

DP251

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 244
Response Date 13/09/18 00:08
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) copsemill properties Ltd

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Site Allocation - Special Areas policies
. Site Allocations - Strategic Site Allocations
. Site Allocations - Housing Sites

SSA6 - Former Peter Pan Leisure Site (adjacent Yellow Wave), Madeira Drive

a) Do you support or object to policy SSA6? Support

SSA6 Support Reasons

b) Please explain why you support this policy?

I think its vital that this long neglected site is built on as its key to the regeneration of Maderia Drive

SSA6 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below...

feel that its really important that the range of uses for this site are broadened to include:

Retail uses (Use Classes A1, A3, A4 & A5)

Commercial space (Use Class B1)

Hotel (Use Class C1)

Galleries/museum(s) (Use Class D1) and or

Leisure uses (Use Class D2) appropriate to the character of the seafront to provide a year round leisure attraction such as an outdoor swimming pool

I suggest the following be added to the site specific requirements:

g) Encourage a variety of temporary / pop up uses consistent with the area's role as a centre for cultural, sports and family based activities - so as for the site to provide a flexible built environment as required.

I suggest that in paragraph 3.40 in supporting evidence that the words such as an open air swimming pool be included

I suggest that in paragraph 3.41 in supporting evidence that the statement regarding the open character of this area be removed as it doesn't reflect the past uses of the site - historically this site has always supported a dense built environment as evidenced by images of the previous playground and should indeed do so in the future. It would be my suggestion that the words "open character" be removed as this will prevent any form of development on the site that blocks views of the sea even single storey development .

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Support

H1 Support Reasons

b) Please explain why you support this policy?

Its important that all possible housing sites are identified in order to mitigate the accute shortage of housing in the city

H1 Housing Site Omissions

g) Are there any other sites that could be allocated as housing sites ?

We own 12 Richmond parade Brighton BN2 9QD. The site is currently used as retail on the ground floor with offices on two floors above . We intend to submit an application for 7 or 9 apartments above an existing single storey loading bay and so would like this allocation (9 units) to be included in the local plan

DP252

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 165
Response Date 10/09/18 12:19
Status Processed
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . No

Organisation Name

Organisation Name (if not applicable please put n/a) N/a

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding

- . Housing, Accomodation and Community
- . Design & Heritage
- . Site Allocation - Special Areas policies
- . Make general comments

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Object

DM7 Object Reasons

d) Please explain why you object to this policy?

The policy does not sufficiently protect the residential character of Brighton. 20% is far too high to maintain a balanced character. The recent lifting of the cap on the number of students at each university will likely make this

issue worse. Conversions should pay attention to the balance in the street and the impact on local service provision such as doctors and schools and outside spaces such as balconies should be restricted due to the noise outdoor students make at night. Conversion 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 recind where landlords do not adequately protect the other residents in the street.

DM24 - Advertisements

a) Do you support or object to policy DM24? Object

d) Please explain why you object to this policy?

I am opposed to plans to allow street furniture adverts without a recognition of the impact they have on pavement access. Many of our pavements are narrow and A boards clutter them making access difficult for people with mobility issues.

Any other comments

Click on the links below to access supporting documents to the CPP2:

- . Proposed CPP2 Implementation and Monitoring Targets [PDF, 506Kb]
- . Sustainability Appraisal [PDF, 8MB]
- . Sustainability Appraisal Non-Technical Summary [PDF, 385 KB]
- . Consultation Statement [PDF, 8.6 MB]
- . Appendix 7 to Consultation Statement [PDF, 20MB]
- . CPP2 East Policy Map [PDF, 11MB]
- . CPP2 West Policy Map [PDF, 14MB]
- . CPP2 Central Policy Map [PDF, 9.4MB]
- . Habitats Regulation Assessment [PDF, 18MB]

Background Studies and Topic Papers are also available on the City Plan Part Two website:

<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-background-studies-topic-papers>

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.

I feel the plan gives insufficient attention to the diversity of use of Brightonseafont. I love the built up area of bars and businesses. I also appreciate attractions on the seafront and beach. However, many families want to use the beach in a more peaceful way and not everyone can afford the Yellowwave prices. The seafront should make provision for all uses in sufficient scale to retain thier character including those which generate no income for businesses. New development along Maderia Drive and at Black Rock will reduce the peaceful free beach and there should be a presumption against further development of the beach in these areas.

DP253

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	249
Response Date	13/09/18 08:48
Status	Submitted
Submission Type	Web
Version	0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Address

Address

Email Address

Email Address

Agent Name

Agent Name n/a

Please tick all of the sections you would like to comment on before proceeding . Site Allocations - Strategic Site Allocations

SSA5 - Madeira Terrace & Madeira Drive

a) Do you support or object to policy SSA5? Object

SSA5 Object Reasons

d) Please explain why you object to this policy?

I feel that the proposed development of hotel and YHA is not appropriate or helpful for the local community or for local small business. The unique character of the Terraces would be lost completely.

From: Sent: 09 July 2018 5:59 PM
To:
Cc:
Subject: RE: BH Connected: City Plan Part Two Consultation

Dee

I would like to suggest, as the ward councillor for Hangleton and Knoll, that the section below (and others throughout the document relating to waste management facility) remove any mention of the 'waste management facility', as this can be negotiated out with our colleagues in East Sussex.

Thanks

E1 Opportunity site for business and warehouse uses

Land at Hangleton Bottom, Hangleton Link Road, North Portslade as shown on the Policies Map will be granted permission for the following uses only where these would not prevent or prejudice the delivery of a strategic scale waste management facility:

- **Business and warehouse premises (Use Classes B1, and B8).**

From:
To: [PlanningPolic](#)
Subject: comments on Draft City Plan Part 2
Date: 13 September 2018 08:46:55

Hello,

I have read specific parts of the CPP2.

I think the aims to provide a wide range of good quality homes to create mixed, balanced, inclusive communities is good. (I live in Bevendean and often feel that a balanced, inclusive community has been taken away from us.)

Although too late for Bevendean now, the fact that " HMOs will be assessed..... to ensure that existing HMOs do not exceed 20% of all properties across the neighbourhood level" is welcome. We need PBSA - not in small estates, so the 2 sites for this will be a relief for local communities.

Looking at "2.72 Developments should also maintain an effective 24 hour staffing/security presence to ensure the safety and security of residents and to enable a rapid response to any incidents of anti-social behaviour. This should not take the form of student volunteers." Do you know who would be responsible for enforcing this ? The Council or the Universities ?

My one comment of concern is where .PBSA is built in a high density HMO area. I think it's possible that may be the case for Bevendean ? (A potential PBSA on the site of the old Drs surgery.) Is the bigger picture of surrounding HMOs taken into account when discussing a PBSA in such an area ?

I am pleased the Council will try to keep residential accommodation (C3).

Thank you for your time,

**For Official Use:**

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

Draft City Plan Part Two
Consultation Period: 5th July 2018 until
5pm on 13th September 2018
Word Response Form

Accessibility Notice: (Ctrl & click to view): <https://www.brighton-hove.gov.uk/content/about-website/help-using-council-website/accessibility>

Draft City Plan Part Two – Consultation

Brighton & Hove City Council has published the draft City Plan Part Two for a 10 week period of consultation starting 5th July 2018. This follows on from the scoping consultation undertaken July - September 2016.

The draft City Plan Part Two sets out the preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications. The City Plan Part Two will support the implementation and delivery of the City Plan Part One.

The council is seeking your views on the draft Plan and supporting documents. Your comments will help inform the final version of the City Plan Part Two. So if you have any comments about the approaches in the plan then we would urge you to submit those comments during this consultation so that they can be fully taken into account.

The Draft City Plan Part 2 and supporting documents including a quick guide to the City Plan Part Two as well as background evidence documents are available to view and download from the Council's website at: www.brighton-hove.gov.uk/cityplan-part2.

Part A: Contact Details

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations

Yes

No

Privacy Notice: (ctrl & click to view)

<https://www.brighton-hove.gov.uk/content/planning/planning-applications/planning-service-privacy-statement>

Please note that you must complete Part A as anonymous forms cannot be accepted.

Organisation Name (If applicable)	The Conservative Group
Name	
Address	
Email Address	
Agent Name (If applicable)	
Agent Name	
Agent Address	
Agent Email Address	

Part B: Your Representation relating to Development Management Policies

Please use a separate sheet for representations against each Development Management policy

(ctrl & click to view)

Housing, Accommodation & Community chapter (policies DM1-DM10)

Employment Tourism & Retail Chapter (policies DM11-DM17)

Design & Heritage Chapter (policies DM18-DM32)

Transport & Travel Chapter (policies DM32-DM36)

Environment & Energy Chapter (policies DM37-DM46)

Policy Number (e.g. DM1) DM2

Policy Name (e.g. Housing Quality, Choice and Mix) Retaining Housing and residential accommodation (C3)

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

The Conservative Group believes that every effort should be made to retain family homes and resist developing such properties into flats. Adequate provisions should be in place within the City Plan Part 2 to ensure this.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM5

Policy Name (e.g. Housing Quality, Choice and Mix) Supported Accommodation

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

We support 2.37 'Other relevant policies will be taken into account when considering if a proposal is appropriately located, for example impact upon transport and amenity. The council will resist proposals for new specialist housing and accommodation where it would result in an over-concentration of similar uses in the immediate area, if it is considered that the proposals will have a negative effect on the character and function of an area, and/or local amenity.' We believe this to be particularly important to any possible future concentration of hostels.

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM6

Policy Name (e.g. Housing Quality, Choice and Mix) Build to Rent Housing

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

Whilst supportive of build to rent housing the Conservative Group believes we should also be fully encouraging shared ownership where possible.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM7

Policy Name (e.g. Housing Quality, Choice and Mix) Houses in Multiple Occupation

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

We believe that 2.58 does not go far enough in restricting the conversion of family homes to HMOs. The current proposal in which applications for conversion to HMOs will be rejected if more than 10% of current dwellings are already HMOs should be reduced to 5%. 20% is also much too high for the wider neighbourhood level. The Conservative Group notes that the DM7 Policy does not refer to the Article 4 Direction introduced in April 2013 which removes permitted development rights to five wards of the city. We would seek assurance that DM7 is applied as wide as legally and practically possible and not simply in the five wards within the Article 4 Directive.

2.58 in relation to the concentration of HMOs also does not define the 'neighbourhood level'. There is the 50m zone for limiting concentrations to 10% of dwellings but there is no definition in the 3rd bullet point regarding 'wider neighbourhood level'. We remain concerned that the ambiguity here is dangerous. It is unclear where the concentration limits apply and whether this is across the whole city. Regardless of this high concentrations of HMOs are undesirable wherever they are in the city and therefore must be avoided.

More generally, we are concerned about the amount of family housing being converted to HMOs, predominantly for students. Whilst we recognise provisions set out in DM8 regarding purpose built student accommodation, there must be sufficient numbers of purpose-built accommodation units to meet demand, where possible on campus if universities wish to expand. They should also do more in partnership with the Council to try and relieve pressure on the city's already over-stretched housing stock when these additional students seek accommodation in the city in their second, third and fourth years. This should include looking to source/build new student accommodation in towns in neighbouring local authorities such as Lewes, Falmer and Newhaven in Lewes District which have good transport links to Brighton & Hove.

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM12

Policy Name (e.g. Housing Quality, Choice and Mix) Primary, Secondary and Local Centre Shopping Frontages

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

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.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM13

Policy Name (e.g. Housing Quality, Choice and Mix) Important Local Parades, Neighbourhood Parades and Individual Shop Units

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

We support the provision which states that named shopping parades are protected.

c) If you support this policy but have some suggested wording changes please outline these clearly below

‘Special’ retail areas such as the Lanes, North Laine and Rottingdean High Street should be given further protection in planning policy in order to preserve their unique independent status.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM17

Policy Name (e.g. Housing Quality, Choice and Mix) Opportunity Areas for new Hotels and Safeguarding Conference Facilities

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

2.133 We do not support DA6 Hove Station Area being identified as an area for a potential budget hotel. Traffic movement and parking would be a significant problem.

