

DM1 Housing Quality Choice and Mix			
Total Number of Responses		45	
Number of Representations that Support		35	
Number of Representations that Object		10	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Comments on housing mix	<p>Re criterion a) it is important that City wide need does not stipulate a housing mix for all sites and instead encourages developers to respond to site specific circumstances in the interests of creating mixed and balanced communities.</p> <p>Criterion a) - recommend removal of the word “reflect” so that developments are instead required to “have regard to” identified housing need and not be bound by it.</p> <p>Support criterion (b) which supports other housing formats such as build to rent accommodation subject to the character, location and context of the site. This acknowledges that such formats are not appropriate on all sites and site-specific circumstances should be taken into account.</p>	DP295 X-Leisure (Brighton II) Ltd and Lands	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Minimum space standards do not replicate national standards</p>	<p>The minimum space standards do not accurately replicate the national standards. The reformatting is confusing and unnecessary and the use of the term 'studio' does not accurately reflect the Government's standard or intention. The Government's reversion to a 1-bedroom, 1-person standard should not be considered synonymous with a 'studio'. This table should be removed for consistency.</p> <p>The national technical housing standards are clear that the minimum standards should only apply to "new dwellings", whereas draft Policy DM1 seeks to apply them to all "residential accommodation". The standards should only be applied to residential dwelling houses, if this policy requirement is carried forward.</p> <p>Paragraphs 2.63 and 2.64 (Policy DM7) indicate that the minimum standards apply to HMO accommodation, so it would be useful for this to be made clear within Policy DM1.</p>	<p>DP260 Lewis & Co Planning</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Comments on private outdoor amenity space</p>	<p>Private outdoor amenity space should be obligatory.</p> <p>The requirement for useable private outdoor amenity space does not show enough understanding of the need or the potential impact on development viability and deliverability.</p> <p>The requirement for useable private outdoor amenity space is not included in the exceptions caveat provided for criteria c) - e).</p> <p>Re paragraphs (2.11), 2.12, (2.13), the account of types and extent of private outdoor amenity space could pay more detailed attention to “gardens, balconies, patios, roof terraces and shared amenity spaces”.</p> <p>DM1 (f): in many parts of Brighton, private outdoor amenity space effectively means balconies; this is not always appropriate to tall buildings or conservation areas and may be covered by ‘appropriate’ but also might be considered as exceptions.</p>	<p>DP263 Brunswick Town Association</p> <p>DP260 Lewis & Co Planning; DP258 Brighton & Hove Planning Agents Forum</p> <p>DP260 Lewis & Co Planning</p> <p>DP156 Kingscliffe Society</p> <p>DP258 Brighton & Hove Planning Agents Forum</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Comments on accessibility requirements	Do not support criterion e) as question whether requirement for 10% of all affordable units and 5% of all market units to be wheelchair accessible is in line with actual need. The policy has been carried forward from the 2005 Local Plan and no updated assessment of need appears to have taken place since 2005. A reassessment of actual dependence on wheelchair use at home ought to be carried out in order to provide a more accurate and up to date assessment of the need for wheelchair accessible homes.	DP281 Toads Hole Valley Landowners	
Need for flexibility to allow for innovative housing	Re national space standards, consider there should be some reference to innovative new housing initiative such as 'Youth Living' or 'tiny home' especially as there is no assessment of the impact of these space standards on the viability of new housing delivery.	DP258 Brighton & Hove Planning Agents Forum	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Comments on monitoring	Monitoring Procedure - the reviews should refer to the actual target, the planning approvals granted and the numbers of units built. Reviews should be carried out at six monthly intervals and the results posted on the Council website. The numbers of 'windfall' developments which were not specifically included in the official targets should be highlighted. There should be a procedure set out within the City Plan, by which actual planning approvals granted for the various types of housing can be monitored against the projected needs.	DP177 The Brighton Society	
Policy should be in City Plan Part 1	This is a core policy which should be considered in a re-opened City Plan Part 1 consultation process; to facilitate achieving full congruence with, and/or amendment to, City Plan Part 1 Policies already approved.	DP311	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Other general comments</p>	<p>Re criteria (c) to (e), support that exceptions can be made where a robust justification is provided.</p> <p>The policy needs to respond to changing housing needs as families grow. The lack of new homes (3 or 4-bed houses) being approved for new dwellings is the main problem which needs to be addressed for the C3 uses.</p> <p>At paragraph 2.11, add: "small scale horticultural uses".</p> <p>At paragraph 2.13, add: "external storage for bicycles, garden tools and furniture etc".</p> <p>There is no mention of the city's special heritage and how the new builds are supposed to be sympathetic to the environment around them.</p> <p>There is no detail on how build quality would be achieved/ enforced. The issue of buildings outliving their carbon footprint of construction and delivery of better value for money through longevity should be addressed.</p> <p>Change of use should be made easier to accommodate ever changing demand.</p> <p>Many of the new builds are unaffordable and are being sold to overseas investors or developers are allowed to buy their way out</p>	<p>DP295 X-Leisure (Brighton II) Ltd and Lands</p> <p>DP177 The Brighton Society</p> <p>DP091</p>	

	<p>of their 40% affordable housing requirement.</p> <p>It is enforcement of good agency and good management which is needed and yearly council HMO inspections to ensure that compliance is maintained.</p>	DP091; DP202	
Support			
Comments on housing mix	<p>By supporting a range of dwelling types it prevents creation of a homogenous urban habitat.</p> <p>Requirement (a) cannot be applied to very small developments, such as a single dwelling on an infill site. The wording of this section and possibly also section (b) requires clarification.</p> <p>Support a mix of dwellings. Design is important.</p> <p>More diversity and range of housing accommodation is needed to provide for family living.</p> <p>Support the policy as it seeks the delivery of a wide choice of high quality homes which will contribute to the creation of mixed, balanced, inclusive and sustainable communities which complies with the NPPF objective of sustainable development, particularly the social objective.</p> <p>The emphasis on the need for a diverse range of housing types and sizes is consistent with national policy.</p> <p>Support the aims to provide a wide range of good quality homes to create mixed, balanced, inclusive communities.</p>	<p>DP189 Natural England</p> <p>DP207 The Regency Society</p> <p>DP095</p> <p>DP135</p> <p>DP296 St Williams Homes</p> <p>DP275 Moda Living Ltd; DP268 LaSalle Investment Management</p> <p>DP255</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Comments on Build to Rent housing</p>	<p>Support the explicit reference to Build to Rent housing in policy.</p> <p>The policy for Build to Rent should allow greater flexibility on space standards given that occupiers utilise more of the building outside of their own 'unit'.</p> <p>Support the flexibility provided by the policy, but consider that criterion b) needs to go further as Build to Rent housing does not lend itself to incorporation of other formats such as self and custom build housing, community led housing and starter homes. Seek amendment to criterion b) to read: “make provision for a range and mix of housing / accommodation formats subject to the character, location and context of the site <u>and subject to the nature and viability of the proposed development</u>, for example, self and custom build housing, build for rent, community led housing, starter homes and other types of provision supported by national and local policy.”</p>	<p>DP275 Moda Living Ltd; DP208 Brighton & Hove Economic Partnership; DP271 Legal & General Investment Management; DP268 LaSalle Investment Management</p> <p>DP208 Brighton & Hove Economic Partnership</p> <p>DP271 Legal & General Investment Management</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Comments on Community Led Housing</p>	<p>Support the explicit reference to Community Led Housing in policy.</p> <p>Re criterion (b), the wording “make provision” should read “must include... “</p> <p>In paragraphs 2.9 and 2.10, the council seems to be acknowledging the requirement for self-build plots but also resisting it except on the Urban Fringe.</p> <p>Welcome the policy support for self and custom build housing, which is appropriate considering the increase in the size of the self-build register and the incoming 'Homes for England' national grants, which many CSB groups may be applying for.</p>	<p>DP217 Brighton and Hove Community Land Trust; DP233 Brighton & Hove Food Partnership</p> <p>DP217 Brighton and Hove Community Land Trust</p> <p>DP175 Nub Brighton</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Comments on space standards</p>	<p>Ensuring all residential units meet nationally described space standards gives people a decent standard of living despite the endeavours of developers to maximise financial returns.</p> <p>Support the inclusion of national space standards.</p> <p>Waivers of national space standards should only be granted where necessary to enable development of a difficult site which would otherwise be left empty.</p> <p>Space standards should also apply to student accommodation.</p> <p>The inclusion of the nationally described space standards will make the determination of planning applications more straight-forward for officers and members alike.</p> <p>The inclusion of space standards for residential accommodation is positive and makes designing units easier and clearer.</p> <p>The space standards for residential accommodation do not allow for the innovative 'tiny home' type of housing.</p>	<p>DP195 Kingsway and West Hove Residents</p> <p>DP157 Hove Civic Society; DP207 Regency Society; DP067; DP031 NLCA</p> <p>DP207 The Regency Society</p> <p>DP031 NLCA</p> <p>DP307 Green Group of Councillors</p> <p>DP217 Brighton and Hove Community Land Trust</p> <p>DP217 Brighton and Hove Community Land Trust</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Comments on accessibility standards</p>	<p>The availability of accessible housing is grossly inadequate to meet existing and future demand.</p> <p>The lack of wheelchair housing is depriving people of the opportunity of independent living. People unnecessarily occupy beds in hospitals and nursing homes because their homes cannot accommodate wheelchair use.</p> <p>Accessible housing is needed because of the growing population of older people.</p> <p>Support the proposed policy requirements regarding accessibility and adaptability. Currently it is difficult for families to care for children with physical or learning disabilities because of lack of suitable housing. Many existing properties are not 'homes for life' because not designed to changing needs as people age. Accessible homes benefit everyone, not just people with disabilities.</p>	<p>DP195 Kingsway and West Hove Residents</p> <p>DP195 Kingsway and West Hove Residents</p> <p>DP307 Green Group of Councillors</p> <p>DP303 Rottingdean Parish Council</p>	

	<p>There should be consideration of how outdoor amenity space placement and orientation can help to deliver green stepping stones for the City's biodiversity in accordance with Paragraph 174b in the revised NPPF. Suggest expanding criterion f) to say, "Consideration should be given to the opportunities for this space to contribute to the city's green infrastructure network through appropriate placement and orientation within a development."</p> <p>Re paragraph 2.11, it is important to ensure that usable outdoor space is not cut at the build stage and that there are opportunities for multi-functional landscaping (fruit trees / pollinator friendly planting).</p> <p>Support the requirement under criterion f) to provide useable private outdoor amenity space. The massive overdevelopment needs to give back to the host communities; therefore any space/amenities should be for all, not just people living in the developments.</p>	<p>DP289 Sussex Wildlife Trust</p> <p>DP233 Brighton & Hove Food Partnership</p> <p>DP280</p>	
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Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Other general comments</p>	<p>Support the principal of retaining housing stock for families and restricting HMO conversion, but do not have confidence that this will be achieved. There are not enough checks on HMOs in the city and there seems to be little communication between HMO licensing and Planning.</p> <p>The wording from the draft London Plan regarding use of 'meanwhile sites' for housing should be included in City Plan Part 2 as an additional policy to in line with best practice guidance being produced in London.</p> <p>Improving the quality of housing is always a good thing, provided it is done in a proper way.</p> <p>Support development that works toward Lifetime neighbourhood principles. Seek a more proactive approach to integrated inter-generational communities (based on approach used in Scandinavian countries).</p>	<p>DP202</p> <p>DP249 QED Sustainable Urban Development</p> <p>DP002 Brighton YIMBY</p> <p>DP307 Green Group of Councillors</p>	

	<p>Support the policy objectives in response to the level of demand for housing and affordability issues in the city. Also support the level of flexibility outlined in the text allowing for movement on the prescribed targets.</p> <p>Welcome the policy aspirations of developing sustainable places with a high quality of life, and the range of property and tenures being diverse to accommodate the city's needs.</p> <p>The feasibility assessments of 'affordable' types of tenure should give consideration to the service charge liabilities incurred by the residents of the development.</p> <p>Paragraph 2.2 - support the need for affordable housing as housing costs are a key reason for food poverty in the city.</p> <p>Paragraphs 2.9 - 2.10 - Any development on the urban fringe including self-build should include food growing space.</p>	<p>DP208 Brighton & Hove Economic Partners</p> <p>DP266 Brighton Marina Neighbourhood Forum</p> <p>DP233 Brighton & Hove Food Partnership</p> <p>DP233 Brighton & Hove Food Partnership</p>	
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Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Wording changes sought	Footnote 7 should be removed. All development costs will vary on a site-by-site basis. It is inappropriate for CPP2 to seek to predetermine developer contributions. This should be included within a S106 SPD.	DP296 St Williams Homes	
Support (no comments)		DP114; DP077; DP028; DP017; DP272; DP314 DP313 Argyle & Campbell Road Residents; DP310 CKC Properties Ltd; DP282 Royal Mail; DP001 Pavilion Architecture	

DM2 Retaining Housing and Residential Accommodation			
Total Number of Responses		28	
Number of Representations that Support		21	
Number of Representations that Object		7	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Use of residential accommodation for Air BnB, party houses & student houses	<p>The council does nothing to prevent the loss of existing residential accommodation to holiday flats, AirBnB, party houses or student houses.</p> <p>Call for controls on AirBnB (e.g 90-day time limit) and tougher licensing conditions for ‘party houses’ (Australian system example).</p> <p>The council does not consider the impact on communities of the loss of long term residents.</p> <p>Need to generate business rate revenue from owners letting residences as short term holiday lets.</p>	<p>DP042; DP028; DP266 Brighton Marina Neighbourhood Forum Steering Group</p> <p>DP307 Green Group of Councillors</p> <p>DP042; DP156 Kingscliffe Society</p> <p>DP028; DP266 Brighton Marina Neighbourhood Forum Steering Group; DP307 Green Group of</p>	

	<p>Paragraph 2.17 misses the opportunity to address the issues around party houses and their impact on housing provision and local neighbourhoods.</p> <p>To ensure that tourists are safe and there is minimal disruption to neighbours affected by these types of properties the council should implement a light registration scheme. This should ensure that any property offered for short term accommodation adheres as a minimum to basic safety standards and has permission to operate from the freeholders of the building. The mortgage company and/or any other owners should also be expected to confirm permission. The council needs to more effectively enforce the laws it already has at its disposal to stop practices which damage the tourism economy.</p> <p>Re paragraph 2.17, a licensing scheme should be examined to ensure that holiday rental properties are operating in a way that supports the tourism economy but also meets safety standards, has permission to operate, has adequate buildings, and holiday rental commercial liability insurance, and has undertaken reasonable measures to ensure neighbours aren't disturbed. Paragraph 2.17 should be removed and instead options should be explored for licensing properties on a five year basis.</p> <p>Paragraph 2.17 refers to changes of use from a residential use to a holiday let. This is not a material change of use from C3 and should be deleted.</p>	<p>Councillors</p> <p>DP156 Kingscliffe Society</p> <p>DP191 My Holiday Let Brighton</p> <p>DP260 Lewis & Co Planning</p>	
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Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Policy restricts provision of C4 accommodation	<p>The policy (in combination with DM7) constrains the delivery or provision of shared houses (C4 uses). This will reduce the range of housing available to residents and would affect specific groups of residents. which unfairly disadvantages specific residents and groups (e.g young professionals), increasing unaffordability among those on lower incomes and reliant on the private rental market. No justification or evidence has been provided. The policy may raise issues in relation to Article 14 of the Human Rights Act 1998 and is not recognised in the Council’s Health and Equalities Impact Assessment.</p>	<p>DP260 Lewis & Co Planning; DP258 Brighton & Hove Planning Agents Forum</p>	
Other comments	<p>Paragraph 2.16 is imprecise - should not expect a similar number of homes as this might allow a net loss contrary to the aims of the policy.</p> <p>Paragraph 2.17 refers to amenity impacts which are already covered by other policies and should not be referenced within DM2.</p> <p>Reference in paragraph 2.18 to “community service” should be changed to “community facility” to ensure consistency with City Plan Part One.</p>	<p>DP260 Lewis & Co Planning</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
<p>General support for retention of housing</p>	<p>There is a need to address the shortage of residential homes in the city.</p> <p>Resisting a net loss in existing residential accommodation decreases the demand for new residential accommodation on greenfield sites. Developing on brownfield sites helps protect greenfield sites and green belt land is a key concept of the NPPF found throughout section “13. Protecting Green Belt land”.</p> <p>The policy around retaining current provision reflects the need to provide 13,200 housing units within the plan lifetime. The exceptions seem prudent and support accessibility to housing.</p> <p>It’s important to keep residential accommodation (C3).</p>	<p>DP002 Brighton YIMBY</p> <p>DP189 Natural England</p> <p>DP208 Brighton & Hove Economic Partnership</p> <p>DP255</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Use of residential accommodation for holiday lets/ air b&b</p>	<p>Wording should be added to achieve some control and regulation of the prolonged use of properties as short-term lets (AirBnB) to avoid the loss of long-term residential accommodation.</p> <p>The wording of the first sentence of Paragraph 2.17 should be changed to say “will” rather than “may” be used for enforcement purposes.</p> <p>The short-term-let retail market, particularly AirBnB has a detrimental effect on hotels (paying business rates). The City Plan’s desire to attract more quality hotels to the city will be negatively affected by unregulated short-term letting.</p> <p>A significant change of use such as a holiday let or AirBnB should be made subject to a planning application or Article 4 direction.</p> <p>The council should 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.</p>	<p>DP266 Brighton Marina Neighbourhood Forum Steering Group</p> <p>DP177 The Brighton Society</p> <p>DP266 Brighton Marina Neighbourhood Forum Steering Group</p> <p>DP177 The Brighton Society</p>	
<p>Change of use to HMOs etc</p>	<p>The wording of this policy could include a cross reference to Policy DM7 which seeks to limit the number of HMOs in an area.</p> <p>The council is making student accommodation more of a priority and family accommodation is being eroded.</p> <p>Stricter control of HMO development is needed.</p>	<p>DP207 The Regency Society</p> <p>DP135</p> <p>DP067; DP202</p>	

	Information on how many properties in the city are second homes and/or vacant is needed. The council's Empty Property Service Plan needs to be explained.		
Support (no comments)		DP114; DP095; DP031 NLCA; DP017; DP272; DP001 Pavilion Architecture; DP313 Argyle & Campbell Road Residents Association; DP263 Brunswick Town Association	

DM3 Residential conversions and the retention of smaller dwellings			
Total Number of Responses		21	
Number of Representations that Support		18	
Number of Representations that Object		3	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy too restrictive	The policy is too restrictive. It will constrain the potential for housing from conversions and is not appropriate given the City Plan housing target and high level of housing need in the city. The policy has been carried forward from 2005 Local Plan (Policy HO9) which set a much lower housing target.	DP260 Lewis & Co Planning	
No justification for policy threshold	No justification is given for the size threshold of 124 sq.m (which has increased from the previous threshold of 115 sq.m in the 2005 Local Plan).	DP260 Lewis & Co Planning	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Policy should be more flexible	The policy needs to be flexible to respond to changing housing needs as families grow; regular 6 monthly monitoring is needed (detailed comments are provided in response to DM1).	DP177 The Brighton Society	
Object (no comments)		DP001 Pavilion Architecture	
Support			
General support	<p>The policy will give families more choice of living possibilities.</p> <p>Pleased to see recognition of the need for smaller homes and the need to retain and build smaller dwellings. Welcome the pragmatism of exceptions i) to iii).</p> <p>The policy will enable more choice and options.</p>	<p>DP135</p> <p>DP303 Rottingdean Parish Council</p> <p>DP091</p>	
Policy could be more flexible	The wording in the policy justification could allow for flexibility in weighing the application of this policy against the city's housing needs at the time in question within the plan period.	DP208 Brighton & Hove Economic Partnership	
Other comments	<p>The policy could have provision for compensating the loss of family homes to conversion by encouraging new development of family homes.</p> <p>Request that designs for new conversions are required to provide sufficient accommodation for storage of bikes, recycling and rubbish.</p>	<p>DP002 Brighton YIMBY</p> <p>DP076 Roundhill Society</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support (no comments)		DP017; DP028; DP031; DP067; DP077; DP114; DP202; DP272; DP095 DP313 Argyle & Campbell Road Residents Association; DP191 My Holiday Let Brighton; DP263 Brunswick Town Association	

DM4 Housing and Accommodation for Older Persons			
Total Number of Responses		25	
Number of Representations that Support		20	
Number of Representations that Object		5	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Additional wording/ requirements sought	Add policy criterion: “The desirability of older people remaining within the same neighbourhood should they move to smaller or more specialised accommodation - (e.g. sheltered housing or care homes).”	DP177 The Brighton Society	
Requirement for affordable housing	Do not consider that the OAN Report 2015 provides sufficient evidence to justify affordable housing provision at a rate of 40% for older persons housing. A more robust assessment is required to determine actual needs for affordable housing for older persons based on actual local need and requirements undertaken on a site by site basis rather than applying an inappropriate blanket 40% requirement for all sites.	DP281 Toads Hole Valley Landowners, Toads Hole Valley Ltd, Pecla Investments Ltd and Robert Mark Simon	
	Reference to an "appropriate amount" of affordable housing is vague and confusing.	DP260 Lewis & Co Planning	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Other comments	<p>Older people need to be located at or near ground floor levels.</p> <p>Re paragraph 2.29, there are probably not enough incentives within the City Plan to make it attractive to developers to provide housing for older persons.</p> <p>Re paragraph 2.31, what would the age restriction referred to in this paragraph be? A communal meeting lounge needs to be a requirement for clusters over a certain size.</p> <p>There is a need for regulation of the whole AirBnB and party house market.</p> <p>The policy should be split into two different policies; one for new development, one resisting the loss of existing accommodation.</p>	<p>DP177 The Brighton Society</p> <p>DP042</p> <p>DP260 Lewis & Co Planning</p>	
Object (no comments)		DP001 Pavilion Architecture	
Support			
General support	<p>Older people need appropriate homes.</p> <p>Older people need to feel part of the community.</p> <p>The policy recognises the existing and growing future demand by the post-WWII baby boomers generation.</p>	<p>DP002 Brighton YIMBY</p> <p>DP135</p> <p>DP195 Kingsway and West Hove Residents' Association</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Clarification sought	Re paragraph 2.30, request clarity on how local marketing would work in practise to ensure the policy is not excessively restrictive or unduly burdensome on developers. This would ensure the policy is 'sound' with regards to the NPPF (2018), which requires that plans contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (NPPF paragraph 16d).	DP275 Moda Living Ltd	
Support (no comments)		DP017; DP028; DP067; DP077; DP095; DP114; DP202; DP272; DP313 Argyle & Campbell Road Residents Association; D157 Hove Civic Society	

