses are listed in the various sections under the topics of Arts and Community; Employment and Retail; Environment and Transport; Housing; and Planning in the enclosed Attachments.

The formal details for the Response Form are as follows:-

RESPONDING ON BEHALF OF: Brighton and Hove Liberal Democrats (following consultation)

PLEASE NOTIFY ME OF: ALL. Submission to independent examination; Publication of recommendations of Inspector; Adoption of the City Plan Two.

I HAVE READ THE DISCLAIMER.

Yours faithfully,

CITY PLAN PART TWO: ARTS, CULTURE AND COMMUNITY

DM9 COMMUNITY FACILITIES

Community, Voluntary and other Groups should be informed about their right to nominate a community facility as an “Asset of Community Value” under the Localism Act. This Facility can be nominated if it “furthers the social wellbeing or social interests of the local community”. These “social interests” can include cultural, recreational or sporting interests so this nomination can help ensure that amenities that are useful (or might be useful in the future) have the opportunity to be preserved and hopefully resourced. (Justification: Preserving Heritage; Local Economy; Community Involvement; Health)

2.82: Lack of uptake after a 12 Month marketing period is not sufficient evidence to conclude that the facility is not needed or not suitable, especially with the slowing of the economy. We request that the Council sets a higher threshold for evidence, including surveying facility users and nearby residents (Justification: Community Involvement; Protecting Community Resources).

There should be a network of signposted seafront “walking routes” to help fulfil the aim of Natural England for a coastal footpath linking up all areas of the Country. This local route should include the promenade and seafront areas of Portslade/Hove/Brighton, Madeira Drive, and the Marina Pathway to Saltdean (Justification: Health; Community; Local Tourism).

DM10 PUBLIC HOUSES

Local Pubs should be encouraged to make use of upstairs and underused spaces to provide accommodation to their staff and/or provide space for community groups, games, sporting activities and other similar activities.

2.95: We welcome the adoption of the “agent of change” principle to support grassroots music venues.

CITY PLAN PART TWO: ENVIRONMENT AND TRANSPORT ISSUES

Accessibility and Affordability are important transport principles. The Service, Maintenance, and general Work requirements of local residents and businesses also require that people are able to get around the City. It is also important for *quality of life*. These are key considerations when developing the City's transport strategy.

Environmental considerations should be at the heart of planning and transport policies. We need to encourage walking and cycling wherever feasible for short journeys whilst also encouraging the use of public transport and more eco-friendly car use.

DM33 SAFE, SUSTAINABLE AND ACTIVE TRAVEL (P98-101)

- **Cycle Infrastructure and planning:** Generally support the need to encourage cycle use with the provision of more safe cycle routes and cycle parking facilities within new developments.
- **“Safe and inclusive travel”** must be an important part of the City's Transport Policies to help meet the needs of a diverse range of people with different needs, including people who are older; people with longer-term health conditions and people with disabilities. There needs to be a balance between the needs of motor vehicles (including motor cycles); buses; cyclists; and pedestrians. (Justification: Demographic Trends; Diversity; Preventing Discrimination)
- The introduction of experimental “courtesy crossings” should be considered, particularly at seafront locations, where usual pedestrian walkways intersect cycle lanes. This would avoid some common conflicts between cyclists and pedestrians. (Justification: Safety).
- Safer walking routes should also be encouraged with the provision of signposting, information points and seating areas at spaced intervals, especially on the Seafront and along the Valley Gardens areas. There should also be co-operation with Natural England and other organisations about the creation/maintenance of a safe, accessible and practical walking route along the seafront as part of their Coastal Walking Route. (Justification: Health; Environment; Economy)
- There should be a thorough assessment of access, safety and traffic flow issues before cycle lanes are placed on main Transport routes through the City, especially “A” Roads. Wider Consultation is also important because those routes affect the whole area. It should be recognised that restricting road space can cause more congestion, traffic displacement and pollution. Also, that age, disability, weather conditions and the geography of the City can affect cycle uptake. (Justification: Safety, Employment, Access; Demographic Changes)
- Consideration should be given to the provision of a network of charging points for electric vehicles in partnership with other community and private organisations. These could be provided in larger new developments; on existing large Council Premises; with the private sector in Light-Industrial areas; and with existing or new fuel suppliers, including petrol stations. (Justification: Environment; Planning)
- Car Clubs and Car Sharing for electric vehicles should be encouraged and consideration should be given to a partnership scheme with one or more car hire companies to encourage people to use motor vehicles only for those journeys that are vital. (Justification: Lowering Carbon; Reducing Congestion and Parking Issues).

- **Transport Planners should consider the needs of motor cyclists, recognising that many of these are more environmentally friendly. Safety consideration should always be considered along with the access and parking needs of motorcyclists. (Justification: Choice; Environmental; Safety)**
- **Local Rail and Bus Companies should be encouraged to provide and promote “all inclusive” linked tickets that enable Visitors to use train or long-distance bus tickets for local “go anywhere” bus travel. Travel Links from the main stations should also be better publicised and signposted (Justification: Sustainability; Choice; Local Economy)**
- **The Council should work with the Bus Companies to ensure that fares are kept as low as feasibly possible and subsidies should be considered for key routes that are important and/or can help reduce congestion/pollution (as identified by the Council’s air pollution monitoring). (Justification: Environment; Quality of Life; Reducing Carbon;)**

DM38 TRANSPORT INTERCHANGES

- **2.255 We strongly support an improved “Park and Ride” scheme to help reduce congestion in the City linking existing bus routes and train stations. The Council should also co-operate with neighbouring Local Authorities with the aim of securing some space for such a scheme in adjoining areas where these are close to bus and train interchanges.**
- **The Council should work with local bus companies to secure a new “circular route” for buses around the central areas, taking into account the proposals for new housing developments in some areas such as New England Road, New England Street and Davigdor Road, with the aim of reducing traffic congestion. (Justification: Sustainable Travel; Reducing Congestion; Local Economy)**

DM37/38:-

- **General Support for these sections. Reconsideration should be given to the boundaries of the Hollingbury Park Golf Course area in order to allow PART to be allocated for eco-friendly homes and allotments.**
- **It should be recognised that areas of eco-friendly homes can also help contribute to carbon reduction through the growing of trees, shrubs and other plants in small streets, gardens and pocket parks.**

DM39:-

- **Seafront Infrastructure and Coastal Defences should be checked thoroughly on a regular basis (preferably annually/minimum bi-annually) and after periods of severe weather conditions. The City’s many miles of seafront must be assessed, monitored and maintained, in partnership with Agencies such as the Environment Agency. (Justification: Safety; Susyainability; Longer-Term Protection of Homes and Infrastructure)**

CITY PLAN PART TWO: HOUSING

INTRODUCTION

Liberal Democrats recognise the importance of having a “base” for reasons of health, welfare, quality of life and work. We believe that people should have choice and that there should be a mixture of housing provision available to meet different needs. We also recognise that in a City such as Brighton and Hove there is a shortage of affordable housing and social rented homes. It is therefore a priority for the Council to make every effort to provide those affordable/social rented homes in the City to house the thousands of people who are on the local Housing Waiting List.

1. We support the aim of providing 40% “affordable homes” within housing developments and this should include a considerable element of “social rented” housing. It has been disappointing that many housing developments in recent years haven’t met this aim, with some developments, both on publicly and privately owned land, failing to meet the requirements of the City. Some examples are: the former AMEX Site (Edward Street); Artisan development (Davigdor Road); the Ellen Street development; former Baptist Church Hall (Montpelier Pl); and former Council owned buildings in Buckingham Rd.

This 40% rule for the provision of affordable/social rented homes should apply to the “Strategic Site Allocations” listed in the City Plan including the former Brighton General Hospital Site in Elm Grove (SSA1); the Combined Engineering Site in New England Road (SSA2); and the Lyon Close Site (SSA3).

2. The City Plan needs to reflect the trend towards more home working; self-employment; part-time work; and flexible working. The Council therefore needs to ensure that vacant, disused and underused commercial/office space in the City is put to good use, including through the conversion of existing commercial buildings. The Council’s Planning and Housing Departments should therefore work with the owners of these vacant and underused commercial sites to maximise the amount of affordable housing provision by means of encouragement, support and (where possible) resources. This should include encouraging the conversion of existing underused commercial buildings into affordable and social rented housing units with a minimum requirement of 40% being “affordable homes”.

3. The failure to meet the aim of “40% affordable homes” in new developments over recent years means that there is now even more of a need for such homes. We believe that the existing plans are unlikely to meet the demand up until 2030, given that there are currently more than 19,000 (INDIVIDUAL) PEOPLE on the Housing Waiting List. We therefore support the re-allocation of Hollingbury Golf Course as an area for “Mixed Use”. This Mixed Use designation should include approximately 40% of that area for “Eco” Social Rented Homes; 40% to be preserved in perpetuity as a “nature reserve”; and 20% to be used as open leisure space, allotments and other recreational/leisure uses.

4. The Council need to work in partnership with Housing Associations, Housing Co-ops, the Community Land Trust and the Private Sector to ensure the maximum provision of affordable and social rented homes in the City. Wherever possible, this housing should be close to transport links, meet high environmental standards and be close to community amenities.

SPECIFIC RESPONSES TO THE HOUSING SECTION

DMI HOUSING QUALITY, CHOICE AND MIX

(f) (P14) Minimum Gross Internal Floor Areas and Storage Levels: The stated levels should be an absolute minimum and the “desirable” level of living space should be 10% above this for the purposes of the City Plan. In addition, space must be made available as part of any housing development for safe storage areas for rubbish and recycling.

(Justification: Healthy Living; Safe Space; Quality of Life; Encouraging Recycling)

DM2 RETAINING HOUSING AND RESIDENTIAL ACCOMMODATION

This should include buildings where accommodation is (or has recently) been provided within office blocks, Pubs and above shops or other commercial buildings, in order to prevent the loss of residential accommodation.

(Justification: Provision of affordable homes; lack of land available for housing)

DM4 HOUSING AND ACCOMMODATION FOR OLDER PERSONS

2.29 (OLDER PERSONS HOUSING NEEDS ASSESSMENT)

The Council should further consider changes in demographics; the availability/closure of care homes; the need to provide independent supported accommodation; and the demand for sheltered and warden-assisted homes, including flats. It might be the case that the current assessment of needs is an underestimate.

The Council should consider directly investing in some housing for older people and the Developers of Sheltered Homes and Warden Assisted Flats should provide at least 20% of their units as “social rented” accommodation to help meet the increasing needs of our City.

(Justification: Meeting growing Housing, Health and Care needs. Helping to reduce the number of hospital and nursing home beds required for older/vulnerable groups)

DM5 SUPPORTED ACCOMMODATION (SPECIALIST AND VULNERABLE NEEDS)

2.37 should include Rehabilitation Units for people with drug and/or alcohol related issues, which might be provided through Charitable, Voluntary Organisations and Housing Associations.

Specialist Supported Accommodation should also be provided for victims of Domestic Abuse.

(Justification: meeting the housing needs of disadvantaged groups)

DM6 BUILD TO RENT HOUSING

2a There should be provision of a minimum of 20% affordable social rented housing, with tenancies open to people for application from the Council’s Housing Waiting List as part of “Build to Rent” housing developments. (Justification: Lack of Affordable Homes; Lack of available land for housing)

DM7 HOUSES IN MULTIPLE OCCUPATION

2.67 This should include a minimum bedroom size in addition to the provision of facilities for a single Person or Couple. (Justification: Space; Quality of Life; Reduce Overcrowding)

DM8 PURPOSE BUILT STUDENT ACCOMMODATION

- The University Authorities should be asked to notify the Council’s Housing and Planning Departments about any proposals to expand the number of students who are studying with them and the likely numbers needing accommodation.
- Appropriate Facilities should be provided for the storage and removal of rubbish and recycling within all student accommodation.

(Justification: Planning; Quality of Life; Improving Recycling)

EMPLOYMENT AND RETAIL SECTION
CITY PLAN PART TWO

INTRODUCTORY PRINCIPLES

Liberal Democrats support a “mixed economy” for our City in which people have equal opportunities and are able to develop their full potential. The City Plan should help enable this and ensure that people have the tools to succeed in order to ensure that we are a successful City.

We support the creation of an Enterprise Centre, in partnership with Coast to Capital, the Federation of Small Businesses and other organisations to support and develop our Local Enterprises; Self Employed People; Small Businesses; and Social Enterprises, including Mutuals and Co-operatives.

DM11: The provision of different size “live/work units” should be encouraged to provide residential space and workshop or office space for a range of needs. The space requirements for homes should be the same as for elsewhere in the City Plan.

DM12 Change Of Use: General Agreement. However, where there have been empty or underused shops for two years or more within a designated “shopping area”, a more flexible approach should be pursued in order to consider the provision of more work/live units or residential units where appropriate (Justification: Changing Retail Trends; Need for more Affordable Residential units)

DM12/13: Change of Use should NOT be permitted where the premises are a Sub Post Office or a Crown Post Office (Justification: Important Community Resource; Banking and Posting Facilities for Businesses and Residents).

DM14: Brighton Marina. The Marina should be re-designated as a Local Shopping Centre because it serves both the considerable residential development here and East Brighton. Favourable consideration should be given to the provision of a Post Office here (Justification: Important Community Resource; Local Facilities; proximity to Tourist areas and Proposed Conference Facilities)

DM15: Commercial and Leisure Uses on the Seafront: Generally support the proposals. The Council should also work with others, in partnership, to provide “stop off hubs” at spaced out points on the seafront for walkers and cyclists. This might include shelters; public seating; Information; signage; and refreshments. This would also help to meet the requirements of Natural England for a well designed Coastal Path. (Justification: Health; Safety; Residents and Tourists facilities which also boost the economy).

The Council should support safe leisure and sporting activities in the seafront area, including basketball; cycling; swimming; and walking. It will aim to provide some seafront support staff in the summer months and continue to be part of the “Red Flag” system for beach and sea safety.

DM16: Markets. General Support. Should also include rubbish/recycling facilities where possible.

DM17: General support, except to delete “New England Street Area” as a “search area for new hotel developments” (Justification: Existing Hotels in New England Area and Queens Road; Need for Affordable Homes in Central Brighton/London Road Areas; Need for Light Industrial workshop spaces).

PLANNING SECTION – CITY PLAN PART TWO

DM 18-32

PRINCIPLES

Liberal Democrats believe that the principles of planning should include accessibility, community participation, good design and interconnectivity with local services and sustainable transport. Most of all, we believe that the local community and the people of our City should be able to have a say about decision making.

HOME WORKING

- ❖ **Working from home:** More people are now working from home in a more flexible way so the City Plan needs to reflect this trend. *(Justification; Demographic Changes; Employment)*
- ❖ There should be more affordable work/live units for people who are self-employed people and those running small businesses. *(Justification: Demographic Changes; Employment).*
- ❖ With an increasing number of people working from home, specific consideration needs to be given to issues such as working space; noise; Whole Body Vibration (W.B.V.); and electronic/technical disruption such as E.M.C. This needs to be considered in conversions of existing buildings and in new-builds. *(Justification; Health, Safety).*

GENERAL PLANNING ISSUES

- ❖ **High Rise Buildings (DM 18):** We recognise the need for more affordable/social rented homes but reject the idea that this can only be achieved through building more high-rise buildings/tower blocks. Consideration must be given to issues such as safety; community cohesion; fire risks; future maintenance costs; and the historic lack of popularity of such forms of living. Most residents seem to prefer more “human scale” homes, so as a general rule we reject all developments of this kind in Conservation Areas and believe that these should be restricted to no more than nine storeys in other areas. *(Justification: Community Cohesion; Safety; Financial Costs)*
- ❖ **DM18: Spaces between buildings:** Wherever possible, spaces between buildings should be allocated as “pocket parks” to help provide leisure and seating space for local residents.
- ❖ **Planning Policy** shouldn’t significantly contradict employment, environmental, housing and sustainable transport policies within the City Plan. *(Justification: Consistency of City Plan).*
- ❖ **The Council** should carry out a regular review of the Office requirements of the City (every two years) to ensure that an excess number of office buildings aren’t provided and that wherever possible, redundant, underused and empty office buildings are brought into use for affordable and social rented homes. *(Justification: Future Housing Needs; Employment Trends)*
- ❖ **Some off-street vehicle parking and cycle parking** should be provided within larger housing developments (e.g. more than eight units of housing) and for commercial developments. *(Justification: Reducing on-street Parking Issues; Loading; Deliveries; Maintenance; Local Economy)*

- ❖ The Council should make use of the power to serve “completion orders” to reduce the problem of Developers holding land and uncompleted developments for long periods (*Justification: Housing Provision; Local Economy*).

CONSULTATION AND PARTNERSHIP WORKING

- ❖ General support for the sections referring to Conservation Areas and Listed Buildings (DM26-27). Residents and Community Organisations should also be able to nominate streets to be included within existing Conservation Areas to ensure that these are protected, following a period of public consultation. (*Justification: Community Planning; Protection Of Amenity*).
- ❖ DM28-29: Community Organisations are able to nominate buildings as “Assets of Community Importance” if they are of significance to the local community. This process should be given further publicity by the Council and become part of the Councils key planning approach. (*Justification: Community Planning; Participation; Protection Of Amenity*).
- ❖ The Council should work in partnership with organisations such as the Community Land Trust, Housing Associations, Local Business Organisations and Amenities Groups. (*Justification: Partnership working*)
- ❖ Larger Planning Applications should be subject to wider consultation through the Council’s online portal and where possible through “paper” consultations conducted at Libraries and Community Buildings. (*Justification: Community Participation*).

DRAINAGE ISSUES

- ❖ The Council should consider local drainage and potential localised flooding issues in all developments. Existing drainage issues should also be considered and grant applications made to help solve these issues as a matter of priority for infrastructure projects. (*Justification: Environmental Protection*).

EMERGENCY PLANNING

- ❖ The Council should ensure that it has detailed plans in place to deal with emergencies relating to environmental issues; transport; health; extreme weather events and other possible circumstances. This should be in line with legislation (including the Civil Contingencies Act 2004) and local needs. (*Justification Security and Safety of Local Residents*)



www.midsussex.gov.uk

Contact:



Your Ref:

Our Ref: Brighton Local Plan Part 2

Date: 29 October 2020

Dear Sir/Madam,

Brighton & Hove Proposed Submission City Plan Part Two Consultation

Mid Sussex District Council (Council) welcomes the opportunity to comment on the Regulation 19 consultation of the Brighton & Hove Draft City Plan Part Two ('the Plan').

The Council acknowledge and welcome the additional analysis that Brighton & Hove City Council (City Council) has undertaken of its housing sites since the Draft CPP2 consultation. CPP1 Policy CP1: Housing Delivery sets a minimum housing requirement of 13,210 new homes; 16,910 below its objectively assessed need. Therefore, it is critical that the City Council demonstrates that it has investigated all opportunities to deliver housing through allocating deliverable sites.

Paragraph 23 of the NPPF states that:

'Strategic policies should provide a clear strategy for bringing sufficient land forward.... This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.'

Paragraph 3.17 of the Housing Provision Topic Paper (October 2019) (HPTP) states that as at 1 April 2019 there is identified potential to deliver at least 14,875 net dwellings; 1,665 over the CP1 housing requirement. However, the over delivery is largely sourced from Small Sites (completions on small identified sites and windfall allowance), Prior Approvals and HRA Estates Regeneration sites rather than allocations.

The windfall allowance in CPP2 is now 1,321 net dwellings over the Plan period, an increase of 101 from the Draft CPP2. The Council note that this represents just under 9% of the total supply. It remains a substantial element of the total supply and so should be carefully monitored and adjusted accordingly.

The HPTP states that 232 dwellings are to be delivered through the City Council's Estates Regeneration Programme, however these are sites described as being in the pipeline and 'Additional potential supply'. As such, there is uncertainty around when these will be delivered. Without their specific allocation there must be robust evidence to justify their contribution to meeting the housing requirement.

In the Council's response to the Draft CPP2 we suggested the inclusion of minimum densities on site allocations to ensure the most efficient use of land, in line with paragraph 123 of the

Working together for a better Mid Sussex



INVESTOR IN PEOPLE

**Planning Policy and Economic Development
Business Unit**



NPPF (2019). We note that this suggestion has not been taken forward into the Proposed Submission version and feel that this is a missed opportunity. However, we also note the amendments made to the wording of policy DM19: Maximising Development Opportunities which strengthen the consideration of densities in new development to ensure sites are not underdeveloped.

The Council also previously suggested that the City Council should update its Tall Buildings Supplementary Planning Guidance (SPG) to reflect changes to national planning policy and relevant guidance. We welcome recent work undertaken by the City Council on developing a new Urban Design Framework SPD which sought early engagement on design issues, including 'Accommodating taller development'. We note that the SPD is at a very early stage, but wider consultation is due; this is welcomed.

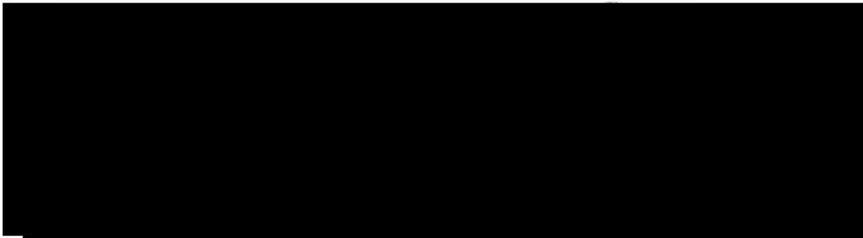
Updated Tall Buildings Guidance should provide a more flexible framework which encourages the development of higher buildings within the City, where appropriate, to deliver more homes in sustainable, accessible locations.

As well as encouraging new, tall buildings, Paragraph 118e of the NPPF also notes that planning policies should:

'support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.'

The Council previously put forward that CPP2 should make provision for such extensions, to increase capacity, where appropriate. Whilst changes to the wording of DM21: Extensions and Alterations have been made, this is unlikely to deliver the scale envisaged by the NPPF. Therefore, it is felt that CPP2 could have gone further in this respect.

Yours sincerely,



Working together for a better Mid Sussex

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafont

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

Land at and adjoining Horsdean Recreation Ground, Patcham

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Justified

H2 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.

response box for legal compliance, soundness and duty to cooperate:

I wish to clarify my objection to the proposed sites in Patcham along the grounds of the area being part of the south downs and an area of natural beauty and the proposed site being well used by the people of patcham as a recreational ground .

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafont

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

Land at and adjoining Horsdean Recreation Ground, Patcham

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Justified

H2 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.

response box for legal compliance, soundness and duty to cooperate:

referring to the development at the north of patcham I.e horsdean

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

Response ID BHLF-8ZMD-Y48A-9Submitted to **City Plan Part Two (Proposed Submission)**

Submitted on 2020-12-17 09:40:40

Your details

[REDACTED]

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

Organisation:

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

Notification matrix - The City Plan Part Two has been submitted for independent examination:

Yes

Notification matrix - The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two:

Yes

Notification matrix - The adoption of the City Plan Part Two:

Yes

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

Yes

Date Response Submitted**Date Response Submitted:**

16/10/2020

City Plan Part Two - Part One - Introduction

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

Comments on the Introduction of CPP2:

DM1 Housing Quality, Choice and Mix

(DM1) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafront

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

ALL SITES

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Justified

H2 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.

response box for legal compliance, soundness and duty to cooperate:

I don't consider myself to be unintelligent but when I sent in my representation concerning Brighton and Hove City Council's Proposed Submission City Plan Part 2 I really did not understand the complexities of management policies and site allocation policies but wish to make it very clear that I am absolutely opposed to the development of any green field sites when there are so many other brown field sites available to you to develop. I appreciate it is far cheaper to develop pristine green field sites but I should have thought that, bearing in mind Brighton and Hove is a 'green council' this would be the last thing to be considered. It would appear that the Council is more than happy to throw ridiculous sums of money at redundant cycle lanes throughout the City which have caused much distress and pollution (where there are massive queues of traffic due to the cycle lanes) in covert operations through the night with no consultation with the Council Tax Payers. I hope this clarifies my representation and I have to wonder if this has been made so complicated in a ploy to make the average resident feel unable to comment.

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

Response ID BHLF-8ZMD-Y48P-RSubmitted to **City Plan Part Two (Proposed Submission)**

Submitted on 2020-12-17 09:45:06

Your details

What is your name?

[REDACTED]
 [REDACTED]

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

Organisation:

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

Notification matrix - The City Plan Part Two has been submitted for independent examination:

Yes

Notification matrix - The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two:

Yes

Notification matrix - The adoption of the City Plan Part Two:

Yes

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

Yes

Date Response Submitted

Date Response Submitted:

16/10/2020

City Plan Part Two - Part One - Introduction

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

Comments on the Introduction of CPP2:

DM1 Housing Quality, Choice and Mix

(DM1) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafont

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

ALL SITES

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Justified

H2 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.

response box for legal compliance, soundness and duty to cooperate:

I found the consultation questionnaire to be unclear and unnecessarily complicated. Therefore, for the avoidance of doubt, please note that I strongly object to the destruction of any greenfield site covered by the city plan.

In my opinion, our "green" council should not even consider the development of greenfield sites until every single brownfield site has been fully investigated, and either sympathetically developed or deemed inappropriate (with evidence). It's common knowledge that our greenfield sites are critically endangered and are the lungs of the planet. They must be protected at all costs.

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

Yes

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

DM1: KAWHRA supports policy DM1 and all supporting text in paragraphs 2.1 to 2.13 which are positively prepared, justified, effective and consistent with the NPPF. Policy DM1 and all supporting text in paragraphs 2.1 to 2.13 addresses the city's assessed demographic, socio-economic and physical characteristics. The importance to residents of private outdoor amenity space outlined described in paragraph 2.11 has been confirmed by residents' experience of their needs during the pandemic.

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafront

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

Yes

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

DM18: KAWHRA strongly supports policy DM18 and all the supporting text in paragraphs 2.145 to 2.158 which are positively prepared, justified effective and consistent with the NPPF. Policy DM18 and all the supporting text 2.145 to 2.158 addresses the key issues relevant to development and redevelopment within and adjoining the city's sensitive urban area. In particular the constraints of the city's setting make it crucial that the scale and shape of new buildings create a sense of harmony and continuity with their surroundings (paragraph 2.149).

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

Yes

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

DM20: KAWHRA strongly supports policy DM20 and all the supporting text in paragraphs 2.162 to 2.168, which are positively prepared, justified effective and consistent with the NPPF. They address the key issues relevant to development and redevelopment within the city's constrained and sensitive urban area. Policy DM20 recognises that achievement of the city's required housing numbers in its constrained circumstances risks damage to the amenity of adjacent users and residents, and paragraphs 2.162 to 2.168 identify all key issues to be taken into account. The requirement for applicants' engagement with neighbours at an early stage reflects the value of integrating development and avoiding the conflict and time-wasting caused by inappropriate design.

(DM20) 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.

modifications to the policy to make sound and legally compliant:

**(DM20) 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)**

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

**(DM21) 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)**

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

**(DM22) 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)**

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

Kingsway/Basin Road North (site AB4 in JAAP policy CA2)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

Yes

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 Table 7: KAWHRA supports policy H1 Table 7 Mixed use housing allocations which is positively prepared, justified effective and consistent with the NPPF. Table 7 appropriately and accurately includes the physically and environmentally constrained site at Kingsway/Basin Road North as allocated for 90 dwellings. This is as allocated in the adopted Shoreham Harbour Joint Area Action Plan following in depth assessments of its capacity over the past seven years.

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H2 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.

response box for legal compliance, soundness and duty to cooperate:

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

Response ID BHLF-8ZMD-Y48K-KSubmitted to **City Plan Part Two (Proposed Submission)**

Submitted on 2020-12-17 10:40:11

Your details

[REDACTED]

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

Organisation:

The Arch Company

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

Notification matrix - The City Plan Part Two has been submitted for independent examination:

Yes

Notification matrix - The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two:

Yes

Notification matrix - The adoption of the City Plan Part Two:

Yes

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

Yes

Date Response Submitted**Date Response Submitted:**

30th October 2020

City Plan Part Two - Part One - Introduction

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

Comments on the Introduction of CPP2:

Please see attached statement - Section 2 which comments on the Duty to Co-operate. which is referenced at paragraph 1.10 of the City Plan Part 2

Duty to Co-operate

2.9 The NPPF requires councils to work together to address strategic priorities across boundaries and development requirements which cannot be wholly met within their own areas. As with the City Plan Part 1, the City Plan Part 2 notes that the Council will continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies to address unmet needs as a member of the East Sussex Strategic Planning Members Group and the Coastal West Sussex and Greater Brighton Strategic Planning Board. A Duty to Cooperate Update Paper has been published alongside the Proposed Submission City Plan Part 2.

2.10 Paragraphs 24 to 27 of the 2019 National Planning Policy Framework (NPPF) set out the requirements relating to the duty to co-operate. Collaboration between authorities should identify the relevant strategic matters to be addressed and to identify where development needs that cannot be met in one area can be met elsewhere. Statements of Common Ground should be maintained documenting any activities relating to cross boundary strategic matters and paragraph 35 of the NPPF confirms that such matters should be dealt with and not be deferred. This paragraph represents a change to the 2012 NPPF in that it seeks to prevent strategic and cross boundary issues being deferred for future local plans to address.

