

Any Other Comments responses			
Total Number of Responses		50	
Number of Representations that Support		n/a – see summary below	
Number of Representations that Object		n/a – see summary below	
Number of Representations – Other		n/a – see summary below	
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
General Comments on Structure/ layout and content of Plan			
Consider CPP2 does not address challenges facing city	<ul style="list-style-type: none"> This early stage of the Plan's preparation offers an appropriate opportunity to engage with the Council and express 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 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. 	DP261 Hargreaves	

	<ul style="list-style-type: none"> • Regretfully document is a missed opportunity to positively and creatively shape the future of the city and appears to be a re-write of 2005 BHLPP policies in a simpler format without seriously grappling with the major challenges and issues the city faces. • The city has objectively assessed housing need of 30,000 new homes by 2030 and constrained land opportunities. However these challenges are experienced in London and other great cities and are tackled with creativity and boldness and in particular a willingness to accept greater density and greater contrast in mass, scale and use between existing and proposed, old and new, small and large – this needs to be encouraged in Brighton & Hove. • Key to this is the architectural quality of the new buildings: high quality, sensitively conceived, appropriate, and where possible bold. We would therefore encourage greater involvement of those with the knowledge and ability to judge what is high quality, sensitively conceived and appropriate architecture, to advise on all planning applications such as Design South East (DSE) that currently only advises on larger schemes. • The recently published NPPF specifically mentions upward extensions as a way of providing much needed housing, see paragraph 118e of the NPPF. This opportunity and other innovative solutions should be encouraged and included in the City Plan Part 2 for Brighton and Hove. 	<p>DP258 Brighton & Hove Planning Agents Forum; DP260 Lewis & Co Planning ; DP261 Hargreaves; DP217 Brighton & Hove Community Land Trust</p> <p>DP258 Brighton & Hove Planning Agents Forum; DP217 Brighton & Hove Community Land Trust; DP274 LCE Architects</p> <p>DP274 LCE Architects</p> <p>DP217 Brighton & Hove Community Land Trust</p>	
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	<ul style="list-style-type: none"> • 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: "...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. • Plan needs to address real issues not ideal situation (eg idealistic views on car usage, transport provision, drainage and sewage provision). 	<p>DP260 Lewis & Co Planning</p> <p>DP095</p>	
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<p>Reasoned Justification and language</p>	<ul style="list-style-type: none"> • Welcome how easy document is to navigate – divided into simple topics, welcome shortening of many of the policies but do not think CPP2 goes far enough – too much unnecessary detail and repetition. • Question the need for lengthy ‘reasoned justification’ makes document repetitive and overly long. Unless provides useful detail to actual policy requirements text should be removed. Seek clarification on status of reasoned justification and whether it should be Supporting Text like CPP1. Policy should not be in Reasoned Justification eg SA7 where housing number is in paragraph 3.5. • Despite the title ‘reasoned justification’ many of the policies are not supported by evidence and Plan will not meet the tests of soundness in some instances. • Policies regularly cross-reference other policies (and some policy references used are wrong) even though there is no need for them to do so. • Jargon is difficult to follow for ordinary people. 	<p>DP258 Brighton & Hove Planning Agents Forum; DP217 Brighton & Hove Community Land Trust; DP217 Brighton & Hove Community Land Trust</p> <p>DP217 Brighton & Hove Community Land Trust</p> <p>DP095</p>	
<p>Objects to CPP2 in its entirety – draft CPP2 policies should be incorporated into a re-opened CPP1 consultation</p>	<ul style="list-style-type: none"> • Representations made at DM1 d) & DM1 e) (about the proposed core Policies needing to firstly be considered under a re-opened City Plan Part 1 process); and with regard to Allocations Policies as stated in my representation at SA7. Hence formal objection to every proposal in this present consultation. It is not possible for respondents to rationally consider all of the Policies proposed in the consultation until or unless the newly-proposed core Policies have been incorporated under a re-opened City Plan Part 1 consultation and re-adoption process. The proposed Allocations Policies 	<p>DP311</p>	