DM5 Supported Accommodation (Specialist and Vulnerable Needs)			
Total Number of Responses		17	
Number of Representations that Support		15	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Compliance with regulations and standards	Non-planning regulations and market requirements will largely determine the relevant standards for accommodation of this type and therefore criterion (c) is of central importance to the function of this policy.	DP260 Lewis & Co Planning	
Need to strengthen policy	Welcome most of the policy but concerned that many vulnerable people can only be accommodated outside of the city boundaries. The policy should specifically state that the council seeks to respond to the problem of a lack of housing for vulnerable people in the city through building in the city, and criterion (a) needs to be strengthened. This would also ensure that people are not isolated from their friends and family as a result of needing accommodation for their needs.	DP307 Green Group of Councillors	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Wording changes/ amendments sought	<p>The first paragraph of the policy could be deleted or moved to supporting text.</p> <p>Criterion (d) provides little planning benefit and could be removed from the policy - in some cases specialist accommodation cannot also be inclusive without an adverse impact on quality.</p> <p>Paragraph 2.36 of the supporting text is unnecessary and should be deleted.</p> <p>The final sentence of the policy is vague and not qualified (what happens where need no longer exists for a type of specialist housing). Specialist housing is not defined within the policy and this term could apply to a wide range of housing that would not need protecting - clearer wording is needed.</p> <p>Paragraph 2.37, and in particular the second sentence, should be policy wording as it has clear implications for decision-takers.</p>	DP260 Lewis & Co Planning	
Support			
General support	<p>It is important for vulnerable people to feel part of the community.</p> <p>The policy seems very sensible.</p> <p>The creation of accommodation for older or vulnerable people to live independently accords with Section 2.27.9 of the Brighton & Hove Economic Strategy.</p>	<p>DP135</p> <p>DP091</p> <p>DP208 Brighton & Hove Economic Partnership</p>	

	Support the wording in paragraph 2.37 and consider this particularly important to any possible future concentration of hostels.	DP256 The Conservative Group	
Support (no comments)		DP028; DP067; DP077; DP114; DP202; DP272; DP095; DP002 Brighton YIMBY; DP031 NLCA; DP001 Pavilion Architecture; DP263 Brunswick Town Association	

DM6 Build to Rent Housing			
Total Number of Responses		25	
Number of Representations that Support		18	
Number of Representations that Object		7	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Support policy in principle	Support the policy in principle as it adds diversity to the housing mix.	DP295 X-Leisure (Brighton II) Ltd and Landsec; DP275 Moda Living Ltd; DP307 Green Group of Councillors	
Criterion 1.a) - housing choice and mix	Reference to Policy CP19 in CPP1 at criterion 1.a) is unnecessary and can be removed.	DP260 Lewis & Co Planning	
Criterion 1.b) - over-concentration of Build to Rent	Re criterion 1.b), it is unclear how ‘over-concentration’ of build to rent within Strategic Allocations would be defined or what evidence is used to justify this restriction. Flexibility should be incorporated into the policy to allow site specific circumstances to be reflected.	DP295 X-Leisure (Brighton II) Ltd and Landsec; DP275 Moda Living Ltd; DP260 Lewis & Co Planning	
	Amend criterion 1.b) to say “the development should ensure that	DP295 X-Leisure	

	<p>the proportion of build to rent within sites designated as Strategic Allocations in the City Plan takes account of site specific circumstances”.</p> <p>Unless a clearer definition and justification is provided, this requirement should be removed from the policy. If retained, a clear evidence base and explanation of how it will be measured and determined should be provided. It is unclear how this might be implemented in a predictable and consistent way, making this an unsound and ineffective component of policy In practice. Build to rent housing represents a long-term investment by developers and/or operators and there are clear efficiencies and advantages to some degree of scale. The scale and quantity of build to rent on a specific site is commercially driven. Concerns about ‘over-concentration’ could easily reduce the potential for the build to rent sector to deliver such high-quality developments and regeneration.</p> <p>Criterion 1.b) could reference to the importance of viewing build to rent proposals in the context of wider housing and regeneration objectives, and against the need to deliver a diverse range of housing types and products which meets the needs of a range of groups within the City.</p>	<p>(Brighton II) Ltd and Landsec</p> <p>DP275 Moda Living Ltd</p>	
<p>Criterion 1.c) requirements</p>	<p>The requirement for dwellings to be self-contained and separately let is not justified or explained within the policy.</p>	<p>DP260 Lewis & Co Planning</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Criterion 1.e) – ownership and management	<p>Criterion 1.e) is too restrictive. It is typical for individual buildings to be under common management but the ownership structure may vary. Different ownerships may be introduced during the delivery and management process. Greater flexibility is required within the policy wording as ownership should not be a concern of policy.</p> <p>Amend criterion 1.e) to say “each build to rent building will be under common management”.</p>	DP295 X-Leisure (Brighton II) Ltd and Landsec	
Criterion 1.f) – management requirements	<p>Criterion 1.f) requirement for on-site management is excessive and would likely make small schemes unviable or unaffordable. There is no viability work that shows this to be an appropriate requirement. In addition, the requirement for ‘professional’ management is vague and undefined.</p>	DP260 Lewis & Co Planning	
Criterion 1.g) – tenancy requirements	<p>Criterion 1.g) is too restrictive in requiring that the development offers tenancies of at least 3 years available to all tenants with defined in-tenancy rent reviews. In practice, build to rent tenants demand greater flexibility and a minimum 3-year tenancy may not be suitable or desired by all tenants. Greater flexibility is required and criterion 1.g) should be deleted.</p> <p>Welcome the requirement for minimum tenancies which is due to be strengthened with primary legislation.</p>	<p>DP295 X-Leisure (Brighton II) Ltd and Landsec</p> <p>DP307 Green Group of Councillors</p>	
Criterion 1.h) – compliance with Policy DM1	<p>Criterion 1.h) is unnecessary as it simply references other policies.</p>	DP260 Lewis & Co Planning	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Criterion 1.i) – provision of affordable housing	Criterion 1.i) is unnecessary as it simply references other policies.	DP260 Lewis & Co Planning	
Approach for seeking affordable housing	<p>Support the approach to negotiating on affordable housing by the council for build to rent schemes, reflecting that the viability of build to rent schemes differs from traditional residential and must be considered on a site-by-site basis.</p> <p>Support the reference to the role that private rented accommodation can make in the delivery of 'affordable rent' housing as part of a diverse and balanced housing market.</p> <p>Concerned about how to keep build to rent housing genuinely affordable – in London, build to rent properties are more expensive than rental properties nearby. The policy should focus on affordability of the housing and linking affordability to incomes, not the market. Affordable rents should be based on Living Wage rents (or Living Rents) defined as a percentage of median rented household income and should not exceed the Local Housing Allowance (which is less than the 80% market rent figure). Should also include some social rents, even if this means fewer affordable homes may be achieved.</p>	<p>DP295 X-Leisure (Brighton II) Ltd and Landsec</p> <p>DP275 Moda Living Ltd</p> <p>DP307 Green Group of Councillors</p>	
Monitoring requirements	The Plan might refer to the importance of monitoring the delivery of new private rented homes to ensure that the council is able to understand the relative level of new build rented homes over the plan period.	DP275 Moda Living Ltd	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Comments on proposed Council Build to Rent study	Request more details on the council's intention to commission further evidence regarding build to rent, as would information about any opportunities to engage in helping provide a market context for this evidence base.	DP275 Moda Living Ltd	
Other comments	<p>The policy is not clear or justified and needs significant revision.</p> <p>The policy is contrary to Government moves to drive landlords out of the housing market.</p> <p>The policy is meaningless without protected rents in the UK (and housing trusts to prevent the buildings being sold off).</p> <p>Add wording to state that the council supports Community Land Trusts as an option for genuinely affordable housing by and for the community.</p> <p>Rented accommodation is too expensive in Brighton and should be better managed. Building more homes specifically for renting will only compound the problem.</p> <p>The policy should be extended to make sure homes are not purchased for renting but then not occupied.</p> <p>The universities should help the rented sector by providing more accommodation for their students, leaving more, cheaper homes for residents of the city.</p>	<p>DP260 Lewis & Co Planning</p> <p>DP077</p> <p>DP091</p> <p>DP095</p>	

	<p>The policy must be interpreted in coordination with minimum space standards.</p> <p>Call for high quality design including robust materials that are designed for the marine environment, including a requirement where possible for the use of environmentally sustainable materials where available at no more than 20% of the cost.</p>	DP307 Green Group of Councillors	
Support			
Support policy in principle	<p>Support the policy as the present shorthold system does not provide good quality property for rent.</p> <p>The policy will make renting more affordable with more choice.</p> <p>Welcome the introduction of policy.</p> <p>Support the policy as it will help to deliver a diverse range of housing.</p> <p>Welcome the inclusion of a specific policy for build to rent and the council view that it can help boost the supply of rental accommodation within the city by providing more choice of good quality rented accommodation and secure long term tenancies.</p> <p>Support the inclusion of policy as reflecting advice in the updated NPPF.</p> <p>Further measures are needed to ensure that the present provision of private renting is regulated by licensing and other measures to ensure suitable and good quality housing for tenants for longer occupancy (e.g as in Germany).</p>	<p>DP031 NLCA; DP177 The Brighton Society</p> <p>DP135</p> <p>DP157 Hove Civic Society</p> <p>DP268 LaSalle Investment Management Ltd</p> <p>DP271 Legal & General Investment Management</p> <p>DP292 Rockwell Developments Ltd</p> <p>DP177 The Brighton Society</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Criterion 1.a) - housing choice and mix	Policy CP19 was drafted in the context of more traditional approaches to housing mix, and may undermine the viability of build to rent schemes. Criterion 1.a) should allow sufficient flexibility to reflect the distinct nature of build to rent schemes which often provide a greater proportion of smaller unit sizes. (These comments also apply to criterion 1.h).	DP271 Legal & General Investment Management	
Criterion 1.b) - over-concentration of Build to Rent	<p>Criterion 1.b) should be deleted as it might have unintended and undesirable consequences, e.g if a major developer offers comprehensive build to rent on a large site - such contributions should be seen in the city wide context.</p> <p>Consider that criterion 1.b) should be removed from the policy unless there is a clearer definition and justification of what might constitute “over-concentration”. If retained, a clear evidence base and explanation of how it will be measured and determined would be needed. It is unclear how this might be implemented in a predictable and consistent way, making this an unsound and ineffective component of policy. This could deter investment and undermine the viability and deliverability of build to rent. Criterion 1.b) could be amended to refer to the importance of viewing build to rent proposals in the context of wider housing and regeneration objectives, and against the need to deliver a diverse range of housing types and products which meets the needs of a range of groups within the city.</p> <p>The current wording of criterion 1.b) has the potential to jeopardise the delivery of build to rent accommodation due to the interpretation of ‘over-concentration’. The criterion should be</p>	<p>DP157 Hove Civic Society</p> <p>DP268 LaSalle Investment Management Ltd</p> <p>DP271 Legal & General Investment Management</p>	

	removed so as not to deter build to rent developments and jeopardise the delivery of much needed housing. Any concerns with the quantum of build to rent accommodation within the City could be regulated through Policy CP19.		
Criterion 1.d) – covenant to retain as Build to Rent	<p>The build to rent sector favours schemes with unrestricted planning usage given the speculative risk of the asset class. Provision for affordable clawback provision should be made to allow for the scheme to be sold (as in the Greater London Authority Aug 2017 SPG) within the restricted period. Other conditions that might allow for a sale during the restricted periods are for market failure and/or mortgagee in possession.</p> <p>A covenant of 15 years is the longest period that funders can adhere to due to fund life and long term market risk testing requirements. Any longer could frustrate the delivery of such accommodation within the city.</p>	<p>DP208 Brighton & Hove Economic Partnership</p> <p>DP271 Legal & General Investment Management</p>	
Criterion 1.e) – ownership and management	This policy could be an opportunity for Brighton & Hove Community Land Trust to work with developers or the council to help secure the homes being affordable in perpetuity as CLTs have experience to offer in this type of housing.	DP217 Brighton & Hove Community Land Trust	
Criterion 1.f) – management requirements	The NPPF definition of build to rent does not require on-site management. In practice, the level of management varies between schemes and is often linked to the scale of the development. For some developments, the provision of some management services off-site may be more cost effective with the tenant ultimately benefitting from the savings.	DP271 Legal & General Investment Management	
Criterion 1.g) – tenancy requirements	The NPPF does not set prescriptive tenancy lengths for build to rent - the definition states that "Schemes will <u>usually</u> offer longer tenancy agreements of three years or more...". The current wording would exclude shorter tenancies and would reduce true	DP271 Legal & General Investment Management	

	prejudice the realisation of other planning objectives.		
Criterion 2.a) - proportion of affordable housing	<p>Reference to the requirements of Policy CP20 with regard to the provision of affordable housing does not provide sufficient flexibility given the distinct economics of build to rent accommodation.</p> <p>Part 1 of policy already includes reference to meeting the requirements of Policy CP20 and some build to rent proposals may provide less than 15 units. Therefore, specifying a requirement for 40% on sites of 15 or more (net) dwellings) is not necessary and should be deleted.</p> <p>Further clarity should be provided on the definition of affordable private rent, which should reflect the definition set out in the NPPF Annex 2 in particular the last sentence which specifically refers to build to rent schemes.</p> <p>Agree that as much affordable housing as possible should be sought from developers. However, given that the Policy CP20 target of 40% has not been achieved in recently approved developments, consider that the process for securing affordable housing is flawed - developers are paying too much for land and then using viability arguments to justify a lower percentage of affordable housing.</p>	<p>DP271 Legal & General Investment Management</p> <p>DP292 Rockwell Developments Ltd</p> <p>DP177 The Brighton Society</p>	
Criterion 2.b) - affordable housing rent levels	Strongly support the policy in not specifying specific rent levels, but have serious concerns with statement in paragraph 2.45 that the council will seek to negotiate 55% of the affordable element provided at Local Housing Allowance (LHA) rent levels and the remaining affordable provided at a discount of at least 20% against	DP271 Legal & General Investment Management	

	<p>local market rents. The high percentage of LHA rent levels risks undermining the viability of build to rent schemes – therefore request that the target percentage is lowered.</p> <p>The criterion 2.b) requirement for affordable housing to be offered at discounted rent levels repeats criterion 2.a) and therefore should be deleted. In addition, the footnote refers to the guidance in the council’s Affordable Housing Brief, which was last updated in December 2016 and does not accurately reflect the revised NPPF (July 2018) regarding rent levels for affordable private rent or how build to rent schemes will be managed by landlords/management companies. The Affordable Housing Brief should be updated in line with the NPPF definitions and guidance on managing build to rent housing.</p>	DP292 Rockwell Developments Ltd	
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Criterion 2.d) - size mix of affordable housing	<p>The preferred size mix specified in Policy CP20 does not reflect the distinct nature of build to rent schemes and the type of affordable housing that they offer which may undermine the viability of such schemes. Suggest that the wording of criterion 2.d) be amended to “the size mix of affordable housing units to be agreed with the council in accordance with Policy CP20 reflecting the distinct nature of build to rent schemes.”</p>	DP271 Legal & General Investment Management	
Criterion 2.c) – eligibility for affordable housing	<p>Further clarity and guidance should be provided regarding the eligibility criteria for occupants of affordable private rent units provided in build to rent schemes. We understand this is likely to be determined by aspects such as income and local house prices.</p>	DP292 Rockwell Developments Ltd	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Criterion 2.e) – ‘clawback’ arrangement	Acknowledge the principle of a ‘clawback’ mechanism, but consider that it needs to be applied to allow sufficient flexibility to reflect the viability and delivery of individual schemes - otherwise could frustrate delivery of build to rent and its associated planning benefits.	DP271 Legal & General Investment Management	
Monitoring requirements	The Plan might refer to the importance of monitoring the delivery of new private rented homes to ensure that the council is able to understand the relative level of new build rented homes over the plan period.	DP268 LaSalle Investment Management Ltd	
Comments on proposed Council Build to Rent study	Welcome the reference at paragraph 2.49 to the council’s intention to commission further evidence regarding build to rent provision (deliverability and viability), and look forward to further details, and the chance to comment on this evidence in due course.	DP268 LaSalle Investment Management Ltd	
Additional policy for co-living Build to Rent	Consider there should be an additional specific policy for the ‘co-living’ type of build to rent accommodation (which is characterised by non- self-contained ensuite rooms with a large provision of shared communal facilities) similar to that in the draft London Plan (ref: Policy H18 Large Scale Purpose Built Shared Living).	DP292 Rockwell Developments Ltd	
Other comments	<p>Tenants’ rights are important and should be protected.</p> <p>Would support further measures to regulate the present provision of private housing by the means of licensing and other measures to ensure provision is made by suitable persons. At present private rented housing is very poor quality with tenants having practically no ability to improve matters due to shorthold tenancies.</p> <p>Support build to rent housing, but believe shared ownership</p>	<p>DP002 Brighton YIMBY</p> <p>DP031 NLCA</p> <p>DP256 The Conservative</p>	

	<p>should also be encouraged where possible.</p> <p>Re paragraph 2.44, the demands on public open space are growing, however funds for essential maintenance have been cut and the quality of the city parks is suffering as a result. More funding from Section 106 agreements and/or CIL funds is required and this should be recognised as an aim in the City Plan, beyond the basic requirements of Policy CP16.</p> <p>Where developers provide commuted payments in lieu of on-site affordable housing, details should be provided of how these funds are spent on affordable housing provision. The commuted payments should include the additional market value of the extra units released by the relaxation of the obligation.</p>	<p>Group</p> <p>DP177 The Brighton Society</p>	
<p>Support (no comments)</p>		<p>DP028; DP067; DP114; DP202; DP272; DP001 Pavilion Architecture; DP263 Brunswick Town Association</p>	

DM7 HMOs			
Total Number of Responses		37	
Number of Representations that Support		22	
Number of Representations that Object		15	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Clarification on application of policy requested	Assurance sought that DM7 is applied as wide as legally and practically possible and not simply in the five wards within the Article 4 Directive.	Conservative Group DP256	
Comment	There are too many HMOs in Brighton already.	DP095	
Policy will restrict housing choice	<p>More HMOs and fewer family homes are needed as people cannot afford to start families or buy family homes these days.</p> <p>Policy will reduce the range of housing available to residents and would disproportionately affect specific groups of residents (in particular non-student sharers).</p>	DP091 DP258 B&H Planning Agents Forum, DP260, DP217 Brighton and Hove Community Land Trust, DP002 Brighton YIMBY	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Scope of policy should be widened to include short term holiday lets	Policy should cover Airbnbs and ‘party houses’ as well as HMOs.	DP314, DP042, DP031, DP177	
Comment	HMOs are historically bad and do not create a good community.	DP077	
Policy threshold is too low	The policy does not sufficiently protect the residential character of Brighton. A 20% threshold is far too high to maintain a balanced character in communities.	DP252	
Applicants should be required to contribute towards costs of servicing the impact of HMOs	Applicants should be required to contribute to the costs of servicing the impact such as noise pollution controls / patrols and street cleaning and the planning permissions should be time limited with the ability to rescind where landlords do not adequately protect the other residents in the street.	DP252	
Clarification required	Has the council contacted the utility companies e.g. electricity, water sewage to see about plans to upgrade the local infrastructure in light of the increasing density of people within HMO properties?	DP181	
Policy not justified	The planning benefits of avoiding a continuous frontage of HMOs are unclear. The colocation of similar uses is likely preferable in amenity terms.	DP260	
Existing HMOs should be protected	The policy does not protect the existing housing supply of HMOs for sharers who choose to live in shared accommodation or cannot afford to buy their own properties.	DP260	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Space standards should be included in policy	A missed opportunity for the Council to set out clearly their planning standards for HMOs and the standard of accommodation expected. As a general rule, communal space provision of below 3m2 per person usually (but not always) results in a refusal of planning permission and this should be included within the Policy as a requirement going forward to provide clarity and certainty for applicants going forward.	DP260	
Policy criteria are too onerous and not justified	The system of assessing the wider neighbourhood area requires applicants to identify the active and lawful use of (according to the supporting text) 625 to 875 houses surrounding their property and this cannot be considered to be an appropriate requirement for applicants.	DP260	
Policy criteria should be toughened	The policy does not go far enough to limit or reduce HMOs.	DP263, DP271, DP313 Argyle & Campbell Road Residents Association	
Support			
Support with caveat	Because of the higher levels of refuse and recycling created by HMOs, there should be a requirement to provide adequate storage facilities for these along with better shared facilities such as living rooms and bathrooms. There needs to be a minimum size for bedrooms.	DP076 Roundhill Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Comment	General support expressed.	DP001, DP017, DP135, DP031, DP067, DP006, DP114, DP028, DP137, DP177 Brighton Society, DP187, DP202, DP203, DP208 BHEP, DP220, DP255, DP266 Brighton Marina Neighbourhood Forum Steering Group, DP307 Green Group, DP176	
Clarification requested – reversal to C3 housing	Clarification requested about reversion to C3 housing from an HMO. For example if the owner of an existing HMO in an area already exceeding the permitted number of HMOs would the buyer have to revert to C3?	DP006	
Comment	Limiting HMOs will help sustain community facilities.	DP153	
	Place a limit on how many future students the universities can expect to be housed outside the universities' own provision.	DP158	
Support with caveat	The Council should seek an undertaking from the universities that they will not exploit the loophole that allows headlease properties to be placed in areas where Article 4 Directions are in place.	DP158	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support with caveat	HMO size standards should be set above the national minimum. Council should require that residential units with two or more bedspaces have at least one double (or twin) bedrooms to make them more suitable for families and key workers.	DP158	
Comment	We encourage the city council to develop a register of leasehold and other premises where HMOs are forbidden by covenants entered into by property owners.	DP266	
Comment – consider practice from other LPAs	The Council should examine the results of the work from Southampton Council, which has placed a ban on HMOs with an Article 4 direction.	DP307 Green Group of Councillors	