2.11 The Council states in its Duty to Co-operate statement that most cross boundary issues affecting the city were dealt with at the examination of the City Plan Part 1. It takes the view that these do not need to be re-opened. Such an approach does not take account of the progress, or lack of progress, on certain key issues, including the supply of housing, or the acknowledged "significant" under-provision against objectively assessed need, since 2016. It also does not take into account that the Duty to Cooperate is an on-going requirement of plan making.

2.12 The unmet need for housing in Brighton and Hove identified in the City Plan Part 1 is not addressed in the Duty to Cooperate Update Paper. No detail is provided as to the progress made by other authorities in addressing Brighton and Hove's unmet housing needs. In the absence of any evidence of progress in addressing the strategic issue of unmet housing need it will be necessary for the Council to consider whether more can be done to meet housing need through the City Plan Part 2 and this should be done before the plan is submitted for examination.

DM1 Housing Quality, Choice and Mix

(DM1) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafront

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

ALL SITES

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

No

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Effective, Justified, Consistent with National Policy

H1 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.

response box for legal compliance, soundness and duty to cooperate:

Please refer to Section 3 of the attached Statement.

3. Housing Land Supply

Five-year Housing Land Supply

3.1 In order for a local plan to be considered up to date the Council must be able to show that it provides a five-year land supply on adoption.

3.2 The level of housing provision is specifically addressed at Policy CP1 of the City Plan Part 1 which states that the Council will make provision for at least 13,200 new homes to be built over the plan period 2010 – 2030 which equates to an annual average rate of provision of 660 dwellings. The Policy states that this will be achieved by:

- a) Focussing new development in accessible areas of the city and those with the most capacity to accommodate new homes;
- b) Promoting the efficient use and development of land/sites across the city including higher densities in appropriate locations (see CP12 and CP14)
- c) Making strategic site allocations in this Plan for at least 3,635 additional new homes;
- d) Preparing Part 2 of the City Plan (Development Policies and Site Allocations) to allocate additional sites to help ensure housing delivery is maintained over the plan period; and
- e) Ensuring that all new housing development contributes to the creation and/or maintenance of mixed and sustainable communities (see SA6).

3.3 The Council's Strategic Housing Land Availability Assessment (SHLAA) published in October 2019 indicates that the adoption of this local plan will not result in the Council having a five-year housing land supply between 2020/21 and 2022/23. Using the delivery expectations in the SHLAA the HBF has calculated the rolling 5-year housing land supply for 2020/21 to 2024/25 which is set out in Table 1 below [Please refer to Section 3 of the attached Statement].

3.4 The table indicates that the Council will only have 4.27-year land supply in 2020/21 and that it will not have a five-year land supply until 2023/24 at the earliest.

3.5 The five-year supply at 2023/24 is marginal and delay of delivery on any of the identified sites could extend the period within which the supply is less than the required five years. The evidence indicates that additional sites with the ability to deliver new homes in the next five years need to be identified and brought forward through this local plan.

3.6 In essence, therefore, to ensure that there is a five-year supply of deliverable sites upon adoption, the City Local Plan Part 2 needs to identify additional sites for the delivery of housing. City Plan Part 2 - Policy H1 Housing Sites

3.7 As noted above, City Plan Part One, Policy CP1 - Housing Delivery sets out the city's housing target of 13,200 new homes over the Plan period to 2030 and states that additional sites will be allocated in Part 2 of the Plan to help ensure housing delivery is maintained over the plan period. The policy goes on to note that significant constraints on the City's capacity to accommodate the amount of development required mean that it is important to maximise the use of brownfield sites.

3.8 Policy H1 identifies and allocates sites for the provision of housing (Table 6) and mixed use development including housing (Table 7) to contribute to meeting the identified housing need of the district.

3.9 The Council's Site Allocations Topic Paper (November 2019) confirms the process by which sites were identified. The Topic Paper confirms that the 2016 SHLAA provided a starting point with further potential sites identified through the 2016 City Plan Part 2 scoping consultation, a review of submitted planning applications and review of commercial databases. Only sites capable of delivering 10 or more dwellings were considered for allocation and this is reflected in the site allocations at Tables 6 and 7.

3.10 Supporting text to Policy H1 notes (paragraph 3.64): "Only sites which are expected to bring forward 10 or more residential units are allocated in this policy. It is expected that smaller sites and windfall provision will continue to make a significant contribution towards the city's planned housing requirements as accounted for in Policy CP1."

3.11 With regard to the reliance on "windfall provision", the NPPF (paragraph 72) is clear that "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply". On the basis that the Council has adopted an approach which allocates only sites which can deliver 10 dwellings or more, it is reasonable to assume some future windfall provision on smaller sites. The NPPF is also clear however (paragraphs 67 and 73) planning policies should "identify a supply of specific, deliverable sites for years 1 to 5 of the plan period (our emphasis). This is reflected in planning practice guidance which states that: "Local planning authorities have the ability to identify broad locations in years 6-15 (our emphasis), which could include a windfall allowance".

3.12 It is clearly established in national guidance therefore that windfall sites should not be relied on in years 1-5 of the plan period. We have noted above in our commentary on 5-year housing land supply that there is a shortfall in provision in 2020/21, 2021/22 and 22/23 with a marginal 5 year supply thereafter. It is clear therefore that the Local Planning Authority should identify further specific, deliverable sites, through the City Plan Part 2, in order to ensure that the plan is sound and that housing needs are met in full.

3.13 It is considered that development of our client's site at Preston Road / Campbell Road could make an important contribution to meeting the identified needs for family housing and affordable housing which the Council are insufficiently planning for in the current City Plan Part 2.

3.14 The Council's current strategy is considered to be unsound in that it is neither justified nor effective, and our client's site should be allocated for residential development under Policy H1 of the City Plan Part 2 to help address the flaws in the current strategy.

H1 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.

modifications to the policy to make sound and legally compliant:

Please refer to Section 3 of attached statement. The Council should allocate additional sites for residential development under Policy H1 of the City Plan Part 2 to ensure that an adequate supply of housing is available in the first five years of the plan period. Allocation of land at Preston Road / Campbell Road is specifically proposed as a means of helping address the deficit in supply.

Our client has a land interest at Preston Road / Campbell Road. The site is in a sustainable location, located within Development Area 4 "New England Quarter and London Road Area" which the City Plan Part 1 identifies as one of eight areas to which development will be directed. It is an appropriate and sustainable location for development, has good access to services and amenities and is located close to the town centre.

The attached Statement and the supporting evidence has clearly demonstrated that residential development can be appropriately accommodated on this deliverable site and would make a valuable contribution to the supply of land for housing.

5. Allocation of Land Off Preston Road for Redevelopment for Housing

Site location

5.1 The site is located off Preston Road to the north of central Brighton. The site boundary is shown on the plan at Appendix 1 of the attached statement.

5.2 Vehicular access is available from Preston Road and Campbell Road, with the latter providing the principal access at present.

5.3 At present the site comprises of a small warehouse / workshop and yard. It is in use for motor vehicle storage and repair however this is considered to represent a sub-optimal use of the site.

5.4 To the north of the site, and at a slightly higher level, are residential properties on Parkmore Terrace and Dyke Road Drive. Immediately to the north is a six-storey office building known as London Gate. To the east is the three storey former Brighton City College Construction Trades building. Planning permission has been granted to convert this building to residential apartments.

5.5 To the south of the site are residential properties on Campbell Road and Argyll Road. To the east is an area of trees / woodland beyond which is the mainline railway.

5.6 The London Road Railway Viaduct, which is a Grade II* Listed structure, over-sails the site. In broad terms the area is one of predominantly residential character with some commercial (retail) uses located on Preston Road and dispersed within the surrounding residential streets. There are a variety of building styles and forms in the locality ranging from five and six-storey office and residential buildings to the north and northeast, to three storey buildings on Preston Road to the east and predominantly twostorey houses to the south of the viaduct.

Policy Context

5.7 The site is located within the New England Quarter and London Road Development Area which is one of eight development areas specifically identified by the City Plan Part 1. City Plan Part 1 states:

"Spatially the majority of new housing, employment and retail development will be located on brownfield (previously developed) sites within the city's built up area and directed to (our emphasis) eight specific development areas"

5.8 The site is currently in employment use but is not a strategic employment site and does not benefit from the same level of policy protection that strategic sites do. We note also that where loss of non-strategic employment sites is permitted the priority for reuse will be for alternative employment generating uses or housing (Local Plan Part 1 Policy CP3).

5.9 Given the relatively constrained nature of the site, particularly in respect of access for commercial vehicles, we consider that it has limited suitability for continued employment use, or redevelopment for employment purposes, and that its release to residential use would not materially prejudice the overall supply of employment sites.

We note that a number of similar small employment sites are proposed as residential allocations in the current draft local plan.

5.10 As noted in preceding Sections, we have reviewed the local plan evidence base documents with regard to overall supply of housing and also the provision for specialist forms of housing. With regard to overall housing land supply, we note that the Council is currently unable to identify a 5 year housing land supply.

The emerging local plan

seeks to address this by allocating sites for a greater number of units than the minimum required by Local Plan Part 1 and, in our judgement, the Preston Road site should be allocated to ensure housing provision on sustainable brownfield sites is maximised and contribute to meeting the 5-year supply requirement.

Site Potential

5.11 The site offers a brownfield redevelopment opportunity with no significant constraints to its redevelopment.

5.12 It is located in an area of mixed character where residential development is the predominant land-use.

5.13 The Grade II* Listed railway viaduct which over-sails the site is acknowledged as a factor which will need to be taken fully into account when formulating a redevelopment proposal. It is clear however that the viaduct is already surrounded by development, including some tall buildings, along its length and that, whilst the impact

of development on its setting will be a material consideration, it does not represent an absolute constraint.

5.14 The proposed allocation site is well located to access the existing services and facilities both in the immediate vicinity but also within the wider centre of Brighton. The site also benefits from good access bility by public transport being located close to Brighton Station and London Road Station and bus services on Preston Road.

5.15 From an initial capacity review of the site we consider that the site could accommodate around 70 residential apartments with a mixture of 1 and 2 bed units. If purpose built student accommodation were proposed we consider that there would be capacity for around 185 student rooms.

5.16 A concept proposal indicating one possible redevelopment scenario is provided at Appendix 2.

5.17 The site should be allocated at Policy H1, Table 6 of the City Plan Part 2 with an indicative capacity of 70 units of residential accommodation.

H1 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)

Yes, I wish to participate in the hearing session(s)

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

To allow us to adequately examine and test the Council's approach.

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H2 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.

response box for legal compliance, soundness and duty to cooperate:

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

ALL SITES

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Effective, Justified, Consistent with National Policy

H3 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.

response box for legal compliance, soundness and duty to cooperate:

Please refer to Section 4 of the attached Statement.

4. Policy H3 Purpose Built Student Accommodation

4.1 Policy HS3 seeks to address the need for PBSA in the City. Brighton's two universities, the University of Brighton and University of Sussex, are major assets that are vital to the city's economy and make an important contribution to its economic and cultural life. Brighton and Hove have a particularly high proportion of students with the two main universities supporting a population of 39,355 in 2017/18, making up 13.5% of the city population. As noted within the City Plan, the provision of additional bed spaces in PBSA will assist in encouraging students to choose managed accommodation over houses in multiple occupation (HMO), which is particularly important for first year students.

4.2 The City Plan Part One sets out that the Council will work with universities and other education providers "to address the need for dedicated purpose built student accommodation in the local area where there is increasing pressure to accommodate students within the existing housing stock" (Para. 3.29).

4.3 City Plan Part One Policy CP19 (Housing Mix) notes that the Council seeks to improve housing choice and ensure that an appropriate mix of housing is achieved across the city, including purpose built student accommodation. The Draft City Plan Two states that the number of permitted PBSA bedspaces remains below the number of students in the city requiring accommodation thereby demonstrating a demand for this type of housing to come forward.

4.4 Brighton and Hove's most recent Authority Monitoring Report for 2018/19 notes that there has been an increase in HMO's over the years due to housing prices, the lack of availability of housing within the city and the supply of purpose built student accommodation not matching the expansion of the student population. This reflects the fact that the number of full-time students in Brighton has grown at a higher rate than the UK average over the past two decades. Due to the relatively low levels of private sector PBSA in the city, there is a heavy reliance on market housing as is evidenced by high rental costs across the city. Notwithstanding that there are a number of PBSA schemes currently under construction, or recently been approved, there is a mismatch between the supply of PBSA and the number of students in the region of 20,000 students. Where the gap has not been met, these students will typically live in private rented accommodation around the city putting pressure on the housing market.

4.5 Policy H3 of the City Plan Part 2 allocates a further three sites for the delivery of PBSA. The identified sites are considered to have potential to deliver 522 student bed-spaces. Whilst this will potentially improve the level of provision of PSA in the city it will still leave a significant under-supply in relation to known demand and will not ensure that the known need for housing is met. To that end the PBSA policies of the City Plan Part 2 are neither justified nor effective as they do not make adequate provision for the delivery of PBSA. As an alternative to its allocation as a site for housing under City Plan 2, Policy H1, the site should be allocated for PBSA, under City Plan Part 2, Policy H3.

4.6 City Plan Part 1, Policy CP21 states that the development of student accommodation will not be supported on:

* Sites allocated for housing or with an extant planning permission; or

* Sites allocated as potential housing sites, which includes identification through the Strategic Housing Land Availability Assessment (SHLAA).

4.7 Our client's site at Preston Road / Campbell Road does not benefit from any extant planning permission for residential accommodation nor has it been identified in the SHLAA. In the event that our client's site is not allocated for the delivery of housing under City Plan Part 2, Policy H1 it should be allocated for the delivery of PBSA under Policy H3.

H3 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.

modifications to the policy to make sound and legally compliant:

Please refer to Section 4 of attached statement. The Council should allocate additional sites for residential development under Policy H1 of the City Plan Part 2 to ensure that an adequate supply of land is available for the provision of Purpose Build Student Accommodation. Land at Preston Road / Campbell Road is specifically identified as a potential allocation as a means of helping address the deficit in supply.

H3 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)

Yes, I wish to participate in the hearing session(s)

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

To enable the Council's evidence and approach to be tested and questioned.

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Duty to Co-Operate Statement - Please see Section 2 of attached statement.

Duty to Co-operate

2.9 The NPPF requires councils to work together to address strategic priorities across boundaries and development requirements which cannot be wholly met within their own areas. As with the City Plan Part 1, the City Plan Part 2 notes that the Council will continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies to address unmet needs as a member of the East Sussex Strategic Planning Members Group and the Coastal West Sussex and Greater Brighton Strategic Planning Board. A Duty to Cooperate Update Paper has been published alongside the Proposed Submission City Plan Part 2.

2.10 Paragraphs 24 to 27 of the 2019 National Planning Policy Framework (NPPF) set out the requirements relating to the duty to co-operate. Collaboration between authorities should identify the relevant strategic matters to be addressed and to identify where development needs that cannot be met in one area can be met elsewhere. Statements of Common Ground should be maintained documenting any activities relating to cross boundary strategic matters and paragraph 35 of the NPPF confirms that such matters should be dealt with and not be deferred. This paragraph represents a change to the 2012 NPPF in that it seeks to prevent strategic and cross boundary issues being deferred for future local plans to address.

2.11 The Council states in its Duty to Co-operate statement that most cross boundary issues affecting the city were dealt with at the examination of the City Plan Part 1. It takes the view that these do not need to be re-opened. Such an approach does not take account of the progress, or lack of progress, on certain key issues, including the supply of housing, or the acknowledged "significant" under- provision against objectively assessed need, since 2016. It also does not take into account that the Duty to Cooperate is an on-going requirement of plan making.

2.12 The unmet need for housing in Brighton and Hove identified in the City Plan Part 1 is not addressed in the Duty to Cooperate Update Paper. No detail is provided as to the progress made by other authorities in addressing Brighton and Hove's unmet housing needs. In the absence of any evidence of progress in addressing the strategic issue of unmet housing need it will be necessary for the Council to consider whether more can be done to meet housing need through the City Plan Part 2 and this should be done before the plan is submitted for examination.

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

Brighton and Hove Local Plan Part II Consultation

Representations on Behalf of The Arch Co.

October 2020

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Client

The Arch Co. Ltd

Our reference

ARCW3000

20 October 2020

1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of The Arch Co. in respect of the Brighton and Hove City Plan Part 2 Consultation (October 2020).
- 1.2 Our client has a land interest in a brownfield site at Preston Road / Campbell Road, Brighton which will be available for redevelopment within the plan period. The extent of the site is shown in red on the plan at Appendix 1.
- 1.3 The City Plan Part 2 falls to be examined in accordance with the NPPF and this report has taken account of the requirements of the revised (2019) Framework accordingly.
- 1.4 We can confirm we wish to appear at the Examination in Public in due course and look forward to continuing to engage with the Local Plan process.

2. Spatial Strategy and Duty to Co-operate

2.1 The City Plan Part 2 has been prepared to identify and allocate specific sites to enable the delivery of development identified as necessary in the City Plan Part 1.

2.2 The City Plan Part 1 sets the spatial strategy for Brighton and Hove over the local plan period and sets out the overall amounts of new development to be planned for (e.g. housing, employment and retail) and the broad locations (e.g. eight 'Development Areas') where new development will take place.

2.3 Paragraph 2.19 of the City Plan Part 1 deals with the "The Spatial Distribution of Development" and states:

"Spatially the majority of new housing, employment and retail development will be located on brownfield (previously developed) sites within the city's built up area and directed to eight specific development areas (DA1 – 8). These are areas of the city which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration will secure substantial benefits for the city. This approach ensures that opportunities for development of brownfield sites are maximised, transport impacts will be minimised and that the city's countryside and the South Downs National Park will continue to be protected."

2.4 The eight identified development areas are:

- DA1 - Brighton Centre and Churchill Square Area
- DA2 - Brighton Marina, Gas Works and Black Rock Area
- DA3 - Lewes Road Area
- DA4 - New England Quarter and London Road Area (Our emphasis – see Section 5)
- DA5 - Eastern Road and Edward Street Area
- DA6 - Hove Station Area
- DA7 - Toad's Hole Valley
- DA8 - Shoreham Harbour

2.5 Paragraph 2.22 of the City Plan Part 1 states:

"The Development Areas are proposed to accommodate a significant amount of development because they contain the potential capacity and opportunities for change, they can deliver development of a citywide or regional importance and/or because they are in need of regeneration. Proposals for each of the Development Areas are set against a guiding 'area strategy' which sets the framework for future development and change within each identified area. Local priorities (such as transport improvements, community safety, open space or public realm improvements) are identified together with broad strategic amounts of additional development required and any associated key infrastructure requirements. Strategic allocations are proposed within Development Area proposals; these are sites whose regeneration/redevelopment are considered critical to the overall delivery of housing and employment growth over the plan period."

- 2.6 At paragraph 2.23, the City Plan Part 1 also encourages development to come forward across the rest of the city: “on suitable brownfield site opportunities (through, for example conversions, redevelopment and changes of use) in accessible locations and by promoting the efficient use and development of land/sites across the city including higher densities in appropriate locations” It is noted that such development “will help to secure the growth of, or maintain, sustainable neighbourhoods and communities and can also help to protect valuable open spaces.”
- 2.7 The level of housing provision is specifically addressed at Policy CP1 of the City Plan Part 1 which states that the Council will make provision for at least 13,200 new homes to be built over the plan period 2010 – 2030 which equates to an annual average rate of provision of 660 dwellings.
- 2.8 Policy acknowledges, City plan Part 1, paragraph 4.2 that meet in full the city’s ‘objectively assessed housing need’ over the plan period to 2030 could mean needing to build 1,506 dwellings per annum or 30,120 dwellings to 2030. The Council considers that this is not possible given the environmental and policy constraints which affect the city. It recognises (paragraph 4.5) that the shortfall against the objectively assessed housing need is “significant” and that the failure to provide for the objectively assessed need invokes the “duty to cooperate” with the city’s neighbouring local authorities. It is stated that: *“In accordance with government guidance, the council will therefore continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas”*.

Duty to Co-operate

- 2.9 The NPPF requires councils to work together to address strategic priorities across boundaries and development requirements which cannot be wholly met within their own areas. As with the City Plan Part 1, the City Plan Part 2 notes that the Council will continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies to address unmet needs as a member of the East Sussex Strategic Planning Members Group and the Coastal West Sussex and Greater Brighton Strategic Planning Board. A Duty to Cooperate Update Paper has been published alongside the Proposed Submission City Plan Part 2.
- 2.10 Paragraphs 24 to 27 of the 2019 National Planning Policy Framework (NPPF) set out the requirements relating to the duty to co-operate. Collaboration between authorities should identify the relevant strategic matters to be addressed and to identify where development needs that cannot be met in one area can be met elsewhere. Statements of Common Ground should be maintained documenting any activities relating to cross boundary strategic matters and paragraph 35 of the NPPF confirms that such matters should be dealt with and not be deferred. This paragraph represents a change to the 2012 NPPF in that it seeks to prevent strategic and cross boundary issues being deferred for future local plans to address.
- 2.11 The Council states in its Duty to Co-operate statement that most cross boundary issues affecting the city were dealt with at the examination of the City Plan Part 1. It takes the view that these do not need to be re-opened. Such an approach does not take

account of the progress, or lack of progress, on certain key issues, including the supply of housing, or the acknowledged “significant” under- provision against objectively assessed need, since 2016. It also does not take into account that the Duty to Cooperate is an on-going requirement of plan making.

- 2.12 The unmet need for housing in Brighton and Hove identified in the City Plan Part 1 is not addressed in the Duty to Cooperate Update Paper. No detail is provided as to the progress made by other authorities in addressing Brighton and Hove’s unmet housing needs. In the absence of any evidence of progress in addressing the strategic issue of unmet housing need it will be necessary for the Council to consider whether more can be done to meet housing need through the City Plan Part 2 and this should be done before the plan is submitted for examination.

3. Housing Land Supply

Five-year Housing Land Supply

- 3.1 In order for a local plan to be considered up to date the Council must be able to show that it provides a five-year land supply on adoption.
- 3.2 The level of housing provision is specifically addressed at Policy CP1 of the City Plan Part 1 which states that the Council will make provision for at least 13,200 new homes to be built over the plan period 2010 – 2030 which equates to an annual average rate of provision of 660 dwellings. The Policy states that this will be achieved by:
- a) Focussing new development in accessible areas of the city and those with the most capacity to accommodate new homes;
 - b) Promoting the efficient use and development of land/sites across the city including higher densities in appropriate locations (see CP12 and CP14)
 - c) Making strategic site allocations in this Plan for at least 3,635 additional new homes;
 - d) Preparing Part 2 of the City Plan (Development Policies and Site Allocations) to allocate additional sites to help ensure housing delivery is maintained over the plan period; and
 - e) Ensuring that all new housing development contributes to the creation and/or maintenance of mixed and sustainable communities (see SA6).
- 3.3 The Council’s Strategic Housing Land Availability Assessment (SHLAA) published in October 2019 indicates that the adoption of this local plan will not result in the Council having a five-year housing land supply between 2020/21 and 2022/23. Using the delivery expectations in the SHLAA the HBF has calculated the rolling 5-year housing land supply for 2020/21 to 2024/25 which is set out in Table 1 below.

	2020/21	2021/22	22/23	23/24	24/25
Annual Requirement	856	856	856	856	712
Cumulative	6,389	7,245	8,101	8,957	9,669
Delivery	646	1,323	1,350	1,058	1,023
Cumulative	5,051	6,374	7,724	8,782	9,805
Surplus/deficit	-1,338	-871	-377	-175	136
Five-year requirement	4,136	3,992	3,848	3,704	3,560

Five-year requirement including deficit/surplus	5,264	5,330	4,719	4,081	3,735
Buffer	1,053	1,066	944	816	747
Total requirement	6,317	6,396	5,663	4,897	4,482
Five-year supply	5,400	5,777	5,477	5,150	5,115
Surplus/deficit	-917	-619	-186	253	633
5YHLS	4.27	4.52	4.84	5.26	5.71

Source: HBF

- 3.4 The table indicates that the Council will only have 4.27-year land supply in 2020/21 and that it will not have a five-year land supply until 2023/24 at the earliest.
- 3.5 The five-year supply at 2023/24 is marginal and delay of delivery on any of the identified sites could extend the period within which the supply is less than the required five years. The evidence indicates that additional sites with the ability to deliver new homes in the next five years need to be identified and brought forward through this local plan.
- 3.6 In essence, therefore, to ensure that there is a five-year supply of deliverable sites upon adoption, the City Local Plan Part 2 needs to identify additional sites for the delivery of housing.

City Plan Part 2 - Policy H1 Housing Sites

- 3.7 As noted above, City Plan Part One, Policy CP1 - Housing Delivery sets out the city's housing target of 13,200 new homes over the Plan period to 2030 and states that additional sites will be allocated in Part 2 of the Plan to help ensure housing delivery is maintained over the plan period. The policy goes on to note that significant constraints on the City's capacity to accommodate the amount of development required mean that it is important to maximise the use of brownfield sites.
- 3.8 Policy H1 identifies and allocates sites for the provision of housing (Table 6) and mixed-use development including housing (Table 7) to contribute to meeting the identified housing need of the district.
- 3.9 The Council's Site Allocations Topic Paper (November 2019) confirms the process by which sites were identified. The Topic Paper confirms that the 2016 SHLAA provided a starting point with further potential sites identified through the 2016 City Plan Part 2 scoping consultation, a review of submitted planning applications and review of

commercial databases. Only sites capable of delivering 10 or more dwellings were considered for allocation and this is reflected in the site allocations at Tables 6 and 7.

- 3.10 Supporting text to Policy H1 notes (paragraph 3.64): *“Only sites which are expected to bring forward 10 or more residential units are allocated in this policy. It is expected that smaller sites and windfall provision will continue to make a significant contribution towards the city’s planned housing requirements as accounted for in Policy CP1.”*
- 3.11 With regard to the reliance on “windfall provision”, the NPPF (paragraph 72) is clear that “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply”. On the basis that the Council has adopted an approach which allocates only sites which can deliver 10 dwellings or more, it is reasonable to assume some future windfall provision on smaller sites. The NPPF is also clear however (paragraphs 67 and 73) planning policies should “identify a supply of specific, deliverable sites for years 1 to 5 of the plan period (our emphasis). This is reflected in planning practice guidance which states that: “Local planning authorities have the ability to identify broad locations in years 6-15 (our emphasis), which could include a windfall allowance”.
- 3.12 It is clearly established in national guidance therefore that windfall sites should not be relied on in years 1-5 of the plan period. We have noted above in our commentary on 5-year housing land supply that there is a shortfall in provision in 2020/21, 2021/22 and 22/23 with a marginal 5 year supply thereafter. It is clear therefore that the Local Planning Authority should identify further specific, deliverable sites, through the City Plan Part 2, in order to ensure that the plan is sound and that housing needs are met in full.
- 3.13 It is considered that development of our client’s site at Preston Road / Campbell Road could make an important contribution to meeting the identified needs for family housing and affordable housing which the Council are insufficiently planning for in the current City Plan Part 2.
- 3.14 The Council’s current strategy is considered to be unsound in that it is neither justified nor effective, and our client’s site should be allocated for residential development under Policy HI of the City Plan Part 2 to help address the flaws in the current strategy.

4. Policy H3 Purpose Built Student Accommodation

- 4.1 Policy HS3 seeks to address the need for PBSA in the City. Brighton's two universities, the University of Brighton and University of Sussex, are major assets that are vital to the city's economy and make an important contribution to its economic and cultural life. Brighton and Hove have a particularly high proportion of students with the two main universities supporting a population of 39,355 in 2017/18, making up 13.5% of the city population. As noted within the City Plan, the provision of additional bed spaces in PBSA will assist in encouraging students to choose managed accommodation over houses in multiple occupation (HMO), which is particularly important for first year students.
- 4.2 The City Plan Part One sets out that the Council will work with universities and other education providers "to address the need for dedicated purpose built student accommodation in the local area where there is increasing pressure to accommodate students within the existing housing stock" (Para. 3.29).
- 4.3 City Plan Part One Policy CP19 (Housing Mix) notes that the Council seeks to improve housing choice and ensure that an appropriate mix of housing is achieved across the city, including purpose built student accommodation. The Draft City Plan Two states that the number of permitted PBSA bedspaces remains below the number of students in the city requiring accommodation thereby demonstrating a demand for this type of housing to come forward.
- 4.4 Brighton and Hove's most recent Authority Monitoring Report for 2018/19 notes that there has been an increase in HMO's over the years due to housing prices, the lack of availability of housing within the city and the supply of purpose built student accommodation not matching the expansion of the student population. This reflects the fact that the number of full-time students in Brighton has grown at a higher rate than the UK average over the past two decades. Due to the relatively low levels of private sector PBSA in the city, there is a heavy reliance on market housing as is evidenced by high rental costs across the city. Notwithstanding that there are a number of PBSA schemes currently under construction, or recently been approved, there is a mismatch between the supply of PBSA and the number of students in the region of 20,000 students. Where the gap has not been met, these students will typically live in private rented accommodation around the city putting pressure on the housing market.
- 4.5 Policy H3 of the City Plan Part 2 allocates a further three sites for the delivery of PBSA. The identified sites are considered to have potential to deliver 522 student bed-spaces. Whilst this will potentially improve the level of provision of PSA in the city it will still leave a significant under-supply in relation to known demand and will not ensure that the known need for housing is met. To that end the PBSA policies of the City Plan Part 2 are neither justified nor effective as they do not make adequate provision for the delivery of PBSA. As an alternative to its allocation as a site for housing under City Plan 2, Policy H1, the site should be allocated for PBSA, under City Plan Part 2, Policy H3.