	<p>could also be considered under such a process (whereby a single City Plan could simply be achieved - being one where all Policies are fully congruent with each other, and where the already adopted Policies can be improved and updated to achieve a single homogenous and modernised City Plan).</p>		
<p>CPP2 could go further to address well-being, social justice and quality of life</p>	<ul style="list-style-type: none"> • Acknowledge the central importance of the City Plan Part Two (CPP2) and appreciate the efforts that have gone into developing it, in particular the substantial number of technical and background studies that have informed it. • Recognise that a well-designed and well-planned built environment creates benefits which go far beyond mere bricks and mortar, such as protecting our fragile environment, boosting other areas of the economy such as tourism, retail and leisure. • Require a strong plan led approach to rise to the many complex challenges the city face: constrained city; re-use of land; large number of heritage assets and conservation areas; housing and environmental crises; population growth, disproportionate share of health problems and yawning gap between rich and poor. • We commend the efforts made in the document to build on the success of Part 1 with a holistic approach. We welcome several of the initiatives in the draft plan. However we also note some significant omissions and have some concerns about the overall direction of the document. Although we note the precedence of the National Planning Policy Framework and the need for our plan to accord with the principles in the framework, we feel as if the plan could go much further in seeing the primary challenge as achieving wellbeing and social justice within ecologically-sound limits. There is little reference to promotion of wellbeing 	<p>DP307 Green Group of Councillors</p>	

	and quality of life which should inform the entire approach of the plan.		
General	<ul style="list-style-type: none"> Support the rationale behind the CPP2 and consider that it will achieve its stated role of supporting the delivery and implementation of the CPP1. 	DP296 St William Homes	
Consistency with NPPF	<ul style="list-style-type: none"> The draft CPP2 pre-dates the publication of the National Planning Policy Framework (~NPPF') on 24 July 2018. It will therefore be important for BHCC to revisit the policy wording to ensure consistency with the NPPF – in particular changes to presumption in favour of sustainable development and housing allocations given city's chronic shortage of housing and particularly affordable housing. 	DP296 St William Homes; DP249 QED Sustainable Developments	
Duty to Cooperate General Comments			
Duty to Cooperate	<ul style="list-style-type: none"> Duty to cooperate section (page 8) - this section should acknowledge benefit of genuine consultation & joint cooperation with other authorities within Brighton & Hove, namely Rottingdean Parish Council. There is experience of loss of opportunities for two- way exchange on the specific needs and aspirations of a semi-rural/village environment. SDNPA has six strategic cross-boundary priorities which provide a framework for ongoing Duty To Cooperate discussions: Conserving and enhancing the natural beauty of the area. Conserving and enhancing the region's biodiversity (including green infrastructure issues); the delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople; the promotion of sustainable tourism; development of the local economy; improving the efficiency of transport networks by enhancing the proportion of 	DP303 Rottingdean Parish Council DP221 South Downs National Park Authority	

	<p>travel by sustainable modes and promoting policies which reduce the need to travel.</p> <ul style="list-style-type: none"> • Considering the draft Plan and the available background documents, it is not clear if there would be any impacts on West Sussex from the proposed additional allocations. We would welcome a discussion, if through continued work to support the preparation of the plan, any cross boundary mitigation is required. 	DP132 West Sussex CC	
Housing Topic General Comments			
<p>Housing Numbers/ Housing Delivery – too low</p>	<ul style="list-style-type: none"> • CPP2 inadequate- planning for far too few homes – need to plan for a more realistic projected population growth – 2/3 times the number of homes in the city plan. • A comprehensive approach to transit is necessary – access to brownfield sites and to other areas of the region unlocking new areas of housing and improve transit between Brighton – Shoreham and Eastbourne. • Use land from other regional authorities – look into potential of outer golf courses and start discussing development proposal with National Park. It is not right that so much land is used for so little value while people lived in cramped and unsanitary accommodation in the city. • Allow greater density near train stations and bus stops. • Use design codes to address opposition (particularly in Conservation Areas) and in order to densify existing residential areas whilst maintaining existing character of the city. • Offices should be built at high density and certain areas – Churchill Square and surround area and New England Road should be higher density and include office space. 	DP003 Brighton YIMBY	