DM8 Purpose Built Student Accommodation			
Total Number of Responses		30	
Number of Representations that Support		16	
Number of Representations that Object		14	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
	General objection.	DP001, DP123, DP263 Brunswick Town Association	
Need for robust management and security	There is a need for substantive management service and accountability to support the staff/security and ensure that the neighbourhood is not overwhelmed by continual or cumulative non-criminal disruption.	DP156 Kingscliffe Society	
PBSA should be located away from Lewes Road	PBSA should be more dispersed away from Lewes Road.	DP007	
PBSA should be located away from the HMO Article 4 Direction area	Developers should be encouraged to site blocks away from Article 4 wards, where the new 20% rule for HMOs should also apply to PBSA blocks.	DP007	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Too much PBSA in city centre	Unregulated increase in numbers is having an impact on the quality of life of those living in the town centre.	DP042	
PBSA developments are unaffordable for most students	Most purpose built student accommodation blocks are completely unaffordable for all but the top 5% of students.	DP091	
No demand for further off-campus PBSA	The market for student accommodation is not set to get larger, but smaller. Moreover both Sussex and Brighton are building more of their own on-site accommodation, therefore BHCC should not approve any further planning applications for PBSA off campus, unless in exceptional circumstances.	DP091	
	The sites need to be near transport that goes directly to university sites.	DP095	
Requirement for predominantly cluster flats is not justified	Requirement that all PBSA schemes include an element of cluster units is not justified. Studio units are part of the overall PBSA offer of the City and provide accommodation that is suited to and popular with particular groups (for example mature students). There is no evidence that residents of studios would not otherwise reside in HMOs. No evidence to suggest that cluster flats encourage greater social interaction than buildings with studio flats.	DP310 CKC Properties Ltd, DP260, DP297 Vita Group	
Criteria should be less prescriptive	Communal living, particularly cooking facilities, will not be appropriate to all PBSA schemes and in particular smaller studio schemes. The criterion should be less prescriptive.	DP310 CKC Properties Ltd	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
BRE guidance should not be applied rigidly	The BRE's guidance is not policy and is just one consideration in the determination of planning applications. It should not be applied rigidly in this way and the Guidance itself acknowledges as much. Access to sunlight and daylight is determined by several factors, not least site context and rigid insistence on adherence to the Guidance could prevent otherwise acceptable schemes proceeding.	DP310 CKC Properties Ltd	
Requirement for 24 hour on-site security is not justified	The requirement for 24 hour on site security is excessive. Some schemes (smaller) may not require an on-site presence for a full 24 hours. The criterion should be reworded to require appropriate 24 hour security is provided.	DP310 CKC Properties Ltd, DP260	
Whole academic year criterion is not justified	The whole academic year criterion, if translated into a planning consent condition it would, in theory, impede the lettings of voids or vacant units mid-way through an academic year. It is unclear what the criterion seeks to achieve and it is not supported by any explanatory text. It should be omitted from the policy.	DP310 CKC Properties Ltd, DP177 Brighton Society	
Policy does not address overall shortfall of PBSA	The policy lacks detail on how to address overall shortfall of PBSA against total student numbers.	DP181	
Further criteria requested	Stronger tests must be complied with if the LPA is to consider the demolition of housing in favour of PBSA. This should include a clear clause that any genuinely affordable housing within the application site and proposed for demolition must be replaced by the applicant at their own cost.	DP307 Green Group	
Further criteria requested	The policy should have stronger design criteria.	DP307 Green Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Developments should be required to incorporate community facilities	PBSA should include facilities open to the wider community, e.g. rooftop terraces; the provision of noticeboards; community use of facilities such as gyms and bars.	DP307 Green Group	
Criteria ineffective	Requirement to ensure occupants do not keep cars in Brighton & Hove is unachievable and excessive.	DP260	
Lack of supply causes studios to be more expensive	Within the IQ Living at Sawmills on Lewes Road, privately operated cluster flats cost over £200 a week, while the studios cost around £250. This evidence demonstrates that the lack of supply drives up prices, whether a building provides cluster or studio flats.	DP297 Vita Group	
Criterion not justified	There is a lack of an evidence base to support the Council's claim that typical residents of studio units would not otherwise reside in HMOs.	DP297 Vita Group	
Benefits of studios understated	Studio based developments can also facilitate social interaction through the provision of gyms, movie rooms, private dining and study spaces. Cluster schemes would only provide basic lounge and kitchen facilities.	DP297 Vita Group	
Wording is difficult to apply to studio developments	Criteria A and C of Policy DM8 should include consideration for studio units. As studio units are self-contained it would not be necessary to include "communal living space; cooking and bathroom facilities to be commensurate in size to the number of occupants", although it is important that hub space is also provided in PBSA residences that generally comprise studio flats.	DP297 Vita Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Support with caveat	Support PBSA with two provisos: 1) meets adequate space standards and 2) location which does not affect nearby residential areas.	DP031 North Laine CA	
	There is no specific mention of a requirement for PBSA developments to provide outdoor amenity space, as a result these developments will not have to contribute to the existing ecological network or the wider GI network. The lack of this requirement also reduces the numerous benefits of exposure to well-maintained GI that students will receive. This requirement is important as minimising impacts on biodiversity and providing net gains are aims of both the NPPF (paragraphs 8, 170, 174, & 175) and the DEFRA 25 year plan (1.1.)	DP189 Natural England	
Minor changes requested	Clarification of the word 'predominantly' and confirmation that bedrooms within such accommodation do not necessarily need to have en-suite bathrooms, which would allow the University to continue offering a range of accommodation options for students. In addition, no reference is made in the draft policy to the delivery of 'town house' type PBSA developments. The University has successfully delivered this type of accommodation on its campus and would not want to encounter restrictions on the development of further such accommodation, as an inadvertent consequence of this type of accommodation not being acknowledged within the policy or supporting text.	DP291 University of Sussex	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Minor changes requested	Criterion (f) – 24 hour security requirement welcomed. It is important that a distinction is made between already established campus-wide security provision (that on-campus PBSA developments would benefit from) and the need for a suitable security presence to be delivered as part of off-campus PBSA development.	DP291 University of Sussex	
Full academic year requirement is too inflexible	Flexibility needs to be added to part g) (length of tenancy agreements), to reflect the differing needs of students. As an illustration of this, the University offers three different lengths of tenancy agreements ranging from 39 weeks to 51 weeks, as well as offering specific tenancy agreements for part-year students (for visiting and exchange students etc).	DP291 University of Sussex	
Comment	General support for policy.	DP291 University of Sussex, DP002 Brighton YIMBY, DP017, DP028, DP067, DP135, DP077, DP202, DP272, DP114, DP255, DP208 BHEP, DP207	

DM9 Community Facilities			
Total Number of Responses		22	
Number of Representations that Support		16	
Number of Representations that Object		6	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy supported but exception criteria should be toughened	We support the intent behind the policy but consider that it should be strengthened by deleting the need to meet just one of the criteria.	DP111 Theatres Trust	
Clarification – marketing evidence	We would contend that marketing evidence should underpin demonstration that the building or land is no longer required or no longer suitable. The only exception would be where replacement of equal or greater standard is being provided.	DP111 Theatres Trust	
Test for partial loss of space should be toughened	We object to the current wording giving support for partial loss of floorspace through change of use where the use requires less floorspace or to sustain the existing use through cross-subsidy. While we appreciate and support the principle behind the policy, as currently drafted it is far too permissive and would be very easy to manipulate. Loss of space currently reads as a favoured option rather than a 'last resort'.	DP111 Theatres Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Refers to an issue covered by other policies	This part of the CPP2 should adhere to the National Planning Policy Framework (Jul 2018) Section 8: Promoting healthy & safe communities Existing open space, sports and recreational buildings and land.	DP280	
General comment	There are currently insufficient community facilities.	DP263	
Additional criteria requested – maintenance/ repairs	It must be demonstrated that decline in use of the facility is not due to poor maintenance or reduced maintenance budgets, and that use of the facility would not be increased if repairs were carried out.	DP028	
General comment	The Council should encourage the provision of affordable and suitable rooms and facilities for hire for community meeting Purposes.	DP156	
General comment	Existing buildings suitable for community use should be retained, rather than building new ones, as this is cheaper and greener.	DP091	
Support			
Appropriate to Local context	The CCG is working more and more closely with the Council to integrate the commissioning and provision of health and social care. A key component of this is the provision of community based hubs that will support the delivery of multi-agency working across health and care and also integrate other Council services, such as Housing.	DP101 B&H CCG,	
Support with caveat	The landlords of Badgers Tennis Club have stated that they purchased the site for 'development.' The site is a thriving tennis club, providing a service to the community and no alternative site is possible.	DP036 Badgers Tennis Club	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Concern about loss of GP facilities	We have continuing concern about the collapse in GPs in the city and the re-provision of such an important part of community infrastructure.	DP307 Green Group	
	Community facilities often contain historic fabric, with many having retained continuous use over long periods of time. As such they are important to the history of the community. If loss is to happen, and where appropriate, the LPA should consider recording its functions through photographic/ digital means if the built form cannot be retained.	DP307 Green Group	
	We fully expect any removal of community space through development to be replaced; it should be done with attention to the local area. For example if there is a reputable community organisation in a purpose-built facility next to a new-build, reasonable applicants would be expected to cooperate with the facility to enhance the infrastructure for the entire community.	DP307 Green Group	
Minor changes requested – links to ecological and GI networks	There is no specific mention of a requirement for new community facilities to connect with and contribute to the existing ecological and GI networks. This is important as minimising impacts on biodiversity and providing net gains are aims of both the NPPF (8. 170. 174. & 175.) and the DEFRA 25 year plan (1.1.).	DP189 Natural England	
	Minor improvements could be made by removing the wording "at least" from part 2 and the word "any" from criterion 2 (c).	DP260 Lewis & Co.	
General Support	General support.	DP002 Brighton YIMBY, DP031 NLCA, DP067, DP77, DP095, DP001 Pavilion Architecture, DP135, DP202, DP208 BHEP, DP272, DP114	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	We must do everything we can to retain community facilities and as such we warmly welcome the policies.	DP307 Green Group of Councillors	

DM10 Public Houses			
Total Number of Responses		23	
Number of Representations that Support		19	
Number of Representations that Object		4	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Criteria are unduly onerous	The requirements of paragraph 2.84 are excessively onerous and unclear, with the pre-agreement of an asking price with the local planning authority not clearly explained (we are not clear what mechanism there is for this agreement to be made).	DP260 Lewis & Co.	
Policy should support new pubs	Policy support should be added for new pubs and the diversification and improvement of existing public houses, where this provides opportunities to improve the viability of these businesses.	DP260 Lewis & Co, DP258 B&H Planning Agents Forum	
Pubs can have a negative effect on health	There is an acknowledged health crisis due to excessive alcohol consumption. While this isn't wholly due to pubs, it does undermine the argument that pubs provide a social benefit.	DP028	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Pubs have can a negative effect on amenity	It is disturbing that one of the envisaged ways of retaining pubs is to grant live music licences. These can be a menace, creating huge disturbance to neighbours. There needs to be recognition that a lot of pubs, including those in town centres, are in the midst of residential areas.	DP028	
	General objection.	DP042	
Support			
Support with caveat – importance of community/ cooperative models	While we welcome the many tests the policy proposed to help ailing public houses, we point to The Rose Hill Tavern which is still in community use, if not with an alcohol licence. We strongly believe that the model of community/ cooperative/ enthusiast ownership should be drawn into discussions as early as possible, facilitated through the LPA, if public houses report difficulties in retaining their premises.	DP307 Green Group of Councillors	
General comment	Pubs are architecturally rich and deserve special attention.	DP307 Green Group of Councillors	
Support with caveat	Theatres and other such cultural venues can also be subject to complex challenges which would justify requirement for a longer marketing period to give decision-makers confidence they cannot reasonably be maintained.	DP111 Theatres Trust	
General comment	Public houses should be registered as community assets.	DP091, DP176	
General comment	Pubs should be converted to community use if no longer viable.	DP091	
General comment	Public houses are an important part of the local community providing a meeting and social place for local residents.	DP135, DP077, DP176, DP303 Rottingdean PC, DP111 Theatres Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
General comment	Pubs face unique challenges compared to other commercial, community and cultural uses and this has been understood well and is reflected within the supporting justification, for example requiring evidence that the pub has been offered free of tie and restrictive covenant.	DP111 Theatres Trust	
General comment	General support.	DP002 Brighton YIMBY, DP003, DP031 NLCA, DP067, DP095, DP001 Pavilion Architecture, DP114, DP202, DP208 BHEP, DP233 B&H Food Partnership, DP272, DP280, DP303	

DM11 New Business Floorspace			
Total Number of Responses		14	
Number of Representations that Support		12	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Purpose of policy is unclear	Not clear what additional benefits this policy offers given adopted CPP1 Policy CP3 Employment Land.	DP260 Lewis & Co Planning, DP258 Brighton & Hove Planning Agents Forum	
Clarify wording at part 2 of policy	The second part of the policy is unclear and needs clarity.	DP260 Lewis & Co Planning	
Support			
Appropriate Response	Requirement to deliver a range of unit size and types, incorporating flexibility to meet a range of business needs, is appropriate in the context of Brighton and Hove.	DP268 La Salle Investment Ltd, DP275 Moda Living Ltd,	
	Ensures provision of flexible B Class floorspace can be ‘future proofed’/adapted to meet changing needs of business particular small business and start ups.	DP065 Big Yellow Self Storage Co. Ltd DP261 Hargreaves	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	Fits with Economic Strategy ('Growing City').	DP208 Brighton & Hove Economic Partnership	
	Efficient use of existing business floorspace will reduce development on greenfield sites.	DP189 Natural England	
Include reference to commercial premises	The policy intent should be carried over into supporting the upgrade, improvement, development and diversification of existing office, commercial and industrial properties given impact of changing work practices and effect this will have on marketability of traditional offices in short to medium term.	DP268 La Salle Investment Management Ltd.	
Support with caveats	Ensure existing commercial space is used first and where purpose built new business space is needed ensure architectural attractiveness, functionality and adequate parking provided.	DP091	
	Ensure better understanding of how mixed use schemes in suburban locations are being occupied and retained.	DP307 Green Group of Councillors	

DM12 Primary, Secondary and Local Centre Shopping Frontages			
Total Number of Responses		15	
Number of Representations that Support		9	
Number of Representations that Object		6	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Support small and independent retailers	<p>Key plank of the policy must be to support what way small and independent retailers are supported by policy. Cite various studies/ surveys on trading patterns.</p> <p>LPA should support the protection of local shopping areas with local traders, and focus on the enhanced local flavour and particular characteristics from the local area which are drawn into focus from the offer – consider use of Article 4 Direction to explicitly protect certain areas.</p> <p>Vacant units owned by the council – council should provide a creative response. In peak seasons and in the most prominent streets, such gaps should be filled by new retailers. Role of Post Office.</p>	DP307 The Green Group of Councillors	

	Work with LEP, BHEP and Federation of Small businesses to create resilience for small local traders.		
Better reflect changing nature of high street	Policy should better reflect the changing nature of the high street and wider range of city centre uses that should be encouraged to maintain vibrancy, vitality and viability of primary and secondary frontages.	DP307 The Green Group of Councillors, Hargreaves DP261; DP260 Lewis & Co Planning	
Policy is not consistent with revised NPPF - frontages	<p>Policy is not effective, justified, or consistent with national policy, and should be revised.</p> <p>Town centres should be destinations which offer a variety of shopping and leisure experiences that encourage increased activity outside of normal shopping hours. Non-A1 uses, particularly in the food and beverage sector, make a positive contribution by supporting town centres as a primary economic driver for the sub-region by increasing footfall and dwell time within centres.</p> <p>The diversification of centres also assists in attracting high quality tenants which furthers economic development and encourages continued investment in town centres.</p> <p>Restricting the amount of appropriate non-A1 town centre uses as drafted, limits its effectiveness in terms of securing the future vitality and viability of town centres.</p> <p>The main focus of Council's Shopping Frontage Review (May 2018) appears to be to define the extent of the relevant Frontages rather than to justify why non-retail uses should be limited in these</p>	DP218 JTC Fund Solutions (Jersey) Limited	

	<p>locations and is contradictory around the role of A uses in providing active street frontages and does not accord with revised NPPF.</p> <p>Question inclusion of frontage protection criteria given revised NPPF. Whilst revised NPPF seeks to define a "Primary Shopping Area (PSA), no longer defines frontages. And while the PSA is a location where retail uses are de-facto more prevalent, the revised NPPF does not stipulate that the amount of retail floorspace in these areas should be protected.</p>		
<p>Shop Front issues and lighting</p>	<p>Historically important retail frontages which especially in the Conservation Areas in the city should be retained where possible. If all attempts to retain features fail, that such features are recorded and kept for local records.</p> <p>Should have a policy like in LP 2005 where bold and inappropriate fascias especially in terms of dimension and unsuitable materials are avoided and that where possible historic signs uncovered through renovation are carefully retained (and appropriately encased) or incorporated into updated signs).</p> <p>Concerned about what is happening to retail parades in Conservation Areas with regard to lighting. Believe a night time survey needs to be conducted at the earliest point to understand the condition of retail frontages in Conservation Areas with regard to harmful artificial light.</p>	<p>DP307 The Green Group of Councillors</p> <p>DP307 The Green Group of Councillors</p> <p>DP307 The Green Group of Councillors</p>	

Query Policy appropriate given Permitted Development Rights and marketing requirements	<p>PD rights have changed allowing permanent and temporary changes of use of A class units.</p> <p>The draft policy fails to provide the same level of support and flexibility, restricting changes of use and requiring vacant units to show 12 months of marketing.</p>	<p>DP261 Hargreaves , DP260 Lewis & Co Planning , DP258 Brighton & Hove Planning Agents Forum</p>	
Policy should be more supportive of complementary uses and dual/mixed uses	<p>The policy should provide support for complementary uses such as food and beverage establishments, leisure uses and professional services that would positively contribute to the frontage.</p> <p>Improved flexibility will help support the role and function of the City Centre and encourage inward investment and the creation of new businesses within the city.</p> <p>The Policy should also be supportive of dual/mixed uses of premises that will allow businesses to make more efficient and dynamic use of their commercial spaces where appropriate and diversify their commercial offer within their existing premises. E.g. permitting change use class between A1, A2, A3, A4 and B1 without the need to return to planning for a change of use application.</p>	<p>DP258 Brighton & Hove Planning Agents Forum DP261 Hargreaves</p>	
Lack of strategic and protective policy for St James Street	<p>Planning Policies and licensing fails to meet the needs of St James's Street, its residential neighbourhood and general catchment. The challenges to its unique character as a shopping area and the progressive imbalance in its commercial profile should be specifically addressed. The lack of a more strategic and protective focus on the street means that it is all the more difficult to preserve its special historic and architectural character.</p>	<p>DP156 Kingscliffe Society</p>	

Support			
Brunswick Town Local Centre	Whilst general concerns with retail - welcome that the Regional Centre has been amended to facilitate a new centre called Brunswick Town Local Centre. The Brunswick Town area has a series of historically important businesses and their retention and the 'feel' of Brunswick Town is enhanced through the presence of small and independent retailers.	DP307 Green Group of Councillors	
General	Note reference to The Lanes in paragraph 2.103 – Rottingdean's draft Neighbourhood Plan has similar restrictions.	DP303 Rottingdean Parish Council	
	Any control over use of existing shops is to be welcomed, especially in centre where cause problems.	DP263 Brunswick Town Association	
Support but request further clarity	Whilst the wording is thorough it remains unclear as to whether these provisions would indeed protect local shopping spaces. Some further clarity would be helpful such as is written in DM13 where it explicitly states that shopping parades are protected.	DP256 The Conservative Group	
Support – reflects Economic Strategy	Supports the policies to protect and enhance the retail offer in the city via theme 5 of the Economic Strategy - An Open City.	DP208 BHEP	
Support	It seems sensible, except in protected areas which should be the Lanes and North Laine area.	DP091	
Support – no detailed comments		DP067, DP031 NLCA, DP002 Brighton Yimby, DP001 Pavilion Architecture	