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM22

Policy Name (e.g. Housing Quality, Choice and Mix) Landscape Design and Trees

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

The Group would support the following recommendations made by the RSPB:

1. Pollinator protection: All new developments and regeneration projects to include high pollinator value trees, shrubs and plants, avoiding invasive, non-native species. Enhance all green spaces with wildflowers/flower-rich grass (even areas which are mown regularly).
2. 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. Promote retro-fitting in older developments and regeneration projects.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM36

Policy Name (e.g. Housing Quality, Choice and Mix) Parking and Servicing

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

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'.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM37

Policy Name (e.g. Housing Quality, Choice and Mix) Green Infrastructure and Nature Conservation

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

The Group would support the following recommendations made by the RSPB:

1. Swift protection: new residential and commercial dwellings to include integral swift bricks at a 1:1 ratio for houses and increased proportions for commercial premises (tba on site design). 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.
2. Water resilience/climate change mitigation: all new developments to design-in SuDS (Sustainable Urban Drainage Solutions), 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.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Policy Number (e.g. DM1) DM38

Policy Name (e.g. Housing Quality, Choice and Mix) Local Green Spaces

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

The Group very much welcomes the proposed designation of Benfield Valley, Three Cornered Copse, Hollingbury Park and Ladies Mile Nature Reserve as designated and protected Local Green Spaces. We would strongly advocate the following areas also being designated as Local Green Spaces also:

- 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 and adjoining Carden Park and Woodbourne Meadows.

Green spaces not only provide valuable opportunities for leisure activities but also provide enormous health benefits for residents in what is one of the most densely populated urban areas in the country.

We support policy CP16 Open Space in City Plan Part 1 which affords protection for many of the city's open spaces including village greens, sports pitches, and playing fields. However, we believe that the Council should undertake an audit of green spaces with a view to further designating areas not currently afforded protection under CP16.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part C: Your Representation(s) relating to Site Allocations

Site Allocations - Special Area policies

(Ctrl & click to view): [SA7 Benfield Valley Policy](#)

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Site Allocations – Strategic Site Allocations

(Ctrl & click to view): **Strategic site allocations: (policies SSA1-SSA7)**

Please use a separate sheet for representations against each Strategic Site Allocation

- SSA1, Brighton General Hospital Site
- SSA2, Combined Engineering Depot, New England Road
- SSA3, Land at Lyon Close, Hove
- SSA4, Sackville Trading Estate & Coal Yard, Hove
- SSA5, Madeira Terrace & Madeira Drive
- SSA6, Former Peter Pan Leisure Site (adjacent Yellow Wave)
- SSA7, Land Adjacent Amex Community Stadium, Falmer Way

Policy Number SSA1

Policy Name Brighton General Hospital Site

a) Do you Support or Object to the policy?

Support If you support this policy, please go to questions (b) and (c)
Object If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

The Group proposes to allocate a larger proportion of the SSA1 site for housing and develop an additional health and care facility (D1) at Toad's Hole, Hangleton.

f) Are there any other sites that could be allocated as strategic sites ?

Site Allocations - Housing Sites

(Ctrl & click to view): [Housing sites and Mixed Use Site allocations: \(policies H1-H3\)](#)

H1 - Housing Sites & Mixed Use Sites

a) Do you Support or Object to the policy?

- Support If you support this policy, please go to questions (b) and (c)
Object If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons

The Conservative Group opposes the specific site allocation 46-54 Old London Road, Patcham BN1 8XQ. It is not an appropriate location given the character of the area and the site's history of severe groundwater flooding. These are the same grounds on which members did not support the recently rejected planning application by McCarthy and Stone at the same site. It would be too dense to have up to 30 units of housing on the site. The Conservative Group supports family homes and the proposal would mean losing five of them. Wider issues including a loss of wildlife and trees as well as increased traffic and parking issues also highlight why this site is not suitable for development.

g) Are there any other sites that could be allocated as housing sites ?

H2 – Urban Fringe Housing Sites

(Ctrl & click to view): [Housing sites and Mixed Use Site allocations: \(policies H1-H3\)](#)

a) Do you Support or Object to the policy?

Support If you support this policy, please go to questions (b) and (c)
Object If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons

The Group opposes the following specific housing site allocations on the grounds that this land is unsuitable for housing –

1. Land at and adjoining Horsdean Recreation Ground, Patcham
2. Land at Ladies Mile, Carden Avenue

H3 - Purpose Built Student Accommodation Sites

(Ctrl & click to view): [Housing sites and Mixed Use Site allocations: \(policies H1-H3\)](#)

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) If you wish to comment on any specific student housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons

g) Are there any other sites that could be allocated as sites for student housing?

Site Allocations - Employment Site

(Ctrl & click to view): **Opportunity site for business and warehouse uses: (policy E1)**

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

The Conservative Group disagrees with the wording “E1 Opportunity site for business and warehouse uses Land at Hangleton Bottom, Hangleton Link Road, North Portslade as shown on the Policies Map will be granted permission for the following uses only where these would not prevent or prejudice the delivery of a strategic scale waste management facility”.

The Conservative Group would advocate the removal of any mention of a strategic scale waste management facility both in section E1 and elsewhere within the City Plan Part Two proposals where any such facility proposals are yet to be finalised and could negatively impact on other

future proposals for use of the land.

f) Are there any other sites that could be allocated as employment sites ?

Part D: Your Representation(s) relating to Any Other Comments & Equalities

Any other comments

Please use a separate sheet for each representation

(Ctrl & click to view):

- [Introduction](#)
- [Appendix 1: Glossary of terms](#)
- [Appendix 2 Parking Standards – Policy DM36 Parking and Servicing \(adopted Parking Standards SPD\)](#)
- [Appendix 3 - Local Wildlife Sites \(Policy DM37 Green Infrastructure and Nature Conservation](#)
- [Appendix 4 - Policy H2 Urban Fringe Housing Site Maps \(see also proposed draft Policies Map\)](#)
- [Appendix 5 - List of Brighton & Hove Local Plan policies that will be superseded on adoption of the City Plan Part 2](#)
- [Appendix 6 Table 1 – Proposed Changes to Policy Map – new additions/ amendments by virtue of policies in Draft City Plan Part 2/ Updates](#)
- [Appendix 6 Table 2 Policies Map – Proposed Changes to the City plan Part 1 Policies Map due to retained Brighton & Hove Local Plan Policies being superseded by City Plan Part 2 policies](#)
- [Supporting documents to the City Plan Part Two](#)
- [Background studies for the City Plan Part Two](#)

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.

The Conservative Group remains concerned that many of the positive arguments for housing development never materialise.

In addition the Group remains concerned about the impact of increasing building costs, for example in steel and cement, in fulfilling the proposals contained within the City Plan Part Two.

The Group would hope that such factors have been fully costed and considered in any future plans.

Equalities

The council has a duty under the Equalities Act 2010 to eliminate discrimination and advance equality of opportunity for people with the following protected characteristics: age, disability, race, religion, sex, sexual orientation, gender reassignment, marriage and civil partnership, and pregnancy and maternity. In addition the council has a duty to foster good relations between all communities.

A Health and Equalities Impact Assessment on the Draft City Plan Part Two has been undertaken and is available to view [here](#) [PDF, 2.8MB]

AO2 Do you consider the City Plan Part Two to have any equalities implications, positive or negative? If so, please provide further details.

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Signed*:	The Conservative Group
Dated*:	12 September 2018

All representations must be received at the email or postal address given on this form by **5.00pm on 13th September 2018**.

Due to the length of the consultation period please kindly note that late representations will not be accepted.

Completed forms should be sent to:

Email: planningpolicy@brighton-hove.gov.uk

Post: Consultation on the Draft City Plan Part Two
Brighton & Hove City Council
Planning Policy Team
1st Floor Hove Town Hall
Norton Road
Hove BN3 3BQ

If you have any further queries please contact us on 01273 292505 or via email planningpolicy@brighton-hove.gov.uk

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

13 September 2018
Ref: KT/Let/P1347

Dear Sir / Madam,

Greater Brighton Metropolitan College, Pelham Street, Brighton

We are writing to make representations on behalf of **Greater Brighton Metropolitan College** (The College) in relation to the current City Plan Part Two Regulation 18 Consultation (5 July to 13 September 2018).

Greater Brighton Metropolitan College delivers technical, vocational and professional education to approximately 12,800 students from age 16 to adult learners across its 5 campuses.

The College are looking to significantly improve their City centre campus by providing enhanced learning and teaching facilities to serve Brighton & Hove and the wider area. The College wish to create a new sustainable mixed use development in the heart of the City that will build upon the surrounding regeneration of the area but most importantly deliver significant improvements to the existing college campus accommodation. To this end a planning application has been submitted to the City Council and is under consideration by Officers (BH2018/02607).

The existing further education accommodation in Pelham Street is provided by a number of restrictive Victorian School buildings and a tower block which no longer meet the demands of 21st Century education. The restrictions faced by The College due to its inflexible accommodation have resulted in difficulties in providing appropriate facilities for certain courses, for instance, specialist Hair and Beauty and Construction Trades courses.

As the fabric of The College's accommodation has deteriorated, the cost of maintaining these building has also increased. At the same time, the overall size of the current College buildings are larger than is required with a development strategy seeking to rationalise the overall floorspace but significantly improve the quality. Overall long-term objectives for The College include:

- Re-imagination and extension of the existing Pelham tower and plinth to deliver outstanding teaching and learning facilities for Greater Brighton;
- Creation of a new Creative Industries and Hair and Beauty facility extension connected to the existing college plinth and tower block;
- Public realm improvements with new open space and improved pedestrian connectivity;
- Residential development opportunities created on the eastern side of Pelham Street;
- Kick-starting the wider regeneration of the area.

In terms of the draft City Plan Part Two, this document considers The College site briefly under proposed policy H1 (Table 6) *Housing Sites and Mixed Use Sites*. This policy states that

“Planning permission will be granted for proposals that accord with the Development Plan and which provide minimum indicative amounts of development shown in the tables”.

Table 6, states that the College

“Site is allocated for 300 student bedspaces in City Plan Part One Policy CP21. Development should take place as part of a wider redevelopment of the site to improve the existing educational facilities”.

It is contended that the requirement of this policy to provide 300 student bedspaces, whilst consistent with City Plan Part 1, was based on the delivery of accommodation associated with the two City universities, as part of previous development proposals. As a vocational college there is no associated need for student residential accommodation, and insufficient reasons to require this particular site to deliver 300 bed spaces where there currently is not the need associated with the College functions.

Development proposals on this site, such as those the subject of the current planning application, should not be stymied as a result of past development proposals by requiring purpose built student accommodation, particularly where other sites have brought forward this type of accommodation.

As alluded to within the current planning application, the Council recently granted planning permission at Preston Barracks (reference BH2017/00492) which included amongst other forms of development, the construction of Student Accommodation providing **1,338 bed spaces** across a number of tower blocks. This is a 78% increase in anticipated delivery for that site. In this regard, it is considered that the requirement of student accommodation has in part been satisfied elsewhere within the City.

It is asserted that this policy and broader implications of this allocation is overly restrictive potentially hindering The College from investing in much needed improvements to facilities. The viability of large scale improvements is frequently dependent on separate funding streams and integration within wider mixed use schemes, as asserted within the current planning application. Therefore, these detailed policies should not place restrictions, such as those set out within draft policy H1, which unduly limit the viability of improvement schemes to education facilities within the City.

We trust this is of assistance at this stage of the City Plan Part 2 process and request that due consideration is given within the overall objectives and policy framework to help facilitate the needs of The College in the significant improvement of educational facilities at the Pelham Street Campus.

If you have any further queries or require further information please contact me on

Yours sincerely

Draft City Plan Part 2 – Consultation Response 13th September 2018

The Brighton & Hove Planning Agents Forum (PAF) has considered the proposed draft City Plan Part 2 and has the following comments to offer.