	<ul style="list-style-type: none"> • Work with community projects and small sites and local organisations like B&H Community Land Trust - this would help increase supply of affordable homes and unlock sites. • Far more should be done to support small and medium sized builders in the city – finding them appropriate sites. 		
Gas Work Site	<ul style="list-style-type: none"> • The former Gas Work Site, located off Boundary Road, Brighton – presents unique brownfield opportunity evidence by its inclusion in the CPP1 as part of the DA2 development area. It is however considered that the site can accommodate more than 85 homes. 	DP296 St William Homes	
Housing Numbers/ Housing Delivery – concerns with government targets	<ul style="list-style-type: none"> • Prioritise brownfield sites first; be wary of government targets – people who live in city already consider it a fantastic place to live with a great balance of green and open space. Don't dress up urban sprawl policies as it there was some sense in the choice of sites. • Brownfield sites first before more pollution and encroaching on green spaces. • Resent the amount of housing/ general development in the city – becoming uncomfortably crowded for residents. • Concerned that many of the positive arguments for housing development never materialise. 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. 	DP096 DP136 DP127 DP256 The Conservative Group	

<p>Opportunities to increase housing allocation through relocation of allotments</p>	<ul style="list-style-type: none"> • Transfer all allotments to the council owned agricultural land around the city and free up existing allotments for housing. The developer should cover the cost of setting new allotments and the number of allotments could be greatly increased, increasing revenue to the council. 	<p>DP067</p>	
<p>No more new sites are required – use existing opportunities</p>	<p>Brighton and Hove need to focus on utilising and filling all its empty buildings and clamping down on holiday lets and second homes rather than new development ruining the city. The Marina in particular is a ghost town for a greater part of the year. The city is vastly oversupplied with shops, restaurants and hotels and many are failing on a continual basis or not paying their business rates (usually a sign of impending failure).</p> <p>The city needs to do an audit of its assets and what is missing and what it can do to rectify before passing another planning application for new premises.</p>	<p>DP091</p>	
<p>Urban Fringe General Comments</p>	<ul style="list-style-type: none"> • The speculative development of some greenfield sites on the Urban Fringe such as Ovingdean, and Saltdean: Falmer Avenue and Coombe Farm are undemocratic and should not be in the City Plan. They are opposed by local elected Councillors and local residents. Urban green space must be protected and development restricted to Brownfield sites. 	<p>DP170 Brighton & Hove Local Access Forum</p>	
<p>More explicit support and detail should be included in CPP2 on Community Self Build (CSB)</p>	<ul style="list-style-type: none"> • More explicit support and detail should be included in Plan for community self-build and the council should make a commitment to put CSB above private developers in terms of access to land of all types. CSB has the following benefits/ opportunities: 1) create communities from people already resident and committed to the city; 2) helps key-workers/ those on low incomes to stay in the city; 3) Do create sustainable 	<p>DP217 Brighton & Hove Community Land Trust</p>	

	<p>affordable housing that can be kept out of general private housing market and allow families to stay in city/ cool inflation of housing prices; 4) not driven by private profit but rather building sustainable communities that help people thrive; 5) Providing life-long affordable housing and reducing living costs has protective effect on health and well-being freeing up money to be spent in local economy and reducing demands on acute and social care services.</p>		
HMO – concern about implementation of policies	<ul style="list-style-type: none"> Do not have a lot of confidence in the council to manage the number and quality of HMOs or check on illegal HMOs. Many permanent residents in the Lewes Road corridor are unhappy with the level of noise, rubbish and fly tipping that comes with the high level of student HMOs in this area. 	DP202	
Housing Policy	<ul style="list-style-type: none"> Pleased to see that the Council's policy for Housing for homeless people is under review and would like to be part of the revision of the policy, along with the specialist homeless service providers across the city. 	DP101 BH Clinical Commissioning	
Transport Related General Comments			
Transport general	<ul style="list-style-type: none"> The City faces long term transport problems and the Society believes that a substantial uplift in public transport is going to be needed in the years to come – coastal road. Should start examining metro-systems in earnest (as done in Bilbao and Bresica). CPP2 should take forward the Gehl Public Space, Public Life Study through public realm policies. Study highlights areas that would substantially benefit from improvements. Also entry points to Conservation Areas. Show diagram 'Polishing the 	DP157 Hove Civic Society	