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units			
Total Number of Responses		14	
Number of Representations that Support		10	
Number of Representations that Object		4	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Inclusion of additional Important Local Parades in the policy	Rottingdean High Street, Longridge Ave and Lustrell's Vale should be included as an Important Local Parade.	DP317 Rottingdean Councillors	
	The Dip in Hollingdean and Moulsecomb Way parade should be included as an Important Local Parade.	DP307 Green Group Of Councillors	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Policy should better reflect changing character of high streets and city centre</p>	<p>The current draft does not reflect the changing nature of high streets and the wider range of City Centre, or the permitted development rights allowing permanent or temporary changes of use of A-class units in order to reduce the barriers to new businesses moving into key retail areas and generating footfall.</p> <p>The policy should provide support for complementary uses such as food and beverage establishments, leisure uses and professional services that would positively contribute to the frontage.</p> <p>The Policy should also be supportive of dual/mixed uses of premises.</p>	<p>DP258 B&H Planning Agents Forum</p> <p>DP258 B&H Planning Agents Forum</p> <p>DP258 B&H Planning Agents Forum</p>	
<p>Object – no comments</p>		<p>DP261 Hargreaves</p>	
<p>Support</p>			
<p>Support with caveats</p>	<p>Welcome Brunswick Town into a category (proposed local centre). Strict regulation of changes of use required.</p>	<p>DP263 Brunswick Town Association</p>	
<p>Minor changes requested</p>	<p>The Lanes, North Laine and Rottingdean High Street should be given further protection to preserve their unique independent retailer offer.</p>	<p>DP256 Conservative group</p>	
	<p>As well as a local shopping function these parades provide specialist retailers such as bridal wear etc.</p>	<p>DP233 B&H Food Partnership</p>	
<p>General Support</p>		<p>DP208 BHEP, DP189 Natural England, DP031 NLCA, DP091, DP067, DP002, DP001</p>	

DM14 Special Retail Area - Brighton Marina			
Total Number of Responses		12	
Number of Representations that Support		8	
Number of Representations that Object		4	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Criterion D (D1 uses) should be removed	Following policy text should be added: <i>“In addition to the identified uses, consideration will also be made for the change of use to other uses that support the vitality and viability of the Marina where justified where an active frontage is maintained.”</i>	DP295 X-Leisure (Brighton II) Ltd and Landsec	
Accessibility concerns	Policy wishes to attract pedestrians to retail areas of Marina, however, questions remain over the accessibility and connectivity of the Marina for these visitors.	DP307 Green Group of Councillors	
Policy should not restrict ground floor residential uses	Diversification of retail centres to include mix of uses (including housing) is advocated in NPPF. Residential uses at ground floor level can provide active frontages and policy should not seek to restrict such use.	DP278 Outer Harbour Development Company Partnership LLP	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Competition/Impact of policy on city centre	<p>In line with NPPF, draft plan should provide clear guidance on what uses will be permitted in the Marina in order to serve its resident population. The site is not a designated retail area and should be treated as such.</p> <p>Criteria of policy should be extended to consider the impacts new retail development will have on the more established designated retail areas within the City.</p>	DP218 JTC Fund Solutions (Jersey) Limited	
Support			
General support		DP317 Rottingdean Coastal Councillors, DP091, DP067, DP031 NLCA	
Appropriate to Local context	Policy protects and enhances the retail offer in the city via theme 5 of the Economic Strategy - An Open City.	DP208 BHEP	
	Development within Brighton Marina reduces the demand for development on greenfield sites – protecting greenfield sites are a key component of the NPPF.	DP189 Natural England	
Support with caveat	Policy should not give greater status to low quality retail over high quality services. Equally, policy must be forward-thinking and not necessarily seek ‘outdated’ services such as bank branches. Research should be done to see what local residents need and want.	DP266 Brighton Marina Neighbourhood Forum Steering Group	
	There needs to be greater synergy between all elements at the Marina to improve on current blight. Retail already struggles, so needs to be supported with office space and improved place making.	DP266 Brighton Marina Neighbourhood Forum Steering Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Minor changes requested	<p>Policy name 'special retail area' be changed to 'special commercial area' which gives equal status to all types of customer facing trading uses.</p> <p>Removal of 'subjective' criteria A.</p>	DP266 Brighton Marina Neighbourhood Forum Steering Group	
	<p>Amend 2.120 to specifically mention key, protected sites: <i>“The Marina is also in very close proximity two nationally protected sites: Beachy head West Marine Conservation Zone (MCZ) and the Brighton to Newhaven cliffs Site of Special Scientific Interest (SSSI).”</i> Between second and final sentence.</p>	DP189 Natural England	
	<p>Needs a clause on the importance of improving public transit to the marina.</p>	DP002 Brighton YIMBY	

DM15 Special Retail Area - The Seafront			
Total Number of Responses		10	
Number of Representations that Support		2	
Number of Representations that Object		8	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Object – request wording changes	No recognition of Hove Lawns section of seafront as a heritage asset that should be protected from development.	DP263 Brunswick Town Association	
	2.123: “Seasonality should be enhanced, not reduced.” Policy should support innovative, yet practical, winter needs and uses.	DP156 Kingscliffe Society	
Support			
General support		DP067, DP002 Brighton YIMBY, DP001 Pavilion Architecture	
Developments need to be high quality, sustainable and attractive	Concerned for state of the lower seafront to the east of Palace Pier. Hopes that DM15 will bring high quality, sustainable, innovative and attractive development to these areas which will in turn boost tourism.	DP266 Brighton Marina Neighbourhood Forum Steering Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	Supports protection and enhancement of the retail offer in the city via theme 5 of Economic Strategy - An Open City.	DP208 BHEP	
Support with caveat	Developments architecture should be worth visiting alone. Provision for new 'Regency style'.	DP091	
	Concerned about the retention of the arches and structure if new developments obscured sea views or negatively impacted the amenities of locals.	DP031 NLCA	
Additional criteria protecting cycle routes	Add extra criteria so cycling/cyclists will not be impeded by activities on the seafront. "e) The use of the Seafront Cycle Route (NCN2) and other cycle routes will be preserved for cycling throughout the year."	DP316 Bricycles and Cycling UK	

DM16 Markets			
Total Number of Responses		8	
Number of Representations that Support		8	
Number of Representations that Object			
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
General Support		DP091, DP067, DP031, DP002, DP001	
Support with caveat – cycle routes	Support policy but concerned about impact on cycle routes. Suggests inserting this within the text of the policy.	Bricycles & Cycling UK (DP316)	
	Support policy however consideration should be given to sustainable travel between different retail areas particularly the seafront in order to enhance and protect business viability.	Brighton & Hove Economic Partnership (DP208)	
Minor changes requested - reference to temporary markets on development sites and further guidance	Support policy but suggest that we include reference to use of box park style market spaces (shipping containers) in areas of the city waiting for development e.g. Black Rock, Marina, and North of St Peter’s Church. Would welcome more detailed guidance about temporary and permanent markets and how and where they are permitted to support access to healthier food.	Brighton & Hove Food Partnership (DP233)	

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

Total Number of Responses		18	
Number of Representations that Support		7	
Number of Representations that Object		11	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy out of date – Brighton Waterfront proposals (which are not supported)	<p>Policy seems out of date regarding Brighton Centre which council currently proposes to be relocated to Black Rock.</p> <p>Serious concerns with Waterfront Projects. Concerns about (and no explanation of feasibility) site size, transport links and impact on Grade 1 Listed Kemp Town and East Cliff CA (if development is level with/ rises above Marine Parade).</p> <p>The Black Rock site does not suit the function of a conference centre - potential for a major attractive hotel/ combination of high profile hotels.</p>	DP207 The Regency Society, DP156 Kingscliffe Society	

	<p><i>midmarket or upscale hotel development and heritage restoration project. In its current form Policy DM17 would fail to support this kind of alternative proposal.</i></p> <p>Welcome policy support for new hotel development however the use of the term 'suitable' in the phrasing of the Policy implies that other locations are not suitable, which we would question, and does not reflect the updated Visitor Accommodation Study which describes the Development Area locations as "locations of opportunity" and doesn't seek to distinguish specific areas within the Development Areas as the current wording of Policy DM17 suggests.</p>	DP258 Planning Agents Forum	
Hove Station Area not suitable for budget hotel and should be removed from policy	Do not support Hove Station area as suitable for a budget hotel. Traffic movement and parking would be a significant problem.	DP256 The Conservative Group	
Churchill Square Area	Regardless of the longer-term future of the Churchill Square area, there needs to be a considerable amount of work done on a much-improved public realm in the area which should include an improved bus area and better connections to the Lanes, the Clock Tower and Brighton train station.	DP307 Green Group of Councillors	
Protection of Smaller hotel	Queried where the policy reference was to protecting change of use of smaller hotels in central Brighton.	DP207 The Regency Society	
Support			
Support approach to new hotel development	Welcome the recognition of the need for additional visitor accommodation in Brighton, and the allocation of several sites for new hotel development in particular the Churchill Square/Brighton	DP218 JTC Fund Solutions (Jersey) Limited	.

	<p>Centre Development Area (DA1.B1) and Black Rock (DA2.C1).</p> <p>The policy is justified and also positively prepared in terms of considering a sufficient, yet realistic number of sites capable of meeting the need identified in the Visitor Accommodation Study Update. The policy is also in accordance with the NPPF which generally supports the visitor economy.</p>		
<p>Support with concerns about effectiveness of policy in relation to safeguarding conference facilities</p>	<p>The current wording limits the effectiveness of this policy as it may serve to limit effective re-provision of conferencing on other sites and prevent redevelopment coming forward. The criteria-based approach to the "safeguarding of conference facilities" should include, as one of its criteria, the ability to secure a re-provision of conference facilities that are lost, by virtue of development, on an alternative site, that is either otherwise in accordance with planning policies elsewhere in the Plan, or allocated for development in relation to policy DM17.</p>	<p>DP218 JTC Fund Solutions (Jersey) Limited</p>	
<p>Support with caveat – need for transport links/ strategy</p>	<p>Concern with transport to and from Black Rock with new conference centre and enlarged Churchill Square and between locations cited in policy.</p> <p>Issue needs to be adequately addressed through a credible, sustainable and consulted transport strategy related to policy.</p>	<p>DP067, DP208 BHEP</p>	
<p>Support (without additional supporting comments)</p>		<p>DP002, DP031 NCLA, DP001 Pavilion Architects, DP266 Brighton Marina Neighbourhood Forum Steering Group</p>	

DM18 High quality design and places			
Total Number of Responses		25	
Number of Representations that Support		23	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Prioritisation of Heritage/ Landscape within criteria unclear	<p>Wording used and criteria which govern design principles need to be more robust and prioritise impact upon heritage and landscape assets, In particular when it comes to the framework supporting assessment of proposals involving tall buildings.</p> <p>External sources of design advice need to rely on local knowledge and appreciation of the local context.</p> <p>Graffiti should be unacceptable in historic environment.</p>	DP 077 The Brighton Society	
Policy and/or supporting text is prescriptive	<p>Policy needs to promote the idea that it may be appropriate for proposals exhibiting the highest standards of architectural design to depart from the prevailing height, scale and shape of its surroundings.</p>	DP258 Brighton & Hove Planning Agents Forum	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Appropriate Response	Emphasis on high quality design and/or place making.	DP002 Brighton YIMBY DP157 Hove Civic Society DP175 Nub Brighton DP266 Brighton Marina Neighbourhood Forum Steering Group DP275 Moda LivingLtd DP296 St Williams Homes	
	Allows for contemporary design.	DP175 Nub Brighton	
	Seeks to enhance and conserve the distinctive, historic character of the city and its heritage assets. Takes account of local context.	DP284 Historic England DP195 Kingsway and West Hove Residents' Association	
Support with caveats: clarity on UDF	Supporting text that informs the criteria set out in policy is useful however policy is, in parts, too prescriptive. Further clarity needed on what is meant by 'detailed area- and site-specific design principles will be identified via the Urban Design Framework' and its relationship with City Plan Part Two.	DP275 Moda LivingLtd	
Support with caveats: sustainability	Ensure better understanding of the need to consider sustainability in building materials and architectural detailing; and opportunities to incorporate up-to-date technologies to reduce the city's carbon footprint. Need to ensure continued maintenance and quality of building materials and architectural detailing at implementation stage.	DP307 Green Group of Councillors DP175 Nub Brighton DP156 Kingscliffe Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support with caveats: design advice	External sources of design advice do not respect local context and/or represent the interests of local people.	DP031 NLCA	
Support with caveats: wording	Stronger wording needed. State that the council will decide the style and standard of architecture is acceptable following full and transparent public consultation. Use 'demanded' rather than 'expected'.	DP091 DP263 Brunswick Town Association	
Support with caveats: local context	Policy needs to account for the fact that appropriate design responses may range from repeating or reinterpreting local patterns/context through deliberate and considered contrast. Supporting text unacceptably prescriptive and/or inconsistent.	DP274 LCE Architects	
Support with caveats: artistic element	Extend requirement to incorporate artistic element to all development.	DP157 Hove Civic Society	
Support with caveat – supporting text changes	Amend supporting text 2.140: This is a major factor in determining the visual character of an area. The aim should be to create a sense of harmony and visual continuity between new and old. <u>In considering the height and mass of new buildings the proportions of existing building should not be used to justify the ever increasing height of new development. Elements of any building that are visible from the public realm are of particular importance.</u>	DP178 Montpelier & Clifton Hill Association	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support with caveats: links with UDF	<p>Draw attention to good and bad practice examples in guidance to reach developers at pre-application stage and influence decision makers.</p> <p>Refer to best practice in design that can help:</p> <ul style="list-style-type: none"> ▪ incorporation of building materials, architectural detailing and up-to-date technologies to reduce the city's carbon footprint and ensure continued maintenance over time; ▪ multi-function public spaces that are well integrated into the city's fabric; ▪ highlight opportunities for cooperation between developers and local communities to generate public art in the city; ▪ maximise use of roof space and public realm for play/sport activities; ▪ allow sufficient space for cooking, fresh food storage, edible planting and communal gardens; ▪ account for the natural environment and opportunities to incorporate green infrastructure at an early stage to reduce impact upon/achieve net gains in biodiversity; ▪ ensure external sources of design advice represent the interest of local people; and ▪ action against graffiti in a historic environment. 	<p>DP207 The Regency Society</p> <p>DP307 Green Group of Councillors DP175 Nub Brighton DP156 Kingscliffe Society</p> <p>DP157 Hove Civic Society</p> <p>DP233 Brighton & hove Food PARTNERSHIP</p> <p>DP289 Sussex Wildlife Trust</p> <p>DP031 NLCA</p> <p>DP 077 The Brighton Society</p>	

DM19 Maximising Development Potential			
Total Number of Responses		18	
Number of Representations that Support		14	
Number of Representations that Object		4	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Redundant policy	Sites are well used as proposals are generally reduced as part of the planning application process. Questions whether this policy is redundant.	DP157 Hove Civic Society	
Density levels quoted in policy are too low	Densities quoted are generally too low, including on fringe sites. Tall buildings are not needed for increasing density.	DP177 The Brighton Society	
Suggest wording changes as caveat to maximising development	Include statement: 'The council does not support the maximising of development at all costs, but the sensitive and sensible best use of sites. Heritage, stability and sustainability come first.'	DP091	
	Amend policy to account for instances where higher office/commercial densities may be appropriate such as those arising from flexible-working schemes and hot-desking facilities.	DP261 Hargreaves	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
General support		DP001 Pavilion Architecture, DP028 and DP067	
Appropriate Response given national policy	Policy maximises efficient land use reduces the impact of increasing development pressure on other greenfield sites in line with section 13 Protecting Green Belt land of the NPPF.	DP189 Natural England	
	Policy reflects NPPF emphasis on importance of making effective use of development land, advocating a design led approach to density that responds to identified needs and balances these with the need to prevent over-crowding and negative impacts on amenity.	DP207 The Regency Society, DP295 X-Leisure (Brighton II) Ltd and Landsec	
Support with caveats: links with UDF SPD	City can accommodate densities that are higher than minimum in City Plan Part One Policy CP14 as evidenced in reports supporting recent proposals for the Sackville Road and Royal Mail, Goldstone Lane and Lyon Close sites.	DP268 LaSalle Investment Management Ltd, DP275 Moda Living Ltd, DP282 Royal Mail, DP295 X-Leisure (Brighton II) Ltd and Landsec	
	Urban Fringe densities are very low in the context of BHCC's housing needs. Housing number allocations are given too much weight following assessments. Council is not consistent in the suggested Urban Fringe densities which are very low in the context of BH housing needs.	DP258 B&H Planning Agents Forum	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Wording changes	'Efficient use of land' is too vague and policy need to promote increased mixed use developments, housing density and public space accessibility more clearly.	DP002 Brighton YIMBY	
	Amend policy text to identify buildings of up to six storeys as a preferred approach to deliver high-density development and taller buildings as the least.	DP178 Montpelier & Clifton Hill Association	
	Add 'community facilities' to list of provisions set out in bullet 'd'.	DP207 The Regency Society	
	Include cross-reference in the supporting text to City Plan Part 1 Policy SA5 The Setting of the SDNP.	DP221 SDNPA	
	Amend policy to ensure the potential of sites in general and Urban Fringe sites in particular is optimised in terms of density. Provide more clarify regarding status of densities set out in Policy CP14 as minimum and Urban Fringe Assessment as indicative.	DP274 LCE Architects, DP295 X-Leisure (Brighton II) Ltd and Landsec	

DM20 Protection of Amenity			
Total Number of Responses		14	
Number of Representations that Support		11	
Number of Representations that Object		3	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Seeking clarification through proposed wording alteration	Provide examples of acceptable levels of protection of visual privacy suitable for dense city that can help facilitate housing delivery.	DP002 Brighton YIMBY	
	"Planning permission for any development ... will be granted ..." Request removal of any.	DP177 The Brighton Society	
	Rather than 'any loss of amenity', policy should read: <i>"only where loss of amenity to existing adjacent users, residents and occupiers is minimised and kept to an acceptable level."</i>	DP258 B&H Planning Agents Forum	
Consultation requirements with neighbours	All planning applications should be required to be accompanied by confirmation and report of outcomes of consultation with neighbours, including on any subsequent amendments.	DP 177 The Brighton Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
General support	Adequate policy response.	DP001 Pavilion Architecture, DP028, DP031 NLCA, DP067, DP091, DP178 Montpelier & Clifton Hill Association, DP268 Brunswick Town Association, DP280	
	Development of the badgers Tennis Club site would be 'detrimental to human health.'	DP036 Badgers Tennis Club	
Support with caveats – clarify issues with amenity	Need to clarify what is meant by ' <i>Amenity will include visual privacy and overlooking, outlook and overshadowing, and sunlight and daylight.</i> '	DP195 Kingsway and West Hove Residents' Association	
	There may be instances where a slight loss of amenity is unavoidable and/or level of amenity remains within acceptable standards. Wording should be amended to ensure that acceptable proposals are not inadvertently caught by this policy. Wording should be amended to refer to ' <i>an unacceptable loss of amenity.</i> '	DP265 Mid Group	

DM21 Extensions and Alterations			
Total Number of Responses		9	
Number of Representations that Support		8	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
General	Not specified.	DP028	
Support			
General support	Not specified.	DP001 Pavilion Architecture, DP067, DP091, DP263 Brunswick Town Association, DP284 Historic England	
	Seeks to enhance and conserve the distinctive, historic character of the city and its heritage assets.	DP284 Historic England	
	Provision retained similar to the prescriptive formula within SPD12 as this is more easily understood by anyone proposing development.	DP031 NLCA	
	Question why SPD12 is not specifically referred to.	DP178 Montpelier & Clifton Hill Association	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support with wording supportive of alterations	Add wording actively encouraging extension of existing properties as long as these adhere to local design.	DP002 Brighton YIMBY	