4.6 City Plan Part 1, Policy CP21 states that the development of student accommodation will not be supported on:

- Sites allocated for housing or with an extant planning permission; or
- Sites allocated as potential housing sites, which includes identification through the Strategic Housing Land Availability Assessment (SHLAA).

4.7 Our client's site at Preston Road / Campbell Road does not benefit from any extant planning permission for residential accommodation nor has it been identified in the SHLAA. In the event that our client's site is not allocated for the delivery of housing under City Plan Part 2, Policy H1 it should be allocated for the delivery of PBSA under Policy H3.

5. Allocation of Land Off Preston Road for Redevelopment for Housing

Site location

- 5.1 The site is located off Preston Road to the north of central Brighton. The site boundary is shown on the plan at Appendix 1.
- 5.2 Vehicular access is available from Preston Road and Campbell Road, with the latter providing the principal access at present.
- 5.3 At present the site comprises of a small warehouse / workshop and yard. It is in use for motor vehicle storage and repair however this is considered to represent a sub-optimal use of the site.
- 5.4 To the north of the site, and at a slightly higher level, are residential properties on Parkmore Terrace and Dyke Road Drive. Immediately to the north is a six-storey office building known as London Gate. To the east is the three storey former Brighton City College Construction Trades building. Planning permission has been granted to convert this building to residential apartments.
- 5.5 To the south of the site are residential properties on Campbell Road and Argyll Road. To the east is an area of trees / woodland beyond which is the mainline railway.
- 5.6 The London Road Railway Viaduct, which is a Grade II* Listed structure, over-sails the site. In broad terms the area is one of predominantly residential character with some commercial (retail) uses located on Preston Road and dispersed within the surrounding residential streets. There are a variety of building styles and forms in the locality ranging from five and six-storey office and residential buildings to the north and north-east, to three storey buildings on Preston Road to the east and predominantly two-storey houses to the south of the viaduct.

Policy Context

- 5.7 The site is located within the New England Quarter and London Road Development Area which is one of eight development areas specifically identified by the City Plan Part 1. City Plan Part 1 states:

“Spatially the majority of new housing, employment and retail development will be located on brownfield (previously developed) sites within the city’s built up area and directed to (our emphasis) eight specific development areas”
- 5.8 The site is currently in employment use but is not a strategic employment site and does not benefit from the same level of policy protection that strategic sites do. We note also that where loss of non-strategic employment sites is permitted the priority for re-use will be for alternative employment generating uses or housing (Local Plan Part 1 Policy CP3).

- 5.9 Given the relatively constrained nature of the site, particularly in respect of access for commercial vehicles, we consider that it has limited suitability for continued employment use, or redevelopment for employment purposes, and that its release to residential use would not materially prejudice the overall supply of employment sites. We note that a number of similar small employment sites are proposed as residential allocations in the current draft local plan.
- 5.10 As noted in preceding Sections, we have reviewed the local plan evidence base documents with regard to overall supply of housing and also the provision for specialist forms of housing. With regard to overall housing land supply, we note that the Council is currently unable to identify a 5 year housing land supply. The emerging local plan seeks to address this by allocating sites for a greater number of units than the minimum required by Local Plan Part 1 and, in our judgement, the Preston Road site should be allocated to ensure housing provision on sustainable brownfield sites is maximised and contribute to meeting the 5-year supply requirement.

Site Potential

- 5.11 The site offers a brownfield redevelopment opportunity with no significant constraints to its redevelopment.
- 5.12 It is located in an area of mixed character where residential development is the predominant land-use.
- 5.13 The Grade II* Listed railway viaduct which over-sails the site is acknowledged as a factor which will need to be taken fully into account when formulating a redevelopment proposal. It is clear however that the viaduct is already surrounded by development, including some tall buildings, along its length and that, whilst the impact of development on its setting will be a material consideration, it does not represent an absolute constraint.
- 5.14 The proposed allocation site is well located to access the existing services and facilities both in the immediate vicinity but also within the wider centre of Brighton. The site also benefits from good accessibility by public transport being located close to Brighton Station and London Road Station and bus services on Preston Road.
- 5.15 From an initial capacity review of the site we consider that the site could accommodate around 70 residential apartments with a mixture of 1 and 2 bed units. If purpose built student accommodation were proposed we consider that there would be capacity for around 185 student rooms.
- 5.16 A concept proposal indicating one possible redevelopment scenario is provided at Appendix 2.
- 5.17 The site should be allocated at Policy H1, Table 6 of the City Plan Part 2 with an indicative capacity of 70 units of residential accommodation.

6. Summary and Conclusions

- 6.1 These representations have been prepared by Turley on behalf of The Arch Co. in respect of the Brighton and Hove City Plan Part 2 Regulation 19 Consultation (November 2018).
- 6.2 The representations confirm that the City Local Plan Part 2 will not provide for a 5 year supply of deliverable housing sites upon adoption of the plan. They also indicate that, contrary to indications given in the City Plan Part 1, the Council has not fulfilled the duty to co-operate with neighbouring authorities with regard to the issue of the delivery of housing to meet the district's objectively assessed need.
- 6.3 The Council's position, that it is not possible to meet the objectively assessed needs for housing within the District, is understood however more needs to be done through the City Plan Part 2 to ensure that the maximum possible contribution is made to meeting needs for market and affordable housing and for specialist forms of housing such as PBSA.
- 6.4 It is considered that the City Plan Part 2 as currently drafted is making insufficient provision to meet the needs for housing in the district. As currently drafted the DPD will exacerbate the mismatch between housing need and housing supply. Additional sites should be allocated to ensure the needs for family housing and specialist forms of housing.
- 6.5 Our client has a land interest at Preston Road / Campbell Road. The site is in a sustainable location, located within Development Area 4 "New England Quarter and London Road Area" which the City Plan Part 1 identifies as one of eight areas to which development will be directed. It is an appropriate and sustainable location for development, has good access to services and amenities and is located close to the town centre.
- 6.6 This Statement and the supporting evidence has clearly demonstrated that residential development can be appropriately accommodated on this deliverable site and would make a valuable contribution to the supply of land for housing.
- 6.7 In order for the City Plan Part 2 to be sound, our client's site should be allocated for residential development which will help to address the shortcomings identified in meeting the housing needs of the district.
- 6.8 In summary it is considered that:
- The Council is currently making insufficient provision to meet the needs for housing and cannot demonstrate a 5-year housing land supply in the early years of the plan.
 - The Council has not demonstrated compliance with the duty to co-operate on an on-going basis to address the shortfall in housing provision and accordingly it is necessary for the City Plan Part 2 to do more to meet identified housing need.

- Additional sites should be allocated to ensure that the maximum possible contribution is made to meeting the acknowledged the needs for both general and specialist forms of housing in the district.
- Our client's site at Preston Road / Campbell Road, Brighton should be allocated for residential development pursuant to Policy H1, Table 6 of the City Plan Part The site is in a sustainable location within an identified Development Area to which the plan directs new development in the Spatial Strategy. It has good access to services and amenities and is located close to Brighton Station, London Road Station and public transport on Preston Road.

Appendix 1: Site Boundary Plan



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KEY

Site Boundary

CLIENT
The Arch Co

PROJECT
Preston Road, Brighton

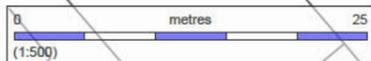
DRAWING
Site Location Plan

PROJECT NUMBER
ARCW3000

DRAWING NUMBER 1001 **CHECKED BY** CD

REVISION - **STATUS** Final

DATE 07/05/2020 **SCALE** 1:500 @ A3



**Appendix 2: Land at Preston Road, Brighton –
Indicative Site Redevelopment
Concept to Indicate Site Capacity**



Type	Average Area (m ²)	Units
1B2p	51.92	13
2B3p	61.37	2
2B4p	72.45	38
		53

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KEY

- Site Boundary
- 1 Bed 2 person (1B2p) Apartment
- 2 Bed 3 person (2B3p) Apartment
- 2 Bed 4 person (2B4p) Apartment

CLIENT
 The Arch Co

PROJECT
 Preston Road, Brighton

DRAWING
 Site Feasibility Layout - Ground Floor

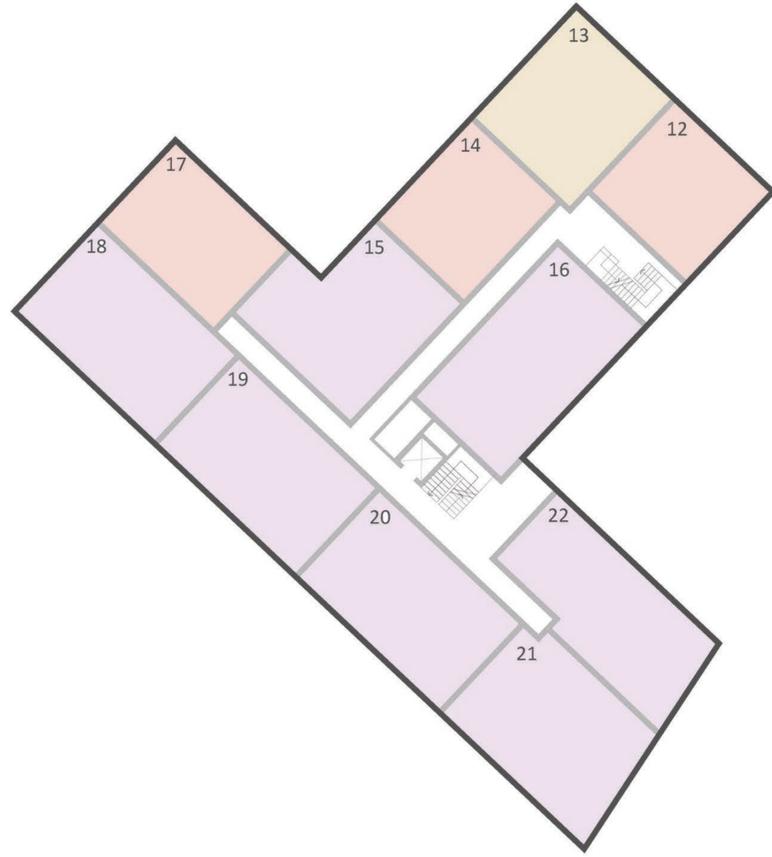
PROJECT NUMBER
 AECW3000

DRAWING NUMBER **CHECKED BY**
 3001-01 CD

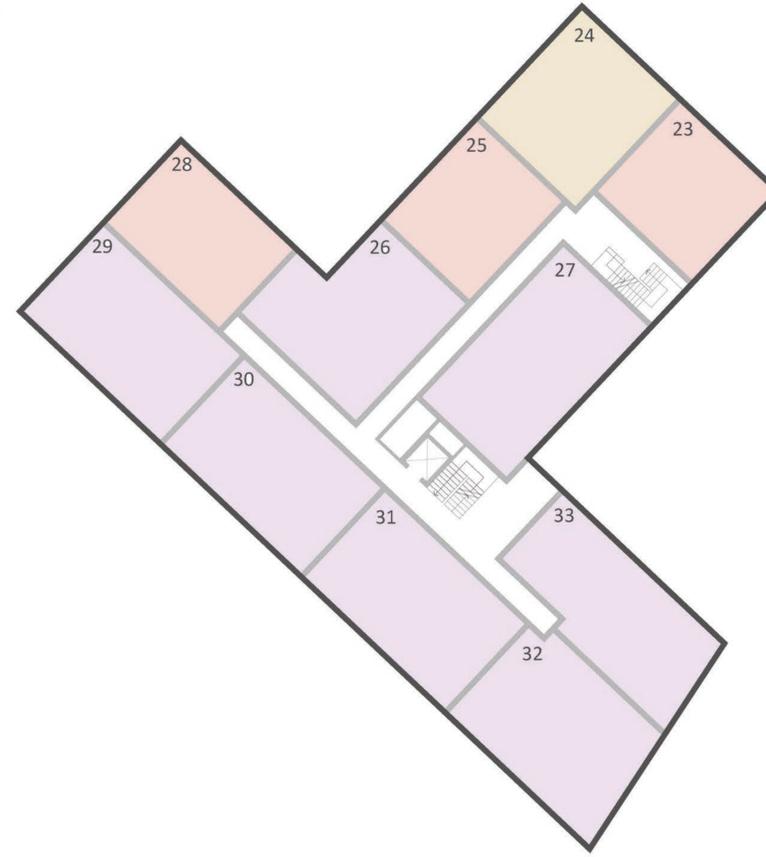
REVISION **STATUS**
 - Final

DATE **SCALE**
 17 April 2020 1:200 @ A1

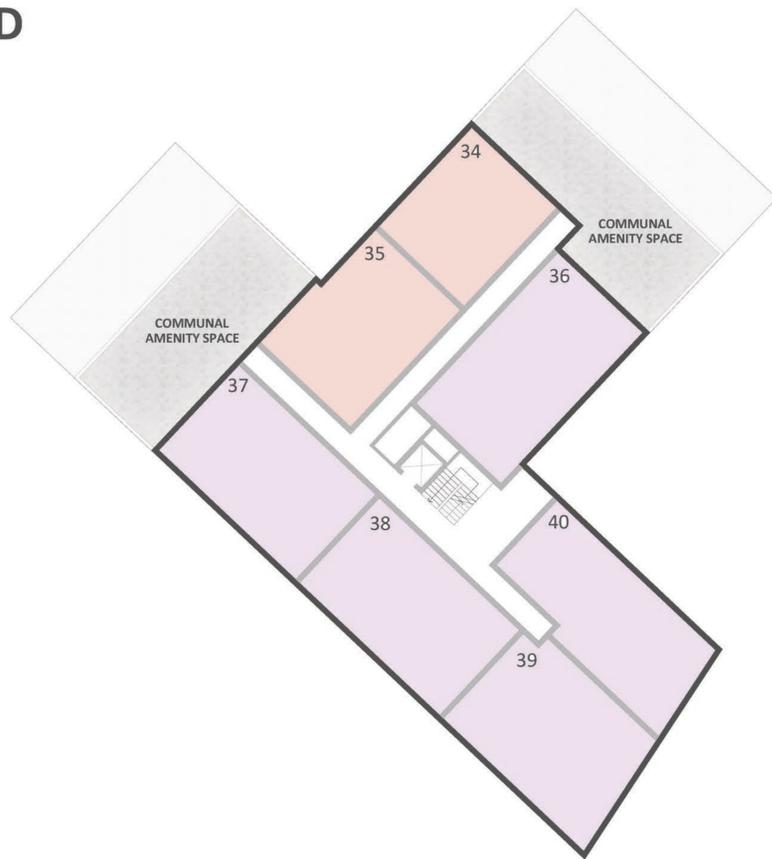




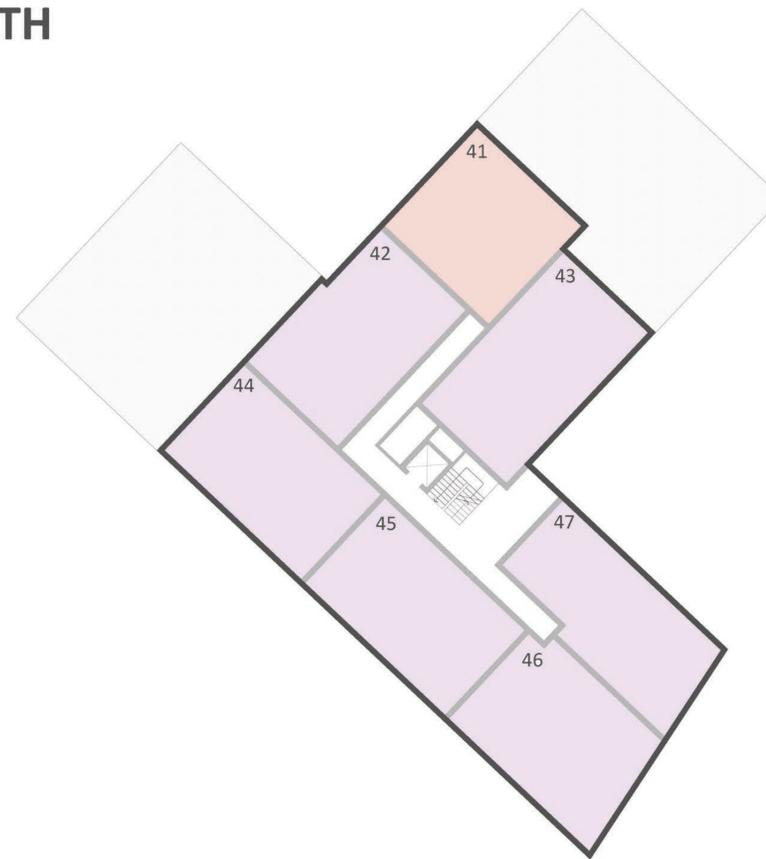
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3RD



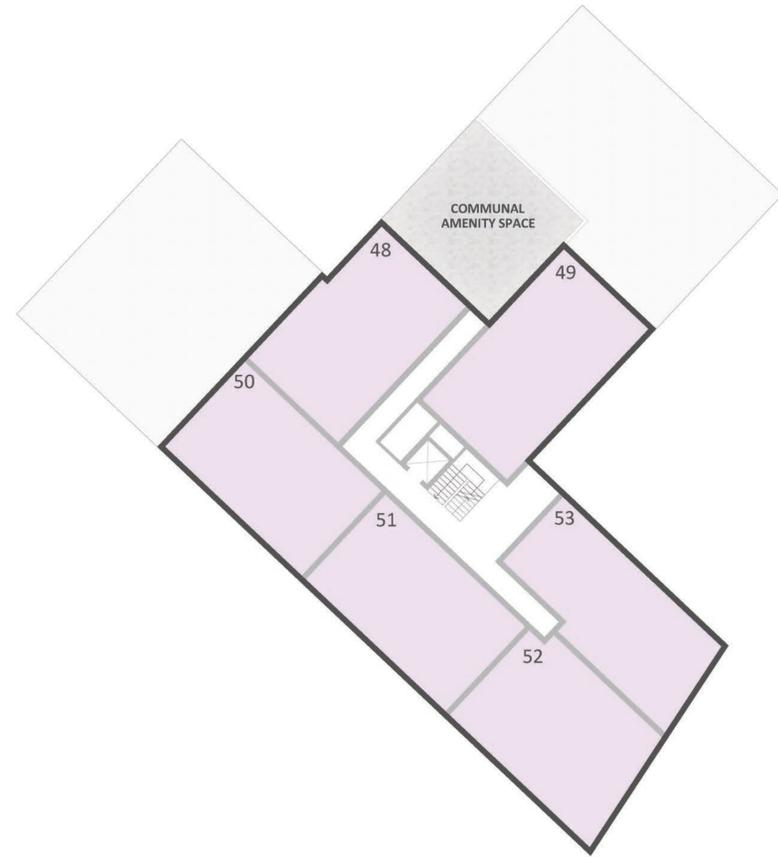
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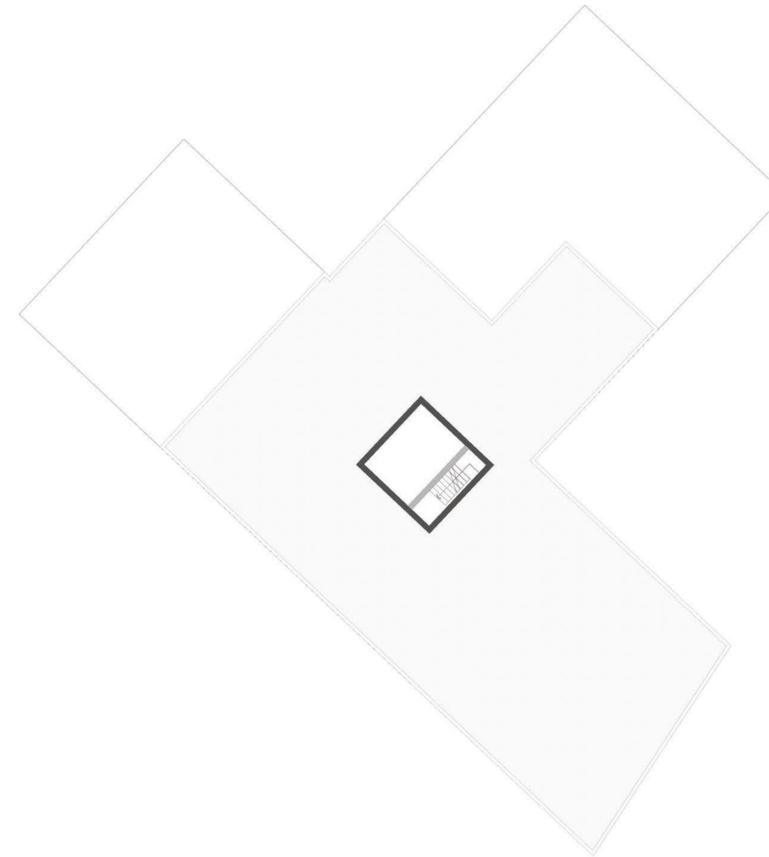
- KEY
- Site Boundary
 - 1 Bed 2 person (1B2p) Apartment
 - 2 Bed 3 person (2B3p) Apartment
 - 2 Bed 4 person (2B4p) Apartment



5TH



Roof



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KEY

- Site Boundary
- 2 Bed 4 person (2B4p) Apartment



CLIENT	
The Arch Co	
PROJECT	
Preston Road, Brighton	
DRAWING	
Site Feasibility Layout - 5th-6th Floors	
PROJECT NUMBER	
AECW3000	
DRAWING NUMBER	CHECKED BY
3001-03	CD
REVISION	STATUS
-	Final
DATE	SCALE
17 April 2020	1:200 @ A1

Turley Office
The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830

(DM1) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafront

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

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(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

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(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

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(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

Yes

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

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

SSA 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.

response box for legal compliance, soundness and duty to cooperate:

Supporting Evidence for Sussex Community NHS Foundation Trust's submission to Brighton & Hove City Council's City Plan Part Two public consultation (re: SSA1 Brighton General Hospital Site)

I am writing on behalf of Sussex Community NHS Foundation Trust (SCFT) in support of the plan to develop the Brighton General Hospital site on Freshfield Road, as described in section SSA1 of Brighton & Hove City Council's City Plan Part Two, to include:

- * a 10,000-12,000 sq m health and care facility;
- * a minimum of 200 residential units; and
- * community facilities.

The Brighton General site is not currently fit for delivering 21st century health care or a modern working environment for staff. The site includes a significant number of hazardous buildings that are no longer sound or safe and the internal layout of the former Victorian workhouse buildings makes it impossible to create clinical environments that meet today's standards for patient privacy, dignity and infection control. Services are spread over approximately 20 buildings, on a large site with very steep gradients. This makes accessing clinics and services particularly challenging for visitors who are disabled, elderly and those with young children.

Despite its name, Brighton General Hospital is no longer a hospital and now houses a number of community health services, SCFT administrative and support functions. The last bed on site closed in 2009, with hospital bed services moving to the Royal Sussex County Hospital less than a mile away. Only 50% of the current estate is well used, with 20% empty.

The local NHS does not have need for a 4.6-hectare site approximately one mile away from a large acute hospital that is currently undergoing a substantial investment in new facilities. Holding on to land for which we have no use is a drain on NHS funds. It is therefore necessary to look at how the site can be redeveloped to make it fit for purpose for current and likely future health service need, while improving how services are delivered, providing a better working environment for staff, and ensuring that services operate from smaller but better utilised facilities with as much investment as possible in effective frontline patient care.

The Trust is proposing to build a new community Health Hub, Sussex Rehabilitation Centre and NHS car park on the north-west corner of the site. The NHS will not need the whole site for the Health Hub so there is the potential for part of the site to contribute to meeting the city's housing need through the creation of new housing on surplus land. The Trust intends to develop detailed design plans in consultation with local people, patients and staff for the health and housing elements of the redevelopment that will:

- * Achieve a high quality of design which preserves and where possible enhances the setting of the landmark Grade II Listed Arundel Building on site. The Trust is absolutely committed to the preservation of the Arundel Building, which is a landmark building that is visible in the skyline from locations across the city. We are working closely with Brighton & Hove City Council's heritage advisors to ensure a development that not only addresses health needs but adds residential development to the area in a sustainable and sympathetic modern urban setting that respects the site's Elm Grove frontage and workhouse history. Furthermore, any scheme will retain much of the curtilage wall around the Brighton General site.
- * Allow for improved landscaping and the creation of new green space through its parking management strategy.
- * Deliver sustainable transport infrastructure improvements that provide and promote public and sustainable transport to and through the site. We are committed to working with the council and public transport providers to lobby for improved public transport provision to the site. We will provide showers and cycle storage in order to encourage active travel and will also incorporate more charging points and encourage pooled electric vehicles.
- * Create new jobs and training opportunities within the local economy. We will look to appoint contractors that can deliver other social benefits, such as apprenticeships (which could be delivered in partnership with the city's local universities and FE College).
- * Contribute towards Biodiversity Action Plan objectives. We will work with RSPB and other organisations to protect bird habitat and other biodiversity and make provision to safeguard the swift colony on site.

In summary, The Trust's Health Hub plan will redevelop the Brighton General Hospital site to make it better for patients, better for health and care staff and better for the environment, while offering the promise of new homes and jobs for local people in Brighton & Hove.

SSA 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.

modifications to the policy to make sound and legally compliant:

SSA 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

We do not necessarily wish to participate at the hearing sessions during the examination but we attach a letter of support for the Council's proposals on the basis that these are compatible with the need to develop local health services and that they have been prepared in a manner that is sound, legally compliant and aligned to the Council's Duty to Co-operate

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H2 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.

response box for legal compliance, soundness and duty to cooperate:

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

19th October 2020

Dear Brighton & Hove City Council Planning

Supporting Evidence for Sussex Community NHS Foundation Trust's submission to Brighton & Hove City Council's City Plan Part Two public consultation (re: SSA1 Brighton General Hospital Site)

I am writing on behalf of Sussex Community NHS Foundation Trust (SCFT) in support of the plan to develop the Brighton General Hospital site on Freshfield Road, as described in section SSA1 of Brighton & Hove City Council's City Plan Part Two, to include:

- a 10,000-12,000 sq m health and care facility;
- a minimum of 200 residential units; and
- community facilities.

The Brighton General site is not currently fit for delivering 21st century health care or a modern working environment for staff. The site includes a significant number of hazardous buildings that are no longer sound or safe and the internal layout of the former Victorian workhouse buildings makes it impossible to create clinical environments that meet today's standards for patient privacy, dignity and infection control. Services are spread over approximately 20 buildings, on a large site with very steep gradients. This makes accessing clinics and services particularly challenging for visitors who are disabled, elderly and those with young children.

Despite its name, Brighton General Hospital is no longer a hospital and now houses a number of community health services, SCFT administrative and support functions. The last bed on site closed in 2009, with hospital bed services moving to the Royal Sussex County Hospital less than a mile away. Only 50% of the current estate is well used, with 20% empty.

The local NHS does not have need for a 4.6-hectare site approximately one mile away from a large acute hospital that is currently undergoing a substantial investment in new facilities. Holding on to land for which we have no use is a drain on NHS funds.

It is therefore necessary to look at how the site can be redeveloped to make it fit for purpose for current and likely future health service need, while improving how services are delivered, providing a better working environment for staff, and ensuring that services operate from smaller but better utilised facilities with as much investment as possible in effective frontline patient care.

The Trust is proposing to build a new community Health Hub, Sussex Rehabilitation Centre and NHS car park on the north-west corner of the site. The NHS will not need the whole site for the Health Hub so there is the potential for part of the site to contribute to meeting the city's housing need through the creation of new housing on surplus land.

The Trust intends to develop detailed design plans in consultation with local people, patients and staff for the health and housing elements of the redevelopment that will:

- **Achieve a high quality of design which preserves and where possible enhances the setting of the landmark Grade II Listed Arundel Building on site.** The Trust is absolutely committed to the preservation of the Arundel Building, which is a landmark building that is visible in the skyline from locations across the city. We are working closely with Brighton & Hove City Council's heritage advisors to ensure a development that not only addresses health needs but adds residential development to the area in a sustainable and sympathetic modern urban setting that respects the site's Elm Grove frontage and workhouse history. Furthermore, any scheme will retain much of the curtilage wall around the Brighton General site.
- **Allow for improved landscaping and the creation of new green space** through its parking management strategy.
- **Deliver sustainable transport infrastructure improvements** that provide and promote public and sustainable transport to and through the site. We are committed to working with the council and public transport providers to lobby for improved public transport provision to the site. We will provide showers and cycle storage in order to encourage active travel and will also incorporate more charging points and encourage pooled electric vehicles.
- **Create new jobs and training opportunities within the local economy.** We will look to appoint contractors that can deliver other social benefits, such as apprenticeships (which could be delivered in partnership with the city's local universities and FE College).
- **Contribute towards Biodiversity Action Plan objectives.** We will work with RSPB and other organisations to protect bird habitat and other biodiversity and make provision to safeguard the swift colony on site.