	<p>Pearls' to act as guidance and inspiration to developers and provide a ready menu of improvements for developer contributions along with listing major schemes listed in LTP (e.g. Church Road).</p> <ul style="list-style-type: none"> • Radical measures must be taken to reduce traffic pollution rather than just tinkering with the redesign of existing roads etc. Improvements to Public Transport, walking and cycling must be given the high priority. • The plan has many useful updates including cumulative impacts on traffic by other developments. • The urban fringe areas of the Deans are different to the rest of the City and should be studied separately with policies to help and protect the shops, countryside and residents. The Deans are badly served by Public Transport. 	<p>DP170 Brighton & Hove Local Access Forum</p> <p>DP315 Saltdean Residents Association</p>	
<p>Considers CPP2 has not addressed the impact of planned development on eastern urban fringe on traffic congestion and air quality targets and would therefore be found unlawful</p>	<ul style="list-style-type: none"> • Building new homes as scheduled in the adopted CPP1 would almost certainly be unlawful (at least eastern section of the Urban Fringe) yet CPP2 proposes no actions to address this obstacle to the successful execution of CPP1. • NPPF and CPP1 requires the City to comply with EU and UK legal limits and targets on pollution levels (paragraph 180/1) and ensure transport infrastructure is in place to support planned developments (paragraph 20b). • With the recent increase in pollution in Rottingdean AQMA and the increase in local peak time road congestion to above that predicted for 2030, it is clear that the 2016 Adopted City Plan Part 1 needs to be brought up to date if the Part 1 plans are to be realised, as sustaining the Outer Fringe schedule requires the infrastructure needs to be addressed and, at least in respect of the environment, it would be unlawful to proceed without addressing these issues. 	<p>DP100</p>	

	<ul style="list-style-type: none"> • Disagrees with the conclusions of the CPP1 Strategic Transport Assessment which says traffic congestion will stay within given limits up to 2030 and growth in commuter peak journeys will be mostly absorbed by improved bus services, removing the need for increased road capacities. • Considers by 2017 NO2 levels in Rottingdean’s AQMA have risen above the legal limit and road congestion on B2123 and A259 have exceeded the 2030 upper limit. • Sanctioning extra traffic that aggravates AQMA pollution will not help the city meets its targets and be unlawful and may well incur substantial fines – potentially on responsible individuals. • The traffic from an extra 1000 homes (even without 1000 more ‘A259’ homes from across the adjacent Lewes District boundary). • CPP2 must put in place actions to reduce current overload on these roads and must identify and address the problem preventing bus services absorbing growth in the Urban Fringe (East) commuter journeys for CPP1 to succeed. • Respondent provides background information to points above – 2018 Air quality Annual Status Report – rising NO2 levels for Rottingdean AQMA over past two years; conclusions of CPP1 STA around estimates on loading and peak traffic growth and no planned road capacity increases identified before 2030 and provides relevant extracts to support response. • Quotes relevant sections of the NPPF – the effects (including cumulative effects) of pollution on health and the potential sensitivity of the area or proposed development to adverse effects from pollution should be taken into account. • Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants. 		
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	<ul style="list-style-type: none"> • Cites requirements of BHLPP policy SU9 not to permit development which may liable to cause pollution/ reduce authorities' ability to meet government air quality and sustainability targets. • The City Plan is not just a schedule for developing new homes; it has responsibility to address needs in respect of infrastructure and safeguarding the environment. City Plan Part 2 is not fit for purpose if does not reflect and respond to the changing infrastructure needs and environmental concerns, having not been kept up to date as required by National Planning Policy. • Respondent quotes relevant sections of the NPPG – role of local plan, what it should contain and how often it should be reviewed; whether the LPA have to monitor the significant effects of implementing the adopted Local Plan and the role of the Local Plan with regards to air quality (including the need to consider the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments). 		
<p>Cycle network requires improvements and upgrade</p>	<ul style="list-style-type: none"> • CPP1 Policy CP9 talks of an integrated cycle network being implemented by 2030, on plan of the cycle network nowhere near a complete “cycle network”. The council is behind East and West Sussex in producing Local Walking and Cycling Infrastructure Plan (DfT Guidance) and an up to date Cycling Strategy – will have an implication on government funding. • Seafront Cycle Route (NCN2) is constantly obstructed – pedestrians and cyclist poorly accommodated during ongoing Shelter Hall renovations – hazardous bottleneck at the bottom of West Street. • Seafront route needs urgent upgrade – more space for cycle highway and separation for waling and cycling. 	<p>DP316 Bricycles and Cycling</p>	