DM22 Landscape Design and Trees			
Total Number of Responses		17	
Number of Representations that Support		15	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Clarity needed with references to national importance and traditional species of trees	Query reference in policy to ‘national importance’ Amend paragraph 2.167 - first line should be: "is not "are” . Paragraph 2.169 - Native trees need to be recognised as traditional species.	DP177 The Brighton Society	
Impact of temporary events should be considered	Consideration should be given to overexploitation by temporary functions, events and structures that might damage the endurance, health and appeal of the grass.	DP177 The Brighton Society	
Inflexibility of policy regarding replacement of felled trees	Inflexible policy re replacement of fell trees – should provide for exceptional cases in which an important tree is replaced by an individual of the same or similar large species, with compensation for protracted loss of volume diverted into commensurate multiple planting at a location or locations in reasonable proximity?	DP177 The Brighton Society;	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Strengthen the policy - street tree planting	Need strengthening in requiring street tree planting as part of design.	DP263 Brunswick Town Association	
Support			
Support without any qualifying comments		DP001 Pavilion Architecture; DP028; DP067; DP091;	
Minor changes requested – clause on encouraging additional trees	Introduce a clause to encourage the addition of trees in new developments would be welcome.	DP002 Brighton YIMBY	
Minor changes requested – retention of trees during construction	The requirement to retain and protect existing trees during construction should be extended to include trees on adjoining properties/land.	DP076 Roundhill Society	
Support with caveat - introduce a standard for new street tree planting	<p>High density of tree planting is required. To secure a continuous tree cover regular replacement planting by introducing a simple standard for new street tree planting of 1 tree per new dwelling, to be planted adjacent or in the vicinity of new developments.</p> <p>Also set up a type of endowment fund from which resources can be drawn in future years for maintenance of trees in the public realm.</p>	DP157, Hove Civic Society	
Minor change requested	Recognise that community-led housing development can be a good source of high quality landscape and trees given the non-profit nature of development.	DP175 Nub Brighton	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Minor change requested to supporting text	Amend Paragraph 2.12 to read: An appropriately detailed arboricultural report and plan will be required in all planning applications that affect trees.	DP178 Montpelier & Clifton Hill Association	
Changes requested to strengthen the policy	Appropriate framework for landscape design, trees and planting helping to protect landscape and setting of National Park with wider benefits in strengthening ecological networks and GI network. Aligned well with NPPF policies and DEFRA 25 Year Plan. For greater alignment, net gain principle should be featured, natural capital principle should be mentioned. Change requested in the first sentence and first bullet point of policy to reflect above principles.	DP189 Natural England	
Minor change requested to policy	Reference to effectiveness of trees and hedges in reducing air pollution in areas of poor air quality in the first bullet point.	DP195 Kingsway and West Hove Residents' Association	
SPD on food requested	Support the inclusion of food growing, tree planting and pollinator friendly planting schemes in the criteria. An SPD on food / 'edible landscapes' is recommended.	DP233 Brighton & Hove Food Partnership	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Policy should address – pollinator protection; wildlife protection measures including retrofitting</p>	<p>Require all new developments and regeneration projects to include high pollinator value trees, shrubs and plants, avoiding invasive, non-native species, enhancing all green spaces with wildflowers/flower-rich grass (even areas which are mown regularly).</p> <p>Vulnerable wildlife protection: include 'hedgehog highways' in garden designs (cutting corridors into fencing etc), install integral bat bricks and house martin cups in external eaves, as appropriate.</p> <p>Promote retro-fitting in older developments and regeneration projects.</p>	<p>DP256 The Conservative Group</p>	
<p>Strengthen policy to contribute to net gains for biodiversity.</p> <p>Strengthen supporting text – tree felling</p>	<p>Criterion relating to biodiversity should go beyond 'enhancing' to 'contribute to... providing net gains for biodiversity' to better reflect the spirit of NPPF (para 170).</p> <p>Rewording of para 2.175 suggested to reflect para 170b NPPF regarding qualities of replacement trees.</p>	<p>DP289 Sussex Wildlife Trust</p>	
<p>Support but enforcement is the key</p>	<p>Support the framework for protecting trees on development sites; Enforcement is the key as unlawful removal is prevalent depriving neighbours of their privacy and 'expose them to the building site next door'.</p>	<p>DP303 Rottingdean Parish Council</p>	

DM23 Shop Fronts			
Total Number of Responses		12	
Number of Representations that Support		11	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy is unnecessary	Policy is convoluted and prescriptive. Shop front design can be managed under existing design, heritage and amenity policies, national and local.	DP261 Hargreaves	
Support			
Support with no comment		DP001 Pavilion Architecture DP002 Brighton Yimby DP028 DP067 DP091 DP178 Montpelier & Clifton Hill Association DP263 Brunswick Town Association	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	Proposed Officer Response
Support as part of suite of policies	These policies, along with the relevant historic environment Policy CP15 and related policies of the City Plan Part 1, will provide a robust framework for underpinning the protection and enhancement of the heritage of the city.	DP284 Historic England	
Support with caveat	Support policy but enforcement of these is particularly slack, so that inappropriate fascias and doorways proliferate throughout the most prominent and sensitive areas of the city.	DP156 Kingscliffe Society	
Minor changes requested	<p>The combining of two shop units into one unit should be resisted in North Laine to protect the historic character of the area.</p> <p>Policy should clarify that decoration of boarded up shop fronts should not include graffiti.</p>	<p>DP031 NLCA</p> <p>DP177 The Brighton Society</p>	

DM24 Advertisements			
Total Number of Responses		16	
Number of Representations that Support		13	
Number of Representations that Object		3	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy does not include street furniture issues	<p>The policy does not cover banners on lamp posts.</p> <p>The policy does not recognise the impact that street furniture adverts have on pavement access, such as A boards.</p>	<p>DP157 Hove Civic Society</p> <p>DP252</p>	
Policy is unnecessary	Policy is convoluted and prescriptive. Advertisements can be managed under existing design, heritage and amenity policies, national and local.	<p>DP261</p> <p>Hargreaves</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Support with no comment		DP001 Pavilion Architecture DP002 Brighton Yimby DP028 DP091 DP178 Montpelier & Clifton Hill Association DP263 Brunswick Town Association	
Support as part of suite of policies	These policies, along with the relevant historic environment Policy CP15 and related policies of the City Plan Part 1, will provide a robust framework for underpinning the protection and enhancement of the heritage of the city.	DP284 Historic England	
Support with reference to Rottingdean	Parish Council is conscious of a plethora of formal & informal signage across the Village, is endeavouring to rationalise signage and recognises the importance of working with local traders.	DP303 Rottingdean Parish Council	
Support with caveat	A boards can harm public safety and should not be allowed on normal sized pavements as they cause obstruction. Clarity is needed in the text over whether graffiti can be regarded as an advertisement.	DP067, DP252. DP177 The Brighton Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Minor changes requested</p>	<p>Delete the wholesale restriction on illuminated signage outside the built up area and instead require illumination that avoids light spillage/light pollution.</p> <p>Delete the specific reference in the supporting text to restricting signage above first floor window cill level.</p> <p>Include specific wording that where advertisements are viewable from the Strategic Road Network they must not distract roads users.</p> <p>Include policy wording that encourages advertising for healthy food options and discourages advertising for junk food etc.</p>	<p>DP004 British Sign & Graphics Association</p> <p>DP004 British Sign & Graphics Association</p> <p>DP112 Highways England</p> <p>DP233 Brighton & Hove Food Partnership.</p>	

DM25 Communications Infrastructure			
Total Number of Responses		12	
Number of Representations that Support		11	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Purpose of policy is unclear	Not clear what this policy provides that isn't available in more general local policies and national planning policies.	DP261 Hargreaves	
Support			
General support		DP001 Pavilion Architecture, DP002 Brighton YIMBY, DP028, DP067, DP178 Montpelier & Clifton Hill Association	
Support with wording alteration	Request the consideration and reference in policy to the issue of communication equipment (cabinets) being subject to art, advertisement, graffiti and visual abuse or tackle this issue in public art references.	DP177 The Brighton Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Lack of clarity in policy regarding maintenance	With reservation - lack of clarity in policy about cabinet service/maintenance. Insert 'and maintenance' following 'provision' within document.	DP263 Brunswick Town Association	
Policy requires reference to ancillary development and netter reflect wording of NPPF	<p>Policy should further highlight that it is applicable to any ancillary development required to support any telecommunications development.</p> <p><i>'Planning applications for telecommunications <u>and associated ancillary development</u> will be permitted where all of the following criteria have been met:...'</i></p> <p>Section 2.191 amendment to better reflect para 175 of NPPF.</p> <p><i>~...including the setting of SDNP. Proposals will be required to minimise <u>avoid environmental harm, where this is not possible, it should be minimised and provide adequate mitigation measures delivered.</u> '</i></p>	DP289 Sussex Wildlife Trust	
Appropriate Response	Ensures the conservation of national park; in line with NPPF (172.), the DEFRA 25 year plan (Chapter 2.), and protection and enhancement of the heritage of the city.	DP189 Natural England, DP221 SDNPA, DP284 Historic England	

DM26 Conservation Areas			
Total Number of Responses		19	
Number of Representations that Support		11	
Number of Representations that Object		8	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
The policy is unnecessary	Not sure whether this policy adds much over and above the City Plan. We would rather expect a statement on the review of conservation areas. Have long believed that there is a need for more areas, but at the same time an argument can be made for reducing some of the existing areas.	DP157 Hove Civic Society	
The policy is not strong enough	Wording to first paragraph of policy should be amended to say “will <u>only</u> be permitted”. Policy should state that applications should not be allowed where they would cause harm.	DP177 The Brighton Society	
	Poor condition should not be allowed to justify the demolition of a building which makes a positive contribution to a conservation area where the actions, or inaction of the current or previous owners are a contributory cause.	DP207 The Regency Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
The policy is too strict	Conservation areas are too large and some are of dubious quality. There should be far more leeway in what development is permitted in areas like Preston Park and Patcham, particularly the areas near public transit. Extensions in keeping with the design of the area should be explicitly allowed for up to 5 stories in all conservation areas.	DP002 Brighton YIMBY	
The policy priorities are wrong	Should prioritise the preparation of up-to-date character statements where they do not exist, and not rely on applicants to make their own assessments. Should prioritise the preparation of management plans.	DP207 The Regency Society	
The policy should be more detailed	<p>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.</p> <p>Demolition and roof extensions in North Laine should be resisted at all costs.</p> <p>Should be a specific insistence on the removal of UPVC windows and doors.</p> <p>Should be a reference to street clutter in the form of redundant street furniture and excessive signage.</p>	<p>DP177</p> <p>DP031 NLCA</p> <p>DP156 Kingscliffe Society</p> <p>DP156 Kingscliffe Society</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Supporting text should require Heritage Statements	<p>The supporting text at paragraph 2.195 should be consistent with paragraph 189 of the NPPF and require submission of Heritage Statement in all cases.</p> <p>Not clear what is meant in paragraph 2.195 by an “up to date” character statement. How should this be interpreted?</p>	DP177 The Brighton Society	
Supporting text should be more detailed	<p>Supporting text should include discussion of the relative weight to be given harm to conservation areas vs public benefits.</p> <p>Paragraph 2.199 - Is there a case for extending this to say “the removal or transformation of buildings”.</p> <p>The wording of the supporting text in paragraph 2.201 is open to misinterpretation – not clear if it only applies to existing buildings.</p>	<p>DP177 The Brighton Society</p> <p>DP177 The Brighton Society</p> <p>DP258 Brighton & Hove Planning Agents Forum</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
General comments	<p>Downgrading of conservation is obvious when dealing with Planning and the reduction in staffing in the area. Feel that this is getting to a danger level which together with the changes of consultation reduces the ability of residents to be able to discuss or influence design decisions.</p> <p>The Council pays lip service to Conservation. There is little enforcement so that inappropriate changes when made without permission are not stopped even after residents have informed Planning. With large scale developments Planning Committees simply ignore the Conservation argument. The Council does nothing to promote understanding of the historical environment. The reduction in the number of Conservation Area officers is indicative of the importance the Council gives to conservation and heritage.</p> <p>There needs to be greater flexibility, an emphasis on design analysis and a qualitative appraisal of the context.</p>	<p>DP031</p> <p>DP042</p> <p>DP258 Brighton & Hove Planning Agents Forum</p>	
Support			
Support with no comment		<p>DP001 Pavilion Architecture</p> <p>DP028</p> <p>DP067</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support with general comment	<p>Supporting the retention of trees and gardens integral to conservation areas provides a greater level of protection to valuable GI assets.</p> <p>Conservation areas first. If people choose to live in a conservation area, they need to conform to the area, not expect the area to conform to them. It is the only way to keep areas special.</p> <p>These policies, along with the relevant historic environment Policy CP15 and related policies of the City Plan Part 1, will provide a robust framework for underpinning the protection and enhancement of the heritage of the city.</p> <p>Conservation areas and green space provide huge environmental, health and wellbeing capital for local areas and residents.</p>	<p>DP189 Natural England.</p> <p>DP091</p> <p>DP284 Historic England</p> <p>DP175 Nub Brighton</p>	
Support with caveat	<p>All of the Conservation statements are too mild. For example, the Hove Lawns are locally listed, but events and activities on them cause damage. Maintenance and repairs are insufficient.</p> <p>Regret that street furniture in conservation areas is not protected.</p>	<p>DP263</p> <p>DP178 Montpelier & Clifton Hill Association</p>	
Minor policy changes requested	<p>Wording to first paragraph of policy should be amended to say “will <u>only</u> be permitted”.</p> <p>Recognise that community-led housing developments are likely to be more respectful of conservation areas than private-led developments.</p>	<p>DP178 Montpelier & Clifton Hill Association</p> <p>DP175 Nub Brighton</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Minor changes to supporting text requested</p>	<p>The supporting text at paragraph 2.195 should be consistent with paragraph 189 of the NPPF and require submission of Heritage Statement in all cases.</p> <p>The supporting text on backland development should also refer to gardens' contribution to the city's green infrastructure network.</p> <p>The wording of the supporting text in paragraph 2.201 is open to misinterpretation – not clear if it only applies to existing buildings.</p> <p>Suggest amendment to supporting text to encourage high quality contemporary design for new development in conservation areas.</p>	<p>DP178 Montpelier & Clifton Hill Association</p> <p>DP289 Sussex Wildlife Trust</p> <p>DP274 LCE Architects</p> <p>DP274 LCE Architects</p>	

DM27 Listed Buildings			
Total Number of Responses		13	
Number of Representations that Support		8	
Number of Representations that Object		5	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy is too permissive	The phrasing of the policy seems to indicate a presumption in favour of permission. Policy should be amended to state that alterations etc. “will <u>only</u> be permitted where they . . .”	DP177 The Brighton Society	
	Should be made explicit that a less interventive but still economically viable use is preferable to a more commercially profitable but highly interventive use.	DP207 The Regency Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Policy is too conservative	<p>The policy is too conservative with regards to contemporary additions to listed buildings. The emphasis is wrong as it suggests all Listed Buildings and their surroundings, in their entirety and in part, are of equal quality.</p> <p>Some liberalisation, for example making it easier to change outdated windows, should be considered.</p>	<p>DP258 Brighton & Hove Planning Agents Forum</p> <p>DP002 Brighton YIMBY</p>	
Policy only deals with change	Policy does not cover issues with the maintenance and repair of listed buildings which need to be more fully addressed.	DP303 Rottingdean Parish Council	
General comment	The Council should also be prepared to exercise its powers for compulsory purchase.	DP207 The Regency Society	
Support			
Support with no comment		<p>DP001 Pavilion Architecture</p> <p>DP028</p> <p>DP067</p> <p>DP263 Brunswick Town Association</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Minor changes requested</p>	<p>Policy should be amended to state that alterations etc. “will <u>only</u> be permitted where they . . .”</p> <p>The policy is too conservative with regards to contemporary additions to listed buildings. Suggest addition to supporting text to cover this.</p> <p>Add that the council takes listing extremely seriously and will do all in its power to preserve the special nature of Brighton and Hove.</p> <p>Emphasis should be on retention rather than allowing change. Should state that change will be (only) considered where it is essential to retain the building and its use.</p>	<p>DP178 Montpelier & Clifton Hill Association</p> <p>DP274 LCE architects</p> <p>DP091</p> <p>DP031 NLCA</p>	

DM28 Locally Listed Heritage Assets			
Total Number of Responses		12	
Number of Representations that Support		10	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy is unnecessary	If it is not listed then it should not be considered a heritage asset. If it is valuable, it should be listed.	DP002 Brighton YIMBY	
Policy is too prescriptive	The approach set out on in the draft policy appears overly prescriptive and at odds with the more balanced policy approach on non-designated heritage assets in the NPPF. It sets too high a threshold for the loss or substantial alteration of an asset. Protection for non-designated heritage assets is lower in the NPPF than for designated heritage assets. The first paragraph of the policy should therefore be reworded to be compliant with the NPPF.	DP218 JTC Fund Solutions (Jersey) Ltd.	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Support with no comment		DP001 Pavilion Architecture DP028 DP031 NLCA DP067 DP178 Montpelier & Clifton Hill Society	
Support with general comment	<p>The walls of Badgers Tennis Club are locally listed - any development would be difficult.</p> <p>Currently heritage assets are at risk.</p> <p>These policies, along with the relevant historic environment Policy CP15 and related policies of the City Plan Part 1, will provide a robust framework for underpinning the protection and enhancement of the heritage of the city.</p>	<p>DP036 Badgers Tennis Club</p> <p>DP263 Brunswick Town Association</p> <p>DP284 Historic England</p>	
Support with caveat	Support but it is too narrow in scope – should include public assets such as cast iron street furniture and historic paving.	DP076 Roundhill Society	
Minor changes requested	Should add that the council takes listing extremely seriously and will do all in its power to preserve the special nature of Brighton and Hove.	DP091	

DM29 The Setting of Heritage Assets			
Total Number of Responses		12	
Number of Representations that Support		10	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy is too restrictive	The policy is at best wildly open to interpretation and at worst inherently prevents densification of the City Centre (where densification of the City Centre is the most desirable and sustainable due to proximity to amenities and availability of public transport) - as the city centre also contains the highest proportion of historic buildings. This wording means that close to a listed building in the city centre it can easily be argued that no new building taller than its existing surroundings will be permitted.	DP258 Brighton & Hove Planning Agents Forum	
	This city has a housing crisis, not a views crisis. The majority of people in this city will accept having their view of a non listed building slightly damaged in return for more homes built.	DP002 Brighton YIMBY	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Support with no comment		DP001 Pavilion Architecture DP028 DP031 NLCA DP067 DP178 Montpelier & Clifton Hill Society	
Support with general comment	These policies, along with the relevant historic environment Policy CP15 and related policies of the City Plan Part 1, will provide a robust framework for underpinning the protection and enhancement of the heritage of the city.	DP284 Historic England	
Minor changes requested	Add after the first paragraph of the policy: “In exceptional circumstances, consideration will be given to proposals within the setting of a heritage asset which create deliberate but considered contrast to it in design, scale, massing and conditional on the following: i. Where justifiable in townscape terms. ii. Where it is demonstrated that the architectural design exhibits sensitivity and respect to the heritage asset. iii. Where the proposal achieves a standards of architectural design, commensurate with the significance of the heritage asset. iv. Sufficient detail is provided to demonstrate that the proposal achieves the required standard of architectural design from its overall massing, shape and design down to its smallest scale details”.	DP274 LCE Architects	

	<p>Amend 'taken into consideration' to say 'will be required'.</p> <p>The wording should warn against a narrow approach; the focus should not only be on the visual connection between a heritage asset and its setting, but also take account of historic, social and economic connections. A further consideration could be added to those listed (a) to (g), namely the potentially negative impact of new, tall buildings overshadowing heritage assets.</p> <p>Add that the council supports the sensitive restoration of heritage buildings to make them suitable for modern day use with minimal compromise to historic integrity and that all developers wishing to convert buildings are required to work closely with the Conservation Officer and English Heritage as appropriate.</p>	<p>DP263 Brunswick Town Association.</p> <p>DP207 The Regency Society</p> <p>DP091</p>	
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DM30 Registered Parks and Gardens			
Total Number of Responses		13	
Number of Representations that Support		10	
Number of Representations that Object		3	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Objection with no comment		DP002 Brighton YIMBY	
Policy should be more restrictive of temporary events	Temporary events should be precisely that. Where they exceed 6 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 6. A statement setting out what investigations have been carried out on the feasibility of using alternative sites must be carried out and included as part of a planning application.	DP177 The Brighton Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Temporary events are too invasive	Events are taking place too invasively, pervasively and for excessive periods in spaces such as the Pavilion Estate, Hove Lawns and Valley Gardens.	DP156 Kingscliffe Society	
Support			
Support with no comment		DP001 Pavilion Architecture DP028 DP031 NLCA DP091	
Support with general comment	<p>These policies, along with the relevant historic environment Policy CP15 and related policies of the City Plan Part 1, will provide a robust framework for underpinning the protection and enhancement of the heritage of the city.</p> <p>Positively encouraging management plans and identified enhancement works for registered parks & gardens will increase their worth as GI which in turn increases their value as natural capital assets. It could also potentially enhance their biodiversity.</p> <p>The revamped Valley gardens could do with a cafe in the middle. This would greatly encourage people to use the new gardens as a leisure destination.</p>	<p>DP284 Historic England</p> <p>DP189 Natural England</p> <p>DP067</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support with caveat	<p>Overuse for profit making activities means that public space is being eroded steadily at weekends, in particular. Need to ensure the public realm and rights of citizens are not lost Overuse of the Lawns in Hove, for example is ruining their condition and the pleasure of walking in open space beside the sea is frequently denied due to commercial activities.</p> <p>The Council's encouragement of management and improvement plans is welcome, but is of little value without a strategy for funding the work required.</p>	<p>DP263 Brunswick Town Association</p> <p>DP207 The Regency Society</p>	
Minor changes requested	<p>Clarify how proposals for temporary uses will be assessed. This is of particular relevance to Rottingdean as there are several events throughout the year which take place on The Green, in Kipling Gardens, and on the Recreation Ground. The current system works well but some clarification as regards when an informal event becomes a formal event would be helpful.</p> <p>It would be helpful if this section identified the registered parks and gardens in the city. It would be welcome if the Council were to commit to a review to establish whether any other sites would merit registration for example Brunswick Square or Palmeira Square / Adelaide Crescent.</p>	<p>DP303 Rottingdean Parish Council</p> <p>DP207 The Regency Society</p>	

DM31 Archaeological Interest			
Total Number of Responses		10	
Number of Representations that Support		10	
Number of Representations that Object			
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Support with no comment		DP001 Pavilion Architecture DP002 Brighton YIMBY DP028 DP031 NLCA DP067 DP091 DP263 Brunswick Town Association	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Support with general comment</p>	<p>The key point from the Regency Society's perspective is the recognition of the importance and role of above ground archaeology, which is well covered in the proposed wording for DM31.</p> <p>Support this policy, which offers a pragmatic solution to complicated sites, such as THV, where it is not always possible to carry out a full program of archaeological investigation prior to the grant of planning consent. Welcome the LPA taking a pragmatic approach and making full use of the opportunity to use planning conditions for such investigations.</p> <p>These policies, along with the relevant historic environment Policy CP15 and related policies of the City Plan Part 1, will provide a robust framework for underpinning the protection and enhancement of the heritage of the city.</p>	<p>DP207 The Regency Society</p> <p>DP281 Toads Hole Valley Landowners, Toads Hole Valley Ltd, Pecla Investments Ltd and Robert Mark Simon</p> <p>DP284 Historic England</p>	