In summary, The Trust's Health Hub plan will redevelop the Brighton General Hospital site to make it better for patients, better for health and care staff and better for the environment, while offering the promise of new homes and jobs for local people in Brighton & Hove.

[REDACTED]

[REDACTED]

[REDACTED]

Chief Financial Officer
Sussex Community NHS Foundation Trust

Response ID BHLF-8ZMD-Y48D-CSubmitted to **City Plan Part Two (Proposed Submission)**

Submitted on 2020-12-17 14:40:54

Your details

What is your name?

Name:

[REDACTED]

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

Organisation:

DTZ Investors Kent County Council Superannuation Fund

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

Notification matrix - The City Plan Part Two has been submitted for independent examination:

Yes

Notification matrix - The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two:

Yes

Notification matrix - The adoption of the City Plan Part Two:

Yes

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

Yes

Date Response Submitted

Date Response Submitted:

30/10/2020

City Plan Part Two - Part One - Introduction

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

Comments on the Introduction of CPP2:

DM1 Housing Quality, Choice and Mix

(DM1) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Justified, Consistent with National Policy

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

In summary, we consider that draft Policy DM12 is overly restrictive and not in accordance with current government guidance, which seeks flexibility and the re-use of buildings. The role of town and city centres is changing, and there needs to be opportunities to provide a wide range of uses within these centres to add to their overall vitality. If town centres are going to survive and thrive there is a need for greater flexibility in the use of high street buildings. In particular there is a need to allow more non-retail uses within Prime Retail Frontages.

We understand that the council is going to substantially change draft Policy DM12 following the changes to the Use Classes Order. We, therefore, reserve the right to make further representations in relation to this policy once the changes have been published.

In conclusion, we request that draft Policy DM12 of the PSCPP2 is removed.

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafront

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H2 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.

response box for legal compliance, soundness and duty to cooperate:

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded



Brighton and Hove City Council
City Development and Regeneration
Hove Town Hall
Norton Road
Hove
BN3 3BQ

Our Ref: 70070474

30 October 2020

planningpolicy@brighton-hove.gov.uk

Dear Sir / Madam,

REPRESENTATIONS TO THE BRIGHTON AND HOVE CITY COUNCIL PROPOSED SUBMISSION CITY PLAN PART 2

We represent DTZ Investors, who are appointed to manage Dukes Lane, Brighton by the owners Kent County Council Superannuation Fund.

Dukes Lane is located within Central Brighton, which is defined as a Regional Shopping Centre in the Brighton and Hove City Plan Part 1 (CPP1). It is also designated as a Prime Retail Frontage.

Dukes Lane is vulnerable, along with other Regional Centre retail units, to increasing vacancies due to the change in retail and shopping patterns within the City Centre. Dukes Lane comprises 21 units of which nine are currently vacant.

These representations request that draft Policy DM12 of the Proposed Submission City Plan Part 2 (PSCPP2) is removed.

Draft Policy DM12

Draft policy DM12 states:

“To allow for diversification in shopping centres, change of use of an existing class A1 unit to non-A1 town centre uses within the following designated shopping centres and as shown on the Policies Map, will be permitted where the following criteria are met;

A) Regional, Town and District Shopping Centres

i) Changes of use of a ground floor Class A1 unit in the primary shopping frontages will only be permitted where the proportion of Class A1 units would not fall below 75% in the Regional Centre, and 50% in Town and District Centres (as a proportion of total units measured across the total Primary Shopping Frontage), taking into account unimplemented planning permissions for changes of use;

ii) Changes of use of a ground floor Class A1 unit in the secondary shopping frontages will only be permitted where the proportion of Class A1 units would not fall below 35% in the Regional Centre and below 30% in the Town and District Centres (as a proportion of total

units measured across the total Secondary Shopping Frontage), taking into account unimplemented planning permission for changes of use.

iii) Within the Lanes and North Laine areas the change of use should not result in a group of three or more adjoining units being in non-A1 use.

iv) The unit has been marketed for a minimum of 6 months, at an appropriate rent (providing three comparable shop rents within the centre) with the marketing information clearly demonstrating that there is no realistic prospect of the unit being used for A1 use in the foreseeable future; and

v) A shop front has been retained or provided.....”

We object to this policy and request that it is deleted for the reasons explained below.

Analysis

Regional, Town and District Centres have historically been shopping destinations. However, due to a number of national retailers closing stores and the increasing popularity of online shopping, centres are becoming increasingly popular for a variety of uses, such as entertainment and leisure activities. A diversity of uses makes an important contribution to the vitality and viability of centres.

NPPF paragraph 85 stipulates that planning policies should take a positive approach to the growth, management and adaptation of town centres, with paragraph 85(a) stating policies should promote the long term vitality and viability of town centres:

“by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses...”

The 2018 update to NPPF paragraph 85(b) removed the requirement for Councils to identify primary and secondary shopping frontages.

The Shopping Frontage Review Retail Topic Paper 2020 prepared by Brighton and Hove City Council, acknowledges this change to national planning policy, however, it stipulates that these definitions remain within the PSCPP2 in order to *“be consistent with the City Plan Part One policy CP4 Retail Provision and the Retail Study 2011...”*

However, the PSCPP2 does not have to be consistent with the City Plan Part One if the evidence base is out of date and if there has been a change in national policy as set out below:

- The NPPF paragraph 31 states that *“the preparation and review of all policies should be underpinned by relevant and up to date evidence ...”* The evidence base is clearly out of date, for example the updated Retail Study was published in 2011 which is almost ten years ago.
- The NPPF paragraph 33 states that local plan reviews should take account of relevant changes to national policy. The government has recently introduced a significant change to the Use Classes Order.

The new regulations in relation to the Use Classes Order came into effect on 1 September 2020 and introduced a broad category of ‘commercial, business and service uses’ known as Class E (Class A1 to A5, B1, D1 and D2 have been revoked). The government introduced these changes to help revive the high street and town centres to allow a degree of flexibility. The changes will

provide flexibility for businesses to adapt and diversify to meet changing demands. It is noted that Draft Policy DM12 does not refer to the Use Class E, and instead refers to the revoked Class A1.

The justification to draft Policy DM12 at paragraphs 2.104 - 2.105 states that a review was undertaken in 2017 of the primary and secondary shopping frontages, which indicated that it was appropriate to continue the approach of controlling A1 uses in each centre. As mentioned above, a number of changes have taken place since this review including changes to national policy.

Paragraph 2.106 of draft Policy DM12 states that:

“for a shopping centre to operate successfully it is necessary for shops to group together...”

However, retail thrives with other compatible uses such as restaurants and cafes, beauty salons and hairdressers, financial services and many other businesses.

We note that changes have been made to draft Policy DM12 since the publication of the Draft City Plan Part 2 (2018), to make the policy more flexible for non-retail uses in the Primary Shopping Areas, however, further changes are required. Draft Policy DM12 is to replace saved Policy SR4 of the Brighton and Hove Local Plan 2005, however, the draft Policy is more restrictive than the policy it replaces, with the inclusion of a requirement to provide 6 months marketing evidence and further criterion included relating to the Lanes and North Laine areas. Furthermore, it is not clear in part A) i) of the Policy whether the stipulated 75% relates to the Primary Shopping Frontages across the whole Regional Centre or specifically the shopping street(s) to which the application relates, as per criterion ii) of saved Policy SR4. This is at odds with current planning legislation, as detailed above, which is seeking to provide more flexibility to enable businesses to adapt and diversify to meet changing demands. Therefore, draft Policy DM12 at the very least should seek to become less restrictive, not more.

In light of the above, we consider that Draft Policy DM12 is not justified and not in accordance with national policy and should be deleted.

Summary

In summary, we consider that draft Policy DM12 is overly restrictive and not in accordance with current government guidance, which seeks flexibility and the re-use of buildings. The role of town and city centres is changing, and there needs to be opportunities to provide a wide range of uses within these centres to add to their overall vitality. If town centres are going to survive and thrive there is a need for greater flexibility in the use of high street buildings. In particular there is a need to allow more non-retail uses within Prime Retail Frontages.

We understand that the council is going to substantially change draft Policy DM12 following the changes to the Use Classes Order. We, therefore, reserve the right to make further representations in relation to this policy once the changes have been published.

In conclusion, we request that draft Policy DM12 of the PSCPP2 is removed.



We trust the above representation and recommendations will be taken into consideration, prior to the submission of the Plan. Should you have any queries relating to the above, please do not hesitate to contact me.

Yours sincerely



Associate Director

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafront

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Positively Prepared, Effective, Justified, Consistent with National Policy

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

1.0 INTRODUCTION

1.1 These representations are made by Enplan on behalf of Benfield Valley Investments Ltd in respect of the public consultation on Brighton and Hove City Council's 'City Plan Part Two' (CPP2). They have been informed by assessments undertaken by EPR (regarding ecology and biodiversity) and Heritage Collective (in respect of heritage).

1.2 The current development plan for Brighton and Hove comprises the Brighton and Hove City Plan Part One (CPP1) which was adopted 26th March 2016 and the saved policies of the Brighton and Hove Local Plan 2005.

1.3 The CPP1 sets out the vision and objectives for the City's growth and development. It contains planning policies to apply to new development and identifies the infrastructure requirements for the City. It sets out broad locations for development and allocates key strategic sites. Upon adoption, it replaced parts of the previously adopted Brighton and Hove Local Plan.

1.4 The purpose of the CPP2 is to allocate additional development sites and set out a detailed development management policy framework. When adopted, it will replace the remaining saved policies of the Brighton and Hove Local Plan and form the development plan for the City along with the CPP1.

1.5 The CPP2 has been published for Regulation 19 public consultation prior to submission to the Secretary of State for independent examination.

2.0 POLICY SA7 POLICY H2 AND POLICIES MAP

2.1 Draft Policy SA7 identifies Benfield Valley as a Special Area and sets out the policy objectives for the site. The draft policy wording is as follows <Sets out Policy SA7 as worded in CPP2 Proposed Submission>

2.2 Draft Policy H2 sets out two areas for residential development at Benfield Valley; one site of 0.93ha to the north of Hangleton Lane and another site of 0.67ha to the south of Hangleton Lane. The policy allocates a potential number of 100 dwelling units at Benfield Valley; 60 on the area to the north of the Hangleton Lane and 40 on the area to the south. It also indicates that it would be appropriate for 50% of the units to be family sized housing (ie 3+ bedrooms).

2.3 The extent of the areas allocated for residential development within the Benfield Valley site is shown on the proposed policies map. They are also shown in the CPP2 at Figure 2 (under policy SA7) and Appendix 4 – Policy H2 Urban Fringe Housing Site Maps.

2.4 It is considered that the content of draft policy SA7 which seeks to protect and enhance important landscape, ecology, biodiversity and heritage features of the site is appropriate and this is broadly supported. However, it should be more overtly acknowledged that the identified objectives for the site will require significant funding and this will need to be provided through new residential development. The ability of the site to make a significant contribution to the Council's housing requirements also needs to be more effectively recognised. Accordingly, the policy should more clearly emphasise the requirement for an appropriate level of residential development in order to deliver the suite of other policy objectives.

2.5 It is also considered that the quantum of housing development for the site identified in draft policy H2 can and should be increased from the 100 dwellings currently indicated. Furthermore, the identified developable areas should be extended. This will not only ensure that the full suite of benefits will be delivered but also facilitate their optimisation whilst delivering increased levels of housing which are required to meet the Council's strategic housing requirement.

3.0 HOUSING NEED AND SUPPLY

3.1 The CPP1 in policy CP1 set out a target housing provision of at least 13,200 new homes over the plan period 2010 – 2030. It is noted that this figure comprises only around 60% of the Objectively Assessed Need (OAN). 13,200 homes equates to an average of 660 dwellings per annum (dpa), although a stepped trajectory was proposed throughout the plan period to deal with previous years' under-supply. For the period 2014/15-2018/19 the target delivery rate was 655dpa. For the period 2019/20-2023/24 this increased to 856dpa and then for the remainder of the plan period, ie 2024/25-2029/30 it is 712dpa.

3.2 In fact, the delivery of housing since the adoption of the CPP1 has failed to meet even the lower annual requirements of 655dpa and, therefore, the housing requirement for the remainder of the plan period is now significantly increased and, in consequence, the supply needs to be commensurately increased.

3.3 The most recent annual review of the Strategic Housing Land Availability Assessment (SHLAA) published in October 2019 states that Brighton and Hove City Council (BHCC) are unable to demonstrate a five year housing land supply (refer to table on page 7 of the SHLAA update).

3.4 The NPPF requires that Local Planning Authorities should be able to identify a supply of deliverable sites that are sufficient to provide a minimum of five years' worth of housing against local need along with an additional buffer of between 5 and 20%. The largest amount of buffer (20%) should be added to the figure where there has been significant under delivery of housing over the previous three years.

3.5 In the last three years BHCC has delivered significantly fewer new dwellings than the requirement, as evidenced by the Housing Delivery Test (HDT). The most recently published HDT data (2019 measurement) demonstrates a consistent under-delivery of housing over the last three years resulting in the provision of only 70% of the requirement for that period and, therefore, BHCC must add a 20% buffer to its requirement figure as well as making up the deficit.

3.6 Adding the previous years' under supply and the 20% buffer results in a revised requirement of some 1,230 dpa (see para 5.4 of the SHLAA update report) This is shown in the tables below.

<First table referred to presents the annual Housing requirement identified in CPP1 of 655 dwellings per annum (dpa) over the period from 2014/15 to 2018/19 giving a cumulative figure of 3,275 net dwellings for the period 2014-2019, and shows the annual surplus/shortfall against this target over the period 2014/15 to 2018/19 amounting to a cumulative shortfall of -844 net dwellings over the period 2014-2019>

<Second table presents the annual Housing requirement identified in CPP1 of 856 dwellings per annum (dpa) over the period from 2019/20 to 2023/24 giving a cumulative requirement figure of 4,280 net dwellings over the period 2019-2024, and shows the 'New housing requirement (inc 844 under-supply and 20% buffer)' amounting to 1,230 dwellings per annum giving a cumulative under-supply of 6,150 net dwellings over the period 2019-2024>

3.7 Furthermore, it should be noted that the requirement identified above is a minimum figure rather than a limit. Against this increased figure, the projected supply as set out in the latest SHLAA update is only 4 years.

3.8 The Council's projections indicate an expectation that the delivery of housing for the current period (2019-2020) will be less than half the annual requirement (see Chart A: Housing Trajectory in the SHLAA update report October 2019). The circumstances in 2020, where construction has been impacted by COVID-19, are likely to limit the delivery of housing for this period even further. This suggests that when the housing delivery is calculated for 2019/20 it will be significantly less than half the annual requirement.

3.9 The CPP1 at policy CP1 sets out a target of 13,200 new homes to be built over the plan period 2010-2030, an average of 660dpa. Policy CP1 also indicates that 1,060 of the total 13,200 new homes will be delivered on urban fringe sites. Policy H2 in the CPP2 sets out the urban fringe locations and indicates the number of dwellings allocated for each site and locations of developable areas. The total number of dwellings proposed in the allocations is only 930 dwellings, which is fewer than the target of 1,060 indicated by CPP1 policy CP1. Furthermore, due to past under delivery, the annual housing target has increased compared to that indicated in CPP1. Accordingly, the CPP2 as drafted is not effective in delivering the housing requirement as it does not make provision for even the number of dwellings on urban fringe sites which were required when the CPP1 was adopted in 2016. The number of dwellings required to meet the housing need is now significantly greater following the recent history of undersupply. Put simply, the draft CPP2 is "planning to fail" and is, therefore, considered to be unsound.

3.10 To make it sound, the CPP2 needs more effectively to support the optimisation of the available development sites by allocating appropriate levels of housing.

3.11 Failure to allocate within the CPP2 a sufficient quantity of dwellings to meet even the requirement set out in the CPP1 would be unsound as it would mean that the Plan is not positively prepared, is not justified, is not effective and would not be in accordance with national policy (which seeks to "boost significantly" the supply of housing – para 59 of the NPPF).

3.12 The Benfield Valley site is well placed to make a significant contribution to the Council's housing land supply in both the short to medium term. It could come

forward with a planning application within 2 years and development could begin to be delivered within 4 years, thus assisting with the current shortfall in the five year housing land supply. It is considered that, with a suitable allocation in the CPP2, all the housing on the site could be delivered well within the remainder of the plan period (ie by 2030).

3.13 The affordable housing provision target set out in policy CP20 of the CPP1 is 40% on sites delivering more than 15 dwellings. All of the strategic development areas identified in the CPP1 (apart from land at Toad's Hole Valley, policy DA7) are large urban sites where viability issues have resulted in affordable housing provision being reduced from 40%. Consequently, the actual affordable housing need in the City is not being met. Generally greenfield sites do not have abnormal development costs and are, therefore, able to provide policy compliant affordable housing. Maximising the quantum of development on the Benfield Valley site would provide scope for greater provision of affordable housing, including family housing.

4.0 THE SITE

Developable areas

4.1 Policy SA7 and its supporting text identify a number of functions performed by Benfield Valley including as green wedge in the urban area, a Local Wildlife Site (LWS) and Local Green Space (LGS).

4.2 However, it is considered that there is significant scope for developing a larger area than has been indicated by the "developable areas" shown on the draft policy map whilst still protecting and enhancing landscape character, biodiversity & wildlife protection and the heritage assets.

4.3 An increase in the area of residential development will not only make the most effective use of the site in delivering new housing to help meet a significant shortfall in the City, it will provide the funding to deliver all of the objectives of Policy SA7 to a high standard. It will also ensure the ability to maintain and manage new "gateway" facilities, as well as provide for long term habitat management, so that the important functions of the site are retained for the entire plan period and beyond.

4.4 The areas currently identified for development as shown at Figure 2 (under policy SA7) and Appendix 4 of the CPP2 and on the policy map, do not correspond with any physical boundaries on the site, nor is their size and shape dictated by any ecological, landscape or heritage constraints. In view of this, it is considered that these areas could readily be revised in order to allow additional housing and hence additional funding, which would enable the site to better meet the special policy aims.

4.5 The developable area on the northern part of the site (north of Hangleton Lane) could be extended northwards to the existing east-west hedgerow located to the south of the listed barn which marks the southern edge of truly 'open' landscape to the west of the listed barn. This would maintain the setting of the barn including long distance views from the west at Foredown Tower. The existing footgolf car park and land to the north and east of it would also be retained to provide the southerly setting of the listed barn and Conservation Area. The extended developable area would also retain the existing woodland to the south and west along the site boundaries. Overall the revised area would be more legible on the ground and would acknowledge historical and ecological constraints.

4.6 With regard to the southern part of the site (south of Hangleton Lane), there are currently no physical boundaries on the site which correspond with the southern and eastern edges of the developable area shown on the proposals map. Therefore, it is considered that the developable area could be extended to the south and east without compromising the policy objectives of SA7 and would retain the important woodland boundaries to the north and west.

4.7 These proposed extensions to the developable areas would, however, retain a significant area of green space, footpath access and boundary planting along the eastern side of Benfield Valley extending from the SDNP to the north down to the Old Shoreham Road in the south. This would preserve the green lung function provided by the site.

Recreation and Enjoyment

4.8 Currently the site offers recreational opportunities in the form of a footgolf course (on the northern part of the site) and public footpaths to both the south and north. The footpaths are well used but there is limited maintenance undertaken. There is also some signage and information boards either side of Hangleton Lane which were erected approximately 30 years ago. However, these contain limited information about the history and ecology of the site and have not been maintained. Consequently, they are faded and have been partially obscured by graffiti. Since they were installed, the South Downs National Park (SDNP) has been designated (in 2010) and is located immediately to the north of the A27. The footpaths across Benfield Valley provide an important link to the SDNP but there is no public information about this on site nor any facilities directed towards visitors to the Park. Accordingly, the creation of gateway facilities is a key objective of policy SA7 and Benfield Barn and its associated structures offer a significant opportunity to provide such facilities. These could include bike hire with associated changing, holiday let units, visitors centre with information boards, café and improved parking area with associated landscaping.

4.9 In addition to providing the above new facilities, development on the site could also fund improvements to the existing footpaths allowing for access to a wider range of visitors.

4.10 Whilst part of the area of the northern parcel of the site identified as a developable area is currently occupied by one of the footgolf holes, there is ample scope for this to be relocated elsewhere within the footgolf course which would be retained on the land between Hangleton Lane and the A27. The listed barn would also continue to provide ancillary facilities for the footgolf operation.

Ecology and Biodiversity

4.11 The site is a LWS and LGS, however, only parts of the site are of intrinsic ecological importance, whilst other areas have no meaningful ecological value. Development at Benfield Valley provides an opportunity to protect, restore and create calcareous grassland, native broadleaved woodland and scrub, which in turn provide habitats for a range of species. The funds released from new housing development will also allow the long-term management of these habitats.

4.12 Since the completion of the Sainsburys superstore to the south in 1992, the remaining open green space within Benfield Valley has been neglected. The

grasslands have become rank and overgrown and scrub has encroached onto sensitive habitats. In addition the area has been subjected to some fly-tipping.

4.13 The grassland in the northern land parcel is mown within the footprint of the Benfield Valley footgolf course. Different areas of grassland are subject to different mowing regimes, so that some areas are short and other grassland has a longer sward. The southern land parcel, south of Hangleton Lane, undergoes minimal management.

4.14 Historical mapping indicates that there is one remaining historic field boundary along the eastern boundary of the southern land parcel. It is now a mature, gappy hedgerow, but most of the boundary is no longer present.

4.15 Given the lack of wildlife-sensitive management, opportunities now exist to halt the decline of habitats and instead introduce beneficial management (funded by development) to protect, restore and create habitats to benefit flora and fauna in the long-term.

4.16 Surveys show that the area to the north of Hangleton Lane mostly comprises calcareous grassland that is either managed as a footgolf course or has been neglected and left unmanaged. The proposals provide an opportunity to restore the calcareous grassland to good condition through habitat management. This will, over time, increase species richness, particularly flora and invertebrate fauna, and therefore the ecological condition of the habitats. These enhanced habitats will be publicly accessible for people to enjoy.

4.17 In addition to enhancements to grassland habitats, the proposals will protect important areas of boundary habitat, mature trees and scrub. These will be enhanced by supplementary planting and management and will provide a green corridor for wildlife as well as a buffer to the important grassland habitat. These improvements will increase habitat extent, quality and connectivity. The protection and sympathetic management of hedgerows, hedgerow buffers, grasslands and other habitats will improve the permeability of the site so a range of animals can move through the landscape unimpeded.

4.18 Furthermore, subject to agreement with Highways England, the development offers an opportunity to retrofit a mammal bridge to the existing footbridge across the A27. This would significantly improve connectivity between the isolated populations of Hazel Dormice that are known to be present on either side of the A27.

4.19 Residential dwellings would include integrated bat and bird boxes for a range of species including local Biodiversity Action Species such as Swift *Apus apus* and Starling *Sturnus vulgaris*, as well as other Red and Amber-listed species such as House Sparrow *Passer domesticus* and House Martin *Delichon urbicum*.

4.20 Educational interpretation boards will provide opportunities for residents to learn about the wildlife on their doorstep. By engaging residents and providing opportunities to wander freely and to look and learn about nature, they are more likely to care about 'their space', and in turn it will encourage people to look after their green spaces.

4.21 Improvements in habitats also deliver many 'ecosystem goods and services' because the resurgence in nature improves pollination, helps capture carbon and delivers benefits for air and water quality.

4.22 Overall, the proposals can achieve the following:

- Restoration of approximately 7ha of lowland calcareous grassland, a Habitat of Principal Importance. In doing so, this will create habitat for Species of Principal Importance, such as the Small Heath *Coenonympha pamphilus* and other species that are of local priority, such as Glow-worm.
- Improvement of approximately 2,000 metres of shrubs. This will provide habitat for invertebrates, birds, and mammals, including Hedgehog *Erinaceus europaeus* and dormice.
- Creation of new bat roosting opportunities by installing integrated bat boxes in the new dwellings. The improvements to grassland, hedgerow, scrub and woodland habitats, as well as the provision of new ponds, will improve the quality of bat foraging habitat.
- Installation of Swift bricks to contribute towards 'Action for Swifts.'
- The retrofitting of a bridge for small mammals, such as the Hazel Dormouse, to the existing footbridge to link currently isolated populations on either side of the A27.
- Creation of new hibernacula for reptiles.
- Secure funding for habitat management and monitoring in the long-term up to 25 years.

4.23 Without development there is little prospect of securing the funds needed to restore and manage this LWS.

4.24 It is also noted that the developable area identified by the Council on the draft proposals maps includes an area of existing woodland on the northern boundary of the southern section of the site. The County Ecologist identified the tree belts and boundary habitats as being important in ecological terms and that these should be retained (see para 4.9 of the Benfield Valley Topic Paper 2019). This area of woodland would be excluded from the developable area.

Heritage

4.25 There are a number of heritage assets on and in the vicinity of the site which are as follows:

- Benfield Barn (grade II)
- Benfield Barn Conservation Area
- Hangleton Manor (grade II*) and dovecote (grade II)
- Rookery Cottage (grade II)
- St Helen's Church (grade II*)
- Hangleton Conservation Area

4.26 The ability to achieve the objectives of the draft policy SA7 depends on the provision of financial input – particularly with regard to the restoration and improvements of the Benfield Barn Conservation Area.

4.27 As set out above, the current boundaries of the developable areas to the north of Hangleton Lane do not appear to be based upon any specific identification

of heritage sensitivity or tolerance. It is considered that there could be an increase in this area for development, without eroding those areas of the setting that contribute to the significance and values – or means to experience – the Benfield Barn Conservation Area or the listed Benfield Barn.

4.28 The western area of the footgolf car park, and the scrubby wooded areas east of the current developable area would provide for an expanded location for valuable additional development whilst also securing funds to achieve the aims of policy SA7.

4.29 Of the designated heritage assets identified above, Benfield Barn Conservation Area and the listed Benfield Barn are considered of the greatest relevance with regard to the site and the proposed developable area north of Hangleton Lane. The setting of the Hangleton Conservation Area is also identified within the SA7 policy text as needing preservation. The small group of listed buildings at Hangleton Manor is located within modern residential development with limited opportunities to see or understand the heritage characteristics or details of the buildings, or their grouped value, from within the site. This also applies to the southern portion of the site, south of Hangleton Lane. The land south of Hangleton Lane is less sensitive in heritage terms.

4.30 The open area of the northern section of the footgolf course immediately west and north west of Benfield Barn, is considered to make a positive contribution to the historic illustrative values of the listed barn and the Conservation Area in retaining the greatest consistency with the historic setting, of open farmland. This area is particularly defined to the north of the hedgerow that runs east-west from the edge of the Conservation Area just south of the barn. This hedgeline is considered to be the northern most edge of the developable area, as set out above.

4.31 The route which runs north off Hangleton Lane also contributes to the setting and significance of the designated assets in that it is an enclosed, informal and wooded and although the barns are heavily screened it enables an understanding of the historical approaches, it also gives some shared experience with Hangleton Manor.

4.32 In contrast, the current car park is a low quality area of space which makes no specific contribution to the heritage assets or an experience of them.

4.33 Draft policy SA7 encourages “the sympathetic repair and re-use of Benfield Barn and its associated structures and walls in a way that is compatible with and integrates with the landscape character of Benfield Valley, the wider natural environment and the Benfield Barn Conservation Area”. The character and appearance of the Conservation Area is today heavily dominated by the ruinous state of the farmyard and outbuildings to the east and south. Aside from the listed barn all former structures are in a declining state, with high risk of collapse and further loss. Although they have some heritage value, they are dangerous, closed off, and offer no means for public access, understanding or experience as a former farm yard. Their overgrown nature precludes and prevents any means of understanding their former forms, functions, material or aesthetic qualities even from a distance.

4.34 Clearance of overgrowth, careful restoration and reconstruction of the structures, walls and yards of the former farm yard combined with sensitive plans and proposals for a sustainable new use would offer a wholly transformative improvement to the character and appearance of the Conservation Area and the setting of the listed barn.

4.35 New uses associated with leisure, ecology, interpretation and information on the SDNP, the local area and its history would not only enable intellectual access to the heritage of the site and nearby assets at Hangleton Manor which share historic context, but would also fulfil objectives within Policy SA7 relating to the creation of ‘gateway facilities’ for the SDNP.

4.36 The improvements to the barn and farmyard also offer scope for restoring the historic connection between Benfield Manor Farm and Hangleton Manor. This restoration would rise naturally from the reinstatement of a legible farm group at the barns and could be augmented with historic interpretation boards or information that build upon existing information at the other places. Preservation of the historic approach route as a primarily pedestrian route would maintain some sense of historic links and the small scale diminutive nature of this historic route between ancient places. It would preserve the historic approach between Hangleton Manor and Benfield Barn and farm, a currently important but poor quality area of setting to both assets.