1.0 Vision

- 1.1 Regretfully this document appears to be a missed opportunity to positively and creatively shape the future of the city; and, albeit in a simpler format, seems to be a re-write of many of the former policies from the 2005 Local Plan without seriously grappling with the major challenges and issues the city faces over coming years to 2030 and beyond.

Brighton and Hove is a truly unique City for reasons well known to us all. It also has an objectively assessed need of 30 000 dwellings by 2030 and the horizontal expansion to accommodate it constrained on all sides. However, the challenges and pressures on land experienced here are shared by most Cities, but the sort of creativity and boldness in tackling these challenges evident in London and other great cities in the UK, Europe and elsewhere, in particular the willingness to accept greater density and greater contrasts in mass, scale and use between existing and proposed, old and new, small and large, is not encouraged in CPP2.

Fundamentally if the housing crisis in the City is to be meaningfully addressed, and the city is to be able to evolve, change and grow into the great city it has the potential to be, greater densities and contrasts which are accepted elsewhere, will need to be accepted here too. In this context, the document in its current draft form is a missed opportunity.

2.0 General

- 2.1 On a more prosaic note, we welcome how the document is easy to navigate and how it is divided in simple topics. We also welcome the shortening, from the previous plan, of many of the policies but we question the need for such long “reasoned justification” which seems to make the document, overall, seem unnecessarily repetitive and lengthy. Text that does not provide useful detail to the actual policy requirements should be removed in the interest of delivering the stated aim to “ensure there is a more streamlined and straightforward set of development management policies”.
- 2.2 We seek clarification on the status of “reasoned justification” and question whether it should reflect City Plan Part 1 with “supporting text”. Also, there appears to be aspects of Policy appearing under “reasoned justification” e.g. Under Special Area SA7, the numbers of dwellings are in paragraph 3.5 of the justification.
- 2.3 Despite the title “reasoned justification” label, many of the policies are not supported by evidence and we believe the Plan will not meet the tests of soundness in some instances.

Planning Agents Forum

3.0 Housing, Accommodation & Community

- 3.1 DM1 - Housing Quality, Choice and Mix, c): the confirmation of national space standards is welcome although we believe there should be some “nod” 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.
- 3.2 DM1(d): seeking to require Building Regulation M4(2) accessibility standards as a minimum for all new residential accommodation is likely to constrain housing delivery and may even prevent the conversion of some existing and historic buildings.
- 3.3 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.
- 3.4 Policy DM2/DM7 - Retaining Housing and Residential Accommodation (C3) and HMOs: these policies have the effect of supporting changes of use from C4 to C3 but preventing changes of use from C3 to C4. This will have the effect, over time, of reducing the range of housing available to residents and would disproportionately affect specific groups of residents. No justification or evidence has been provided for this and could result in a shortage of housing for sharers (in particular non-student sharers) and worsening affordability.
As the Council’s current policy approach (Under CP21 of the City Plan – Part One) is to refuse applications in areas with over 10% concentration of HMOs this planning policy approach will restrict the provision of newer HMO units within the City. Combined with a chronic undersupply of housing (and a housing requirement significantly below the identified need for the City), we believe this policy approach will significantly constrain the provision of new shared housing across the city and could force young professionals out of the City.
- 3.5 DM10 – Public Houses: Policy support should be added for both new pubs and more importantly for the diversification and improvement of existing public houses, where this provides opportunities to improve the viability of these businesses. Wording to this effect may help avoid applications that would result in the loss of public houses in the first place and before they fail.

4.0 Employment & Retail

- 4.1 DM11 – New Business Floorspace: it is not clear what additional benefit this policy offers that is not already covered by part three of City Plan – Part One Policy CP3. Many of the policies in this draft seem to be of a strategic nature and do not seem to add to City Plan Part One and in some cases lead to contradictions.
- 4.2 DM12 – Primary, Secondary and Local Centre Shopping Frontages and DM13 – Important Local Parades, Neighbourhood Parades and Individual Shop Units: The policy should be reconsidered to better reflect the changing character of high streets and the new national policy framework that seeks to deliver flexibility and

Planning Agents Forum

encourage a range of uses. The current draft does not seem to either reflect the changing nature of high streets and the wider range of City Centre uses that should be encouraged to maintain the vibrancy, vitality and viability of our key retail areas, 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. 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. Improved flexibility within the Development Plan will help support the role and function of the City Centre and encourage inward investment and the creation of new businesses within the city. 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.

There are examples with other authorities and other large scale, mixed use schemes where the commercial units that enliven a street front can be permitted to change use class between A1, A2, A3, A4 and B1 without the need to return to planning for a change of use application. Where retail uses are not necessarily required to occupy every unit, this flexibility can help prevent spaces remaining vacant and street frontages 'dying' particularly in times of recession and could help sustain and retain the vibrancy that characterises much of central Brighton.

- 4.3 DM17 – Opportunity Areas for new Hotels and Safeguarding Conference Facilities: We totally back the policy support for new hotel development, but we find the wording of this policy misleading and we suspect the result of the Policy in its current form will be to restrict the potential for new hotel development. 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.

5.0 Design & Heritage

- 5.1 DM18 - High Quality Design and Places: We generally support the policy wording, however some of the supporting text is unacceptably prescriptive and sometimes inconsistent. In particular we support supporting text 2.137 but we feel it needs to go further and specifically encourage greater contrasts, where appropriate, conditional on the delivery of high quality design. The assessment of high quality design needs to be assessed by those qualified to judge, with great confidence, to know when and where the offer of great design can outweigh the often very conservative approach taken by the planning department, and CAG when related to the heritage environment.

We are very concerned that 2.140 and 2.141 are unacceptably prescriptive in defining what scale and shape new buildings 'should' be in relation to local context

Planning Agents Forum

and need to be completely re-written to promote the idea through design analysis that it may be appropriate for a new building on a site to depart from the prevailing height, scale and shape of those around it, whilst exhibiting the highest standards of architectural design.

- 5.2 DM19 - Maximising Development Potential: this Policy is generally welcomed and reflects housing need and pressure within the area. However, the Council is not consistent in the suggested Urban Fringe densities which are very low in the context of BHCC's housing needs. It is recognised that the housing numbers quoted for sites in the Urban Fringe are only, in theory, suggestions. It is also understood that the LPA are required to demonstrate land supply for housing and hence number allocations need to be assessed for this reason. However, in reality, disproportionate weight is attached to these numbers once applications are made. At the very least, these figures create a cognitive bias for starting to consider what might be acceptable on the site, when the original assessments that led to the numbers quoted were very preliminary indeed and not tested (see also item 7.3).
DM20 – Protection of Amenity: we believe this Policy needs re-wording. You can not lose amenity in relation to the proposed and current drafting of this policy could lead to over-restrictive interpretation. We suggest rather than any loss of amenity, it should read “only where loss of amenity to existing adjacent users, residents and occupiers is minimised and kept to an acceptable level.”
- 5.3 DM 26 - Conservation Areas: we support the wording of this Policy, however within the supporting text 2.201 appears to be open to misinterpretation. It is not clear that the wording applies only to existing buildings. As with DM18, there needs to be greater flexibility, an emphasis on design analysis and a qualitative appraisal of the context.
- 5.4 DM27 – Listed Buildings: whilst we support this in principle we consider the wording of the Policy and supporting text to be extremely conservative. There are numerous examples across the UK and elsewhere of existing historic buildings being brought to life and completely reinvigorated by highly contemporary alterations and extensions, through the contrast of often rustic heavy materials traditional materials with light crisp sharp lines of contemporary materials.
We believe the emphasis is wrong. The Policy and its justification suggest all Listed Buildings and their surroundings, in their entirety and in part, are of equal quality. Paragraph 2.204 requires a Heritage Statement to identify all that is good about the building and its surroundings, but equally it should identify all that is poor. It is also important in judging the setting of the listed building, and in assessing the impact (if any) of the new development on that setting, to take full account of the contemporary context in terms of the building itself and its setting and of the way in which this has changed over time.
- 5.5 DM 29 - the Setting of Heritage Assets: We believe the wording of this policy to be completely unsupportable. This 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

Planning Agents Forum

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. In London and elsewhere, provided new buildings close to heritage assets are of high quality design and conceived with a sensitivity towards older (often smaller) Listed Buildings, the contrasts between old and new, large and small, historic and contemporary are not considered to be harmful. This means that the City is at liberty to evolve and grow more freely and sustainably around its transport hubs and city centre amenities. The Policy and supporting text do not favour such bold contrasts of contemporary and historic architecture. With 3,400 individually Listed Buildings and structures, 34 Conservation Areas, 6 historic parks and gardens, 16 scheduled monuments and over 80 archaeological notifications there are many reasons for preventing new development. This results in almost every major development site in Brighton & Hove impacting on views and/or the curtilage of a Listed Building and is in or adjacent to a conservation area. This impact also filters down to householder application where too prosaic an approach to extensions in conservation areas can lead to real heartache for applicants and can prevent homes keeping up to date with the requirements of modern living. In the past, the policies of the 2005 Plan have been used to stultify bold and innovative design and a form of wording needs to be found that recognises that there are poor aspects of conservation areas and listed buildings and that a more balanced and nuanced approach needs to be established in protecting what is really valuable in our historic environment whilst allowing the City to progress and prosper.

6.0 Transport & Travel

- 6.1 DM33 – Safe, Sustainable and Active Travel: Whilst the general aim of this policy is to be welcomed there are important failings with the structure insofar as it segregates between pedestrians, cyclists and public transport. Rather than promoting the incorporation of shared surfaces that manage to safely combine all three modes of transport, and even add private vehicles into the mix, note 4 could predicate against this approach by its wording. 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. New Street in Brighton, and parts of the forthcoming works at Valley Gardens are good examples and policy ought to promote this where appropriate in finding solutions to the city's transport problems.
- 6.2 DM36 – Parking and Servicing: 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 compliment the existing urban grain. Perhaps the wording should state that schemes must demonstrate how the safe provision of

Planning Agents Forum

servicing and delivery vehicles can be accommodated either within the site boundary and/or through use of the existing highways.

7.0 Environment & Energy

7.1 DM37 – Green Infrastructure and Nature Conservation: This Policy seems unnecessarily prescriptive. Why does it need to name “*ancient woodland*” (which is well-protected by National Policy), “*aged/veteran trees*” (which by their very nature may be in poor condition) and can be covered by the third category, “*protected trees*”?

7.2 There is no context to the “*City’s National Elm Collection*”.

7.3 DM38 – Local Green Spaces: there is no obvious reason for this policy given paragraph 2.282 that states “*in general, the designation of an open space as Local Green Space will not provide any greater protection*” than offered by City Plan Part 1 policies CP16 and CP 17.

In addition, apart from Three Cornered Copse, they do not meet the criteria for Local Green Space as defined by Paragraph 77 of the NPPF.

Two of the four sites, Ladies’ Mile and Benfield Valley, could easily accommodate housing and still retain substantial Open Space. Housing numbers for Benfield Valley were established at 30 dwellings through the Urban Fringe Assessment without, by its very nature, having any detailed ecology or landscape assessments. This number has now increased to 100 dwellings without any further evidence. It would appear that numbers are being plucked out of the air, which seems a very cavalier approach to both the City’s Housing needs and to the protection of our Open Space. This points to a lack of rigour in formulating housing numbers indicated in the Urban Fringe Assessment which further undermines the weight that should be given to the UFA (see item 5.2 above).