DM32 The Royal Pavilion Estate			
Total Number of Responses		14	
Number of Representations that Support		12	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy is unnecessary	Policy reflects the present consultations carried out by the estate. Apart from the visibility of the estate from New Road, which could be improved, most of the problems arise from a lack of management and supervision of the estate. The proposal to fence the estate is not a suitable solution. Plans regarding the estate must take into account the needs of the local population who use the gardens and café.	DP031 NLCA	
Policy should be more restrictive of temporary events	Temporary events should be precisely that. Where they exceed 6 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 6. A statement setting out what investigations have been carried out on the feasibility of using alternative sites must be carried out and included as part of a planning application.	DP091 The Brighton Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Support with no comment		DP001 Pavilion Architecture DP002 Brighton YIMBY DP028 DP067 DP091 DP263 Brunswick Town Association	
Support with caveat	Support a careful approach to temporary uses of the Gardens but would not wish to see any restriction of access or charging for entry to them during daylight hours.	DP207 The Regency Society	
Support with general comment	<p>Support this policy, which seeks to reunify the estate and improve the visitor experience and setting of this historic asset which includes the Corn Exchange and Studio Theatres.</p> <p>Welcome this policy.</p> <p>Pavilion Gardens is one of Brighton & Hove's most valuable GI assets and lucrative source of natural capital; as such seeking to enhance the quality, security, accessibility and appeal of the estate will further increase its value. Encouraging greater biodiversity within the gardens directly increases biodiversity, GI value and the role the pavilion gardens play within the wider biodiversity network of Brighton & Hove.</p>	DP111 The Theatres Trust DP157 Hove Civic Society DP189 Natural England	

	<p>Strongly support the policy’s intentions. Particularly encouraged by the plan to co-ordinate with other adjacent sites including Valley Gardens. Particularly welcome the intention to ensure a wider integrated conservation scheme for the estate as a whole including further development at the Dome.</p> <p>These policies, along with the relevant historic environment Policy CP15 and related policies of the City Plan Part 1, will provide a robust framework for underpinning the protection and enhancement of the heritage of the city.</p>	<p>DP207 The Regency Society</p> <p>DP284 Historic England</p>	
<p>Minor changes requested</p>	<p>Pavilion Gardens is one of Brighton & Hove's most valuable GI assets and lucrative source of natural capital; as such seeking to enhance the quality, security, accessibility and appeal of the estate will further increase its value. Amend criterion i) of part one of the policy to say “Encourage conservation of heritage planning and greater biodiversity deliver biodiversity net gains within the gardens”.</p> <p>Heartened to see this policy suggest that greater biodiversity will be encouraged within the Royal Pavilion gardens. But ask the council to be more ambitious for biodiversity within the wording and suggest that policy would benefit from an extra point under section 3 that includes biodiversity. Also query whether point i) of section one of the policy should read “planting” not “planning”.</p>	<p>DP189 Natural England</p> <p>DP289 Sussex Wildlife Trust</p>	

DM33 Safe, Sustainable and Active Travel			
Total Number of Responses		25	
Number of Representations that Support		19	
Number of Representations that Object		6	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy predicates against shared surfaces	Policy could predicate against shared surfaces by segregating requirements for pedestrians, cyclists and public transport. Particularly 4d), which although on the face of it quite logical, does counter much current research that shows where there is risk of conflict between modes of transport, then speeds are naturally reduced and shared surfaces become viable and exciting contributions to a town or cities public realm.	DP258 B&H Planning Agents Forum	
Policy not effective in peripheral areas of the city	Policy is written for central urban areas and does not acknowledge enough that parts of Brighton & Hove may have different characteristics and demographics. Through traffic on the B2123, Falmer Road, for instance, includes private cars travelling from or to places not well served by public transport to anywhere other than the City Centre and are beyond a normal person's ability to walk or cycle.	DP303 Rottingdean PC	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Wording change requested	Wording around cycling should be strengthened, in particular in relation to DM33 part 2b about the city's cycle network. Not sure how a development could 'provide' the network, but it should be expected to improve it and contribute to it as much of the network is poor quality.	DP298 Brighton & Hove Friends of the Earth	
Should refer to national design standards	It is essential that the Plan refers to design standards such as IAN 195/16 (part of the Design Manual for Roads and Bridges - DMRB) to ensure any new facilities are brought forward to a consistent standard.	DP298 Brighton & Hove Friends of the Earth	
Should include more detailed requirements for bus shelters	Part 3 relating to public transport is not strong or clear enough around the provision of high quality infrastructure in terms of bus shelters. Shelter provision needs to be linked to demand, rather than the usual under provision. More importantly, there is nothing in this policy about requiring developers (certainly of major developments) to site the bus stop immediately outside the main entrance linked to it by a sheltered walkway.	DP298 Brighton & Hove Friends of the Earth	
Should include criteria relating to footway obstructions	There is no mention of the need to improve the space for pedestrians and wheelchair users in the main thoroughfares. At present, businesses are given too much freedom to encroach on pedestrian space with tables, chairs, A boards.	DP028	
General comment	Needs to be acknowledgement within the Council that whatever the policy is, people will still use cars.	DP095	
Minor change requested to protect bus services	Sustainable transport services needs better protection and part (3) must be clear and stronger. Should include criteria "and must not degrade bus journey times or their reliability".	DP100	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Change requested – road safety implications	It is important that the road safety implications are properly considered. Traffic impact (of a new development) can be quite remote from the development itself and can even be in a neighbouring or non-neighbouring highways authority's region. Should make clear in policy that “including road users remote from the development in places where additional traffic is known to cause problems” should be considered.	DP100	
General comment	Though (4c) is helpful, the wording does not make these responsibilities clear enough.	DP100	
Support			
General comment	Large parking zones encourage short car journeys.	DP006	
Minor change requested	The policy should include recognition that community led housing development is can encourage more sustainable and active transport as these kinds of developments can include share-cars and bikes, and community micro-travel plans.	DP175 Nub Brighton	
Minor change requested – cycling infrastructure	The policy does not refer to any improvements or upgrading of legacy cycling facilities, many of which urgently need widening and are clearly no longer fit for purpose.	DP316 Bricycles	
Minor change requested	Desire lines are not mentioned in cycling section.	DP316 Bricycles	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Clarifications regarding S106 contributions requested	Policy DM33 as currently worded does not provide sufficient clarification that the mitigation measures it identifies - that include contributions towards improvements to transport infrastructure - may not always be required. At present, the policy could be read as requiring a variety of public transport improvements irrespective of the impact of the development upon existing provision. Amendments should provide clarity that contributions towards transport and network improvements will only be sought where negative impacts can be demonstrated.	DP291 University of Sussex; DP265 Mid Group; DP281 Toads Hole Valley landowners	
Minor change requested	The policy should not also be explicitly linked to the earlier policy on public realm improvements. (DM18)	DP157 Hove Civic Society	
General comment	Support cycle routes and public transport.	DP002 Brighton YIMBY	
Minor change requested	Include reference to supporting active travel to food shopping.	DP233 Brighton & Hove Food Partnership	
Minor change requested	We need to see much more robust wording for cycle parking to ensure that it is accessible for children's cycles to encourage the next generation, and for all non-standard bikes whether trikes, tandems, trailers, hand cycles or specially adapted bikes.	DP316 Bricycles	
Policy should coordinate public realm management	We would suggest ensuring that the policy addresses the management and control by the council of investment in the public realm in relation to large developments. Disjointed public realm has been a long-standing problem at the Marina and this should be acknowledged and learnt from, otherwise it will be repeated throughout future large-scale developments.	DP266 Brighton Marina NF Steering Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Comment – seeking better alignment of new with pre-existing infrastructure	Developments should align any cycling or transport infrastructure with other pre-existing infrastructure; to help create joined up routes, connect sections of 'stranded' routes and improve the cycling experience across road junctions. Increased cycle parking facilities are a city-wide need. Provision should also be made for more accessible forms of cycling to those with low mobility.	DP307 Green Group of Councillors	
Reference to SDNP desirable	Policy should reiterate from the Local Transport Plan the importance of encouraging sustainable travel into the South Downs National Park and other natural areas; with Brighton & Hove being part of the Brighton and Lewes Downs biosphere it is vital to ensure that people and the natural environment are connected.	D189 Natural England	
General comment	General support.	DP067, DP077, DP085, DP001, DP263, DP272	
General comment	The flexibility proposed is supported, and is vital to delivering appropriate types of development which can respond to the accessibility and locational characteristics of specific sites.	DP268 LaSalle	

DM34 Transport Interchanges			
Total Number of Responses		17	
Number of Representations that Support		11	
Number of Representations that Object		6	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
General comment	General objection.	DP100, DP085	
Could encourage increased car usage	A park and ride facility is likely to increase longer distance car travel (which will pass through the National Park) and could undermine longer distance public transport.	DP298 Brighton & Hove Friends of the Earth DP316 Bricycles and Cycling UK	
Existing capacity underutilised	Current interchanges (park and ride) are underutilised. Waste of land that may be useful for other purposes.	DP077	
Public funds should not be used for park and ride	Oppose the use of public funds for park and ride instead of investment in end – end public transport, or cycling/walking facilities.	DP316 Bricycles and Cycling UK	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	DM34 does not go far enough in tackling parking issues related to coaches and vans.	DP095	
Request removal of park and ride unless related to reduction in parking	Suggests removal of Park and Ride from DM34 unless town centre parking is reduced at an equivalent number to new P&R parking spaces.	DP316 Bricycles and Cycling UK	
Support			
General comment	General support.	DP028, DP067, DP001 Pavilion Architecture, DP272	
Supports Economic Strategy	DM34 supports through the Growing City's theme (particularly GC5) – the promotion of active travel and delivering health/wellbeing benefits to residents. DM34 also aligns with Coast to Capital SEP Priorities 2 and 8.	DP208 Brighton and Hove Economic Partnership	
Aims of policy will support national policy	Transport interchanges will reduce vehicular use which will help Brighton and Hove reach key aims set out in NPPF (148. & 170).	DP189 Natural England	
Comment	Support for freight consolidation areas to reduce traffic holdups and pollution.	DP263 Brunswick Town Association	
	Lorries should be restricted in certain areas	DP263 Brunswick Town Association	
Comment	Draft Neighbourhood Plan supports the use of the Rottingdean Long Stay Car Park for Park and Ride.	DP303 Rottingdean Parish Council	
Minor changes requested	Wording change to provide clearer distinction between P&R and other options and their environmental contribution.	DP002 Brighton YIMBY	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Minor changes requested related to setting of SDNP	Include a criterion in the policy equivalent to criterion c in Policy DM25. I.e. to be clear in the policy that there should be no adverse/unacceptable effect on the setting of the SDNP.	DP221 SDNPA	
Additional criteria related to local and strategic road networks	Add "d) there is no unacceptable impact on local and strategic road networks and its capacity to safely and efficiently accommodate the movement generated or attracted by the development."	DP112 Highways England	

DM35 Travel Plans and Transport Assessments			
Total Number of Responses		20	
Number of Representations that Support		17	
Number of Representations that Object		3	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Requirements for TAs should be applied more flexibly in relation to proximity to AQMAs	The protection afforded to our AQMAs to meet the council's legal requirements in respect of meeting UK and EU Air Quality targets is inadequate, being very open to misinterpretation. A development application refused on the grounds that its traffic will adversely impact an AQMA could be overturned on appeal, if it the developer claims it not "near, "adjacent or "close, as stipulated in DM35 and DM40. For example the 450 homes at Lower Hoddern Farm will put significant extra traffic through the A259 Rottingdean AQMA, though being 5km distant is hardly near, close or adjacent. Arguably other provisions (e.g. DM34 and DM40 2.297 & 2.298 and its reference to NPPF Para 5) might be interpreted as giving this protection, but with developers ready to appeal interpretations, clarity is essential. It must be made unambiguously clear that a development which is not adjacent or	DP100	

	even near is still subject to these rules if the traffic it generates passes through the AQMA. Arguably the criteria for needing an Air Quality Impact Assessment should also be made more explicit in the SSAX sections for the specific sites.		
Requirements for TAs should be applied more flexibly in relation to proximity to AQMAs	The LPA should take account of this the increasing number of sites that are likely to end up in close proximity to an AQMA by considering the need for air quality provision at all developments, irrespective of its proximity to an already established AQMA.	DP307 Green Group of Councillors	
Parking spaces are more important than air quality	In principle [protecting air quality] is a good idea, however in reality houses need more parking spaces for cars.	DP095	
Support			
Support for policy criteria as will minimise impact on natural environment	Requiring proposals which could create significant disturbance/intrusion to submit a C&EMP will ensure impact on the natural environment is minimised early on in the development process. Requiring developments to ensure private vehicle use is minimised will reduce private vehicular emissions, air pollution and water pollution. Minimising negative impacts on biodiversity is a key focus of the NPPF (8. 170. 174. & 175.) and is mentioned throughout the DEFRA 25 year plan. Reducing vehicular emissions and pollution is a key aim of the NPPF (148. & 170.) especially section 9.	DP189 Natural England	
Comment	The use of smaller residential roads needs to be clearly limited in peak hours as it is becoming dangerous for residents.	DP077	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support with caveat	Support with reservation that new developments must include infrastructure.	DP263 Brunswick Town Association	
Changes requested in relation to cumulative impact assessments	Only 'committed developments' should be included in cumulative impact assessments. It is not for a current development proposal to consider aspirational development such, we consider that the wording should be amended to remove reference to 'or planned developments'.	DP281 Toads Hole Valley landowners	
Support with caveat	Policy supported but criterion 2. Should be amended to make provision for traffic generated by new developments which passes through an AQMA.	DP303 Rottingdean PC	
Minor changes requested	Recognise that community self-build developments can be encouraged to develop community travel plans.	DP175 Nub Brighton	
Additional criterion requested related to AQMA	Strong support for traffic reduction and improvements to air quality and the use of Travel Plans and Transport Assessments to achieve it. Suggest an additional point 5: Planning applications will be refused where the transport assessment demonstrates that it would increase vehicle emissions in any AQMA.	DP316 Bricycles and Cycling UK	
Minor changes requested	A change is required to the wording of criterion 2 to make it acceptable. Criterion 2 currently requires a Transport Assessment (as opposed to a Transport Statement) for all development, irrespective of size or impacts, within or adjacent to an AQMA. This is a disproportionate approach for smaller developments.	DP265 Mid Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support reflects Economic Strategy	Supports this policy through the Growing City's theme, principally GC5 which states "Support investment in transport infrastructure across the City Region and local active travel & "Continue to work within the city to promote and encourage active travel, improving local connections and delivering health and wellbeing benefits to individuals. This also aligns with the Coast to Capital SEP Priorities 2 and 8.	DP208 BHEP	
Support with additional text relating to Strategic Route Network	It is requested that the text in red is added as follows: "Any development that is likely to impact on the safe and efficient operation of the SRN or requires direct connection to the SRN will require consultation with Highways England, who may have their own requirements for a Transport Assessment/Statement.	DP112 Highways England	
Comment	The junction at the end of New England Road, New England Street and Argyle Road is the most polluted area in Brighton and I welcome any plans to assess this area.	DP272	
	Wording could be expanded to promote sustainable travel measures at Brighton Marina. CPP2 provides an opportunity for key strategic sites, in particular Brighton Marina, to be treated as a 'Central Area', like the rest of the town centre. There is an opportunity for Brighton Marina to be subject to lower maximum car parking requirements, and this should be encouraged through draft policy DM35.	DP278 Outer Harbour Development Company Partnership LLP	
General Support no comments	General support.	DP002 Brighton YIMBY, DP028, DP067, DP085, DP001 Pavilion Architecture	

DM36 Parking and Servicing			
Total Number of Responses		18	
Number of Representations that Support		11	
Number of Representations that Object		7	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy should be more ambitious in cutting car usage	It is disappointing that this is not clearer and stronger about the need to cut car use in the city and that building more car parking generally brings more traffic into the city onto its already over-saturated roads. It is not good enough just to ensure sufficient parking is provided if this is leading us in the wrong direction and clogging up streets which undermines the local economy. The policy needs to be much clearer and stronger about the need to reduce car parking in new developments as much as possible so that the cumulative impact of new development is a positive rather than a negative one which is the current trajectory.	DP298 Friends of the Earth	
General comment	We need cheaper and free parking in the area for local people.	DP153	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Additional parking provision should be permitted at the periphery of the city	No data provided regarding up to date parking needs in Brighton and Hove been set out. In the absence of this, we do not support policy DM36 without amendments. We suggest the following alterations to the first line of proposed policy DM36 to accommodate a different approach on a site by site basis (or a city wide basis), where up to date information justifies this: "In the absence of further evidence or mitigating circumstances provision of parking, including Additionally, at paragraph 2.258, we consider that the supporting text should be amended to recognise that around the periphery of Brighton and Hove closer to the main road network there may be a need for additional parking, especially for the larger family properties. Where justification can be provided (or a need is demonstrated) the council should allow parking provision in excess of the standards.	DP281 Toads Hole Valley landowners	
Parking provision should be required for all units	Any new development should provide parking provision for all likely flats/ owners/ tenants/ businesses rather than a token few, then over-spilling into already congested street parking. It is not fair to current residents. A Permit-free approach is totally unfeasible (and unlikely in the long term) as people just won't want to buy the properties.	DP280	
Policy does not go far enough	More must be done to discourage car transport and parking. The council should consider reducing the areas available for parking and increasing charges.	DP002 Brighton YIMBY	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
More flexibility required – servicing and delivery vehicles	Note 4 calls for all large scale delivery and service vehicles to be accommodated on site. Whilst it is obvious that such vehicles need to manoeuvre safely it is important to avoid these large spatial 'holes' impacting negatively on appropriate designs that complement the existing urban grain. Perhaps the wording should state that schemes must demonstrate how the safe provision of servicing and delivery vehicles can be accommodated either within the site boundary and/or through use of the existing highways.	DP258 B&H Planning Agents Forum	
More parking provision required	Most housing on the outside of Brighton does not need provision for cycle parking - the cycle lanes do not extend past the centre and most people do not cycle. There is a REAL need for ordinary parking let alone cycles and electric cars. There is not much need for car share schemes; they do not operate in the fringe areas.	DP095	
Support			
Appropriate to Local context	Requiring developments to include supporting infrastructure for low emission cars will encourage greater adoption of these vehicles which will reduce private vehicular emissions, air pollution and water pollution within Brighton & Hove.	DP189 Natural England	
Support with caveat	Support car free developments in principle.	DP316 Bricycles and Cycling UK	
Support with caveat	Cyclists can also be disabled. Cycle parking must be accessible and easy to use.	DP316 Bricycles and Cycling UK	
Comment	It is vital that any plans look deeply into parking and dedicated spaces are required to avoid overloading the on-street parking.	DP077	
Support with caveat	Paragraphs 2.261 and 2.262 should be strengthened regarding electric vehicle charge points by amending the wording to be 'require' rather than 'support the provision of' and 'should be considered'.	DP256 Conservative Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Comment	Should recognise that community self-build developments can reduce parking capacity through the use of community share-cars and active travel resources such as share bikes.	DP175 Nub Brighton	
Support – no detailed comments	General support.	DP028, DP067, DP085, DP001 Pavilion Architecture, DP208 BHEP, DP272	