	<ul style="list-style-type: none"> • London Road and many other areas and junctions are forbidding for cyclists. North Laine Roads are regularly made impassable for cyclists. • Much more respect needs to be shown for maintaining cycling routes in the city rather than road encroachment and providing a realistic alternative if obstruction is absolutely unavoidable e.g. temporary arrangements during roadworks etc. • Cycle routes and facilities will need upgrade – forecast increase in number of cyclists, population growth. Government’s Cycling and Walking Investment Strategy – double cycle activity by 2025 – e bikes are faster and heavier and will increase the pool of people cycling and range. BTN bikeshare enormously successful with c.500,000 miles cycled over the last year – need for upgrade in seafront path and other facilities. • Concerns at a regional level that less enlightened transport schemes are being pursued by neighbouring authorities. 		
Parking Provision	<ul style="list-style-type: none"> • Hope adequate parking facilities for patients (especially those with disability or frailty challenges) and staff are reflected in the parking standards – would happy to contribute to discussions. • Appendix 2 – Parking Standards – Hove Station Quarter should have the same car parking standards as the central area. 	DP101 BH Clinical Commissioning DP157 Hove Civic Society	
	<ul style="list-style-type: none"> • Welcome commitment to developing approaches to Environment, Health (DM40) and Active Travel (DM33) and, would be pleased to contribute further to this work as it progresses. 	DP101 BH Clinical Commissioning	
Retail and Employment related general comments			
Retail related concerns-	<ul style="list-style-type: none"> • Area of St James’ Street and the areas south from Edward Street and the seafront should be designated as a ‘special retail 	DP109	

<p>omission of Special Retail Area</p>	<p>area'. Area is within prime retail frontage, hotel core zone and alcohol 'cumulative impact zone'; Air Quality Management Area and also a commercial zone with considerable employment. Edward Street proposals and Valley Gardens Project Phase 2 and draft CPP2 proposals for seafront and Madeira Drive and ongoing residential development in recent years and the proposed site allocation at Manchester Street and Charles Street. Area needs more significant attention and vision in the Plan through making it a special retail area.</p>		
<p>Employment Related</p>	<ul style="list-style-type: none"> • There is a strong need for live/ work units in the city due to high levels of self-employed residents. 	<p>DP001 Pavilion Architects</p>	
<p>Design and Heritage General Comments</p>			
<p>Design and Heritage issues</p>	<ul style="list-style-type: none"> • Hove Civic Society has recently inaugurated the Hove Plinth and the first sculpture. The second sculpture has been commissioned and having been asked by the council to do so, the society is now starting to identify locations throughout Hove for final locations of sculptures. These sites should be shown in a diagram in the City Plan Part II, not least to provide an indication to developers where major arts installations could be located. • Urban Design SPD guidance omits King Alfred Node. • Plan should steer developers away from expensive try-ons. • Consider creating masterplan to protect existing Kings Esplanade colony south of Kingsway Hove – contains original parts of Hove. Also Hove Street to St Andrews Church unrecognised and unprotected (e.g. remnant wall of its graveyard up Haddington Street and Close). • Hove Park Gardens is not in Tongdean Character Area and needs specific recognitions. 	<p>DP157 Hove Civic Society</p> <p>DP312 Save Hove</p>	