7.4 This leads to the issue of Open Space Policy which is almost certain to be challenged sooner or later. It is relevant here as the 2008 Open Space Study and subsequent updates underpin the findings of the Urban Frings Assessment. They record that there is a chronic shortage of open space available for the residents of Brighton and Hove and its visitors for recreation and health and wellbeing benefits. This conclusion is at odds with most people’s experience of living and working in the City. Palpably, the City’s very popularity attracts new residents and visitors because of the sense of open space that pervades and surrounds the City and of course its protection is vital. But such protection must be based on sound analysis and must be based on a qualitative as well as a quantitative basis. The reason for the total mismatch between the reality and the findings of the Open Space Studies is that the studies slavishly adhere to a methodology and categorisation of open space that omits access to the SDNP and seafront, beach and sea from its analysis. In a City famed for its seafront and proximity to the South Downs, accessed and enjoyed collectively by literally millions of people this is a startling omission that results in these studies not being robust. The failure of the Open Space Studies to acknowledge the sea, beach and seafront as a significant component of the City’s

Planning Agents Forum

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.”*

- 7.5 DM44 – Energy Efficiency and Renewables: we note that reference to BREEAM in 2.275 does not note a minimum target, although it does note that it expects the BREEAM targets to be met. However, we believe that there should not be such a reliance on BREEAM accreditation and should be replaced by reference to One Planet Living criteria or other such relevant and appropriate benchmarking tools to be agreed by developers of sites with the Local Authority.

8.0 Special Area Policy & Strategic Site Allocations

- 8.1 It is not the intention of PAF to comment on the individual Strategic Site Allocations, leaving this to the representations of the individual agents and applicants involved. It does not mean we do not have a view and we are happy to be consulted about this.
- 8.2 H1 - Housing Sites and Mixed-Use Sites: For clarity it should be stated that all mixed-use sites must have a substantial housing element within them.
- 8.3 H2 - Housing Sites - Urban Fringe: The densities are well below what is recommended in the NPPF and in the Draft City Plan 2. The numbers of dwellings quoted are based on the Urban Fringe Assessment which by the very nature of the Assessment are not based on detailed studies, and more flexibility is required to ensure efficient use of land in the context of their location and in terms of detailed ecological, visual, landscape and other (such as transport) assessments. At worst, the numbers should be stated as a minimum. Please see also comments on DM19 and DM38 (items 5.2 and 7.3 above).
- The need for family homes within the City is recognised, and that the Urban fringe sites are good locations to provide them, the lower densities will attract major house builders that will provide top-end 4 and 5-bedroom detached houses, but a more affordable typology needs to be considered, for instance the 2.5 and 3 storey terraced house.
- All this needs to be seen in the context that City Plan Part 1 only seeks to deliver a proportion of the City’s housing needs (less than half) and the Council is still falling significantly short of this minimum housing requirement. The need for development management policies which positively and appropriately improve delivery and enable the City to meet its City Plan Part 1 requirements and increase housing provision is vital and has already been anticipated by the City Plan Part 1 Inspector.
- 8.4 H3 – Purpose Built Student Housing: we understand there needs to be a balance between Policies DM1, DM2, DM7 and DM8 in the consideration of windfall sites but in terms of allocation H3 there should be some indication that other sites will be considered in accordance with Policy DM8e.

Planning Agents Forum

9.0 Consultation & Timing

- 9.1 We consider a real opportunity has been missed not to have involved PAF in consultations over the wording of policies pre-publication of the draft. After all, as future “users” of the policies we could have made a major contribution.
- 9.2 It is always surprising in an exercise that takes so long from start to completion that the consultation periods are so short. To instigate such a period over the summer months and to have it run concurrently with consultation on another subject of interest to our members, the Urban Design Framework SPD, suggests the intention to limit a meaningful response from stakeholders whose time is inevitably limited. This has left us very little time to consider our response to the overall context of the document and insufficient time to review the actual wording of the Policies.
- 9.3 It is also unfortunate that the timing has not been co-ordinated with the publication of the new NPPF. Surely it would have been better if the consultation had been delayed until the autumn when a re-draft could have taken into account the updated NPPF.
- 9.4 Conversely, the overall programme seems too long. The Council has given itself over a year following this consultation before it even publishes the submission version of the Plan and two years before it intends to submit the Plan for examination. This timetable appears unnecessarily drawn out and will only provide uncertainty over the next few years without clear justification.
- The longer this Plan document remains in draft stages the more National Policies and local circumstances will change. These may lead to additional delays of their own or result in the Policies of the Plan becoming outdated and/or ineffective before they are even adopted. We encourage the Council to work on an achievable but more ambitious timetable to deliver this Plan efficiently.

10.0 Conclusions

- 10.1 To ensure clarity, we confirm that our comments should be registered as objections to the current wording of those policies and associated justification that we have drawn attention to in this representation.
- 10.2 Given our comments above, PAF would welcome the opportunity to engage further in a positive and constructive dialogue with the Council to explore these and other issues to ensure the Plan and the Policies achieve the best possible built environment for the City and we look forward to further discussions with the Council in the process going forward
- 10.3 We would also wish to confirm we would like the opportunity of attending the examination.

**For Official Use:**

Respondent Number:

Date Received: / / 2018

Entered onto Portal: Yes/No

Draft City Plan Part Two
Consultation Period: 5th July 2018 until
5pm on 13th September 2018
Word Response Form

Accessibility Notice: (Ctrl & click to view): <https://www.brighton-hove.gov.uk/content/about-website/help-using-council-website/accessibility>

Draft City Plan Part Two – Consultation

Brighton & Hove City Council has published the draft City Plan Part Two for a 10 week period of consultation starting 5th July 2018. This follows on from the scoping consultation undertaken July - September 2016.

The draft City Plan Part Two sets out the preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications. The City Plan Part Two will support the implementation and delivery of the City Plan Part One.

The council is seeking your views on the draft Plan and supporting documents. Your comments will help inform the final version of the City Plan Part Two. So if you have any comments about the approaches in the plan then we would urge you to submit those comments during this consultation so that they can be fully taken into account.

The Draft City Plan Part 2 and supporting documents including a quick guide to the City Plan Part Two as well as background evidence documents are available to view and download from the Council's website at: www.brighton-hove.gov.uk/cityplan-part2.

Part A: Contact Details

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations

Yes

No

Privacy Notice: (ctrl & click to view)

<https://www.brighton-hove.gov.uk/content/planning/planning-applications/planning-service-privacy-statement>

Please note that you must complete Part A as anonymous forms cannot be accepted.

Organisation Name (If applicable)	The GoAhead Group Brighton and Hove Bus Company
Name	
Address	
Email Address	
Agent Name (If applicable)	
Agent Name	
Agent Address	
Agent Email Address	

Part B: Your Representation relating to Development Management Policies

Please use a separate sheet for representations against each Development Management policy

(ctrl & click to view)

Housing, Accommodation & Community chapter (policies DM1-DM10)

Employment Tourism & Retail Chapter (policies DM11-DM17)

Design & Heritage Chapter (policies DM18-DM32)

Transport & Travel Chapter (policies DM32-DM36)

Environment & Energy Chapter (policies DM37-DM46)

Policy Number H3

Policy Name Purpose Built Student Accommodation

Lewes Road Bus Garage

250 bedspaces

Other Required Uses Operational requirements of bus depot to be maintained.

a) Do you Support or Object to the policy?

Object

If you object to this policy, please go to questions (d) and (e)

d) Please explain why you object to this policy?

Brighton & Hove Buses is the key provider of public bus services to the Brighton & Hove area. The service is a vital part of community infrastructure, providing comprehensive, sustainable and affordable public transport services.

As part of the community we are highly supportive of the planning policies pursued by the City Council in its role to enhance the city and support residents, visitors and businesses and we share the City Council's bold aspirations.

We are willing to work with the City Council to explore opportunities to increase student and other accommodation opportunities within the city but this must be in the light of the following essential facts and constraints:

- i) the Lewes Road bus depot is part of our business infrastructure and is absolutely essential to the delivery of the city's bus services;
- ii) other relocation sites for our business are not available in either nearby or suitable sites; and
- iii) to move further away from core frequent bus routes would render some routes unviable.

We are pleased to have been reassured by the Head of Planning at the City Council that the continued operational use of the bus depot in Lewes Road was required to be maintained as part of the policy. Assuming that this is the case, and any plans to build student or other

DP259

accommodation on this site include its continued operation as a bus depot of at least the current maximum capacity, then this is a “comment” rather than an “objection”.

However, if this is not the case, or any plans to build student or other accommodation on this site reduce its maximum capacity, then this is an “objection” for the reasons outlined above.

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Lewes Road Bus Depot

250 bedspaces

Other Required Uses; It is a pre-requisite that the operational requirements of bus depot are to be maintained. If student accommodated is found to be appropriate, this should be accompanied by enhancements to the bus depot and its operations by way of enhanced footprint and more secure tenure.

Part C: Your Representation(s) relating to Site Allocations

Site Allocations - Special Area policies

(Ctrl & click to view): [SA7 Benfield Valley Policy](#)

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Site Allocations – Strategic Site Allocations

(Ctrl & click to view): **Strategic site allocations: (policies SSA1-SSA7)**

Please use a separate sheet for representations against each Strategic Site Allocation

- SSA1, Brighton General Hospital Site
- SSA2, Combined Engineering Depot, New England Road
- SSA3, Land at Lyon Close, Hove
- SSA4, Sackville Trading Estate & Coal Yard, Hove
- SSA5, Madeira Terrace & Madeira Drive
- SSA6, Former Peter Pan Leisure Site (adjacent Yellow Wave)
- SSA7, Land Adjacent Amex Community Stadium, Falmer Way

Policy Number

Policy Name

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

Object

If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) Are there any other sites that could be allocated as strategic sites ?

Site Allocations - Housing Sites

(Ctrl & click to view): [Housing sites and Mixed Use Site allocations: \(policies H1-H3\)](#)

H1 - Housing Sites & Mixed Use Sites

a) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)
If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons

g) Are there any other sites that could be allocated as housing sites ?

H2 – Urban Fringe Housing Sites

(Ctrl & click to view): [Housing sites and Mixed Use Site allocations: \(policies H1-H3\)](#)

a) Do you Support or Object to the policy?

Support If you support this policy, please go to questions (b) and (c)
Object If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons

H3 - Purpose Built Student Accommodation Sites

(Ctrl & click to view): [Housing sites and Mixed Use Site allocations: \(policies H1-H3\)](#)

a) Do you Support or Object to the policy?

- Support If you support this policy, please go to questions (b) and (c)
Object If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) If you wish to comment on any specific student housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons

g) Are there any other sites that could be allocated as sites for student housing?

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Site Allocations - Employment Site

(Ctrl & click to view): **Opportunity site for business and warehouse uses: (policy E1)**

a) Do you Support or Object to the policy?

Support If you support this policy, please go to questions (b) and (c)
Object If you object to this policy, please go to questions (d) and (e)

b) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) Are there any other sites that could be allocated as employment sites ?

Part D: Your Representation(s) relating to Any Other Comments & Equalities

Any other comments

Please use a separate sheet for each representation

(Ctrl & click to view):

- [Introduction](#)
- [Appendix 1: Glossary of terms](#)
- [Appendix 2 Parking Standards – Policy DM36 Parking and Servicing \(adopted Parking Standards SPD\)](#)
- [Appendix 3 - Local Wildlife Sites \(Policy DM37 Green Infrastructure and Nature Conservation](#)
- [Appendix 4 - Policy H2 Urban Fringe Housing Site Maps \(see also proposed draft Policies Map\)](#)
- [Appendix 5 - List of Brighton & Hove Local Plan policies that will be superseded on adoption of the City Plan Part 2](#)
- [Appendix 6 Table 1 – Proposed Changes to Policy Map – new additions/ amendments by virtue of policies in Draft City Plan Part 2/ Updates](#)
- [Appendix 6 Table 2 Policies Map – Proposed Changes to the City plan Part 1 Policies Map due to retained Brighton & Hove Local Plan Policies being superseded by City Plan Part 2 policies](#)

- [Supporting documents to the City Plan Part Two](#)

- [Background studies for the City Plan Part Two](#)

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.

Equalities

The council has a duty under the Equalities Act 2010 to eliminate discrimination and advance equality of opportunity for people with the following protected characteristics: age, disability, race, religion, sex, sexual orientation, gender reassignment, marriage and civil partnership, and pregnancy and maternity. In addition the council has a duty to foster good relations between all communities.