DM37 Green Infrastructure and Nature Conservation			
Total Number of Responses		29	
Number of Representations that Support		20	
Number of Representations that Object		9	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy focused on designated sites and is not strong enough on Green Network/ green linkages	<p>The policy focuses primarily on designated species and habitats outside the city but is not strong enough on the Green Network within the city and habitats identified by the Council as being part of the green linkages. Suggests following insertions:</p> <p>Add the Green Network to the policy – bulleted list of protected areas and add to the list of designated and identified sites in policy. By virtue of having been identified in 2009.</p> <p>Paragraph 2.269 - reference to the Green Network footnote 59. It refers, not to the Green Network in the city, but to the NIA. We suggest reference is made to the Council document 'A Green Network for Brighton and Hove 2009' and reference to Green Network elsewhere in policy and text. Linkages identified should be protected from development.</p>	DP217 Brighton and Hove Community Land Trust; DP205	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Include reference to national and local documents in supporting text	<p>Honour recommendations made by Natural England in the Nature Nearby report when considering planning applications.</p> <p>Mention in supporting text: Natural England in the Nature Nearby report as part of the justification. Mention the Green Network. Refer to BHCC's 'A Green Network for Brighton and Hove 2009'.</p>	<p>DP217 Brighton and Hove Community Land Trust</p> <p>DP205</p>	
Soundness of 2017 LWS Review Omission of Local Wildlife Sites from Appendix 3 and policies map	<p>Consider sites that are missing from the list of local wild life sites.</p> <p>Missing LWS is a soundness issue as CPP2 fails to protect specified sites and is therefore contrary to NPPF and national strategy. Concerned with 2017 LWS Review process.</p> <p>Pavilion Gardens, Valley Gardens, The Level and Park Crescent should be added to the BHCC LWS map (further details on sites, names and locations provided along with LNR and LGS).</p> <p>Ovingdean Copse should be added to LWS list.</p>	<p>DP089</p> <p>DP285 Eco21st 'Ecological thinking in the 21st Century'</p> <p>DP317 Rottingdean Coastal Councillors</p>	
Policy not robust or ambitious enough to protect and enhance biodiversity	<p>The policy lacks sufficient protection for biodiversity and does not seek to enhance biodiversity. It refers to obsolete mechanisms, such as the NIA and BAP programmes. It is not ambitious enough.</p> <p>Proposals must seek to protect and enhance the following and to prevent damaging impacts: The South Downs Way Ahead Nature Improvement Area (NIA) does not form the backbone of the Green infrastructure programme as this project was completed two years ago. It was a finite project with a set of resources which have been spent.</p>	<p>DP097</p>	
	<p>The council should have an ecologist to keep up to date on changes within the SDNPA.</p>	<p>DP097</p>	
	<p>2.272 - Add house sparrow to the list of birds. Also add provision to increase the number of swift and bat boxes in new development.</p>	<p>DP097</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Inconsistent with national policies and strategies	<p>Lacks reference to the national strategies. It is not sound for a Unitary Authority with full awareness of the National Biodiversity Strategy and designation of a 'Biosphere Reserve' to fail in including reference to this Strategy or Section 41 of the NERC Act 2006.</p> <p>The habitats and species are derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006 should be fully listed.</p>	DP285 Eco21st 'Ecological thinking in the 21 st Century'	
Extend policy remit to include geodiversity	<p>Extend the duty to protect geodiversity in line with the importance conferred by England Biodiversity 2020 and to accord with NPPF (Paragraphs 109 to 125).</p> <p>Need to refer to DEFRA's 25 Year Plan to improve the environment.</p>	DP285 Eco21st 'Ecological thinking in the 21 st Century'	
	Protection afforded to the Designated Sites require revision if they are to be both positively prepared and effective.	DP218 JTC Fund Solutions (Jersey) Limited	
Policy not effective as written	Welcome distinction made between the levels of protection afforded to each type of designation, according to a hierarchy, which is in accordance with the approach recommended in the NPPF. However consider draft policy DM37, as worded, is not positively prepared or effective as only allows development in designated sites, according to criteria relevant to each type of site.	DP218 JTC Fund Solutions (Jersey) Limited	
Sequential approach undermines site allocations	The de-facto sequential approach undermines the delivery of sites (such as the Black Rock Site) that might be allocated for development under other policies in this Draft Plan. Suggests re-wording: to explain that proposal within a designated site will be permitted where either the site is 'specifically allocated for development or where there are no alternative suitable sites'.	DP218 JTC Fund Solutions (Jersey) Limited	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Policy should protect urban fringes	Policy should be changed to ensure the urban fringes are not eroded by development.	DP095	
Policy is too prescriptive	Policy unnecessarily prescriptive. Some designated sites can be protected from other means (Ancient woodland by National Policy) aged/veteran trees could be covered under 'protected trees' category Policy lacks context to the 'City's National Elm Collection'.	DP258 Brighton & Hove Planning Agents Forum	
Support			
Support without qualifying comments		DP085; DP162 Environment Agency; DP067; DP001; DP238; DP263 Brunswick Town Association; DP272; DP303 Rottingdean Parish Council	
Support with caveat - policy lacks support for green energy	Policy lacks support for multiple forms of green initiatives (solar panels, wind power, no zones for motor vehicles, hydroelectricity, biofuels geothermal energy).	DP134	
Encourage community-led development as these yield more green benefits	Appropriate response to green spaces, wildlife and local ecology as they are huge resources spanning health, wellbeing, sustainability, air quality and quality of life. Plan should encourage community self-build development which will yield more benefits by virtue of not having a profit focus.	DP175 Nub Brighton	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Minor changes requested to extend the focus to development outside designated sites	<p>Policy aligns well with NPPF (171.) and the DEFRA 25 year plan (3.3.i) with respect to</p> <ul style="list-style-type: none"> a) Minimising impacts on biodiversity and providing net gains - NPPF (8. 170. 174. & 175.) and the DEFRA 25 year plan's aims (1.1.). b) Preserving or enhancing ecological/ecological networks is in line with the NPPF (170. & 174.). <p>Paragraph 2.272 ensures developments must consider impacts on features of Brighton & Hove's biodiversity which otherwise may be overlooked.</p>	DP189 Natural England	
New wording to ensure clarity on net gain	<p>New wording should be inserted to ensure GI/natural capital and biodiversity net gain is achieved from all developments, not just those affecting designated sites and to bring the policy in greater alignment with various national strategies (NPPF (8. 170. 174. & 175.), DEFRA 25 year plan (1.1.) on net gain, NPPF (171.) and the DEFRA 25 year plan (3.3.i) on GI maintenance; NPPF (180) on National Park and its landscape and scenic beauty).</p>	DP189 Natural England	
Areas of tranquillity should be identified	<p>Relevant areas of tranquillity should be identified and protected, such as Local Green Spaces and the South Downs National Park to make it aligned with NPPF (180.)</p>	DP189 Natural England	
Suggest publishing a separate Green Infrastructure Strategy	<p>BHCC should go beyond the spatial framework formed by the South Downs Way Ahead NIA to commit to publishing and regularly updating its own Green Infrastructure Strategy which would a)enable more specific management of the city's GI and b)introduce strategies such as a community GI levy developers could pay into. The Strategy could be linked to ANGSt, Green Flag Award or an accessibility standard and will be in line with the level of commitment to preserving and enhancing the natural environment that is indicative of a biosphere designation.</p>	DP189 Natural England	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Potential environmental value of Brownfield land	Brownfield land should be mentioned within this policy for the potential environmental value that exists on these sites, often found in urban areas and former industrial land.	DP189 Natural England	
Priority Habitats and species should be mentioned	Priority habitats and species should be mentioned within this policy in line with the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006.	DP189 Natural England	
Para 2.273 needs changing	Paragraph 2.273 is not supported as it gives an impression that losses to designated sites and conservation features can be mitigated. The policy should state that impacts will be avoided. The emphasis on any losses to SSSIs or biodiversity assets would require compensation not mitigation is at odds to NPPF which requires planning applications to achieve net gain and for developments to adhere to the mitigation hierarchy and avoid, mitigate and as a last resort, compensate. We note that refer to this hierarchy in the policy, but the supporting text should be amended.	DP189 Natural England	
Support with some suggested changes to supporting text - conservation of swifts	<p>Welcome recognition of need for protecting species that are vulnerable but not currently protected by law and support to Brighton & Hove's local BAP habitats. Although policy acknowledges Swift as one of the species to be considered for enhancement opportunities, does not stress enough the urgent need for action to conserve this species and therefore may miss the opportunity to include those enhancements in upcoming developments.</p> <p>RSPB and volunteer surveys have found 76 nests in BHCC in the past two years.</p> <p>Para 2.272: should be amended to provide a stronger protection and wording is suggested.</p>	DP219 RSPB	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support but more emphasis in policy on swift protection sought	Swift protection in new residential and commercial dwellings should include integral swift bricks at a 1:1 ratio for houses and increased proportions for commercial premises. For residential properties, general guidance is an overall ratio of 1 per house, but in clusters of 2-4 per house e.g. on a 100-house development, install 4 on 25 houses.	DP256 The Conservative Group	
Support with suggestion to other typologies of open space as Green Infrastructure	Include allotments, orchards and community food spaces as part of green infrastructure as habitats for wildlife, green corridors and providing shade / ground cover / flood prevention.	DP233 Brighton and Hove Food partnership	
All new developments should include SUDs	All new developments should design in SuDS, green roofs and walls, as appropriate to building design and retrofit same measures where feasible, particularly into problem areas with surface water flooding/drought issues.	DP256 The Conservative Group	
Support with suggested amendment showing caveats on mitigation	Include examples or caveats to indicate adequate mitigation and/or compensation measures that will be sought where proposal is liable to a demonstrable harm to such sites and/or features. Suggest amendment: <i>'Proposals liable to cause demonstrable harm to such sites and/or features will not be permitted, <u>unless adequate mitigation and/or compensation measures are included in the proposals</u> '.</i>	DP281 Toads Hole Valley Landowners, Toads Hole Valley Ltd, Pecla Investments Ltd and Robert Mark Simon	
Support with caveat - amend policy to emphasise net gain	The Sussex Wildlife Trust would like to see the requirement for up-to-date assessments to apply to all applications which may affect biodiversity to ensure that net gains are achievable. NPPF Paragraph 170 is clear that both planning policy and decisions should provide net gains to biodiversity. There is no longer the 'where possible' caveat – it is inconsistent with the principle of net gains and should be removed.	DP289 Sussex Wildlife Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Criteria based policy based on hierarchy of designated sites no longer exists	The requirement to set criteria based policies based on the hierarchy of designated sites no longer exists within National Policy, therefore the suitability of the fourth paragraph of the policy is questioned.	DP289 Sussex Wildlife Trust	
Concerned with criteria base approach to designated sites	<p>Local Wildlife sites need to be protected through the local plan. Reference in policy in relation to within a local site to 'City-wide importance' is not clear.</p> <p>LNR to be considered at regional level and question whether the exception of internationally designated sites is legally compliant with the Habitat Regulations.</p> <p>Policy should clarify what is required when an application may have an impact on an internationally designated site, rather than to list possible exceptions.</p> <p>Recommend that policy is amended to ensure that the components of the City's ecological network are truly safeguarded. If the council are minded to pursue a criteria base approach to designated sites, than the Sussex Wildlife Trust would welcome a discussion to explore what requirements would be suitable to ensure robust protection of locally designated sites.</p>	DP289 Sussex Wildlife Trust	
Suggested policy amendments for clarity	Minor changes for strengthening the policy: Inclusion of the word 'enhanced' in the final line of the first paragraph of policy DM37 ; Removal of '~seek to' and 'where possible' from the first sentence of the existing second paragraph.	DP289 Sussex Wildlife Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Minor amendment suggested for clarity	<p>Add reference to the marine environment to the features listed in the second paragraph.</p> <p>Clarity is sought over bullet point (d) of the final paragraph. The supporting text does not expand on what the council might consider to be public appreciation. Inclusion of the wording 'long-term' in bullet point (e).</p>	DP289 Sussex Wildlife Trust	
Need to identify mechanisms to enable effective implementation of GI policies	Council's approach to considering the assessment of Natural Capital as stated in section 2.271 is supported but this is not supported in policy wording. Request identifying mechanisms that could enable this to happen given the longevity of the plan and the recognition of natural capital in the Defra 25 year plan.	DP289 Sussex Wildlife Trust	
LWS review	Review of LWS is supported and request Council to make commitment within the CPP2 to regular reviews of existing and proposed LWSs, providing a robust evidence base for council decisions and future plans.	DP289 Sussex Wildlife Trust	
Minor editorial amendments to bring clarity	A number of changes suggested to strengthen and bring clarity to the policy; supporting text and footnotes.	DP289 Sussex Wildlife Trust	
Support but recommend establishing Nature Recovery Network	Welcome the broad range of policies aimed at promoting the viability of green infrastructure but consideration could be given to how developments can contribute to a process of 'nature recovery' in line with WWF. Suggest establishing a Nature Recovery network via 'Spaces for nature' in all new developments. Full 'Life Cycle' analyses of developments (including their construction, materials) could form a useful basis to understand impacts of development on nature conservation.	DP307 Green Group of Councillors	
Support	Section 2.28.8 reaffirms the BHEPs commitment to delivering a robust green infrastructure for the city and wider region.	DP208 Brighton & Hove Economic Partnership	

DM38 Local Green Spaces			
Total Number of Responses		53	
Number of Representations that Support		16	
Number of Representations that Object		37	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy inconsistent with the revised NPPF	Policy not compliant with NPPF which states that policies for managing development in LGS should be consistent with those for Green Belt. Policy must be amended to ensure alignment with national policies (revised NPPF paragraphs 101) and suggest wording changes.	DP289 Sussex Wildlife Trust	
St Aubyn's field should be included in the list	Despite full Council recommendation in 2015, St Aubyn's Field in Rottingdean has not been included as a Local Green Space.	DP326; DP325; DP324; DP323; DP346; DP327; DP303 Rottingdean Parish Council; DP321; DP008 A259 Action Group; DP320; DP337; DP342; DP343; DP341; DP319; DP344; DP328; DP336; DP339; DP338; DP340; DP345; DP345; DP335; DP334; DP333;	

		DP332; DP331; DP330; DP329	
Remove Benfield Valley from the list - does not meet NPPF criteria	Local Green Space (LGS) designation for Benfield Valley is not consistent with national guidance (paragraph 100) as the site is an extensive tract of land and therefore lacks local character. DM38 should be amended to remove reference to Benfield Valley.	DP287 Fairfax Acquisitions Ltd	
Lacks focus on wider Green Network	Policy focuses mainly on the designated spaces and could do more with emphasis on the wider Green Network within the city. Request including a map of the Green Network in the appendices and the Green Network referred to in para 2.2283 including 'Green Network for Brighton and Hove 2009' referenced.	DP217 Brighton and Hove Community Land Trust; DP205	
Three designated sites do not meet NPPF criteria	Apart from Three Cornered Copse, the designated sites do not meet criteria for Local Green Space as defined by para 77 of the NPPF. Ladies' Mile and Benfield Valley could easily accommodate housing and still retain substantial open space.	DP258 Brighton & Hove Planning Agents Forum	
Housing number for Benfield Valley is arbitrary	Housing numbers for Benfield Valley were established at 30 dwellings through the Urban Fringe Assessment however this number has now increased to 100 dwellings without any further detailed evidence. Lack of rigour in formulating housing numbers indicated in the Urban Fringe Assessment undermines the weight that should be given to the UFA.	DP258 Brighton & Hove Planning Agents Forum	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Lacks sound analysis and the outcome of Open Space Study disputed	Paragraph 2.282 makes this policy redundant. Any such protection must be based on sound analysis and must be based on a qualitative as well as a quantitative basis. Dispute the conclusion from 2008 Open Space Study that informs Urban Fringe Study. The failure of the Open Space Studies to acknowledge the sea, beach and seafront as a significant component of the City's open space offer is even contradicted by the wording of Policy DM39 which states "proposals should safeguard the importance of the seafront and beach as open space.	DP258 Brighton & Hove Planning Agents Forum	
Amend policy to ensure protection of urban fringe	Policy should be amended to ensure the urban fringes are not eroded by development.	DP095	
Incomplete list	Local Green Space list is incomplete.	DP089	
Support			
Support	Policy is supported.	DP329; DP085; DP134; DP199 Friends of vale park; DP233 Brighton & Hove Food Partnership; DP238; DP272; DP238; DP281 Toads Hole Valley Landowners, Toads Hole Valley Ltd, Pecla Investment Ltd; DP298 Friends of the Earth; DP307 Green Group of Councillors;	

		DP001 Pavilion Architecture	
Support with minor change to emphasize accessibility	Local green space designation protects valuable sources of GI and biodiversity, while also ensuring local communities are more empowered with nature conservation and that tranquillity is preserved. It complies with the basic thrust of NPPF and DEFRA 25 Year Plan's aims. Changes suggested in relation to increasing accessibility to/within Local Green Space where it does not conflict with biodiversity matters.	DP189 Natural England	
Recognise community self-build deliver more green benefits	Recognise that not all developments are equal, and some would be able to create housing that would be of the right scale and environmental sensitivity to not threaten the unique qualities of our local green spaces - for example - small scale community self-build.	DP175 Nub Brighton	
Building close to LGS should be resisted	Building close to any designated green space needs to be deterred generally as this sets a precedent and in a short time the green space will be built on.	DP077	
Support with request for additional sites to be included as LGS	Consider following sites for LGS designation: The park around Hove Museum, the land around St Leonard's Church, St Christopher's School playing field between Leicester Villas and Glebe Villas, Ovingdean Hall School, St Aubyn's Playing Fields, Roedean Pitch and Putt Course, the land in the front of the Lawn Memorial Cemetery in Woodingdean, Happy Valley the Plainfields Open Space in Patcham, Horsdean recreation ground embankment, Vale Avenue/Barrhill Avenue playing fields in Patcham, the area known as Braeside Linar Woods, Patcham Place, and land including adjoining Carden Park and Woodbourne Meadows, Hove Lawns/Seafront, Badgers Tennis Court.	DP256 The Conservative Group; DP263 Brunswick Town Association; DP036 Badgers Tennis Club	

	Support policy CP16 Open Space in City Plan Part 1 which affords protection for many of the city's open spaces including village greens, sports pitches, and playing fields.		
Green space audit requested	Green spaces not only provide valuable opportunities for leisure activities but also provide enormous health benefits for residents in what is one of the most densely populated urban areas in the country. Council should undertake an audit of green spaces with a view to further designating areas not currently afforded protection under CP16.	DP256 The Conservative Group	

DM39 Development on the Seafront			
Total Number of Responses		15	
Number of Representations that Support		13	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Do not support restriction against development extending onto shingle beach	<p>Whilst support policy areas relating to sea defence and ensuring that development takes account of coastal conditions do not support blanket restriction against development extending onto the shingle beach – restricts effectiveness of plan and not positive. Such a restriction could undermine delivery of regeneration schemes such as the development at Black Rock (strategic allocation in CPP1 and referred to in DM17) which may need to extend onto the shingle beach. Suggest amend policy wording to include additional exception: <i>‘where the adjacent land has been allocated for development in the local plan’.</i></p>	DP218 JTC Fund Solutions (Jersey) Ltd	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Beachfront from Yellowwave to Marina should be protected from further development	The City Plan should protect the beach-front east of the Yellowwave site as far as the Marina from further development, as it is relatively un-developed providing a valuable change of character which reveals the natural features of the beach.	DP207 The Regency Society	
Support			
Appropriate and accords with NPPF	Positives – ensures important biological and geological aspects of coast are not negatively impacted; ensures public amenities on the shingle beach are small scale reduces impact on important coastal habitats while reducing damage that will occur with climate change driven sea-level rise; limits negative impact on the marine environment. Minimising impacts on biodiversity and net gains and maintaining and enhancing GI accords with NPPF and DEFRA 25 year plan.	DP189 Natural England	
	Aims to protect and enhance public access to the sea and build in climate change and adaptation.	DP238	
	Strongly support especially in relation to Hove Lawns and seafront to boundary – a valuable open space enhancing the shoreline with natural habitats.	DP263	
Support presumption against development extending onto the shingle beach	However concerned that there is currently a gradual spread of piecemeal encroachment by commercial attractions on to areas of shingle in the Old Town and East Cliff Conservation Areas.	DP156 Kingscliffe Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Refer to Marine Conservation Zone	Specific mention should be made to the protection from impacts of development on "beachy head west" marine conservation zone (MCZ). The designation of MCZ is a nationally important marine designation which encompasses Brighton marina.	DP189 Natural England	
Include statement discouraging litter on the beach	With respect to sea water quality as an environmental and recreational asset - include in paragraph 2.311 or in topics covering waste management, refuse, litter, etc. to discourage litter strewn on the shingle and blown or washed into the sea.	DP156 Kingscliffe Society	
Support with suggested wording amendment – access routes	Recommend that Policy wording at part d) includes reference to ‘access’ as well as escape routes.	DP162 Environment Agency	
Support with caveat – seafront cycle routes should be protected	Proposals should safeguard the importance of the seafront and beach as an open space and maintain and enhance public access to and along the coast and to sea-based activities (see City Plan Part One policies CP9 Sustainable Transport CP16 Open Space and CP17 Sports Provision).	DP316 Bricycles and Cycling UK	
Support (with no supporting comments)		DP067; DP077; DP085; DP089; DP095; DP001 Pavilion Architecture; DP272	