4.37 The southern part of the Benfield Barns Conservation Area contains four derelict 19th century cottages, on the site of the former Manor house. Restoration of these four cottages, with associated amenity garden space to their south would also contribute to the enhancement of the character and appearance of the Conservation Area, the setting of the listed barn and the visual character and quality of the approach. There is good evidence in the form of historic photographs as well as the standing ruinous remains for the appearance of these cottages. A facsimile reproduction could be created that would restore the historic appearance of this small farmstead. These could be private residential cottages or used as holiday let cottages which would also address the policy aim for recreational uses and increasing public access to the surrounding area. As the buildings are almost entirely collapsed at present, new dwellings could be offered with enhanced environmental credentials to minimise the impact of these structures.

4.38 The restoration and reuse of the Benfield Barn Conservation Area would give rise to other public benefits in terms of local employment, craftsmen and traditional building techniques in the restoration of the structures which will need to be undertaken in a careful manner utilising sensitive materials and traditional techniques.

Landscape Impact

4.39 It is noted that none of the Benfield Valley site which is the subject of draft policy SA7 (ie, south of the A27) is subject to any landscape designation. It is accepted and agreed that the northern-most part of the site, ie north of the above mentioned east-west hedgerow, is not appropriate for development given that this is the most elevated area. There are long distance views from the northern extent of the site across the surrounding urban area but from where the proposed developable areas would be largely screened by existing retained mature vegetation and planting.

4.40 Development to the north and south of Hangleton Lane would be situated on the lower parts of the site where any landscape impact would be limited. Furthermore, ensuring there is no development north of the existing hedgerow referenced above would protect views across the valley between the listed barn and Foredown Tower.

4.41 The developable area could be expanded as indicated above without any significant additional landscape impact. On the southern part of the site where ground levels are lower there are substantial areas of boundary vegetation which would screen new built form from long distance views.

5.0 SUMMARY AND CONCLUSIONS

5.1 As set out above, BHCC do not currently have a five year housing land supply and the annual housing requirement set out in the CPP1 has not been met in the years since adoption of the plan. As a result the housing requirement for the remainder of the plan period is significantly greater and BHCC must seek to maximise the opportunities for housing within the CPP2 in order to ensure that it is effective in delivering the housing requirement.

5.2 The CPP1 at policy CP1 sets out a target of 13,200 new homes to be built over the plan period 2010-2030, an average of 660dpa. Policy CP1 also indicates that 1,060 of the total 13,200 new homes will be delivered on urban fringe sites. Policy H2 in the CPP2 sets out the urban fringe locations and indicates the number of dwellings allocated for each site. The total of these is only 930 dwellings which is 130 units fewer than the target of 1,060 indicated by CPP1 policy CP1. Furthermore, due to past under delivery, the annual housing target has increased compared to that indicated in CPP1, particularly in the short term. This confirms that the draft CPP2 would not be effective in delivering the housing requirement as it does not make provision for even the number of dwellings on urban fringe sites which were required when the CPP1 was adopted, let alone the increased number of housing which is now required. The NPPF at para 59 sets out an objective of significantly boosting the supply of homes and, as set out above, the current draft of the CPP2 is not able to achieve this.

5.3 BHCC does not have the luxury of retaining Urban Fringe sites such as Benfield Valley while the housing need goes unmet. Sites such as Benfield Valley that can deliver more housing should do so in this context.

5.4 It is recognised that the Benfield Valley site performs a number of functions. The draft special area policy (SA7) to protect and enhance the site as such is supported in principle. However, it should be noted that the quality of the habitats on site are in decline naturally and that active improvement and management is required in order to preserve the ecological and biodiversity value. Appropriately funded improvement works and management proposals would not only preserve but would enhance the ecological value of the site including measures for protected species such as dormice and reptiles.

5.5 The policy sets out a list of objectives for the site to enhance its biodiversity and landscape character role, maintain and improve wildlife connectivity, secure long term habitat management, improve public access to the wider natural environment, preserve and maintain the heritage assets and provide "gateway" facilities to the South Downs National Park. These objectives within policy SA7 are broadly supported.

5.6 In order to achieve these objectives the policy states that some residential development on the site will be permitted. This is also supported but it is considered that the policy should place greater emphasis on the need for residential development given the need to meet the Council's housing requirement and because this is the means by which the essential funding will be secured to deliver all the other objectives for the site. The greater the funding, the higher the quality of measures that can be secured and implemented. The site is currently underused and not well maintained which has resulted in the decline in both the heritage and ecological value of the site. Without development there is little prospect of securing the funds needed to restore and manage this Local Wildlife Site.

5.7 Development on the site would help to enhance the key functions identified by the Council by providing funding for habitat management and measures for protected species (such as a dormouse bridge across the A27) as well as physical works such as footpath improvements and the restoration of the historic cottages and buildings to the south and east of the listed barn. The policy should focus on residential development of part of the site as this is fundamental in order to achieve the identified objectives.

SA7 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.

modifications to the policy to make sound and legally compliant:

5.8 Consequently, it is considered that the policy wording should be revised to read as follows:

"In conjunction with residential development (approximately 175 dwellings) on the areas shown, land at Benfield Valley will be protected and enhanced as an important green wedge into the urban area, a valued Local Wildlife Site and Local Green Space. The council supports residential development on the site where it addresses the key considerations set out in Policy H2 Urban Fringe Housing Sites and secures the following objectives:

- * Improved public access through the site and to the wider natural environment through the provision and improvement of safe pedestrian and cyclist access including the north/ south linear footpath/cycleway on the eastern side of Benfield Valley and existing rights of ways;
- * The creation of 'gateway' facilities and interpretation facilities in connection with the South Downs National Park;
- * Preventing further decline of habitats and securing biodiversity conservation and enhancements; including wildlife connectivity and buffer zones, as well as the ongoing and positive management of wildlife habitats and securing a long term funded management and maintenance plan to be agreed with the council;
- * The continued protection and enhancement of the wider biodiversity and landscape role and character of Benfield Valley as an important green wedge connecting the urban area to the South Downs National Park;
- * The protection and enhancement of the open spaces at Benfield Valley to include a long term funded management and maintenance plan to be agreed with the council;
- * The sympathetic repair and re-use of Benfield Barn and its associated structures and walls in a way that is compatible with and integrates with the landscape character of Benfield Valley, the wider natural environment and the Benfield Barn Conservation Area. Appropriate uses of the Benfield Barn and outbuildings within the conservation area will be non intensive community and /or recreational facilities appropriate to the area. Proposals for the use of the buildings should include provision for a respective long term funded management and maintenance plan, to be agreed with the council.

Development will also be subject to the criteria set out in City Plan Part One Policy SA4."

5.9 The proposed revised wording of policy SA7 (as set out above) therefore achieves the following important purposes:

- i. It improves the housing supply;
- ii. It makes the policy more effective in securing its objectives; and
- iii. It de-risks the allocation and secures the viability of all the policy proposals.

5.10 As set out above, more housing on the site could be accommodated without having any greater impact in terms of landscape character, heritage or ecology than the current draft allocation for 100 units. Indeed, more development would offer enhancements to the various features of the site by:

- i. improving public access to promote recreational use of the land and links to the SDNP,
- ii. allowing long term habitat management to prevent further natural decline and preserve protected species, and
- iii. by securing high quality restoration and maintenance works to the historic buildings with the consequent enhancement to the Benfield Barn Conservation Area.

5.11 A larger development area could readily accommodate approximately 75 additional dwellings without compromising the function of the LWS and LGS. This would result in a development density of approximately 53 dwellings per hectare which sits at the lower end of the range of densities set out in policy CP14 of the CPP1. This would also increase the number of dwellings allocated in policy H2 of the CPP2 to be more in line with the 1,060 set out in adopted policy CP1 of CPP1.

5.12 In conclusion, the CPP2 as currently drafted is considered "unsound" for the following reasons:

- It is not positively prepared in that it fails to make most effective use of an Urban Fringe site, Benfield Valley in order to not only provide sufficient housing to help meet the need in the City but to secure the funding to deliver all the objectives of Special Area policy SA7 to a high standard.
- It is not justified in that BHCC cannot adequately defend the retention of unmanaged Urban Fringe land when there is a significant housing land shortfall.
- It is not effective in that it does not meet the housing requirement for the City which has increased since the adoption of the CPP1. It does not allocate sufficient housing on Urban Fringe sites to meet the requirement detailed in policy CP1 of CPP1.
- It is not consistent with national policy in that it does not seek to significantly boost the supply of housing.

5.13 It is considered that the following changes to the Plan are required:

- Amendment to the wording of policy SA7 to reflect that shown at para 5.8 above.
- Amendment to the wording of the column headings in the table of urban fringe sites within policy H2 to read "approximate area of development potential" and "approximate number of dwelling units". The development areas should also be rounded to one decimal point rather than two.
- Increasing the "area of development potential" for the Benfield Valley site to a total of 3.3 ha (1.8ha for site 11 and 1.5ha for site 12) and to amend the potential number of dwelling units to a total of approximately 175.

<The supporting document submitted includes a map indicating the proposed expanded boundaries of the indicative developable areas shown on the Policies Map>

SA7 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)

Yes, I wish to participate in the hearing session(s)

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

To respond to questions regarding the housing allocation for the site.

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

Benfield Valley

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Positively Prepared, Effective, Justified, Consistent with National Policy

H2 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.

response box for legal compliance, soundness and duty to cooperate:

<See detailed comments under Policy SA7>

H2 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.

modifications to the policy to make sound and legally compliant:

5.10 As set out above, more housing on the site could be accommodated without having any greater impact in terms of landscape character, heritage or ecology than the current draft allocation for 100 units. Indeed, more development would offer enhancements to the various features of the site by:

- i. improving public access to promote recreational use of the land and links to the SDNP,
- ii. allowing long term habitat management to prevent further natural decline and preserve protected species, and
- iii. by securing high quality restoration and maintenance works to the historic buildings with the consequent enhancement to the Benfield Barn Conservation Area.

5.11 A larger development area could readily accommodate approximately 75 additional dwellings without compromising the function of the LWS and LGS. This would result in a development density of approximately 53 dwellings per hectare which sits at the lower end of the range of densities set out in policy CP14 of the CPP1. This would also increase the number of dwellings allocated in policy H2 of the CPP2 to be more in line with the 1,060 set out in adopted policy CP1 of CPP1.

5.12 In conclusion, the CPP2 as currently drafted is considered “unsound” for the following reasons:

- It is not positively prepared in that it fails to make most effective use of an Urban Fringe site, Benfield Valley in order to not only provide sufficient housing to help meet the need in the City but to secure the funding to deliver all the objectives of Special Area policy SA7 to a high standard.
- It is not justified in that BHCC cannot adequately defend the retention of unmanaged Urban Fringe land when there is a significant housing land shortfall.
- It is not effective in that it does not meet the housing requirement for the City which has increased since the adoption of the CPP1. It does not allocate sufficient housing on Urban Fringe sites to meet the requirement detailed in policy CP1 of CPP1.
- It is not consistent with national policy in that it does not seek to significantly boost the supply of housing.

5.13 It is considered that the following changes to the Plan are required:

- Amendment to the wording of the column headings in the table of urban fringe sites within policy H2 to read “approximate area of development potential” and “approximate number of dwelling units”. The development areas should also be rounded to one decimal point rather than two.
- Increasing the “area of development potential” for the Benfield Valley site to a total of 3.3 ha (1.8ha for site 11 and 1.5ha for site 12) and to amend the potential number of dwelling units to a total of approximately 175.

<The supporting document submitted includes a map indicating the proposed expanded boundaries of the indicative developable areas shown on the Policies Map>

H2 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)

Yes, I wish to participate in the hearing session(s)

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

To respond to questions regarding the housing allocation.

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

Enplan for Benfield Valley Investments (CPP2 Proposed Submission rep).pdf was uploaded

|

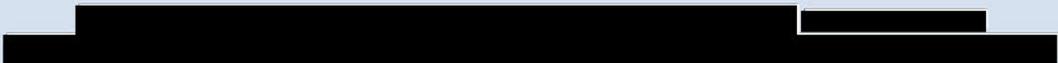
Brighton and Hove City Council City Plan Part 2

Housing and Strategic Site Allocation for Benfield Valley

REPRESENTATIONS TO THE CONSULTATION DRAFT PLAN REGULATION 19

Prepared on behalf of
Benfield Valley Investments Ltd

October 2020



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1.0 INTRODUCTION

- 1.1 These representations are made by Enplan on behalf of Benfield Valley Investments Ltd in respect of the public consultation on Brighton and Hove City Council's 'City Plan Part Two' (CPP2). They have been informed by assessments undertaken by EPR (regarding ecology and biodiversity) and Heritage Collective (in respect of heritage).
- 1.2 The current development plan for Brighton and Hove comprises the Brighton and Hove City Plan Part One (CPP1) which was adopted 26th March 2016 and the saved policies of the Brighton and Hove Local Plan 2005.
- 1.3 The CPP1 sets out the vision and objectives for the City's growth and development. It contains planning policies to apply to new development and identifies the infrastructure requirements for the City. It sets out broad locations for development and allocates key strategic sites. Upon adoption, it replaced parts of the previously adopted Brighton and Hove Local Plan.
- 1.4 The purpose of the CPP2 is to allocate additional development sites and set out a detailed development management policy framework. When adopted, it will replace the remaining saved policies of the Brighton and Hove Local Plan and form the development plan for the City along with the CPP1.
- 1.5 The CPP2 has been published for Regulation 19 public consultation prior to submission to the Secretary of State for independent examination.

2.0 POLICY SA7 POLICY H2 AND POLICIES MAP

2.1 Draft Policy SA7 identifies Benfield Valley as a Special Area and sets out the policy objectives for the site. The draft policy wording is as follows:

Land at Benfield Valley will be protected and enhanced as an important green wedge into the urban area, a valued Local Wildlife Site and Local Green Space. The council will promote and support the careful use and management of land and buildings at Benfield Valley to achieve the following objectives:

- *The continued protection and enhancement of the wider biodiversity and landscape role and character of Benfield Valley as an important green wedge connecting the urban area to the South Downs National Park;*
- *Securing biodiversity conservation and enhancements; including wildlife connectivity and buffer zones, as well as the ongoing and positive management of wildlife habitats and securing a long term funded management and maintenance plan to be agreed with the council;*
- *The creation of 'gateway' facilities and interpretation facilities in connection with the South Downs National Park;*
- *The protection and enhancement of the open spaces at Benfield Valley to include a long term funded management and maintenance plan to be agreed with the council;*
- *Improved public access through the site and to the wider natural environment through the provision and improvement of safe pedestrian and cyclist access including the north/ south linear footpath/cycleway on the eastern side of Benfield Valley and existing rights of ways;*
- *The sympathetic repair and re-use of Benfield Barn and its associated structures and walls in a way that is compatible with and integrates with the landscape character of Benfield Valley, the wider natural environment and the Benfield Barn Conservation Area.*

Residential development in accordance with the identified development areas shown to the north and south of Hangleton Lane will be permitted provided that such development addresses the key considerations set out in Policy H2 Urban Fringe Housing Sites. Development proposals will be required to preserve the settings of the Benfield Barn and Hangleton Conservation Areas and contribute towards the achievement of the key objectives as listed above (see also Policy H2) and as set out in City Plan Part One Policy SA4 Urban Fringe.

Appropriate uses of the Benfield Barn and outbuildings within the conservation area will be non-intensive community and /or recreational facilities appropriate to the area.

Proposals for the use of the buildings should include provision for a respective long term funded management and maintenance plan, to be agreed with the council.

Development proposals will also be subject to the criteria set out in City Plan Part One Policy SA4.

- 2.2 Draft Policy H2 sets out two areas for residential development at Benfield Valley; one site of 0.93ha to the north of Hangleton Lane and another site of 0.67ha to the south of Hangleton Lane. The policy allocates a potential number of 100 dwelling units at Benfield Valley; 60 on the area to the north of the Hangleton Lane and 40 on the area to the south. It also indicates that it would be appropriate for 50% of the units to be family sized housing (ie 3+ bedrooms).
- 2.3 The extent of the areas allocated for residential development within the Benfield Valley site is shown on the proposed policies map. They are also shown in the CPP2 at Figure 2 (under policy SA7) and Appendix 4 – Policy H2 Urban Fringe Housing Site Maps.
- 2.4 It is considered that the content of draft policy SA7 which seeks to protect and enhance important landscape, ecology, biodiversity and heritage features of the site is appropriate and this is broadly supported. However, it should be more overtly acknowledged that the identified objectives for the site will require significant funding and this will need to be provided through new residential development. The ability of the site to make a significant contribution to the Council’s housing requirements also needs to be more effectively recognised. Accordingly, the policy should more clearly emphasise the requirement for an appropriate level of residential development in order to deliver the suite of other policy objectives.
- 2.5 It is also considered that the quantum of housing development for the site identified in draft policy H2 can and should be increased from the 100 dwellings currently indicated. Furthermore, the identified developable areas should be extended. This will not only ensure that the full suite of benefits will be delivered but also facilitate their optimisation whilst delivering increased levels of housing which are required to meet the Council’s strategic housing requirement.

3.0 HOUSING NEED AND SUPPLY

- 3.1 The CPP1 in policy CP1 set out a target housing provision of at least 13,200 new homes over the plan period 2010 – 2030. It is noted that this figure comprises only around 60% of the Objectively Assessed Need (OAN). 13,200 homes equates to an average of 660 dwellings per annum (dpa), although a stepped trajectory was proposed throughout the plan period to deal with previous years' under-supply. For the period 2014/15-2018/19 the target delivery rate was 655dpa. For the period 2019/20-2023/24 this increased to 856dpa and then for the remainder of the plan period, ie 2024/25-2029/30 it is 712dpa.
- 3.2 In fact, the delivery of housing since the adoption of the CPP1 has failed to meet even the lower annual requirements of 655dpa and, therefore, the housing requirement for the remainder of the plan period is now significantly increased and, in consequence, the supply needs to be commensurately increased.
- 3.3 The most recent annual review of the Strategic Housing Land Availability Assessment (SHLAA) published in October 2019 states that Brighton and Hove City Council (BHCC) are unable to demonstrate a five year housing land supply (refer to table on page 7 of the SHLAA update).
- 3.4 The NPPF requires that Local Planning Authorities should be able to identify a supply of deliverable sites that are sufficient to provide a minimum of five years' worth of housing against local need along with an additional buffer of between 5 and 20%. The largest amount of buffer (20%) should be added to the figure where there has been significant under delivery of housing over the previous three years.
- 3.5 In the last three years BHCC has delivered significantly fewer new dwellings than the requirement, as evidenced by the Housing Delivery Test (HDT). The most recently published HDT data (2019 measurement) demonstrates a consistent under-delivery of housing over the last three years resulting in the provision of only 70% of the requirement for that period and, therefore, BHCC must add a 20% buffer to its requirement figure as well as making up the deficit.
- 3.6 Adding the previous years' under supply and the 20% buffer results in a revised requirement of some 1,230 dpa (see para 5.4 of the SHLAA update report) This is shown in the tables below.

Year	Housing requirement identified in CPP1 (dpa)	Level of Under Delivery
2014/15	655	74
2015/16	655	-32
2016/17	655	316
2017/18	655	211
2018/19	655	275
Total	3275	844

Year	Housing requirement identified in CPP1 (dpa)	New housing requirement (inc 844 undersupply and 20% buffer) (dpa)
2019/20	856	1,230
2020/21	856	1,230
2021/22	856	1,230
2022/23	856	1,230
2023/24	856	1,230
Total	4,280	6,150

- 3.7 Furthermore, it should be noted that the requirement identified above is a minimum figure rather than a limit. Against this increased figure, the projected supply as set out in the latest SHLAA update is only 4 years.
- 3.8 The Council’s projections indicate an expectation that the delivery of housing for the current period (2019-2020) will be less than half the annual requirement (see Chart A: Housing Trajectory in the SHLAA update report October 2019). The circumstances in 2020, where construction has been impacted by COVID-19, are likely to limit the delivery of housing for this period even further. This suggests that when the housing delivery is calculated for 2019/20 it will be significantly less than half the annual requirement.
- 3.9 The CPP1 at policy CP1 sets out a target of 13,200 new homes to be built over the plan period 2010-2030, an average of 660dpa. Policy CP1 also indicates that 1,060 of the total 13,200 new homes will be delivered on urban fringe sites. Policy H2 in the CPP2 sets out the urban fringe locations and indicates the number of dwellings allocated for each site and locations of developable areas. The total number of dwellings proposed in the allocations is only 930 dwellings, which is fewer than the target of 1,060 indicated by CPP1 policy CP1. Furthermore, due to past under delivery, the annual housing target has increased compared to that indicated in CPP1. Accordingly, the CPP2 as drafted is not effective in delivering the housing requirement as it does not make provision for even the number of dwellings on urban fringe sites which were required when the CPP1 was adopted in 2016. The number of dwellings required to meet the housing need is now significantly greater following the recent history of undersupply. Put simply, the draft CPP2 is “planning to fail” and is, therefore, considered to be unsound.
- 3.10 To make it sound, the CPP2 needs more effectively to support the optimisation of the available development sites by allocating appropriate levels of housing.
- 3.11 Failure to allocate within the CPP2 a sufficient quantity of dwellings to meet even the requirement set out in the CPP1 would be unsound as it would mean that the Plan is not positively prepared, is not justified, is not effective and would not be in accordance with national policy (which seeks to “boost significantly” the supply of housing – para 59 of the NPPF).
- 3.12 The Benfield Valley site is well placed to make a significant contribution to the Council’s housing land supply in both the short to medium term. It could come forward with a planning application within 2 years and development could begin to be delivered within 4 years, thus assisting with the current shortfall in the five year housing land supply. It is

considered that, with a suitable allocation in the CPP2, all the housing on the site could be delivered well within the remainder of the plan period (ie by 2030).

- 3.13 The affordable housing provision target set out in policy CP20 of the CPP1 is 40% on sites delivering more than 15 dwellings. All of the strategic development areas identified in the CPP1 (apart from land at Toad's Hole Valley, policy DA7) are large urban sites where viability issues have resulted in affordable housing provision being reduced from 40%. Consequently, the actual affordable housing need in the City is not being met. Generally greenfield sites do not have abnormal development costs and are, therefore, able to provide policy compliant affordable housing. Maximising the quantum of development on the Benfield Valley site would provide scope for greater provision of affordable housing, including family housing.

4.0 THE SITE

Developable areas

- 4.1 Policy SA7 and its supporting text identify a number of functions performed by Benfield Valley including as green wedge in the urban area, a Local Wildlife Site (LWS) and Local Green Space (LGS).
- 4.2 However, it is considered that there is significant scope for developing a larger area than has been indicated by the “developable areas” shown on the draft policy map whilst still protecting and enhancing landscape character, biodiversity & wildlife protection and the heritage assets.
- 4.3 An increase in the area of residential development will not only make the most effective use of the site in delivering new housing to help meet a significant shortfall in the City, it will provide the funding to deliver all of the objectives of Policy SA7 to a high standard. It will also ensure the ability to maintain and manage new “gateway” facilities, as well as provide for long term habitat management, so that the important functions of the site are retained for the entire plan period and beyond.
- 4.4 The areas currently identified for development as shown at Figure 2 (under policy SA7) and Appendix 4 of the CPP2 and on the policy map, do not correspond with any physical boundaries on the site, nor is their size and shape dictated by any ecological, landscape or heritage constraints. In view of this, it is considered that these areas could readily be revised in order to allow additional housing and hence additional funding, which would enable the site to better meet the special policy aims.
- 4.5 The developable area on the northern part of the site (north of Hangleton Lane) could be extended northwards to the existing east-west hedgerow located to the south of the listed barn which marks the southern edge of truly ‘open’ landscape to the west of the listed barn. This would maintain the setting of the barn including long distance views from the west at Foredown Tower. The existing footgolf car park and land to the north and east of it would also be retained to provide the southerly setting of the listed barn and Conservation Area. The extended developable area would also retain the existing woodland to the south and west along the site boundaries. Overall the revised area would be more legible on the ground and would acknowledge historical and ecological constraints.
- 4.6 With regard to the southern part of the site (south of Hangleton Lane), there are currently no physical boundaries on the site which correspond with the southern and eastern edges of the developable area shown on the proposals map. Therefore, it is considered that the developable area could be extended to the south and east without compromising the policy objectives of SA7 and would retain the important woodland boundaries to the north and west.

- 4.7 These proposed extensions to the developable areas would, however, retain a significant area of green space, footpath access and boundary planting along the eastern side of Benfield Valley extending from the SDNP to the north down to the Old Shoreham Road in the south. This would preserve the green lung function provided by the site.

Recreation and Enjoyment

- 4.8 Currently the site offers recreational opportunities in the form of a footgolf course (on the northern part of the site) and public footpaths to both the south and north. The footpaths are well used but there is limited maintenance undertaken. There is also some signage and information boards either side of Hangleton Lane which were erected approximately 30 years ago. However, these contain limited information about the history and ecology of the site and have not been maintained. Consequently, they are faded and have been partially obscured by graffiti. Since they were installed, the South Downs National Park (SDNP) has been designated (in 2010) and is located immediately to the north of the A27. The footpaths across Benfield Valley provide an important link to the SDNP but there is no public information about this on site nor any facilities directed towards visitors to the Park. Accordingly, the creation of gateway facilities is a key objective of policy SA7 and Benfield Barn and its associated structures offer a significant opportunity to provide such facilities. These could include bike hire with associated changing, holiday let units, visitors centre with information boards, café and improved parking area with associated landscaping.
- 4.9 In addition to providing the above new facilities, development on the site could also fund improvements to the existing footpaths allowing for access to a wider range of visitors.
- 4.10 Whilst part of the area of the northern parcel of the site identified as a developable area is currently occupied by one of the footgolf holes. there is ample scope for this to be relocated elsewhere within the footgolf course which would be retained on the land between Hangleton Lane and the A27. The listed barn would also continue to provide ancillary facilities for the footgolf operation.

Ecology and Biodiversity

- 4.11 The site is a LWS and LGS, however, only parts of the site are of intrinsic ecological importance, whilst other areas have no meaningful ecological value. Development at Benfield Valley provides an opportunity to protect, restore and create calcareous grassland, native broadleaved woodland and scrub, which in turn provide habitats for a range of species. The funds released from new housing development will also allow the long-term management of these habitats.
- 4.12 Since the completion of the Sainsburys superstore to the south in 1992, the remaining open green space within Benfield Valley has been neglected. The grasslands have

become rank and overgrown and scrub has encroached onto sensitive habitats. In addition the area has been subjected to some fly-tipping.

- 4.13 The grassland in the northern land parcel is mown within the footprint of the Benfield Valley footgolf course. Different areas of grassland are subject to different mowing regimes, so that some areas are short and other grassland has a longer sward. The southern land parcel, south of Hangleton Lane, undergoes minimal management.
- 4.14 Historical mapping indicates that there is one remaining historic field boundary along the eastern boundary of the southern land parcel. It is now a mature, gappy hedgerow, but most of the boundary is no longer present.
- 4.15 Given the lack of wildlife-sensitive management, opportunities now exist to halt the decline of habitats and instead introduce beneficial management (funded by development) to protect, restore and create habitats to benefit flora and fauna in the long-term.
- 4.16 Surveys show that the area to the north of Hangleton Lane mostly comprises calcareous grassland that is either managed as a footgolf course or has been neglected and left unmanaged. The proposals provide an opportunity to restore the calcareous grassland to good condition through habitat management. This will, over time, increase species richness, particularly flora and invertebrate fauna, and therefore the ecological condition of the habitats. These enhanced habitats will be publicly accessible for people to enjoy.
- 4.17 In addition to enhancements to grassland habitats, the proposals will protect important areas of boundary habitat, mature trees and scrub. These will be enhanced by supplementary planting and management and will provide a green corridor for wildlife as well as a buffer to the important grassland habitat. These improvements will increase habitat extent, quality and connectivity. The protection and sympathetic management of hedgerows, hedgerow buffers, grasslands and other habitats will improve the permeability of the site so a range of animals can move through the landscape unimpeded.
- 4.18 Furthermore, subject to agreement with Highways England, the development offers an opportunity to retrofit a mammal bridge to the existing footbridge across the A27. This would significantly improve connectivity between the isolated populations of Hazel Dormice that are known to be present on either side of the A27.
- 4.19 Residential dwellings would include integrated bat and bird boxes for a range of species including local Biodiversity Action Species such as Swift *Apus apus* and Starling *Sturnus vulgaris*, as well as other Red and Amber-listed species such as House Sparrow *Passer domesticus* and House Martin *Delichon urbicum*.
- 4.20 Educational interpretation boards will provide opportunities for residents to learn about the wildlife on their doorstep. By engaging residents and providing opportunities to

wander freely and to look and learn about nature, they are more likely to care about ‘their space’, and in turn it will encourage people to look after their green spaces.

4.21 Improvements in habitats also deliver many ‘ecosystem goods and services’ because the resurgence in nature improves pollination, helps capture carbon and delivers benefits for air and water quality.