A Health and Equalities Impact Assessment on the Draft City Plan Part Two has been undertaken and is available to view [here](#) [PDF, 2.8MB]

AO2 Do you consider the City Plan Part Two to have any equalities implications, positive or negative? If so, please provide further details.

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Signed*:	
Dated*:	

All representations must be received at the email or postal address given on this form by **5.00pm on 13th September 2018**.

Due to the length of the consultation period please kindly note that late representations will not be accepted.

Completed forms should be sent to:

Email: planningpolicy@brighton-hove.gov.uk

Post: Consultation on the Draft City Plan Part Two
Brighton & Hove City Council
Planning Policy Team
1st Floor Hove Town Hall
Norton Road
Hove BN3 3BQ

If you have any further queries please contact us on 01273 292505 or via email planningpolicy@brighton-hove.gov.uk

Brighton & Hove City Council
FAO: Policy Projects and Heritage Team (Draft CPP2)
First Floor, Hove Town Hall
Norton Road
Hove
BN3 3BQ

13th September 2018

Dear Sirs,

Brighton and Hove Draft City Plan – Part Two

We welcome the publication of the Draft City Plan – Part Two, which will play a key role in planning decisions until 2030 and shape development across the city. However, we have a number of concerns with the document in its current form which we hope can be resolved in future iterations of the Plan.

As a company we were formed in the city and work with a wide range of clients throughout Brighton and Hove, many of whom have individual interests in various parts of the City Plan – Part Two. Where appropriate we will be submitting separate comments on the City Plan – Part Two on behalf of clients, but this letter seeks to deal with more general concerns with the City Plan – Part Two and our views on how this document could be improved.

We want to work alongside the City Council to help achieve their strategic aims for the city and help deliver the development that the city needs. We would welcome any opportunity to discuss these matters further.

Objectives and Timetable

The City Plan – Part Two is intended to “*ensure there is a more streamlined and straightforward set of development management policies*”, which we fully support. Concise and coherent policies help enable consistent and predictable decision-making.

We do not feel the City Plan – Part Two goes far enough in this respect. The draft document contains far too much unnecessary detail and repetition. Whilst the ‘reasoned justification’ section provides explanation of why the policy approach has been taken, this reduces the overall usability of the document and makes it harder to navigate. Text that does not provide useful detail to the actual policy requirements should be removed in the interests of delivering a succinct document that can better guide development decisions. Policies regularly cross-

reference other policies (and some policy references used are wrong) even though there is no need for them to do so.

Timetable

The Council has given itself over a year following this consultation before it even publishes the submission version of the Plan and two years before it intends to submit the Plan for examination. This timetable is unnecessarily drawn out and will only provide uncertainty over the next few years without clear justification.

The longer this Plan document remains in draft stages the more national policies and local circumstances will change. These may lead to additional delays of their own or result in the policies of the plan becoming outdated and/or ineffective before they are even adopted. We encourage the Council to work on an achievable but more ambitious timetable to deliver this Plan efficiently.

The City Plan – Part One only seeks to deliver a proportion of the City’s housing needs (less than half) and the Council is still falling significantly short of this minimum housing requirement. Development management policies within the City Plan – Part Two need to positively and appropriately drive improvements in future delivery against a wide-range of recognised and established needs. Whilst the need for additional housing remains the most pressing, there are a range of other needs that also need careful consideration (including employment floorspace requirements, improvements to the quality and offer of the city as a regional employment centre, retail and leisure provision and identified visitor accommodation requirements).

In particular, the need for planning policies which further support and drive the delivery of new homes across the city is clearly highlighted in the conclusions of the City Plan Part One Inspector and should serve as a basis for the overall ambition and intention of the City Plan – Part Two:

“37. The City Plan Part One, as proposed to be modified, seeks to meet only 44% of the objectively assessed need for new housing. This is a very significant shortfall which has important implications for the social dimension of sustainable development. However, as noted above, the City is subject to significant constraints in finding land for new development. The target of 13,200 new homes is expressed as a minimum, which offers scope for that number to be increased when more detailed consideration of individual sites is undertaken for the preparation of the City Plan Part Two.”

Overall Vision

Regretfully this document appears to be a missed opportunity to positively and creatively shape the future of the city and instead simply regurgitates many former policies from the 2005 Local Plan without seriously grappling with the major challenges and issues the city faces over the next twelve years (to 2030).

We will touch on some matters where we think more forward-thinking is needed but encourage the City Council to consider its overall ambition and vision for the city as these policies will shape and/or constrain its future over the next twelve years.

Policy DM1 – Housing Quality, Choice and Mix

The policy imposes a number of minimum requirements on new housing that have not been justified. There is no assessment of the impact of these standards on the viability of new housing delivery (particularly at a time where additional housing development is urgently needed and the City Council is failing to deliver enough housing to meet even 44% of its overall housing need).

Any policies requirements that further constrain the delivery of new and affordable housing within the city should not be brought forward until the Council have a clear strategy to meet their own housing needs and a robust supply of housing land to do so.

Planning practice guidance is clear on the considerations for local planning authorities where they seek to justify requiring internal space standards (Reference ID: 56-020-20150327). The implication of requiring these minimum space standards in new properties could well result in all new housing being less affordable than existing homes and further worsening the city's affordability issues. Whilst the delivery of more spacious, high quality new homes is no bad thing in isolation, the resulting effect on the city's already worsening affordability problems has the potential to create far worse social and economic sustainability impacts for residents. In this context, the failure to explore and understand the viability and affordability implications of Policy DM1 is concerning.

In addition to these space standards, the Council is also seeking to require Building Regulation M4(2) accessibility standards as a minimum for all new residential accommodation. This will likely also constrain delivery and may even prevent the conversion of some existing (and historic) buildings. The Council should note Mid Sussex District Council's intention to require these standards for all new residential development, but the examining Inspector required this policy to be modified to only 20% of all developments of 5 or more dwellings to reflect "evidence of need".

Further to this the requirement for useable private outdoor amenity space is not included in the exceptions caveat provided for criteria c) – e) (where robust justification has been made).

Despite this caveat it is imperative that the Council understand the need for these requirements or the potential impact on development viability and deliverability before imposing them. The Council's Sustainability Appraisal does not even assess these aspects of the policy or consider reasonable alternatives (such as not including these as a requirement).

We are not clear why the Council have included minimum space standards that do not 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 draft national space standards originally referred to ‘studios’ but this reference was removed following consultation as it was considered that including a minimum standard for studios *“might impact on the provision of small one person flats on brownfield sites in higher cost parts of the country”*. The Government’s reversion to a 1-bedroom, 1-person standard should therefore not be considered synonymous with a ‘studio’. This table should be removed for consistency.

The national technical housing standards are clear that these standards should only apply to “new dwellings”, whilst draft Policy DM1 seeks to apply them to all “residential accommodation”. The standards should only be applied to residential dwellinghouses, if this policy requirement is carried forward. It is also clear from paragraphs 2.63 and 2.64 (Policy DM7) that these standards apply to HMO accommodation, it would be useful for this to be clear within Policy DM1.

Policy DM2 - Retaining Housing and residential accommodation (C3)

This policy narrowly defines residential accommodation as C3 single dwellinghouses. Given the large demographic of young professionals and students within the city this is neither justified or appropriate and the effect of the policy is allow the loss of C4 dwellings and opposes the principle of any changes of use between C3 and C4 uses. Whilst reference is made to CP21 and DM7 in relation to changes to C4, this wording does not negate or reduce the effect of the Policy as a whole, which resists any net loss of C3 units.

This would constrain the delivery or provision of shared houses and unfairly disadvantage specific residents and groups, increasing unaffordability amongst a group that is more likely to be on lower incomes and reliant on the private rental market. Young professionals would be disproportionately affected by this policy constraint and this may raise issues in relation to Article 14 of the Human Rights Act 1998 that don’t appear to be considered. The Council’s Health and Equalities Impact Assessment does not recognise this implication of the policy and therefore its impact on specific age groups within the city has not been assessed.

2.16 of the supporting text is imprecise (should not expect a “similar” number of homes as this might allow a net loss contrary to the aims of the policy). The last sentence, in relation to changes of use from two dwellings into one is also a direct contradiction of the policy.

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. The remainder of this paragraph refers to amenity impacts which are already covered by other policies and should not be referenced within DM2.

Reference in paragraph 2.18 to “community service” should be changed to “community facility” to ensure consistency with the City Plan – Part One.

¹ Housing Standards Review – March 2015

Policy DM3 – Residential conversions and the retention of smaller dwellings

This policy largely reflects Policy HO9 of the 2005 Local Plan. The 2005 Local Plan only provided for 216 homes per year within an entirely different national and local policy context. Over a 20-year plan period this would result in the delivery of only 4,320. We now know that there is an objectively assessed housing need over City Plan period from 2010 to 2030 of 30,120 homes, almost seven times that required under the Local Plan (2005).

The retention of policies which seek to restrict the delivery of additional housing within the City Plan – Part Two should be subject to very careful consideration. Instead, the draft City Plan – Part Two further raises the size threshold that buildings must meet in order to be suitable for subdivision (from 115m² to 124m²). No justification is provided for this or the floorspace figure chosen.

Over the last three monitoring years the City Council has only achieved an average of 35 new homes per annum from residential conversions. Despite this, the City Plan – Part Two seeks to further constrain the supply of new homes from this source under policy DM3. This will further reduce the delivery of new homes in this form and worsen the housing crisis that national policies are seeking to address. We do not consider that this policy will meet the tests of soundness as it is not positive prepared, justified, effective or consistent with national policy.

The policy itself can be improved, if retained. The reference to the size of a building “as originally built” should be better defined to provide clarity, defining this as the size of the building as at 1948 would provide consistency with case law.

Criterion (c) is unnecessary as this would be a policy requirement in any case. Criterion (ii) is imprecise and cannot be secured. Original floor area should be based on gross internal floorspace consistent with national technical housing standards.

Policy DM4 – Housing and Accommodation for Older Persons

This policy should be split into two different policies; one for new development, one resisting the loss of existing accommodation. The first three paragraphs should form the first policy and the last two paragraphs should form the second policy.

Reference to an “appropriate amount” of affordable housing is vague and confusing and this wording should be removed.

Policy DM5 – Supported Accommodation (Specialist and Vulnerable Needs)

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.

The first paragraph could be deleted or moved to supporting text. 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. Paragraph 2.36 of the supporting text is unnecessary and should be deleted.

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 also 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.

Paragraph 2.37, and in particular the second sentence, should be policy wording as it has clear implications for decision-takers.

Policy DM6 – Build to Rent Housing

This policy is not clear or justified and needs significant revision.

Reference to Policy CP19 of the City Plan – Part One at criterion (a) is unnecessary and can be removed. Criterion (b) refers to “over-concentration” of build to rent but this is not defined within the policy and needs much greater clarity. The requirement for dwellings to be self-contained and separately let under criterion (c) is not justified or explained within the policy.

The requirement for on-site management under criterion (f) 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.

The requirement under criterion (g) for tenancies of at least 3 years cannot be a planning requirement. Criteria (h) and (i) simply reference other policies and are not necessary.

Policy DM7 – Houses in Multiple Occupation (HMOs)

As set out in our comments under Policy DM2, the draft City Plan – Part Two has the effect of supporting changes of use from C4 to C3 but preventing changes of use from C3 to C4. This will have the effect, over time, of reducing the range of housing available to residents and would disproportionately affect specific groups of residents.

No justification or evidence has been provided to justify this policy approach that could result in a shortage of housing for sharers (in particular non-student sharers as the City Plan provides for new purpose-built student accommodation) and worsening affordability. We do not consider that the current City Plan – Part Two would meet the tests of soundness on this basis.