DM40 Protection of the Environment and Health – Pollution and Nuisance			
Total Number of Responses		19	
Number of Representations that Support		14	
Number of Representations that Object		5	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy needs strengthening drawing on Environment Audit Committee’s report	Policy needs to be strengthened to ensure measures to tackle emissions from all sources and have a positive impact on air quality. Especially, given the Environment Audit Committee’s view on the NPPF, suggesting that the NPPF policy allows trade off which undermines the importance of air quality and makes it more difficult to refuse planning applications on the grounds of air quality (such as the conversion of buildings from offices to residential use).	DP307 Green Group of Councillors	
Policy needs an additional criterion	In view of the Council’s recent track record of implementing a number of measures (low emission zones, retrofitting of buses and green space initiatives), include an additional criterion on spatial planning that reduce the need to travel by car, and encourage developments in locations where facilities are already accessible.	DP307 Green Group of Councillors	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Widen scope to cover beyond existing AQMAs to include buildings and areas frequented by vulnerable population	Extend the scope of the policy to cover planning developments in proximity not just to an existing AQMA but also to buildings or areas frequented by high-risk residents, such as the elderly or school children. These areas should be assessed on grounds of air quality impact.	DP307 Green Group of Councillors	
Building design's positive role not cited	Policy should encourage building design that plays a role in providing effective dispersal of pollution, such as vegetation in a local area.	DP307 Green Group of Councillors	
Align with BHCC Corporate KPIs	Policy should be aligned to BHCC Corporate KPIs, November 2017.	DP307 Green Group of Councillors	
Policy is city centrist and ignores outlying areas with air quality and infrastructure problems	The overall thrust is supported but it does not adequately acknowledge different needs & characteristics of outlying parts of Brighton & Hove, particularly infrastructure needs and inadequate road capacity in the Rottingdean area. The volume of vehicle traffic using the B2123 and its junction with the A259 already creates serious problems, air pollution, congestion and delay in journey times which affect economic prosperity as well as health and environmental harm.	DP303 Rottingdean Parish Council	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
City Plan STA methodology cannot be relied on	<p>The narrowness of Rottingdean’s historic High Street (B2123) already carries too much traffic most of which are commuters using the road as a rat run to go further east on the A259.The mitigations through travel plans etc. of developments will not have a significant impact on these levels despite various efforts.</p> <p>The City Plan STA’s reliance on additional journeys being absorbed by bus services have not been measured so it cannot be relied upon as an offset for the future. Developments which risk additional journeys by car in an area in which the AQMA is already above the legal limit must be addressed with adequate mitigating measures.</p>	DP303 Rottingdean Parish Council	
Inadequate in addressing immediate areas outside AQMA and implications	<p>Policy does not go far enough to ensure health, safety and quality of life of residents are not undermined in AQMAs such as Rottingdean, some parts of which are already above the legal limit in the High Street despite move to low emission buses. Amend paragraph 2.298 to read <i>‘new development in or near or adding to traffic in an AQMA assists....’</i></p>	DP303 Rottingdean Parish Council	
Policy is weak in view of dangers of air pollution even within limits	<p>The policy is weak in view of the increasing recognition of the dangers of air pollution even well below legal limits.</p>	DP298 Friends of the Earth	
Chimneys that support wood burning stoves should be banned	<p>Chimneys which support the use of wood-burning stoves should be discouraged or banned in densely populated areas. They create significant additional transport demands (bringing in the wood) and pollute the air, causing quite high localised pollution for neighbours, especially with so many attic conversions nowadays.</p>	DP298 Friends of the Earth	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
New way of conducting air quality impact survey should be introduced	The policy should be changed to ensure the urban fringes are not eroded by development. Due to ignoring the actual level of car usage in the outskirts of the city, any survey as to impact on surrounding areas is flawed. A new way of conducting these surveys needs to found where actual information is used not the supposed use of land.	DP095	
Policy needs to be strengthened to give stronger protection for AQMAs	The policy fails to meet the council's legal requirements to meet UK and EU Air Quality targets. In conjunction with Policy DM35, DM40 provides inadequate protection to AQMAs due to lack of clarity around what is near, close or adjacent. Paragraph 2.298 to replace "or near" with "in or near or adding to the traffic in an AQMA" in line 2.	DP100	
Criteria for needing AQIA should be included in Site Specific policies	Criteria for needing an Air Quality Impact Assessment should also be made more explicit in the Strategic Site Allocation sections for the specific sites.	DP100	
Criterion c) needs strengthening	Criterion c) to include (after when appropriate) "including where the development will add to the traffic in an AQMA in the City or a neighbouring district".	DP100	
Support			
Appropriate reference to street lighting	Policy makes appropriate reference to efficient street lighting, heating and in conjunction with the policy on heat networks will lead to improvements.	DP307 Green Group of Councillors	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Strong policy but monitoring is vital	It is strong on air quality - but the Council should actively monitor impacts of development and refuse permission for developments that will worsen Air Quality.	DP238	
Policy ignores other green initiatives/measures	There are far too many cars in Brighton and that the future should be a move towards green energy. Policy silent on introduction of electric tram or phasing out of diesel bus operations.	DP134	
Support but strengthening recommended	<p>Appropriate Policy alignment with the aims of the NPPF (171) and the DEFRA 25 year plan (3.3.i) especially in maintenance of GI and biodiversity and minimising harmful impacts while also preventing damaging increases of air pollution, water pollution, light pollution and noise pollution/nuisance; NPPF (170) on biodiversity net gain; NPPF (180 & 181) on avoiding/mitigating pollution and nuisance.</p> <p>This policy could be improved by mentioning the impacts pollution can have on the marine and water environments. Perhaps linking to DM42.</p>	DP189 Natural England	
Support with minor change	<p>Support subject to removing 'Where Practicable' from criterion d.</p> <p>Particular regard must be given to the impacts of emissions from transport, flues, fixed plant, and, heat and power systems.</p>	DP316 Bicycles and Cycling UK	
Support with caveat	Support subject to inclusion of 'requires and ensures'.	DP263 Brunswick Town Association	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support but strengthening needed with respect to biodiversity	Support the inclusion of this policy and particularly the recognition of development needing to prevent unacceptable harm to biodiversity (paragraph 1). Suggest strengthening criterion e) to insert “biodiversity, in particular priority habitat and species”, to align with paragraph 180c of the revised NPPF.	DP289 Sussex Wildlife Trust	
Support but references to chalk block aquifer needed	Support and suggest amendment to Paragraph 2.302 to make references to the importance of the protection of the Brighton chalk block aquifer.	DP162 Environment Agency	
Support without qualifying comments		DP067; DP085; DP089; DP001; DP272; DP281 Toads Hole Valley Landowners, Toads Hole Valley Ltd, Pecla Investments Ltd and Robert Mark Simon	
Financial contribution to be directed towards AQMP initiatives	Support however measures to mitigate air pollution from development likely to increase pollution (ie all housing where people will own cars) should include a financial contribution to the AQMP which fund electric buses, charging places for cars, electric bike hire schemes etc.	DP097	

DM41 Polluted sites, hazardous substances & land stability			
Total Number of Responses		10	
Number of Representations that Support		9	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Site surveys should be undertaken	There should be site surveys on all proposed developments regardless of Council's resource issues.	DP095	
Support			
Appropriate reference to ecosystem services	Support the reference to ecosystem services within this policy. For clarity include its reference in criterion d).	DP289 Sussex Wildlife Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support without qualifying comments		DP272; DP263 Brunswick Town Association; DP162 Environment Agency; DP089; DP085; DP067; DP001 Pavilion Architecture;	
Support with a text insertion to strengthen the policy	Appropriate Policy and good alignment with NPPF (paragraph 171, 8, 170, 174 & 175) and the DEFRA 25 year plan (1.1 and 3.3.i). Minor additional text suggested to include: 'natural capital stocks'.	DP189 Natural England	

DM42 Protecting the Water Environment			
Total Number of Responses		18	
Number of Representations that Support		17	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Extent of policy is limited	Policy does not acknowledge 'issues with flooding and sewage'. Particular concern for flooding across Patcham Old Village.	DP095	
Support			
General support		DP067, DP077, DP085, DP089, DP001, DP238, DP263 Brunswick Town Association, DP272	
	Support connection to mains sewerage system.	DP162 Environment Agency	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Support with wording alteration</p>	<p>Mention specifically that Nitrates are a major contributor for the poor quality of the aquifer Brighton Chalk Block Aquifer.</p> <p>For reasoned justification 2.311 amend as:</p> <p><i>'Sea water quality is of equal importance in terms of environmental quality and its value as a key recreational asset, especially regarding the <u>Beachy Head West MCZ</u> (See also City Plan Part One Policy SA1 The Seafront and DM39 Development on the Seafront)..'</i></p> <p>Mention of Brighton CHaMP project would be welcomed.</p>	<p>DP189 Natural England</p>	
<p>Policy should address plastic pollution of water</p>	<p>Policy should discuss plastic pollution of water and aims to reduce single use plastic.</p> <p>Concerned with beach rubbish and general cleanliness in the city – suggests improvements to size of bins, signposting collection points, more regular collection and better monitoring of disposal of waste at the beach.</p>	<p>DP097, DP134</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>New approach to water and wastewater connections should be reflected in policy wording</p>	<p>OFWAT's has implemented a new approach to water and wastewater connections charging. Any reinforcement required as a result of an identified lack of water or wastewater network capacity will now be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. This is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure, in order to prevent an increased risk of flooding. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.</p> <p>As a result, recommendations for policy provisions have been altered. For 2.316 amend as:</p> <p><i>'Applicants should liaise with Southern Water in order to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development and that it would not lead to problems for existing users. In some circumstances, it may be necessary for applicants to carry out appropriate studies to ascertain whether the proposed development would lead to overloading of existing infrastructure. Where capacity assessments show there is a need, Southern Water</i></p>	<p>DP201 Southern Water</p>	

	<i>will require for <u>occupation of development to be phased to align with the delivery of water or wastewater infrastructure. Connect to the sewerage/water network at the nearest point of adequate capacity.</u></i>		
Refer to water quantity in policy	Brighton & Hove is an area under serious water stress. Amend text (paragraph 1) so that policy relates to water quantity as well as quality.	DP289 Sussex Wildlife Trust	
Appropriate Response	Supports policy; in particular ensuring developments connect to mains sewerage.	DP162 Environment Agency	
	Welcome policy as RPC often consider there is a lack of acknowledgment by BHCC of cumulative impact of multiple applications on water supply and sewage disposal.	DP303 Rottingdean Parish Council	
	Fits with the economic strategy 'Growing City' for a city region wide water and energy plan.	DP208 B&H Economic Partnership	
	Access to safe, clean water is a priority.	DP233 B&H Food Partners	

DM43 Sustainable Urban Drainage			
Total Number of Responses		13	
Number of Representations that Support		12	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Lack confidence that policy would be applied in practice	Standards are already being ignored in Patcham – example of proposed housing sites at London Road. Have no confidence in policy will be upheld. Stronger measures also to correct problems once they have occurred (without cost to council).	DP095	
Support			
Appropriate Response	Fits with Economic Strategy ('Growing City' theme for the development of a city region wide water and energy plan).	DP208 BHEP	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Would accord with National policy	<p>Prioritising sustainable urban drainage systems to reduce flood risk pollution is in line with the aims of the NPPF (163. & 165.) Minimising water pollution is in line with the aims of the NPPF (170.) Maintaining & enhancing G/BI is in line with the aims of the NPPF (171.) and the DEFRA 25 year plan (3.3.i)</p> <p>Minimising impacts on biodiversity and providing net gains is in line with the NPPF (8. 170. 174. & 175.) and the DEFRA 25 year plan's aims (1.1.) Preserving or enhancing ecological networks is in line with the NPPF (170. & 174.).</p>	DP189 Natural England	
Would protect biodiversity, ecological networks, GI and natural capital and improve water quality	<p>Reducing surface run off pollution by the effective implementation of SUDs will improve the water quality within the Brighton & Hove aquifer. Encouraging the creation of more SUDs directly contributes to the GI network within Brighton & Hove while also adding to natural capital stocks.</p> <p>Some SUDs if implemented and managed properly can also directly contribute to biodiversity and the existing ecological network, as such this policy could result in biodiversity net gain and greater connectivity of Brighton & Hove's ecological network.</p>	DP189 Natural England	
Support	Stronger than national policy.	DP238	
	London Road has a history of flooding due to high water table, building larger premises here will increase the flood risk.	DP077	
Support (no qualifying comments)		DP272, DP233, DP089, DP085, DP067, DP001	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Support with amendments - Include reference to delivery of biodiversity and net gains</p>	<p>New development, car parking and hardstanding through good design can deliver opportunities for biodiversity and aspirations of net gains as per NPPF and suggest following wording changes:</p> <p><i>'...SUDS should be sensitively located and designed to ensure that the quality of local water is not adversely affected; and should promote deliver improved biodiversity <u>net gains</u>, an enhanced landscape/townscape and good quality spaces that improve public amenities in the area'.</i></p>	<p>DP289 Sussex Wildlife Trust</p>	
<p>Support with amendments - require larger development to modernise drainage system</p>	<p>Larger developments should be required to renovate harmful, antiquated drainage systems such as gully pots with more suitable SUDs. This is would enable Brighton & Hove to start modernising its drainage system; currently Brighton & Hove has over 5000 gully pots all of which contribute to introducing pollutants such as nitrates and heavy metals into the chalk aquifer without filtration. This policy could alternatively be incorporated in DM42.</p>	<p>DP189 Natural England</p>	
<p>Support with amendment – include in policy wording role of SUDS, and type of SUDS, in management of water quality</p>	<p>This policy and supporting text has an emphasis on the use of SUDS for the management of flood risk, however it does not seem to acknowledge the role that SUDS can play in the management of water quality. We would recommend some rewording to this effect.</p> <p>It should be noted that in some locations only specific types of SUDS will be appropriate so as not to have an adverse impact on groundwater quality. Whilst we note that there is some reference to this in the supporting text paragraph 2.322, we would recommend that this could be referred in the policy wording.</p>	<p>DP162 Environment Agency</p>	

DM44 Energy Efficiency and Renewables			
Total Number of Responses		16	
Number of Representations that Support		11	
Number of Representations that Object		5	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
EPC requirement is too low	<p>EPC requirement in policy should be amended to require: EPC A (new build) and EPC B (conversion/ change of use).</p> <p>There is a strong body of professionals and campaigners working to support the fledgling eco-homes industry in a city with strong eco-building practices. More constructive discussions should be happening with professionals and other LPAs about how we build above what is required by law, in order that we achieve wellbeing and social justice within ecologically-sound limits.</p> <p>EPC B is not high enough for new builds.</p>	<p>DP307 Green Group of Councillors</p> <p>DP077</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Reliance on BREEAM targets	There should not be such a reliance on BREEAM accreditation. This should be replaced with One Planet Living criteria or other such relevant and appropriate benchmarking tools to be agreed by developers of sites with the local authority.	DP258 Brighton & Hove Planning Agents Forum	
BREEAM 2018 standards	Under the latest BREEAM 2018 requirements it is not achievable for BREEAM Excellent to be achieved for non-residential elements which are being delivered to shell and core standard. This is due to how BREEAM calculates the mandatory Energy credits based purely on the performance of the envelope. Accordingly we request that reference is made in CPP2 to BREEAM 2018, and an acknowledgement included that achieving 'Excellent' for shell and core non-residential units is not feasible under BREEAM 2018, and therefore 'Very Good' will be acceptable in these instances.	DP278 Outer Harbour Development Company Partnership LLP	
Need for BHCC to lead on CO2 reduction measures	In reference to paragraph 2.251 – there is little incentive for developers to implement the type of CO2 reduction measures needed such as district heating nodes highlighted in the energy studies unless the Council gives a firm leadership.	DP157 Hove Civic Society	
Support			
Welcomes commitments and principle of policy as standard achievable	No objection to principle of policy and welcomes the commitment to promoting opportunities for greater reductions in CO2 emissions. As a developer, University of Sussex already meet BREEAM Excellent and support the requirement for all development to do so.	DP291 University of Sussex	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Support general approach but suggest changes: to remove reference to conversions and change of use in part 1 of the policy</p>	<p>Welcome allowance for technical feasibility and viability. However may not be possible to achieve a 19% carbon reduction target for conversions and changes of use and suggest the policy be amended: <i>'1. All new build development including conversions and change of uses of existing buildings to achieve at least 19% improvement on the carbon emissions target set by Part L.'</i></p> <p>The council should ensure that sufficient flexibility is applied to the target to avoid unintended consequences (e.g. the use of potentially inappropriate technologies).</p>	<p>DP281 Toads Hole Valley Landowners et al.</p>	
<p>Support general approach but suggest removal of any reference to EPC and deletion of Part 2 of Policy</p>	<p>Consider EPC is inappropriate as an assessment as the figures can change between application and construction due to different software used at design stage and at end of project and given that this software is updated on a regular basis.</p> <p>Also question why an EPC target is required in addition to the 19 % carbon reduction target. Both are seeking to reduce carbon emissions and use of both may introduce confusion and not be consistent with 2015 Ministerial Statement.</p> <p>Suggest removal of any reference to EPCs as a planning target in this policy and recommend the complete removal of clause 2.</p>	<p>DP281 Toads Hole Valley Landowners et al.</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Inclusion of reference to viability and feasibility considerations in part 3	<p>Support clause 3 it is clear that greater reductions will only be south subject to clearly demonstrable viability and feasibility considerations and suggest following amendment:</p> <p><i>'3. <u>Only where clearly viable and feasible</u> will opportunities for new development <u>be sought</u> to achieve greater reductions in CO2 emissions through the use of passive design, fabric standards, energy efficiency measures and low and zero carbon technologies will be encouraged in the following areas...'</i></p>	DP281 Toads Hole Valley Landowners et al.	
Amendment to requirement for Energy Statements	<p>Support use of word 'may' in penultimate paragraph of policy as it introduces flexibility in relation to requirements for site mitigation since such a requirements would need to be considerate of viability.</p> <p>Whilst requirement for Energy Statement seems sensible it may not be necessary for all development therefore suggest: <i>'All development will <u>may</u> be expected to submit an energy statement to provide details of the low and zero carbon energy technologies used including the size/capacity of the systems and the estimated CO2 savings that will be achieved.'</i></p>		
Supportive of wider city ambition	<p>Supports wider energy and water plans for the city region.</p>	DP208 Brighton & Hove Economic Partnership	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Supportive of national policy	Will assist in delivering additional low and zero carbon energy solutions to help mitigate the impact of climate change and energy efficiency improvements will also contribute to biodiversity and existing ecological networks such as green walls and walls should also be actively supported. Policy would be in line with NPPF (Sections 8, 14, 152, 170, 171, 174 and 175) and DEFRA 25 Year Plan aims(1.1).	DP189 Natural England	
Recognise role of Community Self build in innovative and sustainable energy use	Energy efficiency and the use of and encouragement of sustainable energy development at both an individual house-owner and community led energy company level is essential. Policy could recognise that community self-build developments are uniquely well placed to deliver innovative and sustainable energy use.	DP175 Nub Brighton	
Support with no detailed comments		DP272, DP095, DP089, DP085, DP067, DP001	

DM45 Community Energy			
Total Number of Responses		11	
Number of Representations that Support		7	
Number of Representations that Object		4	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy should be strengthened	Policy should be strengthened to a requirement. Suggest: 'Developers of medium scale and major development schemes are encouraged to actively seek <u>must demonstrate that they have actively sought</u> out community energy developers...'. 	DP097	
Policy is aspirational and take up will be limited	Policy is aspirational only and adds no value. Concerns raised around community energy vehicles. Whilst energy supply model may play an increased role in the future, take up in the near term is likely to be modest and probably restricted to owner-occupiers (or projects which are seeking a point of differentiation). Purchasers often value independence; full access to the energy market to ensure competition and; security of supply. Deviation can affect onward sale price (or rate of sales), which has an impact on viability.	DP0281 Toads Hole Valley Landowners	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Council needs to take a leadership role	Interaction is needed between the council and the developers (and in this case the community) to make these policies meaningful.	DP157 Hove Civic Society	
Emphasis on existing provision	The policy needs to look at existing provisions and keep them where it would be more 'green' to do so.	DP095	
Support			
Supportive of wider city ambition	Supports wider energy and water plans for the city region as set out in the Growing City theme of the Economic Strategy.	DP208 BHEP	
Supportive as addresses key issues set out in national policy	Will assist in delivering additional low and zero carbon energy solutions to help mitigate the impact of climate change which are key issues in NPPF and DEFRA 25 year plan.	DP189 Natural England	
Support without detailed comments		DP272; DP089; DP085; DP067; DP001	

DM46 Heating and Cooling network infrastructure			
Total Number of Responses		15	
Number of Representations that Support		13	
Number of Representations that Object		2	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Policy should not be restrictive to one method of achieving reduction in carbon emissions in new development. Drawback to district heating. Consider policy does not add anything more to Policy DM44	<p>Policy does not consider that alternative means of achieving reducing carbon emissions are actually more effective than District Heating. As such, the policy should not be restricted to one means of meeting the objective.</p> <p>District Heating is not without its drawbacks: Infrastructure can be very expensive (£1,000 to £2,000 per metre) limiting the distance for which connection costs are viable; Distribution losses can be significant (potentially 15% - 25% even on new networks; and more on older networks) meaning that on-site systems can be lower carbon; The national grid for electricity is decarbonising as the UK increases its use of renewable technologies. If the council is to encourage significant investment into District Heating, it should be considering how such networks will decarbonise over time; District Heating is best applied in high density development, it would therefore not be appropriate in more suburban locations;</p>	DP281 Toads Hold Valley Landowners et al.	

	<p>District Heating typically requires wet distribution within the buildings. Given that the design of the building envelope is continuing to focus on very high efficiency fabric, the introduction of an uncontrolled heat source into the building may increase the overheating risks.</p> <p>Therefore not supportive of policy and consider it does not add anything more given Policy DM44 suggest remove. Alternatively, the scope of this policy should be broadened to offer equal support to other options within the energy mix, encouraging alternative options where its environmental and economic advantages are clear.</p>		
Object – no comments		DP293	
Support			
Supportive of wider city ambition	<p>Supports wider energy and water plans for the city region as set out in the Growing Theme of the Economic Strategy.</p> <p>Supportive of policy and reasoned justification and in particular paragraph 2.279 - identification and prevention of future connection by identifying pipe run.</p>	<p>DP208 BHEP</p> <p>DP157 Hove Civic Society</p>	
Supportive of national policy	<p>Encouraging consideration of integrated heat networks will contribute to lowering energy consumption and CO2, which in turn will reduce the impacts of climate change which are key issues in the NPPF and DEFRA 25 year Plan.</p>	DP189 Natural England	
Minor change requested: policy should prioritise less well-off and vulnerable	<p>Support the inclusion of integrated heat networks / communal heating systems in development proposals and the associated inclusion of heat service customer protection. Consider it is reliable, cheap, locally sourced, low-carbon energy. Analysis indicates that half of the UK's existing heat demand could be met</p>	DP307 Green Group of Councillors	

	<p>by heat networks - an approach that would save over £30bn (Brighton and Hove City Council Fuel Poverty and Affordable Warmth Strategy, 2016-2020).</p> <p>Given the positive nature of these heat networks, consideration must be given to flexibility within the policy criteria, in order to enable proposals for heat networks to come forward. In the first instance it should be used to help heat homes of the least well-off and vulnerable. This should be taken in conjunction with the positive introduction or applications that introduce other renewable energy sources or sources of low carbon energy infrastructure, such as solar.</p>		
Minor change requested: should include customer protection	<p>Brighton Marina residents connected to a District Heating System comment that they are ambivalent regarding the arrangement. The downside is reported as high fixed costs and lack of choice of supplier and a lack of regulation in the market at present. Would welcome wording that requires suppliers to comply with industry voluntary regulation and best-practices.</p>	<p>DP266 Brighton Marina Neighbourhood Forum Steering Group</p>	
Support – no detailed comments		<p>DP272, DP175 Nub Brighton; DP095; DP089, DP085, DP077, DP067, DP001</p>	