	<ul style="list-style-type: none"> • Historic England strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 185). • Make spaces age friendly – drop pavements, benches etc. – for all ages; neighbourhoods with communal spaces and greening areas are well valued and improves perception of community safety. • Consider responsible landlord schemes to demonstrate engagement with local health and wellbeing services. • Consider food deserts, role of corner shops in providing fresh/ healthy food. • Consideration of street furniture and A boards limits older residents feeling of safe footed walking. • Mental health benefits of sea views/ green spaces – don't block views with tall buildings along seafront and ensure views of Downs. • Ensure all developments around parks have views over Parks. Take advice from FCL/community safety regarding children's play areas – balance of surveillance/ safeguarding. • Greening urban environment – benefits for mental health and anti-pollution benefits; consider less allergenic types. Promote urban gardens. • Stairs at entrance of buildings not lifts to make stairs default and green cycle/ walkways between places/ buildings will need good lighting for safety. 	<p>DP284 Historic England</p> <p>DP179 Public Health Team</p>	
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Implementation Comments and Developer contributions/CIL comments			
Implementation Issues	<ul style="list-style-type: none"> • Council does not have resources to police the policies – worrying given the damage that could be done to the environment/ local community by mistakes – should be restitution where damage is done. • The aspirations and interaction between public and private sector activities should be highlighted in the CPP2. For example for heat networks to work and developers to be encouraged to join there is a need for a plan, however rudimentary, produced by the local authority - setting technical standards to allow networks to grow together over time and trading mechanisms for heat. • Concerned with flaws in the system that large scale planning applications result in little or no affordable spaces and / or containing office space are being allowed to avoid proper scrutiny (particularly hearings) due to BHCC officers use of NPPF (para 14) as a trump card against refusing development. BH2018/00340 cited as an example. This flaw needs addressing. • Unless all proposals are made in policy and council departments work in a co-ordinated way the Plan will fail to deliver what it sets out to do in terms of sense of place and lively townscape. There needs to be a firm enforcement policy and system of fines to deal with issues e.g current policies for Rubbish are detrimental to heritage areas and commercial activities conflict with green spaces policies. 	<p>DP095</p> <p>DP157 Hove Civic Society</p> <p>DP198</p> <p>DP263 Brunswick Town Association</p>	

<p>Developer Contributions/ S106 related comments/ CIL</p>	<ul style="list-style-type: none"> • S106 should be used to ensure purchasers of new homes demonstrate local connection. • More transparency is needed regarding developer contributions. The council's schedule and calculations of allocating developer contributions to open space / recreation, education etc. are largely unknown to the public. CPP2 should show how such funds are to be allocated as an annex in Part II or clearly referenced. There should be a statement on how local communities can get involved in commenting on and putting forward proposals for developer contributions for local improvements. • The BHEP would like more business involvement when dealing with distribution of CIL contributions and would welcome being part of discussions to facilitate that. Particularly around enhancement of retail areas in the city – more involvement would provide business with more say on how their district develops. 	<p>DP001 Pavilion Architects</p> <p>DP157 Hove Civic Society</p> <p>DP208 BHEP</p>	
<p>Utilities Infrastructure</p>	<ul style="list-style-type: none"> • National Grid has no comments to make in response to this consultation. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. 	<p>DP021 National Grid</p>	

Nature Conservation General Comments			
<p>Failure to fulfil formal duty to consider Biodiversity</p>	<ul style="list-style-type: none"> • Council has a formal duty to consider biodiversity and geodiversity in carrying out its functions. National guidance also states that the planning process is a key mechanism for implementing this biodiversity duty – through planning policy and site management (site selection, identification and management). • CPP2 fails to deliver those duties to an adequate level. Land to the south of the National Park needs to be fully covered by biodiversity and geodiversity policies. • CPP2 does not clearly select site, assign clear reference name to each and mark its boundary clearly on a map using current information sources. • Considers the CPP2 has ignored the lengthy 2013 stakeholder consultations on choosing the best wildlife sites for Brighton and Hove. The stakeholders had detailed specific knowledge of the biodiversity features for each site and it is recommended that these agreed sites are included in the City Plan. • Sussex Geological Partnership recommended that 4 Local Geological Sites (LGSs) be included in the Local Plan - council has failed to keep an accurate of list of sites of sites and is working instead on incorrect data. It can't simply lose information through lack of administrative or archiving competence. • Unsound – fails to work with latest data sources (NPPF plan-making paragraph 165). • Lack of engagement with wildlife specialists has resulted in many wildlife and geodiversity sites simply not been included in the Plan. 	<p>DP285 Eco21st Ecologically</p>	