As per the 2016/17 Monitoring Report published by the Council *“The city has a high number of HMOs, which have increased from 8.2% to 10.9% of all properties between 2001 and 2011”*. As the Council's current policy approach (Under CP21 of the City Plan – Part One) is to refuse applications in areas with over 10% concentration of HMOs this planning policy approach will clearly restrict the provision of new HMO units within the city. Combined with a chronic undersupply of housing (and a housing requirement significantly below the identified need for the city), this policy approach will significantly constrain the provision of new shared housing across the city and will force young professionals out of the city.

The City Plan – Part One makes some (limited) provision for new purpose built-student housing but does nothing to protect the existing housing supply of HMOs for sharers who choose to live in shared accommodation or cannot afford to buy their own properties. Additionally, single individuals under the age of 35 can currently only access housing benefit at the local housing allowance rate for a single room in a shared house. The implication of the Council's policies in this regard (combined with a rather aggressive approach to enforcement against existing and sometimes long-term HMO accommodation) is that certain groups within the city will be unfairly disadvantaged and priced out of certain areas or the city generally.

If this policy approach were to continue the Council will be in breach of Article 14 of the Human Rights Act. Young adults across the city would be disproportionately affected by the inevitable adverse impacts that would arise from an undersupply of housing (The City Plan – Part One Inspector highlighted that the housing strategy results in “a very significant shortfall which has important implications for the social dimension of sustainable development”). These include being priced out of the market, subjected to significant rent increases that are not matched in commensurate salary increases and the inevitable impacts on quality of life that would arise as a result.

Article 14 of the Human Rights Act requires that all of the rights and freedoms must be protected and applied without discrimination. This policy approach would disproportionately impact upon certain age groups without any valid justification given.

Turning to the policy itself, this represents a missed opportunity for the Council to set out clearly their planning standards for HMOs and the standard of accommodation expected. Recent planning decisions have demonstrated that the Council's planning team seeks to apply standards in excess of those set out in the HMO licensing standards adopted by the Council, but they have not published any clear planning standards. This should be a priority in the City Plan – Part Two to provide certainty for applicants and ensure good standards of accommodation within HMOs across the city.

Currently there is inconsistency with the way HMO proposals are assessed. In particular, the level of communal space considered appropriate for different levels of occupation varies from officer to officer in the absence of any published planning standards. 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. Private sector

licensing standards and planning requirements should be aligned to provide clarity and consistency.

Policy CP21 of the City Plan – Part One already seeks to manage changes of use to HMO and seeks to avoid over-concentrations of HMOs. There is no evidence that this policy approach is not working or providing an appropriate mechanism to manage this type of change of use. It is not clear why DM7 seeks to introduce a higher threshold for applications of this type. The City Plan – Part One Inspector concluded that the Plan struck “an acceptable balance between the need for student accommodation and general housing needs” and we do not consider that this position has changed since the adoption of the City Plan – Part One.

The additional requirements within DM7 are complex and members of the public would not be able to navigate or understand its requirements. 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. No information is given to set out to applicants where they can find the information required to understand the requirements of the policy, nor are its excessive requirements justified in any form.

We are not clear what the planning benefits of avoiding a continuous frontage of HMOs are considered to be (criterion (c)). The co-location of similar uses is likely preferable in amenity terms. Criterion (d) is simply a reference to another policy and can be deleted.

Paragraph 2.61 refers to a ‘hope’ that the supply of Purpose Built Student Accommodation increases and therefore demand for HMO accommodation will decrease. This severely underestimates the number of non-student sharers that contribute to the demand for HMO accommodation within the city and this demand will not be met by Purpose Built Student units.

There is a general shortage of residential accommodation across the city and the City Plan – Part One does not come close to meeting these needs in full. In addition to this, only 400 additional bedspaces are identified across two allocations for purpose-built student housing within the City Plan – Part Two and this will not come close to meeting the need arising over the Plan period. The Council’s ‘hope’ that demand for accommodation of this type will decrease is therefore not based on facts or evidence and forms a poor basis for policy formation.

DM8 – Purpose Built Student Accommodation

This policy needs strengthening and should identify the standards considered acceptable by the Council (particularly in relation to criteria (b), (c) and (d)).

The requirement for a predominance of cluster units is not well justified. The requirement of criterion (e) to “ensure occupants do not keep cars in Brighton & Hove” is unachievable and excessive. The requirement for a 24-hour on-site security presence will likely impact upon

the viability and delivery of some purpose built student accommodation and the policy as a whole is a significant constraint to delivery when the expectations of the Council set out under Policy DM7 are considered (that delivery of PBSA will be sufficient enough to not just meet needs but also reduce demand for HMO accommodation).

DM9 – Community Facilities

We support this policy and its wording however minor improvements could be made by removing the wording “at least” from part 2 and the word “any” from criterion 2 (c).

DM10 – Public Houses

This policy currently only supports the retention of public houses and should be titled accordingly or expanded to provide support for new public houses, or the improvement of existing public houses.

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).

Policy support should be added for the diversification and improvement of existing public houses, where this provides opportunities to improve the viability of these businesses. Wording to this effect may help avoid applications that would result in the loss of public houses in the first place and before they begin to fail.

DM11 – New Business Floorspace

The second half of this policy is unclear and needs clarity. The wording could be simplified to “Development proposals that seek to upgrade lower quality premises on protected industrial estates, and/or seek to provide higher employment densities, will be supported where the proposed use/s remain within B1, B2 and B8 Use Classes”. However, it is not clear what additional benefit this policy offers that is not already covered by part three of City Plan – Part One Policy CP3.

It should also be noted that Policy H3 appears to incorrectly reference this policy and this reference should be amended accordingly.

DM12 – Primary, Secondary and Local Centre Shopping Frontages and DM13 – Important Local Parades, Neighbourhood Parades and Individual Shop Units

This policy should better reflect the changing nature of high streets and the wider range of city centre uses that should be encouraged to maintain the vibrancy, vitality and viability of primary and secondary retail areas.

Since Policies SR4 and SR5 of the 2005 Local Plan were adopted there have been a number of revisions to permitted development rights allowing permanent and 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. In contrast the draft Policy DM12 fails to provide the same level of support and flexibility and will instead restrict changes of use and require vacant (or nearly vacant) units to be marketed for at least twelve months before an alternative use could move in.

The policy should be reconsidered to better reflect the changing character of high streets and the new national policy framework that seeks to deliver flexibility and encourage a range of uses.

The policy should provide particular support for complementary uses such as food and drink establishments, leisure uses and professional services that would positively contribute to the frontage. Improved flexibility within the Development Plan will help support the role and function of the city centre, in particular, and encourage inward investment and the creation of new businesses within the city. 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.

We receive regular enquiries from clients seeking to introduce positive city centre uses that will generate footfall but do not progress with properties due to the restrictions of existing planning policies. A policy which welcomes applications for introducing positive uses within these areas, to be judged on their own merits rather than overly prescriptive policy criteria, would go a long way.

DM17 – Opportunity Areas for new Hotels and Safeguarding Conference Facilities

We fully support the policy support for new hotel development however, given the clear need for new hotel development identified in the Visitor Accommodation Study Update 2018 and the absence of any hotel site allocations in the City Plan – Part Two, we suggest that the ‘suitable search areas’ have the potential to unnecessarily restrict hotel development outside these areas, even on sites that would clearly be suitable.

The use of the term ‘suitable’ in the phrasing of the policy implies that other locations are not suitable, which is neither true nor the intention set out in the Study Update. The Study Update 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 does.

The result of the policy in its current form is likely to actually restrict the potential for new hotel development, contrary to its intentions and the evidence base which underpins it. The whole policy should be reworded to support new hotel development, identify specific allocations and strongly support appropriate proposals in these four DA areas of opportunity (DA1, DA2, DA4 and DA6).

The Study Update highlights that “hotel companies that are keen to open new hotels in Brighton are clearly struggling to secure sites”. In the absence of sufficient hotel sites coming forward for delivery, the Council should seriously consider the development potential of the Madeira Terraces area as a suitable site for a new midmarket or upscale hotel development and heritage restoration project. In its current form Policy DM17 would fail to support this kind of alternative proposal.

Lewis & Co Planning would welcome the opportunity to discuss these matters in greater detail with the Council. Officers should contact

Yours faithfully,



Draft City Plan Part Two
Consultation Period: 5th July 2018 until
5pm on 13th September 2018
Word Response Form

For Official Use:

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

Accessibility Notice: (Ctrl & click to view): <https://www.brighton-hove.gov.uk/content/about-website/help-using-council-website/accessibility>

Draft City Plan Part Two – Consultation

Brighton & Hove City Council has published the draft City Plan Part Two for a 10 week period of consultation starting 5th July 2018. This follows on from the scoping consultation undertaken July - September 2016.

The draft City Plan Part Two sets out the preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications. The City Plan Part Two will support the implementation and delivery of the City Plan Part One.

The council is seeking your views on the draft Plan and supporting documents. Your comments will help inform the final version of the City Plan Part Two. So if you have any comments about the approaches in the plan then we would urge you to submit those comments during this consultation so that they can be fully taken into account.

The Draft City Plan Part 2 and supporting documents including a quick guide to the City Plan Part Two as well as background evidence documents are available to view and download from the Council's website at: www.brighton-hove.gov.uk/cityplan-part2.

Part A: Contact Details

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations

Yes

No

Privacy Notice: (ctrl & click to view)
<https://www.brighton-hove.gov.uk/content/planning/planning-applications/planning-service-privacy-statement>

Please note that you must complete Part A as anonymous forms cannot be accepted.

Organisation Name (If applicable)	Lewis & Co Planning
Name	
Address	
Email Address	
Agent Name (If applicable)	
Agent Name	
Agent Address	
Agent Email Address	

Part B: Your Representation relating to Development Management Policies

See supporting letter (attached)

Part D: Your Representation(s) relating to Any Other Comments & Equalities

**AO1 Do you have any other comments on any other part of the plan or its supporting documents?
If you are commenting on more than one supporting document / background study please make
this clear in the box below by using headings.**

See supporting letter for comments on the Plan vision, objectives and timetable

Equalities

The council has a duty under the Equalities Act 2010 to eliminate discrimination and advance equality of opportunity for people with the following protected characteristics: age, disability, race, religion, sex, sexual orientation, gender reassignment, marriage and civil partnership, and pregnancy and maternity. In addition the council has a duty to foster good relations between all communities.

A Health and Equalities Impact Assessment on the Draft City Plan Part Two has been undertaken and is available to view [here](#) [PDF, 2.8MB]

AO2 Do you consider the City Plan Part Two to have any equalities implications, positive or negative? If so, please provide further details.

Yes, the Plan as currently worded would have a disproportionately adverse impact on young adults (largely in an 18-35 age range) and the Health and Equalities Impact Assessment fails accurately assess the impact of policies including DM2 and DM7 on this group.

The City Plan – Part Two seeks to constrain the delivery of shared housing, disproportionately increasing unaffordability of housing for those on low incomes and those reliant on the private rental market. This will disproportionately impact upon adults in the age range specified and is contrary to Article 14 of the Human Rights Act 1998 and Equalities Act 2010. No valid justification or evidence is given for this policy approach.

Please see our supporting letter for further details.

Signed*:	
Dated*:	13 th September 2018

All representations must be received at the email or postal address given on this form by **5.00pm on 13th September 2018**.

Due to the length of the consultation period please kindly note that late representations will not be accepted.

Completed forms should be sent to:

Email: planningpolicy@brighton-hove.gov.uk

Post: Consultation on the Draft City Plan Part Two
Brighton & Hove City Council
Planning Policy Team
1st Floor Hove Town Hall
Norton Road
Hove BN3 3BQ

If you have any further queries please contact us on 01273 292505 or via email
planningpolicy@brighton-hove.gov.uk

DP261

Brighton & Hove City Council
FAO: Policy Projects and Heritage Team (Draft CPP2)
First Floor, Hove Town Hall
Norton Road
Hove
BN3 3BQ

13th September 2018

Dear Sirs,

Brighton and Hove Draft City Plan – Part Two

We write on behalf of Hargreaves in relation to the Draft City Plan – Part Two and have a number of comments on its contents. These include general observations and concerns around the content of the Plan, its general strategy, detailed policies and the impact that these might have on commercial premises across the city over the Plan period to 2030.