4.22 Overall, the proposals can achieve the following:

- Restoration of approximately 7ha of lowland calcareous grassland, a Habitat of Principal Importance. In doing so, this will create habitat for Species of Principal Importance, such as the Small Heath *Coenonympha pamphilus* and other species that are of local priority, such as Glow-worm.
- Improvement of approximately 2,000 metres of shrubs. This will provide habitat for invertebrates, birds, and mammals, including Hedgehog *Erinaceus europaeus* and dormice.
- Creation of new bat roosting opportunities by installing integrated bat boxes in the new dwellings. The improvements to grassland, hedgerow, scrub and woodland habitats, as well as the provision of new ponds, will improve the quality of bat foraging habitat.
- Installation of Swift bricks to contribute towards ‘Action for Swifts.’
- The retrofitting of a bridge for small mammals, such as the Hazel Dormouse, to the existing footbridge to link currently isolated populations on either side of the A27.
- Creation of new hibernacula for reptiles.
- Secure funding for habitat management and monitoring in the long-term up to 25 years.

4.23 Without development there is little prospect of securing the funds needed to restore and manage this LWS.

4.24 It is also noted that the developable area identified by the Council on the draft proposals maps includes an area of existing woodland on the northern boundary of the southern section of the site. The County Ecologist identified the tree belts and boundary habitats as being important in ecological terms and that these should be retained (see para 4.9 of the Benfield Valley Topic Paper 2019). This area of woodland would be excluded from the developable area.

Heritage

4.25 There are a number of heritage assets on and in the vicinity of the site which are as follows:

-
- Benfield Barn (grade II)
 - Benfield Barn Conservation Area
 - Hangleton Manor (grade II*) and dovecote (grade II)
 - Rookery Cottage (grade II)
 - St Helen's Church (grade II*)
 - Hangleton Conservation Area
- 4.26 The ability to achieve the objectives of the draft policy SA7 depends on the provision of financial input – particularly with regard to the restoration and improvements of the Benfield Barn Conservation Area.
- 4.27 As set out above, the current boundaries of the developable areas to the north of Hangleton Lane do not appear to be based upon any specific identification of heritage sensitivity or tolerance. It is considered that there could be an increase in this area for development, without eroding those areas of the setting that contribute to the significance and values – or means to experience – the Benfield Barn Conservation Area or the listed Benfield Barn.
- 4.28 The western area of the footgolf car park, and the scrubby wooded areas east of the current developable area would provide for an expanded location for valuable additional development whilst also securing funds to achieve the aims of policy SA7.
- 4.29 Of the designated heritage assets identified above, Benfield Barn Conservation Area and the listed Benfield Barn are considered of the greatest relevance with regard to the site and the proposed developable area north of Hangleton Lane. The setting of the Hangleton Conservation Area is also identified within the SA7 policy text as needing preservation. The small group of listed buildings at Hangleton Manor is located within modern residential development with limited opportunities to see or understand the heritage characteristics or details of the buildings, or their grouped value, from within the site. This also applies to the southern portion of the site, south of Hangleton Lane. The land south of Hangleton Lane is less sensitive in heritage terms.
- 4.30 The open area of the northern section of the footgolf course immediately west and north west of Benfield Barn, is considered to make a positive contribution to the historic illustrative values of the listed barn and the Conservation Area in retaining the greatest consistency with the historic setting, of open farmland. This area is particularly defined to the north of the hedgerow that runs east-west from the edge of the Conservation Area just south of the barn. This hedgeline is considered to be the northern most edge of the developable area, as set out above.
- 4.31 The route which runs north off Hangleton Lane also contributes to the setting and significance of the designated assets in that it is an enclosed, informal and wooded and

although the barns are heavily screened it enables an understanding of the historical approaches, it also gives some shared experience with Hangleton Manor.

- 4.32 In contrast, the current car park is a low quality area of space which makes no specific contribution to the heritage assets or an experience of them.
- 4.33 Draft policy SA7 encourages “the sympathetic repair and re-use of Benfield Barn and its associated structures and walls in a way that is compatible with and integrates with the landscape character of Benfield Valley, the wider natural environment and the Benfield Barn Conservation Area”. The character and appearance of the Conservation Area is today heavily dominated by the ruinous state of the farmyard and outbuildings to the east and south. Aside from the listed barn all former structures are in a declining state, with high risk of collapse and further loss. Although they have some heritage value, they are dangerous, closed off, and offer no means for public access, understanding or experience as a former farm yard. Their overgrown nature precludes and prevents any means of understanding their former forms, functions, material or aesthetic qualities even from a distance.
- 4.34 Clearance of overgrowth, careful restoration and reconstruction of the structures, walls and yards of the former farm yard combined with sensitive plans and proposals for a sustainable new use would offer a wholly transformative improvement to the character and appearance of the Conservation Area and the setting of the listed barn.
- 4.35 New uses associated with leisure, ecology, interpretation and information on the SDNP, the local area and its history would not only enable intellectual access to the heritage of the site and nearby assets at Hangleton Manor which share historic context, but would also fulfil objectives within Policy SA7 relating to the creation of ‘gateway facilities’ for the SDNP.
- 4.36 The improvements to the barn and farmyard also offer scope for restoring the historic connection between Benfield Manor Farm and Hangleton Manor. This restoration would rise naturally from the reinstatement of a legible farm group at the barns and could be augmented with historic interpretation boards or information that build upon existing information at the other places. Preservation of the historic approach route as a primarily pedestrian route would maintain some sense of historic links and the small scale diminutive nature of this historic route between ancient places. It would preserve the historic approach between Hangleton Manor and Benfield Barn and farm, a currently important but poor quality area of setting to both assets.
- 4.37 The southern part of the Benfield Barns Conservation Area contains four derelict 19th century cottages, on the site of the former Manor house. Restoration of these four cottages, with associated amenity garden space to their south would also contribute to the enhancement of the character and appearance of the Conservation Area, the setting of the listed barn and the visual character and quality of the approach. There is good evidence in the form of historic photographs as well as the standing ruinous remains for

the appearance of these cottages. A facsimile reproduction could be created that would restore the historic appearance of this small farmstead. These could be private residential cottages or used as holiday let cottages which would also address the policy aim for recreational uses and increasing public access to the surrounding area. As the buildings are almost entirely collapsed at present, new dwellings could be offered with enhanced environmental credentials the minimise impact of these structures.

- 4.38 The restoration and reuse of the Benfield Barn Conservation Area would give rise to other public benefits in terms of local employment, craftsmen and traditional building techniques in the restoration of the structures which will need to be undertaken in a careful manner utilising sensitive materials and traditional techniques.

Landscape Impact

- 4.39 It is noted that none of the Benfield Valley site which is the subject of draft policy SA7 (ie, south of the A27) is subject to any landscape designation. It is accepted and agreed that the northern-most part of the site, ie north of the above mentioned east-west hedgerow, is not appropriate for development given that this is the most elevated area. There are long distance views from the northern extent of the site across the surrounding urban area but from where the proposed developable areas would be largely screened by existing retained mature vegetation and planting.
- 4.40 Development to the north and south of Hangleton Lane would be situated on the lower parts of the site where any landscape impact would be limited. Furthermore, ensuring there is no development north of the existing hedgerow referenced above would protect views across the valley between the listed barn and Foredown Tower.
- 4.41 The developable area could be expanded as indicated above without any significant additional landscape impact. On the southern part of the site where ground levels are lower there are substantial areas of boundary vegetation which would screen new built form from long distance views.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 As set out above, BHCC do not currently have a five year housing land supply and the annual housing requirement set out in the CPP1 has not been met in the years since adoption of the plan. As a result the housing requirement for the remainder of the plan period is significantly greater and BHCC must seek to maximise the opportunities for housing within the CPP2 in order to ensure that it is effective in delivering the housing requirement.
- 5.2 The CPP1 at policy CP1 sets out a target of 13,200 new homes to be built over the plan period 2010-2030, an average of 660dpa. Policy CP1 also indicates that 1,060 of the total 13,200 new homes will be delivered on urban fringe sites. Policy H2 in the CPP2 sets out the urban fringe locations and indicates the number of dwellings allocated for each site. The total of these is only 930 dwellings which is 130 units fewer than the target of 1,060 indicated by CPP1 policy CP1. Furthermore, due to past under delivery, the annual housing target has increased compared to that indicated in CPP1, particularly in the short term. This confirms that the draft CPP2 would not be effective in delivering the housing requirement as it does not make provision for even the number of dwellings on urban fringe sites which were required when the CPP1 was adopted, let alone the increased number of housing which is now required. The NPPF at para 59 sets out an objective of significantly boosting the supply of homes and, as set out above, the current draft of the CPP2 is not able to achieve this.
- 5.3 BHCC does not have the luxury of retaining Urban Fringe sites such as Benfield Valley while the housing need goes unmet. Sites such as Benfield Valley that can deliver more housing should do so in this context.
- 5.4 It is recognised that the Benfield Valley site performs a number of functions. The draft special area policy (SA7) to protect and enhance the site as such is supported in principle. However, it should be noted that the quality of the habitats on site are in decline naturally and that active improvement and management is required in order to preserve the ecological and biodiversity value. Appropriately funded improvement works and management proposals would not only preserve but would enhance the ecological value of the site including measures for protected species such as dormice and reptiles.
- 5.5 The policy sets out a list of objectives for the site to enhance its biodiversity and landscape character role, maintain and improve wildlife connectivity, secure long term habitat management, improve public access to the wider natural environment, preserve and maintain the heritage assets and provide “gateway” facilities to the South Downs National Park. These objectives within policy SA7 are broadly supported.
- 5.6 In order to achieve these objectives the policy states that some residential development on the site will be permitted. This is also supported but it is considered that the policy should place greater emphasis on the need for residential development given the need to meet the Council’s housing requirement and because this is the means by which the

essential funding will be secured to deliver all the other objectives for the site. The greater the funding, the higher the quality of measures that can be secured and implemented. The site is currently underused and not well maintained which has resulted in the decline in both the heritage and ecological value of the site. Without development there is little prospect of securing the funds needed to restore and manage this Local Wildlife Site.

5.7 Development on the site would help to enhance the key functions identified by the Council by providing funding for habitat management and measures for protected species (such as a dormouse bridge across the A27) as well as physical works such as footpath improvements and the restoration of the historic cottages and buildings to the south and east of the listed barn. The policy should focus on residential development of part of the site as this is fundamental in order to achieve the identified objectives.

5.8 Consequently, it is considered that the policy wording should be revised to read as follows:

In conjunction with residential development (approximately 175 dwellings) on the areas shown, land at Benfield Valley will be protected and enhanced as an important green wedge into the urban area, a valued Local Wildlife Site and Local Green Space. The council supports residential development on the site where it addresses the key considerations set out in Policy H2 Urban Fringe Housing Sites and secures the following objectives:

- *Improved public access through the site and to the wider natural environment through the provision and improvement of safe pedestrian and cyclist access including the north/ south linear footpath/cycleway on the eastern side of Benfield Valley and existing rights of ways;*
- *The creation of 'gateway' facilities and interpretation facilities in connection with the South Downs National Park;*
- *Preventing further decline of habitats and securing biodiversity conservation and enhancements; including wildlife connectivity and buffer zones, as well as the ongoing and positive management of wildlife habitats and securing a long term funded management and maintenance plan to be agreed with the council;*
- *The continued protection and enhancement of the wider biodiversity and landscape role and character of Benfield Valley as an important green wedge connecting the urban area to the South Downs National Park;*
- *The protection and enhancement of the open spaces at Benfield Valley to include a long term funded management and maintenance plan to be agreed with the council;*

- *The sympathetic repair and re-use of Benfield Barn and its associated structures and walls in a way that is compatible with and integrates with the landscape character of Benfield Valley, the wider natural environment and the Benfield Barn Conservation Area. Appropriate uses of the Benfield Barn and outbuildings within the conservation area will be non-intensive community and /or recreational facilities appropriate to the area. Proposals for the use of the buildings should include provision for a respective long term funded management and maintenance plan, to be agreed with the council.*

Development will also be subject to the criteria set out in City Plan Part One Policy SA4.

5.9 The proposed revised wording of policy SA7 (as set out above) therefore achieves the following important purposes:

- i. It improves the housing supply;
- ii. It makes the policy more effective in securing its objectives; and
- iii. It de-risks the allocation and secures the viability of all the policy proposals.

5.10 As set out above, more housing on the site could be accommodated without having any greater impact in terms of landscape character, heritage or ecology than the current draft allocation for 100 units. Indeed, more development would offer enhancements to the various features of the site by:

- i. improving public access to promote recreational use of the land and links to the SDNP,
- ii. allowing long term habitat management to prevent further natural decline and preserve protected species, and
- iii. by securing high quality restoration and maintenance works to the historic buildings with the consequent enhancement to the Benfield Barn Conservation Area.

5.11 A larger development area could readily accommodate approximately 75 additional dwellings without compromising the function of the LWS and LGS. This would result in a development density of approximately 53 dwellings per hectare which sits at the lower end of the range of densities set out in policy CP14 of the CPP1. This would also increase the number of dwellings allocated in policy H2 of the CPP2 to be more in line with the 1,060 set out in adopted policy CP1 of CPP1.

5.12 In conclusion, the CPP2 as currently drafted is considered “unsound” for the following reasons:

- It is not positively prepared in that it fails to make most effective use of an Urban Fringe site, Benfield Valley in order to not only provide sufficient housing to help

meet the need in the City but to secure the funding to deliver all the objectives of Special Area policy SA7 to a high standard.

- It is not justified in that BHCC cannot adequately defend the retention of unmanaged Urban Fringe land when there is a significant housing land shortfall.
- It is not effective in that it does not meet the housing requirement for the City which has increased since the adoption of the CPP1. It does not allocate sufficient housing on Urban Fringe sites to meet the requirement detailed in policy CP1 of CPP1.
- It is not consistent with national policy in that it does not seek to significantly boost the supply of housing.

5.13 It is considered that the following changes to the Plan are required:

- Amendment to the wording of policy SA7 to reflect that shown at para 5.8 above.
- Amendment to the wording of the column headings in the table of urban fringe sites within policy H2 to read “approximate area of development potential” and “approximate number of dwelling units”. The development areas should also be rounded to one decimal point rather than two.
- Increasing the “area of development potential” for the Benfield Valley site to a total of 3.3 ha (1.8ha for site 11 and 1.5ha for site 12) and to amend the potential number of dwelling units to a total of approximately 175.



enplan

Response ID BHLF-8ZMD-Y48U-W

Submitted to City Plan Part Two (Proposed Submission)

Submitted on 2020-12-18 12:16:44

Your details

What is your name?

[Redacted Name]

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

Organisation:
Royal Mail

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

Notification matrix - The City Plan Part Two has been submitted for independent examination:
Yes

Notification matrix - The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two:
Yes

Notification matrix - The adoption of the City Plan Part Two:
Yes

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

Yes

Date Response Submitted

Date Response Submitted:
30th October 2020

City Plan Part Two - Part One - Introduction

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

Comments on the Introduction of CPP2:

No Comments

DM1 Housing Quality, Choice and Mix

(DM1) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

Yes

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

Not Applicable

(DM1) 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.

modifications to the policy to make sound and legally compliant:

Not Applicable

(DM1) 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)

No, I do not wish to participate in hearing session(s)

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Not Applicable

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafont

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

Yes

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

Broadly Support Policy, but flexibility should allow for higher density of development in appropriate locations.

FOLLOWING TEXT TAKEN FROM SUPPORTING DOCUMENT

6.11 Our Client supports the principle of Draft Policy DM19, which seeks to avoid underdevelopment of sites, requiring the maximisation of opportunities, density and the efficient use of sites in terms of building layouts and design.

6.12 Para 118 (c and d) of the National Planning Policy Framework ('NPPF') identifies the value of using sustainable brownfield land within settlements for homes and other identified needs, and the need to promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained.

6.13 Para 122 of the National Planning Policy Framework ('NPPF') states planning policies and decisions should support development that makes efficient use of land, taking into consideration identified need for different types of housing, local market conditions and viability, the availability and capacity of infrastructure and services and the need to regenerate. Moreover, Para 123 states:

"Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site."

6.14 As set out in our representations submitted in September 2018, when supporting the adoption of the City Plan Part One, the Inspector in their report, specifically emphasised the need for Brighton & Hove City Council to maximise (our emphasis) development on all allocated sites, so as to meet Brighton's Housing Needs (estimated to be in excess of 30,000 homes to 2031). The City Plan Part One was adopted on that premise, given that the Council could only demonstrate the capacity to deliver 13,200 homes (less than 50% of the identified need) to 2031.

6.15 The 2019 Housing Delivery Test results were published in February 2020. The results confirmed Brighton and Hove delivered only 70 percent of its target and is required to add a 20 percent buffer to its five-year housing land supply. In effect this requires the Council to add a further 20% housing to the local plan housing requirement. In addition, in the B&HCC Strategic Housing Land Availability Update 2019 (published October 2019), the Council has applied a 20 percent buffer to its housing need. Against the five-year requirement of 6,149, the Council has a deliverable housing supply of 4,949 for the period 2019 – 2024 (leaving a shortfall of 1,200 units). The Council has a four-year housing land supply (page 7). The Council's housing supply shortfall is further realised in recent Appeal decisions, in which Inspectors have concluded the Council can no longer demonstrate a five-year housing and supply and is subject to speculative development.

6.16 The need to maximise development opportunities on available, suitable sites is therefore crucial. As set out above, recently approved planning applications/ allowed appeals on brownfield land within the City have been of a significantly higher density. Lyon Close, Hove (LPA reference BH2018/01738) has a density of approximately 167 dph, 70

Goldstone Lane, Hove (LPA reference BH2014/03605) has a density of approximately 217dph and Sackville, 1 – 3 Ellen Street, Hove (LPA reference BH2016/02663, which is also located within the wider DA6 designation, has a density of approximately 470 dph. These planning approvals set a precedent for higher density development within the immediate

area, contributing to the City's housing requirement and current supply position. Furthermore, the Sackville development sets a precedent for tall buildings south of the railway, within Policy area DA6, where the Site is located.

6.17 Royal Mail considers this sustainable approach should be taken in allocating sites in the Local Plan Part 2. Where sustainable, accessible brownfield sites area available, development should be optimised in accordance with the NPPF, subject to complying with other local planning policies. Identifying the Site as able

to accommodate 67 dwellings (100 dwellings per hectare) would represent 'under development' contrary to the NPPF and adopted local policy DA6. The Site is considered to have adequate capacity for at least 128 units (approximately 190 dwellings per hectare) with scope to increase up to 315 dwellings in line with the approved Sackville scheme (470 dph), given the potential for taller buildings that would not be visible from the Conservation Area within policy area DA6.

(DM19) 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.

modifications to the policy to make sound and legally compliant:

Not Applicable

(DM19) 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)

Yes, I wish to participate in the hearing session(s)

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Because density and quantum of development is relevant to a Specific Site we are acting on, that is set out within Policy H1. It is important to be able to attend the Examination to make the case for that form of development.

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

**(DM23) 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)**

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

**(DM24) 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)**

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

**(DM25) 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)**

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

Hove Sorting Office, 88 Denmark Villas, Hove

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Yes

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Positively Prepared, Effective, Justified, Consistent with National Policy

H1 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.

response box for legal compliance, soundness and duty to cooperate:

See enclosed representations. The policy does not make effective use of a highly accessible and sustainably located site. The amount of development proposed is significantly below other sites in the area recently approved and given the scale of housing need and the Inspector's conclusions in the Report for City Plan Part One (to maximise development on site allocations), the Policy as worded is considered to be ineffective - as it will deter developers from seeking to purchase/redevelop the site, it is not positive as it doesn't propose to make a sufficiently positive contribution to housing need, which in turn is contrary to National Planning Policy which seeks to make the most effective use of brownfield previously developed sites in accessible locations, particular where the Council is unable to meet its housing need or does not have a 5YHLS. This is not positively planned and would likely result in an appeal.

FOLLOWING TEXT TAKEN FROM SUPPORTING DOCUMENT

6.1 The Site has been identified within a wider Policy Area within Local Plan Part One (Policy DA6), in need of wider physical regeneration with potential to provide a minimum 525 dwellings and 1,000sqm of new employment space. We would emphasise that consistent with the NPPF, and the Inspector's Report that accompanied the City Plan Part One, the amount of housing directed to the allocated sites should be considered a minimum so as to help meet the acute housing and employment needs of the Council.

6.2 The accompanying document prepared by Conran & Partners highlights that should the Site become available for redevelopment, it could accommodate a more sustainable form of development than that currently identified in draft planning policy set out in draft Local Plan Part 2. The Conran & Partners Study highlights the constraints of the Site and demonstrates that an opportunity exists for a new residential development that could accommodate between 128 and 135 dwellings.

6.3 Although located in proximity to the Hove Station and Willett Estate Conservation Areas, the Site has been expressly excluded from these designations. Moreover, the Site includes no listed buildings in or immediately adjacent to the Site. Listed buildings in proximity include Ralli Memorial Hall, Walls and Railings, however, this is separated from the Site by a newly erected development.

6.4 In developing the proposals enclosed, in accordance with adopted planning policy, Conran & Partners have considered the amenity of surrounding residential properties, including loss of privacy, daylight sunlight and overshadowing. Having taken into consideration separation distances between buildings, window placement and building orientation, the study demonstrates that if the Site were to become available for redevelopment, it could accommodate 128 and 135 dwellings without having a detrimental impact on surrounding properties. This is far more than the capacity identified in the SHLAA of 67 homes – and consistent with the NPPF and Inspector's Report in respect of the City Plan Part One, the Council should be seeking to maximise the contribution brownfield previously developed sites such as these can make.

6.5 The Conran & Partners Study considers a number of massing scenarios on the Site. Key findings include:

1. A redevelopment of the Site would not cause loss of light to neighbouring properties immediately north, although taller buildings may result in overshadowing properties north of the railway line. At six storeys in height, such overshadowing would not occur, however, this should be considered a minimum and a taller building could be accommodated subject to an appropriate daylight sunlight assessment.

2. The most appropriate option considered is to form a Courtyard Block (massing option A) of circa 6 storeys in height that can deliver a minimum of 128 new homes.

3. Given the Site's highly accessible location adjacent to Hove Station and in proximity to various bus stops, parking can be limited to circa 0.3-0.5 spaces per unit, ensuring a more efficient use of land. This aligns with the emerging Hove Station Neighbourhood Plan which proposes that the Policy DA6 designated area is classified as a Central Zone, which would drastically reduce the number of car parking spaces required.

6.6 The latest SHLAA and Local Plan Part 2 identify the Site as suitable to deliver 67 residential units, a density of 100 dwellings per hectare. Although adopted Policy CP14 'Housing Density' sets a general expectation for a minimum net density of 100 dwellings per hectare within Development Areas including DA6, this should be treated as a minimum. Simply applying the minimum net density to future allocations would result in significant underdevelopment across B&HCC, contrary to adopted national and local policy, and in direct conflict with the conclusions of the Inspector's Report for the City Plan Part One. It will deter developers from acquiring and redeveloping sites, potentially stifle the delivery of affordable housing and further amplify the housing supply shortage within the area. It will also result in speculative development, and planning appeals rather than a plan led approach.

6.7 The Site can accommodate, subject to a number of technical assessments relating to Daylight/Sunlight etc. a minimum of 128 dwellings should it become available (approximately 190 dph). This is comparable to recently approved applications/ allowed appeals in the area including:

1. Lyon Close, Hove (LPA reference BH2018/01738), which secured planning permission for the mixed use redevelopment of the Site (6-8 storeys) to provide 152 dwellings, 2 live/ work units and 697 sqm of office accommodation on 31 July 2019 (approximately 167 dph); and

2. 70 Goldstone Lane, Hove (LPA reference BH2014/03605), which secured planning permission for office floorspace, 59 self-contained apartments (4-6 storeys) and 6 x 3 storey terrace dwellings on 25 May 2016 (approximately 217 dph).

6.8 Taking the two sites above as an average, and applying that to the site area of the Royal Mail Site, would accommodate 128.6 dwellings – consistent with the massing studies enclosed.

6.9 Recently, the Sackville development, located south of the railway line, within policy area DA6, (1 – 3 Ellen Street, Hove) (LPA reference BH2016/02663), secured permission for a mixed use development of 188 residential apartments (up to 16 storeys), 1,988 sqm of office space and 226 sqm of retail space. Following refusal by B&HCC, the application was allowed at appeal on 24th January 2019 (Appeal reference APP/Q1445/W/18/3192649). The approximate density of this development is 470 dph. This scheme sets a precedent for the DA6 area, particularly on land south of the railway line, which the draft Neighbourhood Plan has identified as being suitable for taller buildings.

6.10 The Conran & Partners Study highlights the Site, if it were to become available, could accommodate at least 128 dwellings. If we were to apply a density of 470 dph, as approved a part of the Sackville development, the Site could accommodate circa 315 units. In short, whilst each site must be considered on its own merit, we consider our Client's Site has a minimum capacity to deliver 128 dwellings, with scope to include the Site's capacity significantly further, given the potential for taller buildings that would not be visible from the Conservation Area within this area.

6.18 Draft Policy H1 identifies housing and mixed-use sites within Brighton and Hove. These sites would allow for a quicker delivery compared to larger, strategic sites, which are often burdened with infrastructure constraints that delay delivery. The sites identified in draft Policy H1 would therefore assist the Council in maintaining a five-year housing land supply, which the Council is currently struggling to uphold.

6.19 Of note, our Client's Site is identified in Table 6 as a housing site, with an "indicative number of residential units" of 67 dwellings, which is welcomed. We also note that permitted additional uses include employment. The principle of the allocation is welcomed. However, we are concerned the quantum of development identified would constitute 'underdevelopment' if the Site were to come forward for redevelopment. This would be contrary to NPPF Para 123, adopted local planning policy CP14 and DA6, which focus on higher density development and the regeneration of under-utilised land. We note the Council has applied Policy CP14's minimum density to the Site (100 dwellings per hectare). However, we must stress this is a minimum only. Please refer to the enclosed Study prepared by Conran & Partners which demonstrates that the Site has a significantly larger capacity than 67 dwellings. Given adopted planning policy and the Council's five-year housing supply shortfall of 1,200 units, we consider the Council should have greater ambitions for our Client's Site, if it were to become available for redevelopment.

6.20 The Site comprises brownfield land in a highly sustainable location, less than 250m from Hove Station. The emerging Hove Station Neighbourhood Plan has earmarked land south of the railway as potentially suitable for tall buildings. Adopted policy CP14 states Response to Local Plan Part 2 development should be a minimum of 100 dph in designated development area such as this. The recently approved Sackville development (LPA reference BH2016/02663), also located south of the railway line within wider policy designation DA6, is 16 storeys in height and has a density of approximately 470 dph. This further cements the notion that this area can accommodate higher density, tall buildings. Whilst each site must be considered on its own merit, we consider our Client's Site has capacity to deliver a minimum of 128 dwellings (approximately 190 dwellings per hectare). With exemplary development, there is scope to include the Site's capacity further, similar to that of Sackville. Policy H1 should be amended to reflect the Site's full potential.

6.21 In relation to commercial uses, draft Policy H1 states 'employment' as an additional use on Site, with no reference to Use Classes. Our Client welcomes this flexibility and requests that this is retained in future drafting. This is in accordance with Para 81 of the NPPF, which requires planning policies to be flexible enough to accommodate needs not anticipated in the Plan.

6.22 In line with the enclosed Conran & Partners Study, we consider the Site should be retained in draft Policy H1, however, the minimum capacity of the Site increased to a minimum of 128 dwellings. This will provide the Council with additional housing supply on an accessibly located brownfield site, to assist in addressing existing shortfalls.

H1 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.

modifications to the policy to make sound and legally compliant:

See enclosed Representations. The site should be allocated for a minimum of 120 new homes.

FOLLOWING TEXT TAKEN FROM SUPPORTING INFORMATION

6.22 In line with the enclosed Conran & Partners Study, we consider the Site should be retained in draft Policy H1, however, the minimum capacity of the Site increased to a minimum of 128 dwellings. This will provide the Council with additional housing supply on an accessibly located brownfield site, to assist in addressing existing shortfalls.

H1 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)

Yes, I wish to participate in the hearing session(s)

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

It is necessary to attend the Examination to make the case for an appropriate quantum of development at the site.