<p>Need additional Policy - swift conservation</p>	<ul style="list-style-type: none"> • In line with comments made at Scoping Stage strongly believe a specific policy should be included in CPP2 that would include – the installation of swift boxes as a standard procedure in urban development. All new builds, refurbishments and renovations to benefit swifts. SPD11 (Nature Conservation and Developments) and Annexes needs urgent update to inform applicants and developers about the swift brick and the rationale for including it. This policy if implemented will help deliver a net gain in biodiversity consistent with NPPF 117 and 118. 	<p>DP219 RSPB</p>	
<p>Need additional Policies for Biodiversity and GI/ Natural Capital and Soils</p>	<ul style="list-style-type: none"> • Biodiversity net gain policy should be interwoven throughout local plan but also an individual net gain policy covering the concept of biodiversity and GI/ natural capital net gain. Would demonstrate commitment to nature conservation; exemplify membership of Biosphere and ensure development would be beneficial for residents and visitors. Specific biodiversity metrics should be adopted to allow the amounts of net gain to be quantified and compared. Specific metrics for GI/ natural capital are being developed by Natural England. Sites NPPF 170, 174 and 175 as being ubiquitous mentions of securing net gain and DEFRA 25 Year Plan as having embedding an environment net gain principle for development. • Specific soils policy – would be in line with NPPF (paragraph 170) and DEFRA 25 Year Plan – Chapter 1 section 3. 	<p>DP189 Natural England</p>	
<p>Need for a Food SPD</p>	<ul style="list-style-type: none"> • Welcome that food growing / access to shops selling food and the role of food growing in place making is included in City Plan Part 2. • Reference should be made to the production of the SPD in the CPP2. • Revised NPPF confirms that food is a planning issue. • Policies that recognise the value of agricultural land owned by 	<p>DP233 Brighton & Hove Food Partnership</p>	

	<p>the city to the city for food production as well as water supply could be strengthened. Food security post Brexit, and longer term food security as an issue related to climate change are becoming a concern for the city.</p> <ul style="list-style-type: none"> • Welcome the new NPPF's support for the development and diversification of agricultural and other land-based rural businesses and would recommend working closely with the SDNP on this issue. • The new NPPF confirms the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. In light of the expectation that councils will enhance existing, and create new, markets in town centres in an effort to improve access to healthier food we would like stronger guidance on this. • In response to the drive to create high quality buildings and places we would like more guidance for developers to ensure new housing has sufficient space for families to cook and store fresh food and to eat together in homes on streets with edible planting and communal gardens. • An SPD on access to health food and prevention of an obesigenic environment could draw together in one easily accessible policy the elements of food and planning spread across the NPPF and our main recommendation is that BHFP and BHCC work together to scope the idea of a 'food SPD' and if viable commit to having this adopted by 2020. This would continue the city's trailblazing work on food and the planning system. 		
<p>Health hub strategy and potential for</p>	<ul style="list-style-type: none"> • The city wide health estates strategy continues to evolve to support new models of care wrapped around place based communities of practice. Envisage 3 main hub locations for 	<p>DP101 Clinical Commissioning Group</p>	

<p>multi-sector community infrastructure proposals at SSA7</p>	<p>community based health services (incorporating primary care, community services, mental health and social care). 2 established hub with BHGH as a new health hub.</p> <ul style="list-style-type: none"> • Community health infrastructure within central and north Brighton would need to be enhanced but do not envisage a unified hub because of the lack of sites and very different requirements for specific areas within central area. • In the city centre where the priorities are to provide homelessness services, drug and alcohol and sexual health services, and it should be noted that the assessed deficit in total primary care capacity is greatest overall (cluster one). • The northern suburbs (Preston Park and Patcham) might only require minor investment, with potential development of the 175 and 177 Preston Road sites and minor expansion of primary care in Patcham and a potential neighbourhood centre in Westdene (an affluent suburb that does not have any primary care provision within). There are specific needs within the Lewes Road corridor related to the larger student population and particularly Moulsecoomb. • We are engaged with the council on plans for the Moulsecoomb neighbourhood hub and see the opportunity to consolidate and develop primary care and community health infrastructure. • We would be supportive of extending the SSA7 (land adjacent to the Amex stadium) to effectively become a strategic site zone that incorporates the existing leisure centre, community centre, children’s services and miscellaneous other sites in order to facilitate a multi-sector community infrastructure proposal that is developed in the most coherent way possible. 		
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Other General Comments			
Sustainability	<ul style="list-style-type: none"> Higher standards of Sustainability such as the use of solar power should be a requirement in all new buildings. 	DP170 Brighton & Hove Local Access Forum	
Community Space	<ul style="list-style-type: none"> Loss of community space in Hove is severe – with impending King Alfred redevelopment it will be hard to book venues for meetings/ events – this should be addressed in new developments. 	DP312 Save Hove	
Comments on Consultation on draft CPP2 and timetable			
Comments on the Consultation undertaken for the draft CPP2 and the timetable	<ul style="list-style-type: none"> The need for community involvement in improving the City. Welcome this reference several times in City Plan Part II. However fail to see a mechanism where communities can be involved and be listened to. Found format of consultation not helpful. Real opportunity missed not to have involved the Planning Agents Forum over wording of the policies pre-publication of the draft as ‘future users’ of the policies we could have made a major contribution. Always surprising how long the plan takes from start to completion and how short the consultation periods area. Running consultation over summer and concurrently with the SPD consultation suggests the intention to limit a meaningful response from stakeholders whose time is inevitably limited. Consultation would have been better delayed until autumn so that Policy wordings could have taken into account revised NPPF. 	DP157 Hove Civic Society DP170 B&H Local Access Forum DP258 Planning Agents Forum DP258 Planning Agents Forum; DP217 Brighton & Hove Community Land Trust	