This early stage of the Plan's preparation offers an appropriate opportunity to engage with the Council to express our reservations with the draft document in its current form and to develop and constructive dialogue through which the challenges of the coming years can be effectively addressed through forward thinking and ambitious planning policy approaches.

In its current form we consider the Plan lacks sufficient foresight around a number of issues including the function and diversity of city centres and the changing ways in which companies and their employees work and the impact these changes are having and will continue to have on the city's existing commercial premises and future development needs.

Hargreaves

As a company, Hargreaves were formed on the south coast and have been Sussex-based for the entirety of the company's existence. Hargreaves is a private investment and



RTPI

mediation of space · making of place

Chartered Town Planners

development company specialising in commercial and residential property across the South East of England, with long-standing connection to Brighton and Hove.

Hargreaves has substantial land holdings in Brighton and Hove, including office premises along Queens Road, Dyke Road, Manchester Street and Preston Road/Lovers Walk and industrial and commercial premises at Freshfield Industrial Estate. Hargreaves is fully committed to their existing commercial interests in the city.

Where relevant we have submitted site-specific representations in relation to specific draft policies in the City Plan – Part Two. We do not intend to duplicate those comments within this letter.

Timetable

The Council has given itself over a year following this consultation before it publishes the submission version of the Plan and two years before it intends to submit the Plan for examination. This timetable is unnecessarily drawn out and will only provide uncertainty over the next few years without clear justification.

Overall Vision

Regretfully the document fails to identify creative and positive ways in which the city can meet the anticipated challenges of the coming years to 2030. Many former policies from the 2005 Local Plan have been replicated in part or in principle and opportunities to seriously consider the ways the character and function of cities generally (and Brighton and Hove in particular) have not been fully grasped.

We will touch on some matters where we think more forward-thinking is needed but encourage the City Council to consider its overall ambition and vision for the city as these policies will shape and/or constrain its future over the next twelve years.

DM11 – New Business Floorspace

The underpinning principles to this policy are supported and it seeks to ensure that new employment floorspace is sufficiently flexible and ‘future-proofed’ to meet the changing demands of the commercial market.

However, this policy intent is not carried over into supporting the upgrade, improvement, development and diversification of existing office, commercial and industrial properties. It is not clear why the second half of the policy only applies to protected industrial sites and more should be included within the policy providing clear policy support for proposals that upgrade existing commercial premises.

Our suggested wording is as follows:

“Development proposals that upgrade and improve existing commercial properties (including delivering more flexible workspaces and complementary uses/facilities) will be supported.”

Any proposals that seek to improve the existing stock of business premises within the city should be supported by the policies of the City Plan – Part Two and therefore wording to this effect is important in securing appropriate upgrades and investment over the Plan period. Our client is extremely concerned about the impact of changing working practices and the effect this will have on the marketability of traditional office spaces in the short to medium term future. Planning policies which support and encourage appropriate upgrades to future-proof these commercial properties and meet the changing needs of current and future occupants are considered to be an essential requirement for the city over the coming years to 2030.

DM12 – Primary, Secondary and Local Centre Shopping Frontages and DM13 – Important Local Parades, Neighbourhood Parades and Individual Shop Units

This policy should better reflect the changing nature of high streets and the wider range of city centre uses that should be encouraged to maintain the vibrancy, vitality and viability of primary and secondary retail areas.

Since Policies SR4 and SR5 of the 2005 Local Plan were adopted there have been a number of revisions to permitted development rights allowing permanent and 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. In contrast the draft Policy DM12 fails to provide the same level of support and flexibility and will instead restrict changes of use and require vacant (or nearly vacant) units to be marketed for at least twelve months before an alternative use could move in.

The policy should be reconsidered to better reflect the changing character of high streets and the new national policy framework that seeks to deliver flexibility and encourage a range of uses.

The policy should provide particular support for complementary uses such as food and drink establishments, leisure uses and professional services that would positively contribute to the frontage. Improved flexibility within the Development Plan will help support the role and function of the city centre, in particular, and encourage inward investment and the creation of new businesses within the city. 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.

DM17 – Opportunity Areas for new Hotels and Safeguarding Conference Facilities

The current wording of the policy identifying ‘suitable search areas’ for new hotel development infers that any new visitor accommodation outside these areas would be considered ‘unsuitable’ within the requirements of the policy.

This is not the intention of supporting evidence prepared to inform this policy. A Hotel Future Study Update describes the Development Area locations as “locations of opportunity”, without the inference that other areas are unsuitable and unacceptable in principle.

The policy in its current form would restrict the potential for the development of new visitor accommodation. The policy should be reworded accordingly.

As no suitable sites have been identified to meet the clear need for additional visitor accommodation within the city, policy wording should be included that makes clear that some sites allocated or protected for other uses – particularly within these locations of opportunity - could be considered acceptable locations for new hotel development if *“a clear need for visitor accommodation can still be evidenced”*.

We consider that more flexible wording to this effect could play a key role in securing the additional visitor accommodation needed to deliver the cities key events throughout the year and continue to support the significant primary and secondary economic benefits that the city’s events and visitor economy generate every year. The impact of more flexible policies could be monitored annually through authority monitoring reports and Local Plan reviews when appropriate.

DM19 – Maximising Development Potential

Additional wording should be considered that recognises that some proposals for upgrade or improvement of existing commercial spaces may still be appropriate even where this reduces the density of workspaces.

Changing working practices and habits have seen an increase in the popularity of flexible-working schemes, hotdesking facilities, homeworking and more diverse working spaces will likely result in a demand for some traditional office spaces to be upgraded to modern standards where the actual density of desk-spaces reduces but the quality and the marketability and long-term viability of the accommodation also improves. These types of improvements should be supported within the policy and the impact of changing working practices should be better understood and reflected.

DM23 – Shop Fronts and DM24 Advertisements

The requirements of these policies are unnecessarily convoluted and prescriptive and the planning impacts of poor design in relation to shop fronts and advertisements can be appropriately managed under existing design, heritage and amenity policies and national

planning requirements. The requirements of DM25 – Communications Infrastructure are also already reflected in more general local policies and national planning policies and the policy provides has little purpose.

.... would welcome the opportunity to discuss these matters in greater detail with the Council. Officers should contact ...

Yours faithfully,



Draft City Plan Part Two
Consultation Period: 5th July 2018 until
5pm on 13th September 2018
Word Response Form

For Official Use:

Respondent Number:

Date Received: / / /2018

Entered onto Portal: Yes/No

Accessibility Notice: (Ctrl & click to view): <https://www.brighton-hove.gov.uk/content/about-website/help-using-council-website/accessibility>

Draft City Plan Part Two – Consultation

Brighton & Hove City Council has published the draft City Plan Part Two for a 10 week period of consultation starting 5th July 2018. This follows on from the scoping consultation undertaken July - September 2016.

The draft City Plan Part Two sets out the preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications. The City Plan Part Two will support the implementation and delivery of the City Plan Part One.

The council is seeking your views on the draft Plan and supporting documents. Your comments will help inform the final version of the City Plan Part Two. So if you have any comments about the approaches in the plan then we would urge you to submit those comments during this consultation so that they can be fully taken into account.

The Draft City Plan Part 2 and supporting documents including a quick guide to the City Plan Part Two as well as background evidence documents are available to view and download from the Council's website at: www.brighton-hove.gov.uk/cityplan-part2.

Part A: Contact Details

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations

Yes

No

Organisation Name (If applicable)	Hargreaves
Name	
Address	
Email Address	
Agent Name (If applicable)	
Agent Name	
Agent Address	
Agent Email Address	

Part B: Your Representation relating to Development Management Policies

Policy Number DM11

a) Do you Support or Object to the policy?

Support
Object

b) Please explain why you support this policy?

See supporting letter

c) If you support this policy but have some suggested wording changes please outline these clearly below

“Development proposals that upgrade and improve existing commercial properties (including delivering more flexible workspaces and complementary uses/facilities) will be supported.”
See supporting letter for further details

Part B: Your Representation relating to Development Management Policies

Policy Number DM12

c) Do you Support or Object to the policy?

Support
Object

d) Please explain why you object to this policy?

See supporting letter

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

See supporting letter

Part B: Your Representation relating to Development Management Policies

Policy Number DM13

d) Do you Support or Object to the policy?

Support
Object

d) Please explain why you object to this policy?

See supporting letter

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

See supporting letter

Part B: Your Representation relating to Development Management Policies

Policy Number DM17

e) Do you Support or Object to the policy?

Support
Object

d) Please explain why you object to this policy?

See supporting letter

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

See supporting letter

Part B: Your Representation relating to Development Management Policies

Policy Number DM19

f) Do you Support or Object to the policy?

Support
Object

d) Please explain why you object to this policy?

See supporting letter

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

See supporting letter

Part B: Your Representation relating to Development Management Policies

Policy Number DM23

g) Do you Support or Object to the policy?

Support
Object

d) Please explain why you object to this policy?

See supporting letter

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

See supporting letter

Part B: Your Representation relating to Development Management Policies

Policy Number DM24

h) Do you Support or Object to the policy?

Support
Object

d) Please explain why you object to this policy?

See supporting letter

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

See supporting letter

Part D: Your Representation(s) relating to Any Other Comments & Equalities

Any other comments

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.

See comments on the timetable and overall vision of the Plan within our Supporting Letter

Equalities

AO2 Do you consider the City Plan Part Two to have any equalities implications, positive or negative? If so, please provide further details.

Signed*:	
Dated*:	13 th September 2018

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Planning Policy Team
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Hove BN3 3BQ

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DP262

Comment

Event Name	Consultation on the Draft City Plan Part 2
Comment ID	264
Response Date	13/09/18 11:33
Status	Submitted
Submission Type	Web
Version	0.2

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) n/a

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding . Housing, Accomodation and Community
. Site Allocations - Housing Sites

H1 - Housing Sites & Mixed Use Sites

a) Do you support or object to policy H1? Object

H1 Object Reasons

d) Please explain why you object to this policy?

I can't understand how the council has identified 5 private properties as a development site when planning permission for the McCarthy and Stone development was rejected? The village as it stands

is busy, the number of potential homes will increase the burden on the local infrastructure especially flooding.

H1 Housing Site Allocations

f) If you wish to comment on any specific housing site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

I can't understand how the council has identified 5 private properties as a development site when planning permission for the McCarthy and Stone development was rejected? The village as it stands is busy, the number of potential homes will increase the burden on the local infrastructure especially flooding.

H2 - Urban Fringe Housing Sites

a) Do you support or object to policy H2? Object

H2 Object Reasons

d) Please explain why you object to this policy?

Why would the council identify urban fringe sites as suitable instead of existing brownfield sites? The woods and land by Horsdean act as a buffer between the A27 and the house owners.

No access has been identified. If access was granted via Horsdean Rec then the increase in traffic would be detrimental to all of the children playing sports on the recreation ground. If access was given via Barhill Ave then the council would have to knock down an existing house to do so.

As a family we regularly use the paths behind Horsdean to go family walking, blackberry picking and use the access to walk up to the Downs. The area provides a much needed escape from the city. You'd only have to see the high numbers of people walking their dogs (or even just walking!) that this area is very much loved and used. Developing this land would increase pollution and take away our enjoyment of the urban fringe. A disaster for the local people of Patcham.

H2 - Urban Fringe Site Allocations

f) If you wish to comment on any specific urban fringe site allocations listed in the policy please do so below making clear which site(s) you are commenting on and give your reasons...

Why would the council identify urban fringe sites as suitable instead of existing brownfield sites? The woods and land by Horsdean act as a buffer between the A27 and the house owners.

No access has been identified. If access was granted via Horsdean Rec then the increase in traffic would be detrimental to all of the children playing sports on the recreation ground. If access was given via Barhill Ave then the council would have to knock down an existing house to do so.