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H2 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.

response box for legal compliance, soundness and duty to cooperate:

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

question-2020-01-22-2428630261-filesubquestion.pdf was uploaded

Brighton & Hove City Council Draft City Plan Part Two

Responses on behalf of
Royal Mail

October 2020

**Brighton & Hove City Council
Draft City Plan Part Two**

**Responses on behalf of
Royal Mail**

Project Ref:	28974/A5/P2/AL/SO	28974/A5/P2/AL/SO
Status:	Draft	Final
Issue/Rev:	01	02
Date:	October 2020	October 2020
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File Ref: 28974.P2.DCP.AL
Date: October 2020

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- 7.0 Summary

1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore LLP on behalf of Royal Mail (the "Client") in respect of the Brighton and Hove City Council (B&HCC) Draft City Plan Part Two Submission Stage. They are submitted pursuant to a land interest of the Client within the area, which have initially been highlighted by B&HCC for possible future development. The site is 88 Denmark Villas, Hove BN3 3UG ('the Site'). We previously submitted representations on behalf of our Client in respect of the Draft City Plan Part Two in September 2018. These representations are accompanied by a Design Document dated September 2018 by Conran & Partners. This document was submitted alongside the Regulation 19 representations in September 2018 to promote the development of this Site (and another) within the City.
- 1.2 Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week (and packets five days a week) at an affordable and geographically uniform price to every address in the UK. Royal Mail has a statutory duty to provide efficient mail sorting and delivery services for the administrative area of Brighton and Hove City Council.
- 1.3 The Site mentioned in these representations is currently an operational facility, and there is no certainty over release. However, it has been highlighted by the Council as potentially assisting in meeting future housing targets. On the basis that it might become available in the medium term, subject to viability and a site being made available for relocation, Royal Mail has sought to respond to the Council's proposals. It should be noted that the relocation/re-provision of Royal Mail's operations is essential prior to the vacation and subsequent redevelopment of the Site. Should any relocation of Royal Mail's operations occur it would need to be in close proximity to the current Site to minimise vehicle mileage and travel time. This will ensure that operations will not be prejudiced and that Royal Mail can continue to comply with their statutory duty to maintain a 'universal service' for the UK.
- 1.4 Furthermore, in order for the Site to be brought forward for redevelopment, it would be essential that any facilities solution is available prior to the demolition of the existing building, to ensure Royal Mail's continuity of service within the administrative boundary of Brighton & Hove.

- 1.5 These representations provide comment on specific policies within the draft Local Plan. The conclusion of the representations confirms that the Site would represent sustainable development if at any time it was brought forward for residential or mixed-use development.
- 1.6 Royal Mail wish to retain the option to participate at the Examination in Public on the matters discussed within the representations.

2.0 SITE AND SURROUNDINGS

- 2.1 The Site is located on land set behind existing built form along Denmark Villas. It is currently used as a Royal Mail delivery office, with a customer car park located along the western part of the site. The Site utilises the existing access at the Station Approach/Denmark Villas junction, running parallel with the adjacent railway line. There is adequate space for two-way traffic along the access. The Site is a brownfield site.
- 2.2 It has an area of approximately 0.67 hectares. To the west of the Site is a recent development providing commercial use at ground floor level, including a local supermarket and gymnasium, with residential development above. Located further south along the western boundary are the rear gardens to properties along Denmark Villas. The southern boundary backs on to the residential properties along Oxford Mews and Eaton Grove. To the east of the Site is the Drive Bowling Club. To the north is the Hove to Brighton railway line, beyond which is further residential development.
- 2.3 The delivery office is a single storey structure of no architectural merit. The building is not listed. It is a brick and sheeted building, with a large canopy along the western elevation, under which delivery vans load parcels and letters. There is a further canopy to the northern part of the building, again allowing cover for vehicles visiting the Site.
- 2.4 The Site is located adjacent to the Hove Station and Willett Estate Conservation Areas. The Site, the Bowling Club and the dwellings on the northern side of Oxford Mews are excluded from these designated areas. The closest listed building is the Grade II Ralli Memorial Hall. This is located to the western side of Denmark Villas and is separated from the Site by a newly erected mixed-use block.
- 2.5 Further west of the Site is Hove railway station, set approximately 170m from the Site. Hove station is served by local rail services into Brighton, as well as regular services direct to London and along the south coast. The railway station is also served by bus stops along Goldstone Villas. Other bus stops are located along Cromwell Road to the south.

3.0 CITY PLAN PART ONE

- 3.1 The Site has been included by the Council as forming part of one of the eight areas identified for development as noted within the City Plan Part One (adopted September 2016), that being DA6 'Hove Station Area'. The policy recognises potential for wider physical regeneration around the Hove station area and this area which includes Royal Mail's facility is expected to provide a minimum 525 dwellings and 1,000sqm of new employment space.

4.0 STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

- 4.1 The Strategic Housing Land Availability Assessment (SHLAA) update (published by Brighton & Hove City Council in October 2019) highlights that the Council believe the site could bring forward 67 dwellings to contribute to the 525 dwellings required within policy area DA6 should it become available. It must be noted the figure of 525 dwellings is a minimum figure within the policy, and the opportunity to bring forward further dwellings on brownfield sites in such a sustainable location is broadly encouraged.

5.0 HOVE NEIGHBOURHOOD PLAN

5.1 The Site falls within the Hove Neighbourhood Plan, which was designated in December 2013, and redesignated in September 2019. The Hove Station Neighbourhood Forum published the Neighbourhood Plan for Regulation 14 consultation in Spring 2019. In the draft Plan, the Site falls within the 'Hove Station Hub'. The draft Neighbourhood Plan vision for Development Area 6 (DA6 within the adopted City Plan Part One) is that it will undergo wholesale redevelopment during the plan period (up to 2030), in a way that will establish Hove Station Quarter. The Forum secured support from the then DCLG to produce a 'Concept Plan' for the Hove Station Quarter, to inform proposals moving forward (found in Part 2 of the draft Neighbourhood Plan). In the Concept Plan, the Site is identified for 'new housing development'. Draft Policy 1 ('Redevelopment of DA6') of the emerging Neighbourhood Plan states "*individual proposals should make efficient use of land*". On page 38, it goes on to state:

"As a result of redevelopment existing low intensity use of land will be used more effectively. This would allow City Plan policies for employment to be met, whilst substantially increasing the volume of much needed housing. It would also allow the area of DA6 to grow into a homogenous and attractive new city quarter".

5.2 Draft Policy 5 ('Land South of the Railway') seeks the comprehensive redevelopment of land South of the Railway.

5.3 Draft Policy 11 'Tall Buildings' states development to the south of the railway, within DA6, should take advantage of the lower topography by bringing forward taller buildings at occasional points within the area, as long as they are designed in such a way as to collectively minimise over shadowing and enable for good visual permeability north-south.

5.4 At present, the Neighbourhood Plan can be given limited planning weight. However, if the Site were to be released for redevelopment, proposals would need to adhere to the Neighbourhood Plan and its aims and objectives moving forward, and clearly the emphasis of the Neighbourhood Plan is to make a far more efficient use of land to the south of the Railway, with the potential for tall buildings and higher density housing. The site allocation for the existing Royal Mail site should reflect this and support a far higher density of housing than the 67 homes it has been identified for in the SHLAA. The massing studies

that accompany these representations demonstrate how higher density development could be accommodated on the site, with potential for circa 130 homes.

6.0 RESPONSE TO LOCAL PLAN PART 2

Site Opportunity

- 6.1 The Site has been identified within a wider Policy Area within Local Plan Part One (Policy DA6), in need of wider physical regeneration with potential to provide a minimum 525 dwellings and 1,000sqm of new employment space. We would emphasise that consistent with the NPPF, and the Inspector's Report that accompanied the City Plan Part One, the amount of housing directed to the allocated sites should be considered a minimum so as to help meet the acute housing and employment needs of the Council.
- 6.2 The accompanying document prepared by Conran & Partners highlights that should the Site become available for redevelopment, it could accommodate a more sustainable form of development than that currently identified in draft planning policy set out in draft Local Plan Part 2. The Conran & Partners Study highlights the constraints of the Site and demonstrates that an opportunity exists for a new residential development that could accommodate between 128 and 135 dwellings.
- 6.3 Although located in proximity to the Hove Station and Willett Estate Conservation Areas, the Site has been expressly excluded from these designations. Moreover, the Site includes no listed buildings in or immediately adjacent to the Site. Listed buildings in proximity include Ralli Memorial Hall, Walls and Railings, however, this is separated from the Site by a newly erected development.
- 6.4 In developing the proposals enclosed, in accordance with adopted planning policy, Conran & Partners have considered the amenity of surrounding residential properties, including loss of privacy, daylight sunlight and overshadowing. Having taken into consideration separation distances between buildings, window placement and building orientation, the study demonstrates that if the Site were to become available for redevelopment, it could accommodate 128 and 135 dwellings without having a detrimental impact on surrounding properties. This is far more than the capacity identified in the SHLAA of 67 homes – and consistent with the NPPF and Inspector's Report in respect of the City Plan Part One, the Council should be seeking to maximise the contribution brownfield previously developed sites such as these can make.
- 6.5 The Conran & Partners Study considers a number of massing scenarios on the Site. Key findings include:

1. A redevelopment of the Site would not cause loss of light to neighbouring properties immediately north, although taller buildings may result in overshadowing properties north of the railway line. At six storeys in height, such overshadowing would not occur, however, this should be considered a minimum and a taller building could be accommodated subject to an appropriate daylight sunlight assessment.
2. The most appropriate option considered is to form a Courtyard Block (massing option A) of circa 6 storeys in height that can deliver a minimum of 128 new homes.
3. Given the Site's highly accessible location adjacent to Hove Station and in proximity to various bus stops, parking can be limited to circa 0.3-0.5 spaces per unit, ensuring a more efficient use of land. This aligns with the emerging Hove Station Neighbourhood Plan which proposes that the Policy DA6 designated area is classified as a Central Zone, which would drastically reduce the number of car parking spaces required.

6.6 The latest SHLAA and Local Plan Part 2 identify the Site as suitable to deliver 67 residential units, a density of 100 dwellings per hectare. Although adopted Policy CP14 'Housing Density' sets a general expectation for a minimum net density of 100 dwellings per hectare within Development Areas including DA6, this should be treated as a minimum. Simply applying the minimum net density to future allocations would result in significant underdevelopment across B&HCC, contrary to adopted national and local policy, and in direct conflict with the conclusions of the Inspector's Report for the City Plan Part One. It will deter developers from acquiring and redeveloping sites, potentially stifle the delivery of affordable housing and further amplify the housing supply shortage within the area. It will also result in speculative development, and planning appeals rather than a plan led approach.

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- 6.8 Taking the two sites above as an average, and applying that to the site area of the Royal Mail Site, would accommodate 128.6 dwellings – consistent with the massing studies enclosed.
- 6.9 Recently, the Sackville development, located south of the railway line, within policy area DA6, (1 – 3 Ellen Street, Hove) (LPA reference BH2016/02663), secured permission for a mixed use development of 188 residential apartments (up to 16 storeys), 1,988 sqm of office space and 226 sqm of retail space. Following refusal by B&HCC, the application was allowed at appeal on 24th January 2019 (Appeal reference APP/Q1445/W/18/3192649). The approximate density of this development is 470 dph. This scheme sets a precedent for the DA6 area, particularly on land south of the railway line, which the draft Neighbourhood Plan has identified as being suitable for taller buildings.
- 6.10 The Conran & Partners Study highlights the Site, if it were to become available, could accommodate at least 128 dwellings. If we were to apply a density of 470 dph, as approved a part of the Sackville development, the Site could accommodate circa 315 units. In short, whilst each site must be considered on its own merit, we consider our Client's Site has a minimum capacity to deliver 128 dwellings, with scope to include the Site's capacity significantly further, given the potential for taller buildings that would not be visible from the Conservation Area within this area.

DM19 Maximising Development Potential

- 6.11 Our Client supports the principle of Draft Policy DM19, which seeks to avoid underdevelopment of sites, requiring the maximisation of opportunities, density and the efficient use of sites in terms of building layouts and design.
- 6.12 Para 118 (c and d) of the National Planning Policy Framework ('NPPF') identifies the value of using sustainable brownfield land within settlements for homes and other identified needs, and the need to promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained.
- 6.13 Para 122 of the National Planning Policy Framework ('NPPF') states planning policies and decisions should support development that makes efficient use of land, taking into

consideration identified need for different types of housing, local market conditions and viability, the availability and capacity of infrastructure and services and the need to regenerate. Moreover, Para 123 states:

'Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.'

- 6.14 As set out in our representations submitted in September 2018, when supporting the adoption of the City Plan Part One, the Inspector in their report, specifically emphasised the need for Brighton & Hove City Council to maximise (our emphasis) development on all allocated sites, so as to meet Brighton's Housing Needs (estimated to be in excess of 30,000 homes to 2031). The City Plan Part One was adopted on that premise, given that the Council could only demonstrate the capacity to deliver 13,200 homes (less than 50% of the identified need) to 2031.
- 6.15 The 2019 Housing Delivery Test results were published in February 2020. The results confirmed Brighton and Hove delivered only 70 percent of its target and is required to add a 20 percent buffer to its five-year housing land supply. In effect this requires the Council to add a further 20% housing to the local plan housing requirement. In addition, in the B&HCC Strategic Housing Land Availability Update 2019 (published October 2019), the Council has applied a 20 percent buffer to its housing need. Against the five-year requirement of 6,149, the Council has a deliverable housing supply of 4,949 for the period 2019 – 2024 (leaving a shortfall of 1,200 units). The Council has a four-year housing land supply (page 7). The Council's housing supply shortfall is further realised in recent Appeal decisions, in which Inspectors have concluded the Council can no longer demonstrate a five-year housing and supply and is subject to speculative development.
- 6.16 The need to maximise development opportunities on available, suitable sites is therefore crucial. As set out above, recently approved planning applications/ allowed appeals on brownfield land within the City have been of a significantly higher density. Lyon Close, Hove (LPA reference BH2018/01738) has a density of approximately 167 dph, 70 Goldstone Lane, Hove (LPA reference BH2014/03605) has a density of approximately 217 dph and Sackville, 1 – 3 Ellen Street, Hove (LPA reference BH2016/02663, which is also located within the wider DA6 designation, has a density of approximately 470 dph. These planning approvals set a precedent for higher density development within the immediate area, contributing to the City's housing requirement and current supply position.

Furthermore, the Sackville development sets a precedent for tall buildings south of the railway, within Policy area DA6, where the Site is located.

- 6.17 Royal Mail considers this sustainable approach should be taken in allocating sites in the Local Plan Part 2. Where sustainable, accessible brownfield sites are available, development should be optimised in accordance with the NPPF, subject to complying with other local planning policies. Identifying the Site as able to accommodate 67 dwellings (100 dwellings per hectare) would represent 'under development' contrary to the NPPF and adopted local policy DA6. The Site is considered to have adequate capacity for at least 128 units (approximately 190 dwellings per hectare) with scope to increase up to 315 dwellings in line with the approved Sackville scheme (470 dph), given the potential for taller buildings that would not be visible from the Conservation Area within policy area DA6.

H1 Housing Sites and Mixed-Use Development

- 6.18 Draft Policy H1 identifies housing and mixed-use sites within Brighton and Hove. These sites would allow for a quicker delivery compared to larger, strategic sites, which are often burdened with infrastructure constraints that delay delivery. The sites identified in draft Policy H1 would therefore assist the Council in maintaining a five-year housing land supply, which the Council is currently struggling to uphold.
- 6.19 Of note, our Client's Site is identified in Table 6 as a housing site, with an "indicative number of residential units" of 67 dwellings, which is welcomed. We also note that permitted additional uses include employment. The principle of the allocation is welcomed. However, we are concerned the quantum of development identified would constitute 'underdevelopment' if the Site were to come forward for redevelopment. This would be contrary to NPPF Para 123, adopted local planning policy CP14 and DA6, which focus on higher density development and the regeneration of under-utilised land. We note the Council has applied Policy CP14's minimum density to the Site (100 dwellings per hectare). However, we must stress this is a minimum only. Please refer to the enclosed Study prepared by Conran & Partners which demonstrates that the Site has a significantly larger capacity than 67 dwellings. Given adopted planning policy and the Council's five-year housing supply shortfall of 1,200 units, we consider the Council should have greater ambitions for our Client's Site, if it were to become available for redevelopment.
- 6.20 The Site comprises brownfield land in a highly sustainable location, less than 250m from Hove Station. The emerging Hove Station Neighbourhood Plan has earmarked land south of the railway as potentially suitable for tall buildings. Adopted policy CP14 states

development should be a minimum of 100 dph in designated development area such as this. The recently approved Sackville development (LPA reference BH2016/02663), also located south of the railway line within wider policy designation DA6, is 16 storeys in height and has a density of approximately 470 dph. This further cements the notion that this area can accommodate higher density, tall buildings. Whilst each site must be considered on its own merit, we consider our Client's Site has capacity to deliver a minimum of 128 dwellings (approximately 190 dwellings per hectare). With exemplary development, there is scope to include the Site's capacity further, similar to that of Sackville. Policy H1 should be amended to reflect the Site's full potential.

- 6.21 In relation to commercial uses, draft Policy H1 states 'employment' as an additional use on Site, with no reference to Use Classes. Our Client welcomes this flexibility and requests that this is retained in future drafting. This is in accordance with Para 81 of the NPPF, which requires planning policies to be flexible enough to accommodate needs not anticipated in the Plan.
- 6.22 In line with the enclosed Conran & Partners Study, we consider the Site should be retained in draft Policy H1, however, the minimum capacity of the Site increased to a minimum of 128 dwellings. This will provide the Council with additional housing supply on an accessibly located brownfield site, to assist in addressing existing shortfalls.

7.0 SUMMARY

- 7.1 These representations are made on behalf of Royal Mail (the "Client") in respect of the Brighton and Hove City Council (B&HCC) Draft City Plan Part Two Submission Stage pursuant to the Royal Mail Site located at 88 Denmark Villas, Hove.
- 7.2 The Site is within single ownership and is currently occupied. However, the Site may become available in the medium term, subject to viability and a site being made available for the relocation of the facilities. Should that be the case, the site would represent an ideal opportunity to accommodate high density residential development, and the Local Policy should reflect that.
- 7.3 The Site is located within policy area DA6 Hove Station Area within the adopted City Plan Part One. Despite this allocation, the Site is considered worthy of a specific allocation within emerging draft Policy H1. Draft Policy H1 and the SHLAA assessed the Site as having a capacity of 67 dwellings. We are concerned this quantum of development identified would constitute 'underdevelopment'.
- 7.4 The Site represents a brownfield redevelopment opportunity in a highly accessible location with excellent access to both bus and rail services. Given adopted planning policy and the Council's five-year housing supply shortfall of 1,200 units, we consider the Council should have greater ambitions for our Client's Site, if it were to become available for redevelopment. Recently, Policy Area DA6, in which the Site falls, has been subject to various planning permissions including the Sackville development comprising a 16 residential storey tower (470 dph).
- 7.5 As per the enclosed Study, we consider the Site can adequately provide a minimum of 128 dwellings (with potential for more). It is therefore commended to B&HCC to reflect this in draft Policy H1.
- 7.6 Royal Mail wish to retain the option to participate at the Examination in Public on the matters discussed within the representations.

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TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
INFRASTRUCTURE &
ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

(DM1) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM12) 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.

modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM13) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM13) 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.

modifications to the policy to make sound and legally compliant:

(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM14) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM14) 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.

modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafront

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM15) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM16) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM16) 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.

modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM17) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM17) 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.

modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM18) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM18) 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.

modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Yes

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

response box for legal compliance, soundness and duty to cooperate:

Our client supports the principle of Draft Policy DM19, which seeks to avoid underdevelopment of sites, requiring the maximisation of opportunities, density and the efficient use of sites in terms of building layouts and design.

When supporting the adoption of the City Plan Part One, the Inspector in her report, specifically emphasised the need for Brighton & Hove City Council to maximise (our emphasis) development on all allocated sites, so as to meet Brighton's Housing Needs (estimated to be in excess of 30,000 homes to 2031). Our Client considers this sustainable approach should be taken in allocating sites in the Local Plan Part 2 – i.e. facilitating high density mixed use developments that secure as a minimum an existing quantum of commercial use to activate key frontages and create flexible workspace, but equally accommodate new homes above. Where sustainable, accessible brownfield sites are available, development should be optimised in accordance with the NPPF, subject to complying with other local planning policies.

(DM19) 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.

modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM20) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM20) 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.

modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

DM31 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.

modifications to the policy to make sound and legally compliant:

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

DM35 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.

modifications to the policy to make sound and legally compliant:

DM35 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)

Not Answered

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

Not Answered

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

DM38 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.

modifications to the policy to make sound and legally compliant:

DM38 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)

Not Answered

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

SA7 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.

modifications to the policy to make sound and legally compliant:

SA7 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)

Not Answered

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

ALL SITES

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

No

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Positively Prepared, Effective, Justified, Consistent with National Policy

H1 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.

response box for legal compliance, soundness and duty to cooperate:

See enclosed representations. The site [3–9 Blackman Street, Brighton] could make a positive contribution to Housing Needs in Brighton and should be included under Policy H1 as a Housing Site or a Mixed Use Site. Not including such a site undermines policy H1 as it does not make effective use of a highly accessible and sustainably located site. The site is protected for offices where it could support high density residential or mixed use development. The Inspector's conclusions in the Report for City Plan Part One (to maximise development on site allocations) applies specifically to Policy DA4 and sites within it. To simply allocate this site for offices, when the office consent has expired is wholly ineffective. It will deter developers from seeking to purchase/redevelop the site, or seek to appeal it contrary to the desire for a plan-led system. The site does not currently make a positive contribution given its highly accessible location and as such to not include it (even though it is within a designated Policy Area fails to represent positive planning. There is a significant housing need which is just as important as the need for offices. Further the need for offices is likely to be subject to significant structural changes following on from the effects of the Pandemic. Accordingly and in accordance with the NPPF the policy that affects this site should be sufficiently flexible to accommodate to such changes in circumstances and support employment and residential development on this site either as a housing site or a mixed use site. The policy is also out-dated as the current use of the site is storage and distribution, the previous office permission has expired and thus any redevelopment for housing or mixed use could not by default result in the loss of office floorspace. Failure to include this site as a housing or mixed use allocation when it could make a positive contribution to housing need, would be contrary to National Planning Policy which seeks to make the most effective use of brownfield previously developed sites in accessible locations, particular where the Council is unable to meet its housing need or does not have a 5YHLS.

Info from supporting document: The Site has been identified within a wider Policy Area within Local Plan Part One (Policy DA4), in need of wider physical regeneration with potential to provide a minimum 1,130 residential units, 20,000 sqm of B1a and B1b floorspace and 300 bed spaces (student housing). Planning permission was granted for the site to be redeveloped for offices in 2009. The permission was extended in 2012. However, the permissions expired in 2015 and the Site has yet to come forward for redevelopment.

H1 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.

modifications to the policy to make sound and legally compliant:

Refer to Enclosed Representations - The site should be included as a residential or mixed use site to accommodate circa 50 homes, and reference to its protection for offices should be deleted given that the site does not have a valid permission for offices and is currently in Storage and Distribution Use.

H1 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)

Yes, I wish to participate in the hearing session(s)

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

It is important to be able to make the case to include this site within those listed under H1 and to demonstrate the positive contribution it can make to helping Brighton & Hove meet its housing shortfall. By the time of the Examination a redevelopment proposal for the site will be available to present to the Inspector

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H2 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.

response box for legal compliance, soundness and duty to cooperate:

H2 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.

modifications to the policy to make sound and legally compliant:

H2 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)

Not Answered

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

Brighton & Hove City Council Draft City Plan Part Two

Responses on behalf of
McLaren Living

October 2020

**Brighton & Hove City Council
Draft City Plan Part Two**

**Responses on behalf of
McLaren Living**

Project Ref:	28974/A5/P1/AL/SO	28974/A5/P1/AL/SO
Status:	Draft	Final
Issue/Rev:	01	02
Date:	October 2020	October 2020
Prepared by:	██████████	██████████
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1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore LLP on behalf of McLaren Living (the "Client") in respect of the Brighton & Hove City Council (B&HCC) Draft City Plan Part Two Submission Stage. They are submitted pursuant to a land interest of the Client within the area. The site is 3–9 Blackman Street, Brighton ('the Site').
- 1.2 The Site mentioned in these representations is currently an operational facility, used for storage and distribution (Use Class B8). Surrounding uses include retail, office and residential. Recently, the Site has been subject to various planning applications. Please find a summary of relevant planning permissions below:
1. BH2012/01252 - Application to extend time limit for implementation of previous approval BH2009/00087 for demolition of existing warehousing/storage and distribution (B8) building at rear of site facing Blackman Street. Redevelopment of site for offices (B1) on ground and three upper floors, together with underground car parking. Approved 24 July 2012.
 2. BH2009/00087 - Demolition of existing warehousing/storage and distribution (B8) building at rear of site facing Blackman Street. Redevelopment of site for offices (B1) on ground and three upper floors, together with underground car parking. Approved 27 April 2009.
- 1.3 In the City Plan Part 1, the Site has been identified by the Council as a potential office allocation (please refer to Policy DA4 'New England Quarter and London Road', Site 1(H) 'GB Liners Site'). Policy DA4 states where there is an extant planning permission for B1(a) office uses on the Site, planning permission will not be granted for alternative uses. Please note the permission to extend time limit (LPA reference BH2012/01252) expired in July 2015. There are currently no extant planning permissions on Site.
- 1.4 These representations provide comment on specific policies within the draft Local Plan. The conclusion of the representations confirms that the Site would represent sustainable residential-led mixed use development.
- 1.5 McLaren Living wish to retain the option to participate at the Examination in Public on the matters discussed within the representations.

2.0 SITE AND SURROUNDINGS

- 2.1 The Site is located on land between Blackman Street and Station Street, less than 150m from Brighton Train Station. It is currently occupied by GB Liners Self Storage, with a car park located to the north of built form on Site, off Blackman Street. The Site utilises the existing access off Blackman Street, off Trafalgar Street. The Site is a brownfield site.
- 2.2 It has an area of approximately 0.08 hectares and currently consist of a two storey (approximate) GB Liners self-storage warehouse of no architectural merit. The building is not listed. It is a white rendered/ sheeted building, with a large canopy along the eastern elevation.
- 2.3 To the west of the Site is a five – six storey office development occupied by Kimberley Clark; Avalara and other units. The building comprises commercial height storeys, with a pitched roof and plant, as well as a basement. Located to the south of the Site, along Trafalgar Street are various commercial offerings, including retail, pubs and restaurants. The southern boundary backs on to the retail/ residential properties along Trafalgar Street, which range from 2-3 storeys in height. To the east of the Site is the Trafalgar Street Car Park, on top of which sits an 18 storey residential tower known as Theobald House. To the north, abutting the Site is a two storey building which adjoins a 6 commercial block. To the rear of this is a larger 8/9 storey commercial development located between Station Street, Blackman Street and Fleet Street.
- 2.4 The Site is located adjacent to the North Laine Conservation Area. The closest listed buildings are numbers 30-37 Kensington Place, to the south of the Site.
- 2.5 The Site falls outside of the designated 'Prime Retail Frontage' and 'Outside Prime Retail Frontage' in the adopted Proposals Map.
- 2.6 Further west is Brighton railway station, less than 150m from the Site. Brighton station is served by local rail services, as well as regular services direct to London and along the south coast. The Site is also located in close proximity to various bus stops.
- 2.7 The Site does not fall within a designated Neighbourhood Plan area.

3.0 CITY PLAN PART ONE

3.1 The Site has been included by the Council as forming part of one of the eight areas identified for development as noted within the City Plan Part One (adopted September 2016), that being DA4 'New England Quarter and London Road Area'. The policy recognises potential to revitalise the area. This area which includes the Site is expected to provide a minimum of 1,130 residential units, 20,000 sqm of B1a and B1b floorspace and 300 bed spaces (student housing). In Policy DA4, the Site has been identified by the Council as a potential office allocation (please refer to Policy DA4 'New England Quarter and London Road', Site 1(H) 'GB Liners Site'). Policy DA4 states where there is an extant planning permission for B1(a) office uses on the Site, planning permission will not be granted for alternative uses.

4.0 STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

- 4.1 The Strategic Housing Land Availability Assessment (SHLAA) update (published by Brighton & Hove City Council in October 2019) does not identify the Site for residential development. Within the DA4 policy area, the SHLAA identifies a total supply of 1,336 dwellings. It must be noted the figure of 1,130 dwellings is a minimum figure (our emphasis) within Policy DA4, and the opportunity to bring forward further dwellings on brownfield sites in such a sustainable location is broadly encouraged.

5.0 RESPONSE TO LOCAL PLAN PART 2

Site Opportunity

- 5.1 The Site has been identified within a wider Policy Area within Local Plan Part One (Policy DA4), in need of wider physical regeneration with potential to provide a minimum 1,130 residential units, 20,000 sqm of B1a and B1b floorspace and 300 bed spaces (student housing).
- 5.2 Para 11 (a) of the National Planning Policy Framework ('NPPF') states *"plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change"*. Para 118 (c and d) of the NPPF identifies the value of using sustainable brownfield land within settlements for homes and other identified needs, and the need to promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained. Para 59 of the NPPF states *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed"*.
- 5.3 Planning permission was granted for the site to be redeveloped for offices in 2009. The permission was extended in 2012. However, the permissions expired in 2015 and the Site has yet to come forward for redevelopment. Accordingly, the most recent permission (LPA reference BH2012/01252) has expired. Currently, the Site is an underutilised brownfield site, in a highly accessible location less than 150m from Brighton Station. The Council currently has a four-year housing land supply (page 7 of the Strategic Housing Land Availability Update 2019). Furthermore, the ongoing Pandemic is likely to have affected long-term tenant specific demand for office space. The need for large plate corporate office floorspace is likely to have decreased, with many companies looking to downsize and utilise more flexible space in terms of size and tenancy (i.e. shorter-term leases with less onerous commitments). Flexible space is therefore critical, with more people potentially working from home, or accessing offices less than the traditional 5 days a week.
- 5.4 Accounting for this and given the pressure for housing within Brighton & Hove we strongly advocate greater flexibility within Policy DA4 specific to this Site to allow residential and/or offices as well as well as, or part of mixed use development. The need for housing is just as important as that of offices, and it is clear the site has not come forward for offices to date. We suspect the policy DA4, and any specific allocation for the site was

borne out of the extant consent at the time, and a more buoyant office market. However, that has not come forward and its ongoing use as a storage and distribution facility represents a missed opportunity given the prominence and location of the site and in the context of acute housing need. We consider this Site would make a significant contribution to housing need within the existing urban area, alongside a flexible shared/communal/co-working office facility at ground floor and basement level. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly as they are not burdened with infrastructure requirements. This Site could therefore potentially assist the Council in addressing its short term housing supply issues, whilst also bringing forward office space tailored to local needs that is flexible enough to respond to the impact of the current pandemic.