As a family we regularly use the paths behind Horsdean to go family walking, blackberry picking and use the access to walk up to the Downs. The area provides a much needed escape from the city. You'd only have to see the high numbers of people walking their dogs (or even just walking!) that this area is very much loved and used. Developing this land would increase pollution and take away our enjoyment of the urban fringe. A disaster for the local people of Patcham.

DP263

Comment

Event Name Consultation on the Draft City Plan Part 2
Comment ID 263
Response Date 13/09/18 11:16
Status Submitted
Submission Type Web
Version 0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations . Yes

Organisation Name

Organisation Name (if not applicable please put n/a) Brunswick Town Association

Name

Name

Address

Address

Email Address

Email Address

Please tick all of the sections you would like to comment on before proceeding

- . Housing, Accomodation and Community
- . Employment, Tourism and Retail
- . Design & Heritage
- . Transport and Travel
- . Environmental and Energy
- . Site Allocation - Special Areas policies
- . Make general comments

DM1 - Housing Quality, Choice and Mix

a) Do you Support or Object to policy DM1? Object

DM1 Object Reasons

d) Please explain why you object to this policy?

Insufficient. attention to role of outdoor private amenity space.

DM1 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Private outdoor amenity space to be **obligatory**

DM2 - Retaining Housing

a) Do you Support or Object to policy DM2? Support

DM3 - Residential Conversions & Retention of Smaller Dwellings

a) Do you support or object to policy DM3? Support

DM5 -Supported Accommodation

a) Do you support or object to policy DM5? Support

DM6 - Build to Rent Housing

a) Do you support or object to policy DM6? Support

DM7 - Homes in Multiple Occupation

a) Do you support or object to policy DM7? Object

DM7 Object Reasons

d) Please explain why you object to this policy?

Not strong enough wording to ensure delivery

DM7 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Requires instead of supports reversion of homes to family homes

DM8 - Purpose Built Student Accommodation

a) Do you support or object to policy DM8? Object

DM8 Object Reasons

d) Please explain why you object to this policy?

The universities have expanded without thinking of the whole City and its residents and the standard of their lives. Suggest expansion is stopped until sub structure can cope.

Shortage of land means pbsc takes this when it is needed to house families

DM8 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

To **refuse** additional proposals for additional PBSA

DM9 - Community Facilities

a) Do you support or object to policy DM9? Object

DM9 Object Reasons

d) Please explain why you object to this policy?

Currently insufficient community facilities

DM9 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Liimit any loss of community facilities

DM12 - Primary, Secondary and Local Centre Shopping Frontages

a) Do you support or object to policy DM12? Support

DM12 Support Reasons

b) Please explain why you support this policy?

Any control over use of existing shops is to be welcomed, especially in centre where "" cause problems

DM13 - Important Local Parades, Neighbourhood Parades and Individual Shop Units

a) Do you support or object to policy DM13? Support

DM13 Support Reasons

b) Please explain why you support this policy?

Welcome acknowledgement of Brunswick into a category, hitherto ignored.

DM13 Support Wording Changes

c) If you support this policy but have some suggested wording changes please outline these clearly below

Strict regulation of change of use to be **enforced**

DM15 - Special Retail Area - The Seafront

a) Do you support or object to policy DM15 ? Object

DM15 Object Reasons

d) Please explain why you object to this policy?

No recognition of the heritage asset of **Hove Lawns**, and protection from encroachment of retail.

DM15 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Suggest the **Hove Lawns** are included and regulated to have no development

DM17 - Opportunity Areas for New Hotels & Safeguarding Conference Facilities

a) Do you support or object to policy DM17 Object

DM17 Object Reasons

d) Please explain why you object to this policy?

no policy included with reference to Air B 'n B. In some areas these cause problems; there are no safety regulations as in guest houses and hotels.

DM17 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

include Air b'n b

DM18 - High Quality Design & Places

a) Do you support or object to policy DM18? Support

DM18 Support Reasons

b) Please explain why you support this policy?

with reservation, see below

c) If you support this policy but have some suggested wording changes please outline these clearly below

Insufficiently strong language. Rather than 'expected', suggest '**demanded**'

DM20 - Protection of Amenity

a) Do you support or object to policy DM20? Support

DM21 - Extensions & Alterations

a) Do you support or object to policy DM21? Support

DM22 - Landscape Design & Trees

a) Do you support or object to policy DM22? Object

d) Please explain why you object to this policy?

Not strong enough. **Need to require street tree planting as part of design**

DM23 - Shopfronts

a) Do you support or object to policy DM23? Support

DM24 - Advertisements

a) Do you support or object to policy DM24? Support

DM25 - Communications Infrastructure

a) Do you support or object to policy DM25? Support

b) Please explain why you support this policy?

with reservation - lack of clarity; there is a need for commercial cabinets, etc to be regularly serviced and maintained.

DM25 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Insert after 'provision' insert 'and maintenance's communication infrastructure

DM26 - Conservation Areas

a) Do you support or object to policy DM26? Support

b) Please explain why you support this policy?

with reservations. 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. This also applies to Parks and Gardens

DM27 - Listed Buildings

a) Do you support or object to policy DM27? Support

DM28 - Locally Listed Heritage Assets

a) Do you support or object to policy DM28? Support

b) Please explain why you support this policy?

Currently Heritage assets are at risk

DM29 - The Setting of Heritage Assets

a) Do you support or object to policy DM29? Support

b) Please explain why you support this policy?

Most important as many of the heritage buildings are **adjacent to the sea and this is important for views.**

c) If you support this policy but have some suggested wording changes please outline these clearly below instead of 'taken into consideration' to '**will be required**'

DM30 - Registered Parks & Gardens

a) Do you support or object to policy DM30? Support

b) Please explain why you support this policy?

with reservation - see above. Overuse for profit making activities means that public space is being eroded steadily at weekends, in particular. A policy is needed 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.

DM31 - Archaeological Interest

a) Do you support or object to policy DM31? Support

DM32 - The Royal Pavilion Estate

a) Do you support or object to policy DM32? Support

DM33 - Safe, Sustainable & Active Transport

a) Do you support or object to policy DM33? Support

DM34 - Transport Interchanges

a) Do you support or object to policy DM34? Support

DM34 Support Reasons

b) Please explain why you support this policy?

Support freight consolidation centres. These could remove heavy delivery lorries from causing traffic holdups and pollution, especially in the Western Road area. Restrict size of lorries in specific areas.

DM35 - Travel Plans & Transport Assessments

a) Do you support or object to policy DM35? Support

DM35 Support Reasons

b) Please explain why you support this policy?

with reservation. -not strong enough wording. - see below

DM35 Support Wording Changes

**c) If you support this policy but have some suggested wording changes please outline these clearly below
new developments must include infrastructure**

DM37 - Green Infrastructure & Nature Conservation

a) Do you support or object to policy DM37? Support

DM38 - Local Green Spaces

a) Do you support or object to policy DM38? Support

DM38 Support Reasons

b) Please explain why you support this policy?

Strong support with addition of Hove Lawns/Seafront

DM39 - Development on the Seafront

a) Do you support or object to policy DM39? Support

DM39 Support Reasons

b) Please explain why you support this policy?

Strongly support, especially in relation to Hove Lawns and seafront to boundary. A valuable Open Space enhancing the shoreline with natural habitats

DM40 - Protection of Environment and Health - Pollution & Nuisance

a) Do you support or object to policy DM40? Support

DM40 Support Reasons

b) Please explain why you support this policy?

with reservation

DM40 Support Wording Changes

**c) If you support this policy but have some suggested wording changes please outline these clearly below
Suggestion:Requires and ensures**

DM41 - Polluted Sites, Hazardous Substances & Land Stability

a) Do you support or object to policy DM41? Support

DM42 - Protecting the Water Environment

a) Do you support or object to policy DM42? Support

Any other comments

Click on the links below to access supporting documents to the CPP2:

- . Proposed CPP2 Implementation and Monitoring Targets [PDF, 506Kb]
- . Sustainability Appraisal [PDF, 8MB]
- . Sustainability Appraisal Non-Technical Summary [PDF, 385 KB]
- . Consultation Statement [PDF, 8.6 MB]
- . Appendix 7 to Consultation Statement [PDF, 20MB]
- . CPP2 East Policy Map [PDF, 11MB]
- . CPP2 West Policy Map [PDF, 14MB]
- . CPP2 Central Policy Map [PDF, 9.4MB]
- . Habitats Regulation Assessment [PDF, 18MB]

Background Studies and Topic Papers are also available on the City Plan Part Two website:

<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-background-studies-topic-papers>

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.

Brunswick Town Association welcomes this consultation of the Draft City Plan 2. but feels that in some areas the proposal are not strong enough. Unless all proposals are made Policy, and subsequently Council Departments work in a **co-ordinated** way it will fail to deliver what it sets out to do in term of a sense of place, and a live townscape. For example, currently policies for Rubbish are detrimental to the Heritage areas and Commercial activities conflict with green spaces policy.

There will need to be a firm Enforcement Policy and system of fines to ensure success.

DP264

Comment

Agent

Email Address

Company / Organisation

DMH Stallard

Address

The Community Stadium Limited

Consultee

Consultation on the Draft City Plan Part 2

Company / Organisation

The Community Stadium Limited (Mr Martin Perry -

Address

Event Name

Comment by

1182195)

Comment ID

262

Response Date

13/09/18 10:30

Status

Submitted

Submission Type

Web

Version

0.1

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations

. Yes

Organisation Name

Organisation Name (if not applicable please put n/a)

The Community Stadium Limited

Name

Name

Address

Address

Email Address

Email Address

Agent Name

Agent Name

Agent Address

Agent Address

Agent Email

Agent Email

Please tick all of the sections you would like to comment on before proceeding . Site Allocations - Strategic Site Allocations

SSA7 - Land Adjacent Amex Community Stadium, Falmer Way

a) Do you support or object to policy SSA7? Object

SSA7 Object Reasons

d) Please explain why you object to this policy?

We are generally supportive of the wording of the proposed policy however we consider that the range of acceptable uses should include a retail store associated directly with the American Express Community Stadium. This would allow sufficient flexibility for the range of uses that may be required to support use of the Stadium, furthermore it would allow the retail store within the Stadium itself to be reconfigured as part of these proposals and ensure the effective use of the Stadium and proposed East Stand building.

The above is considered necessary to make the proposed allocation positively prepared and in accordance with the NPPF (2018) which states that planning policies should 'be flexible enough to accommodate needs not anticipated in the plan...and to enable a rapid response to changes in circumstance'.

With regards to bullet point d) it should be noted that the Community Stadium already lies in a highly sustainable location which has received significant investment due to construction and expansion of the Universities and Community Stadium. Both the Universities and Community Stadium operate under detailed Travel Plans to promote sustainable transport in compliance with Planning Conditions and Legal Agreements. The Proposed Development will be for a complementary use to these existing facilities and it is considered unnecessary and too prescriptive to require any significant additional sustainable transport infrastructure. It is considered that any significant additional sustainable transport infrastructure would not be justified, due to the highly sustainable location and the proposed uses.

With regards to bullet point e) it is considered that reference to green walls and roofs is too prescriptive and should be removed, as such features will not always be either the best or achievable solutions to any specific project. The use of such features would not be in keeping with the architecture of the Stadium, and it is unlikely that they would be the best landscape approach to the Proposed Development. It is considered that the specific detailed landscape design of the Proposed Development would be more appropriately addressed at the Planning Application stage. Therefore it is considered

that reference to specific features should be removed as they would be too prescriptive and the approach to be taken has not been justified in design terms.

SSA7 Object Wording Changes

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below...

We would request that

- 1 the Policy is amended to include Retail (A1) directly associated with use of The American Express Community Stadium to be included as part of the mixture of acceptable uses;
- 2 removal of reference to provision of new sustainable transport infrastructure; and
- 3 removal of reference to green roofs and walls.