- 5.5 Although located in proximity to the North Laine Conservation Area, the Site has been expressly excluded from this designation. The Site includes no listed buildings in or immediately adjacent to the Site. Given this, the Site's highly accessible location and surrounding townscape, subject to various technical assessments relating to Daylight/Sunlight etc, we consider a higher density development would be appropriate in this location. The site is identified within an area appropriate for Tall Buildings and accounting for adjacent commercial floorspace and nearby developments a building up to 7-9 storeys in part would not be out of place, or indeed exceed prevailing scale, whilst a taller feature element could help to detract from the visual dominance of the 18-storey Theobold House. This would be in accordance with NPPF Para 123, adopted local planning policy CP14 and DA6, which focus on higher density development and the regeneration of under-utilised land. We welcome further discussions with Officers to discuss Site capacity.
- 5.6 Given the accessible nature of the Site, a car free development would be appropriate.

DM19 Maximising Development Potential

- 5.7 Our client supports the principle of Draft Policy DM19, which seeks to avoid underdevelopment of sites, requiring the maximisation of opportunities, density and the efficient use of sites in terms of building layouts and design.
- 5.8 Para 122 of the NPPF states planning policies and decisions should support development that makes efficient use of land, taking into consideration identified need for different types of housing, local market conditions and viability, the availability and capacity of infrastructure and services and the need to regenerate. Moreover, Para 123 states:

“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.”

- 5.9 When supporting the adoption of the City Plan Part One, the Inspector in her report, specifically emphasised the need for Brighton & Hove City Council to maximise (our emphasis) development on all allocated sites, so as to meet Brighton’s Housing Needs (estimated to be in excess of 30,000 homes to 2031). The City Plan Part One was adopted on that premise, given that the Council could only demonstrate the capacity to deliver 13,200 homes (less than 50% of the identified need) to 2031. Accordingly, as one of the 8 key development sites within the City Plan Part One, it would be entirely appropriate and consistent with the Inspector’s conclusions to support high density residential development on this site either on its own or as part of a mixed use development. This would in no way conflict with the remainder of Policy DA4 as the previous extant permission has expired and the site is currently used for storage and distribution purposes, accordingly there would be no net loss of offices and any office content proposed on the site would be a net increase from existing.
- 5.10 The 2019 Housing Delivery Test results were published in February 2020. The results confirmed Brighton & Hove delivered only 70 percent of its target and is required to add a 20 percent buffer to its five-year housing land supply. In effect this requires the Council to add a further 20% housing to the local plan housing requirement. In addition, in the B&HCC Strategic Housing Land Availability Update 2019 (published October 2019), the Council has applied a 20 percent buffer to its housing need. Against the five-year requirement of 6,149, the Council has a deliverable housing supply of 4,949 for the period 2019 – 2024 (leaving a shortfall of 1,200 units). The Council has a four-year housing land supply (page 7). The Council’s housing supply shortfall is further realised in recent Appeal decisions, in which Inspectors have concluded the Council can no longer demonstrate a five-year housing and supply and is subject to speculative development.
- 5.11 The need to maximise development opportunities on available, suitable sites is therefore crucial. Recently approved applications/ allowed appeals in Brighton & Hove include:
1. Lyon Close, Hove (LPA reference BH2018/01738), which secured planning permission for the mixed use redevelopment of the Site (6-8 storeys) to provide 152 dwellings, 2 live/ work units and 697 sqm of office accommodation on 31 July 2019 (approximately 167 dph);

2. 70 Goldstone Lane, Hove (LPA reference BH2014/03605), which secured planning permission for office floorspace, 59 self-contained apartments (4-6 storeys) and 6 x 3 storey terrace dwellings on 25 May 2016 (approximately 217 dph);
3. 1-3 Ellen Street, Hove (LPA reference BH2016/02663) which secured permission for a mixed use development of 188 residential apartments (up to 16 storeys), 1,988 sqm of office space and 226 sqm of retail space. Following refusal by B&HCC, the application was allowed at appeal on 24th January 2019 (Appeal reference APP/Q1445/W/18/3192649) (approximately 470 dph);
4. Land at Station Street, Blackman Street and Cheapside, Brighton (LPA reference BH2016/05493) which secured planning permission for the erection of a 7 storey office building (B1) on 23 March 2017;
5. One Preston Park (Former Anston House) secured permission for 229 residential units on a 0.62 Hectare site in 2016 at a density of 369 dwellings per hectare.

5.12 The above planning approvals set a precedent for higher density development within the City, contributing to the Council's housing requirement and current supply position. A development comprising active ground floor and basement office/commercial uses with residential above would be entirely appropriate and help to contribute to both housing and employment needs. In particular we note that similar sites in the City Centre have been allocated for a similar mix of uses – notably the Royal Mail Sorting Office at North Street, allocated for 3,000 sq. m of commercial uses and 110 residential units. We see no reason why a similar mix/ratio could not be applied to this site, as provision of commercial use at ground floor and basement would exceed the current quantum of commercial use, create more jobs and allow upper storeys to be utilised for residential development.

5.13 Our Client considers this sustainable approach should be taken in allocating sites in the Local Plan Part 2 – i.e. facilitating high density mixed use developments that secure as a minimum an existing quantum of commercial use to activate key frontages and create flexible workspace, but equally accommodate new homes above. Where sustainable, accessible brownfield sites area available, development should be optimised in accordance with the NPPF, subject to complying with other local planning policies.

H1 Housing Sites and Mixed-Use Development

5.14 Draft Policy H1 identifies housing and mixed-use sites within Brighton & Hove. These sites would allow for a quicker delivery compared to larger, strategic sites, which are often burdened with infrastructure constraints that delay delivery. The sites identified in draft Policy H1 would therefore assist the Council in maintaining a five-year housing land supply, which the Council is currently struggling to uphold.

- 5.15 Our Client's Site comprises brownfield land in a highly sustainable location, less than 150m from Brighton Station. Given B&HCC's existing shortfall in housing supply and changing demands in respect of office space given the ongoing Pandemic, greater flexibility should be provided within polices. Our Client's Site should not be restricted to office development only, which will only serve to restrict its long-term development potential, making it dependent on a strong demand for offices. There is no certainty that will be the case following what are evidently structural changes in that market arising from Covid-19, and the flexibility advocated in the NPPF that would allow policies to adapt to changes in circumstances should clearly apply here given the development needs of Brighton & Hove and the highly sustainable under-utilised location of the site. We therefore propose Policy H1 is amended to include the Site for residential development.
- 5.16 Policy CP12 identifies suitable areas of the City in which higher density high rise buildings (those over 18metres/6 storeys) will be considered suitable. The Brighton Station/New England Quarter is identified in planning policy as being one such area that is suitable for such development. Whilst each site must be considered on its own merit, we consider the Site has capacity to deliver a higher density residential led development, which would not be out of place up to 7-9 storeys. With exemplary development, there is scope to include the Site's capacity further. We welcome further discussions with Officers to discuss Site capacity.

6.0 SUMMARY

- 6.1 These representations are made on behalf of McLaren Living in respect of the Brighton & Hove City Council (B&HCC) Draft City Plan Part Two Submission Stage pursuant to the Site located at 3–9 Blackman Street, Brighton.
- 6.2 The Site is within single ownership and is currently occupied. However, the Site will become available in the short/ medium term and could contribute to the Council's 5 year housing land supply.
- 6.3 The Site is located within policy area 'DA4 New England Quarter and London Road Area' within the adopted City Plan Part One. In Policy DA4, the Site has been identified by the Council as a potential office allocation (please refer to Policy DA4 'New England Quarter and London Road', Site 1(H) 'GB Liners Site'). Policy DA4 states where there is an extant planning permission for B1(a) office uses on the Site, planning permission will not be granted for alternative uses. There is no extant planning permission on our Client's Site.
- 6.4 The Site represents a brownfield redevelopment opportunity in a highly accessible location with excellent access to both bus and rail services. Given adopted planning policy and the Council's five-year housing supply shortfall of 1,200 units, we consider the Site lends itself to residential redevelopment. The need for housing is just as important as that of office. We consider this Site would make a significant contribution to housing need within the existing urban area. It is therefore commended to B&HCC to reflect this in draft Policy H1 and include the Site for residential development.
- 6.5 McLaren Living wish to retain the option to participate at the Examination in Public on the matters discussed within the representations. Furthermore, our Client welcomes further discussions with Officers to discuss taking the Site forward.

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TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
INFRASTRUCTURE &
ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM1) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM1) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM1) 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.

modifications to the policy to make sound and legally compliant:

(DM1) 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)

Not Answered

(DM1) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM2 Retaining Housing and residential accommodation (C3)

(DM2) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM2) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM2) 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.

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(DM2) 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.

modifications to the policy to make sound and legally compliant:

(DM2) 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)

Not Answered

(DM2) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM3 Residential conversions and the retention of smaller dwellings

(DM3) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM3) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM3) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM3) 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.

modifications to the policy to make sound and legally compliant:

(DM3) 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)

Not Answered

(DM3) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM4 Housing and Accommodation for Older Persons

(DM4) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM4) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM4) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM4) 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.

modifications to the policy to make sound and legally compliant:

(DM4) 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)

Not Answered

(DM4) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM5 Supported Accommodation (Specialist and Vulnerable Needs)

(DM5) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM5) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM5) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM5) 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.

modifications to the policy to make sound and legally compliant:

(DM5) 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)

Not Answered

(DM5) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM6 Build To Rent Housing

(DM6) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM6) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM6) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM6) 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.

modifications to the policy to make sound and legally compliant:

(DM6) 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)

Not Answered

(DM6) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM7 Houses in Multiple Occupation (HMOs)

(DM7) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM7) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM7) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM7) 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.

modifications to the policy to make sound and legally compliant:

(DM7) 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)

Not Answered

(DM7) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM8 Purpose Built Student Accommodation

(DM8) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM8) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM8) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM8) 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.

modifications to the policy to make sound and legally compliant:

(DM8) 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)

Not Answered

(DM8) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM9 Community Facilities

(DM9) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM9) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM9) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM9) 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.

modifications to the policy to make sound and legally compliant:

(DM9) 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)

Not Answered

(DM9) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM10 Public Houses

(DM10) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM10) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM10) 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.

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(DM10) 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.

modifications to the policy to make sound and legally compliant:

(DM10) 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)

Not Answered

(DM10) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM11 New Business Floorspace

(DM11) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM11) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM11) 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.

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(DM11) 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.

modifications to the policy to make sound and legally compliant:

(DM11) 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)

Not Answered

(DM11) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

(DM12) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM12) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM12) 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.

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modifications to the policy to make sound and legally compliant:

(DM12) 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)

Not Answered

(DM12) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

(DM13) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM13) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

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(DM13) 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)

Not Answered

(DM13) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM14 Commercial and Leisure Uses at Brighton Marina

(DM14) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM14) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

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modifications to the policy to make sound and legally compliant:

(DM14) 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)

Not Answered

(DM14) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM15 Commercial and Leisure Uses on the Seafont

(DM15) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM15) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

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(DM15) 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.

modifications to the policy to make sound and legally compliant:

(DM15) 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)

Not Answered

(DM15) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM16 Markets

(DM16) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM16) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

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modifications to the policy to make sound and legally compliant:

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)

Not Answered

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

Why wish to speak:

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

(DM17) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM17) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

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modifications to the policy to make sound and legally compliant:

(DM17) 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)

Not Answered

(DM17) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM18 High quality design and places

(DM18) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM18) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

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modifications to the policy to make sound and legally compliant:

(DM18) 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)

Not Answered

(DM18) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM19 Maximising Development Potential

(DM19) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM19) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM19) 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.

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modifications to the policy to make sound and legally compliant:

(DM19) 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)

Not Answered

(DM19) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM20 Protection of Amenity

(DM20) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM20) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

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modifications to the policy to make sound and legally compliant:

(DM20) 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)

Not Answered

(DM20) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM21 Extensions and alterations

(DM21) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM21) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM21) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM21) 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.

modifications to the policy to make sound and legally compliant:

(DM21) 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)

Not Answered

(DM21) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM22 Landscape Design and Trees

(DM22) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM22) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM22) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM22) 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.

modifications to the policy to make sound and legally compliant:

(DM22) 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)

Not Answered

(DM22) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM23 Shop Fronts

(DM23) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM23) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM23) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM23) 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.

modifications to the policy to make sound and legally compliant:

(DM23) 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)

Not Answered

(DM23) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM24 Advertisements

(DM24) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM24) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM24) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM24) 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.

modifications to the policy to make sound and legally compliant:

(DM24) 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)

Not Answered

(DM24) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM25 Communications Infrastructure

(DM25) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM25) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

(DM25) 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.

response box for legal compliance, soundness and duty to cooperate:

(DM25) 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.

modifications to the policy to make sound and legally compliant:

(DM25) 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)

Not Answered

(DM25) 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM26 Conservation Areas

(DM26) 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

(DM26) 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM26 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.

response box for legal compliance, soundness and duty to cooperate:

DM26 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.

modifications to the policy to make sound and legally compliant:

DM26 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)

Not Answered

DM26 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM27 Listed Buildings

DM27 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM27 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM27 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.

response box for legal compliance, soundness and duty to cooperate:

DM27 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.

modifications to the policy to make sound and legally compliant:

DM27 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)

Not Answered

DM27 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM28 Locally Listed Heritage Assets

DM28 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM28 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM28 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.

response box for legal compliance, soundness and duty to cooperate:

DM28 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.

modifications to the policy to make sound and legally compliant:

DM28 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)

Not Answered

DM28 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM29 The Setting of Heritage Assets

DM29 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM29 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM29 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.

response box for legal compliance, soundness and duty to cooperate:

DM29 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.

modifications to the policy to make sound and legally compliant:

DM29 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)

Not Answered

DM29 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM30 Registered Parks and Gardens

DM30 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM30 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM30 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.

response box for legal compliance, soundness and duty to cooperate:

DM30 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.

modifications to the policy to make sound and legally compliant:

DM30 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)

Not Answered

DM30 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM31 Archaeological Interest

DM31 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

No

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

DM31 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Positively Prepared, Justified, Consistent with National Policy

DM31 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.

response box for legal compliance, soundness and duty to cooperate:

Building on Whitehawk Hill threatens a monument of national significance (Whitehawk Causewayed Enclosure- Russell, Miles 2002, Perhistoric Sussex) and one of the most important Neolithic monuments in the country. This area should be protected from development at all costs.

DM31 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.

modifications to the policy to make sound and legally compliant:

Protect this ancient monument from further development and research means of highlighting its importance nationally and within the local community

DM31 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)

Not Answered

DM31 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM32 The Royal Pavilion Estate

DM32 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM32 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM32 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.

response box for legal compliance, soundness and duty to cooperate:

DM32 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.

modifications to the policy to make sound and legally compliant:

DM32 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)

Not Answered

DM32 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM33 Safe, Sustainable and Active Travel

DM33 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM33 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM33 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.

response box for legal compliance, soundness and duty to cooperate:

DM33 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.

modifications to the policy to make sound and legally compliant:

DM33 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)

Not Answered

DM33 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM34 Transport Interchanges

DM34 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM34 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM34 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.

response box for legal compliance, soundness and duty to cooperate:

DM34 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.

modifications to the policy to make sound and legally compliant:

DM34 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)

Not Answered

DM34 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM35 Travel Plans and Transport Assessments

DM35 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

No

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

DM35 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Justified

DM35 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.

response box for legal compliance, soundness and duty to cooperate:

Building on the Benfield Valley (together with the other proposed developments at Mile Oak and Oakdene) will put increased pressure on the road system towards the A27. The removal of trees for the Benfield Valley development (and the loss of the green spaces) will contribute to a deterioration of air quality for local residents, who will lose green space and gain air pollution

DM35 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.

modifications to the policy to make sound and legally compliant:

Protect Benfield Valley nature reserve. Reassess Urban Fringe areas before building. The current assessments are outdated, and do not recognise more recent and positive developments in biodiversity.

DM35 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)

No, I do not wish to participate in hearing session(s)

DM35 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Please invite Benfield Valley nature reserve

DM36 Parking and Servicing

DM36 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM36 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM36 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.

response box for legal compliance, soundness and duty to cooperate:

DM36 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.

modifications to the policy to make sound and legally compliant:

DM36 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)

Not Answered

DM36 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM37 Green Infrastructure and Nature Conservation

DM37 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

No

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

DM37 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Justified, Consistent with National Policy

DM37 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.

response box for legal compliance, soundness and duty to cooperate:

The building development on Whitehawk Hill is contrary to paragraph 174 of the National planning Policy Framework .

I object to the phrase 'unless allocated to the development to the City plan'. This significantly weakens local site protection and allows developments to go ahead, even if they have adverse effects on the integrity of the site.

It pre-empts the due process of evaluating ecological impacts of any developments on Locally Designated Sites.

DM37 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.

modifications to the policy to make sound and legally compliant:

DM37 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)

No, I do not wish to participate in hearing session(s)

DM37 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

I think representatives of Friends Of Whitehawk should attend as they know the site and can represent my views more effectively

DM38 Local Green Spaces

DM38 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

No

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

DM38 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Effective, Justified, Consistent with National Policy

DM38 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.

response box for legal compliance, soundness and duty to cooperate:

The move to build on green spaces is not consistent with National Planning Policy framework.

The Urban Fringe Assessment is outdated.

Benfield valley is a designated green space. In City Plan Part 1, the council stated green spaces should be protected and that there should be more of them within the city, rather than fewer. This green space provides a invaluable green lung and is part of the one percent of remaining chalkland. Building on this site reduces green space and threatens biodiversity. There is no guarantee that building on the space will improve biodiversity, and it is very unlikely that it will. Building on the Benfield Valley will spoil the integrity of the nature reserve, and this has not been taken into account.

Building on the Benfield Valley has not considered the positive developments in wildlife since the Urban fringe Assessment. The area is home to many indicator species and ancient hedgerow, which need protection.

Building on the Benfield Valley will undermine the positive work of volunteers and ecologists to preserve and restore priority habitats.

Whitehawk Hill Local Nature reserve meets all the requirements for designation of Local green Space (Para. 77 of National planning Policy Framework), but is not listed for designation in the City Plan part 2.

It is not clear why Whitehawk Hill Local Nature Reserve was excluded from the choice of sites suggested for designation as Local Green Spaces in the 2014 Urban fringe Assessment.

Whitehawk Hill meets the objective to act as 'important green wedges into local areas' (Para 2.293 of City Part Plan 2)

DM38 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.

modifications to the policy to make sound and legally compliant:

Protect all local nature reserves from development

Add Whitehawk hill Local Nature reserve to the list of sites for designation as Local green Spaces

DM38 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)

No, I do not wish to participate in hearing session(s)

DM38 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM39 Development on the Seafront

DM39 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM39 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM39 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.

response box for legal compliance, soundness and duty to cooperate:

DM39 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.

modifications to the policy to make sound and legally compliant:

DM39 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)

Not Answered

DM39 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM40 Protection of the Environment and Health – Pollution and Nuisance

DM40 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM40 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM40 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.

response box for legal compliance, soundness and duty to cooperate:

DM40 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.

modifications to the policy to make sound and legally compliant:

DM40 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)

Not Answered

DM40 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM41 Polluted sites, hazardous substances & land stability

DM41 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM41 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM41 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.

response box for legal compliance, soundness and duty to cooperate:

DM41 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.

modifications to the policy to make sound and legally compliant:

DM41 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)

Not Answered

DM41 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM42 Protecting the Water Environment

DM42 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM42 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM42 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.

response box for legal compliance, soundness and duty to cooperate:

DM42 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.

modifications to the policy to make sound and legally compliant:

DM42 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)

Not Answered

DM42 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM43 Sustainable Drainage

DM43 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM43 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM43 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.

response box for legal compliance, soundness and duty to cooperate:

DM43 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.

modifications to the policy to make sound and legally compliant:

DM43 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)

Not Answered

DM43 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM44 Energy Efficiency and Renewables

DM44 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM44 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM44 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.

response box for legal compliance, soundness and duty to cooperate:

DM44 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.

modifications to the policy to make sound and legally compliant:

DM44 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)

Not Answered

DM44 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM45 Community Energy

DM45 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM45 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM45 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.

response box for legal compliance, soundness and duty to cooperate:

DM45 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.

modifications to the policy to make sound and legally compliant:

DM45 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)

Not Answered

DM45 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

DM46 Heating and cooling network infrastructure

DM46 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

DM46 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

DM46 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.

response box for legal compliance, soundness and duty to cooperate:

DM46 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.

modifications to the policy to make sound and legally compliant:

DM46 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)

Not Answered

DM46 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Special Area SA7 Benfield Valley

SA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

No

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

Yes

SA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Positively Prepared, Justified, Consistent with National Policy

SA7 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.

response box for legal compliance, soundness and duty to cooperate:

It is not justified as the Council is able to meet its targets without building on the city's last green lung. Building on this area will not improve its biodiversity. The area's existing biodiversity is underestimated and this is the home of many indicator species. Building here will result in loss of habitat and threatens biodiversity. The building threatens air quality for local residents. There is a genuine concern about the increased traffic this build will generate.

Benfield valley is a designated green space. In City Plan Part 1, the council stated green spaces should be protected and that there should be more of them within the city, rather than fewer. This green space provides an invaluable green lung and is part of the one percent of remaining chalkland. Building on this site reduces green space and threatens biodiversity. There is no guarantee that building on the space will improve biodiversity, and it is very unlikely that it will. The space does not need development in order to support biodiversity. In contrast, nationally we have seen that building on biodiverse areas threatens or destroys biodiversity and endangers wildlife. The area already contains indicator species and important biodiversity as a green space. Green spaces do not need to be 'scenic' in order to be valuable. There is strong evidence that scrub land like the Benfield Valley site is precisely the sort of green land we should be protecting to ensure biodiversity and wildlife habitat. The green wedge already exists and building on it reduces the green space. Building on the Benfield Valley will spoil the integrity of the nature reserve, and this has not been taken into account. Air quality will be reduced with additional traffic and a reduction of green space. Building on the Benfield Valley proposals have not considered the positive developments in wildlife since the Urban fringe Assessment. The area is home to many indicator species and ancient hedgerow, which need protection. Building on the Benfield Valley will undermine the positive work of volunteers and ecologists to preserve and restore priority habitats. This development is not supported by all councillors, and the council does not need to build on this land to meet its housing target. Mile Oak, Hangleton and Portslade are losing many of their green spaces to development. This contravenes City Plan Part 1

SA7 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.

modifications to the policy to make sound and legally compliant:

Rather than building on the area, consider supporting the nature reserve
Do not build on local nature reserves. Protect green spaces

SA7 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)

Yes, I wish to participate in the hearing session(s)

SA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road

SSA1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA1 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.

response box for legal compliance, soundness and duty to cooperate:

SSA1 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.

modifications to the policy to make sound and legally compliant:

SSA1 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)

Not Answered

SSA1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA2 Combined Engineering Depot, New England Road

SSA2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA2 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.

response box for legal compliance, soundness and duty to cooperate:

SSA2 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.

modifications to the policy to make sound and legally compliant:

SSA2 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)

Not Answered

SSA2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA3 Land at Lyon Close, Hove

SSA3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA3 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.

response box for legal compliance, soundness and duty to cooperate:

SSA3 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.

modifications to the policy to make sound and legally compliant:

SSA3 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)

Not Answered

SSA3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA4 Sackville Trading Estate and Coal Yard

SSA4 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA4 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA4 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.

response box for legal compliance, soundness and duty to cooperate:

SSA4 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.

modifications to the policy to make sound and legally compliant:

SSA4 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)

Not Answered

SSA4 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA5 Madeira Terrace and Madeira Drive

SSA5 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA5 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA5 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.

response box for legal compliance, soundness and duty to cooperate:

SSA5 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.

modifications to the policy to make sound and legally compliant:

SSA5 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)

Not Answered

SSA5 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive

SSA6 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA6 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA6 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.

response box for legal compliance, soundness and duty to cooperate:

SSA6 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.

modifications to the policy to make sound and legally compliant:

SSA6 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)

Not Answered

SSA6 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

SSA7 Land Adjacent to American Express Community Stadium, Village Way

SSA7 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

SSA7 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

SSA7 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.

response box for legal compliance, soundness and duty to cooperate:

SSA7 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.

modifications to the policy to make sound and legally compliant:

SSA7 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)

Not Answered

SSA7 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H1 Housing Sites and Mixed Use Sites

H1 Which site(s) does your representation refer to? (Tick all that apply to your submission)

H1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H1 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.

response box for legal compliance, soundness and duty to cooperate:

H1 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.

modifications to the policy to make sound and legally compliant:

H1 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)

Not Answered

H1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H2 Housing Sites – Urban Fringe

H2 Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)

Land at Oakdene, Southwick Hill / Land West of Mile Oak Road, Portslade, Benfield Valley, Land at and adjoining Brighton Race Course, Land at South Downs Riding School & Reservoir Site, Land north of Warren Road (Ingleside Stables)

H2 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

No

Legally compliant sound - Sound:

No

Legally compliant sound - Meets the Duty to Co-Operate:

H2 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

Effective, Justified, Consistent with National Policy

H2 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.

response box for legal compliance, soundness and duty to cooperate:

Race Course development is inconsistent with 1822 Tenancy Down common enclosure deed.

All areas.

Contrary to para 174 of National Planning Policy Framework

Will not deliver net gain to biodiversity (as required by para 170 of NPPF)

The ecological evidence in the Urban Fringe Assessments is out of date and undervalues the importance of sites in terms of biodiversity and ecological impact and the impact on nature reserves.

Negative effects are unlikely to be mitigated. The nature reserve will become fragmented and the UFA did not consider the impact of this. It also did not consider the impact on historic gorse and the scrub habitat, crucial to red-listed birds (identified in 2019 surveys) or the impact on the brown-banded carder bee, , small heath and small blue, dingy skipper, wall and brown hairstreak butterflies.

It is not justified because the tall buildings would affect the views from the National Park.

The development would intrude on the strong sense of naturalness. The UFA did not consider the loss of statutory Access land The loss of open space

undermines the work of the local volunteers and rangers to restore priority habitats, and is contrary to the City Plan Part 1, which seeks to increase rather than decrease the amount of access bly land adjacent to urban areas.

H2 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.

modifications to the policy to make sound and legally compliant:

Delete this sites from the list of potential developments. Protect local green spaces and biodiversity

H2 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)

No, I do not wish to participate in hearing session(s)

H2 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

H3 Purpose Built Student Accommodation

H3 Which Purpose Built Student Accommodation site(s) does your representation refer to? (Tick all that apply to your submission)

H3 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

H3 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

H3 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.

response box for legal compliance, soundness and duty to cooperate:

H3 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.

modifications to the policy to make sound and legally compliant:

H3 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)

Not Answered

H3 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

E1 Opportunity site for business and warehouse uses

E1 1. Do you consider this policy is: (tick as appropriate)

Legally compliant sound - Legally Compliant:

Legally compliant sound - Sound:

Legally compliant sound - Meets the Duty to Co-Operate:

E1 2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)

E1 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.

response box for legal compliance, soundness and duty to cooperate:

E1 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.

modifications to the policy to make sound and legally compliant:

E1 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)

Not Answered

E1 6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Why wish to speak:

Supporting Documents and Background Studies

Please provide comments you have on the Supporting Documents and / or Supporting Evidence (Please be as precise as possible, with reference to the name of the document / studies you would like to comment on)

SA comments box:

Upload Supporting Information to your representation(s)

Do you have any supporting information to add to your submission?

upload box:

No file uploaded

[REDACTED]

From: [REDACTED]
Sent: 30 October 2020 12:22
To: PlanningPolicy
Subject: SSA3 planned development in Lyon Close Hove

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

I am a local resident [REDACTED] and I am writing to state my objections to the above proposed development. My objections are :

- 1)The existing "Artisan" development still has unsold properties simply because they are ridiculously expensive.
- 2) The idea of multiple high rise blocks is totally at odds with the neighbourhood, which is already fully developed. This area is definitely not suitable for buildings over 6 storeys
- 3) the additional traffic on Davigdor Road will have a very negative impact in terms of pedestrian safety and pollution.
- 4) The local schools, doctor and dentist practices are already over stretched.
- 5) what is required locally is affordable housing, but the targets for social housing are never met in any new developments.
- 6) The proposed position of the blocks will mean that the other blocks to the north will receive virtually no direct sunlight whatsoever. This is just not good for people's health & wellbeing.

Can you please acknowledge receipt of this email ?
thanks

[REDACTED]