	<ul style="list-style-type: none"> • Timetable for publication and submission appears unnecessarily drawn out and unjustified and will provide uncertainty and risks policies becoming outdated/ or ineffective before even adopted. Timetable should be achievable but more ambitious. • Welcome opportunity to engage further in a positive and constructive dialogue with the council to explore these issues and the process. • Found the word version of the consultation response form impossible to use on Microsoft Word (Windows 7). The online consultation system is not user friendly and impeded detailed comments. There is no way to keep a record of the representation submitted and the consultation portal is design more to assist the council than assist stakeholders. This representation should be given the same eight to comments submitted online. 	<p>DP258 Planning Agents Forum; DP260 Lewis and Co Planning ; DP261 Hargreaves</p> <p>DP258 Planning Agents Forum</p> <p>DP285 Eco 21st Ecologically</p>	
Additional information provided by Representations			
Background details submitted supporting representations	<ul style="list-style-type: none"> • Background provided to representations made by Royal Mail to CPP2. Royal Mail has a statutory duty to provide efficient mail sorting and delivery services for the administrative area of Brighton and Hove City Council. Both sites mentioned in representations are currently operational facilities, and there is no certainty over release. However, they have been highlighted by the Council as potentially assisting in meeting future housing targets. On the basis that they may become available in the medium term, subject to viability and a site being made available for relocation, Royal Mail has sought to respond to the Council's initial proposals for each. • It should be noted that the relocation/re-provision of Royal 	DP282 Royal Mail	

	<p>Mail's operations is essential prior to the vacation and subsequent redevelopment of the site. Should any relocation of Royal Mail's operations occur it would need to be in close proximity to the current site to minimise vehicle mileage and travel time. This will ensure that operations will not be prejudiced and that we can continue to comply with our statutory duty to maintain a 'universal service' for the UK.</p> <ul style="list-style-type: none"> • Furthermore, in order for either of the site's to be brought forward for redevelopment, it would be essential that any facilities solution is available prior to the demolition of these existing buildings, to ensure Royal Mail's continuity of service within the administrative boundary of Brighton & Hove. • Describes the allocation of Toads Hole Valley in the CPP1 and indicates that CPP2 comments submitted on behalf of the landowners are made in relation to potentially relevant draft policies to the THV site. 	<p>DP281 Toads Hole Valley Landowners</p>	
<p>Representations to supporting documents in relation to 3 sites</p>	<p>The <u>Urban Fringe Assessments</u> should be updated to ensure that the most relevant, accurate and up to date information is utilised by BHCC to support the progression of the CPP2 - considering age of documents and that they were prepared to support CPP1. High level basis and does not include site specific assessment.</p> <p><u>SHLAA 2017 (Feb 2018)</u> – should be updated to review the opportunity to deliver a higher quantum of development at the three sites: Belgrave Centre, Portslade and the Urban Fringe Sites at Coldean and Whitehawk – considers that while council undertook some high level - prepared and presented as the Urban Fringe Assessment - this did not explore all planning matters affecting the development opportunities at the sites in Whitehawk and Coldean. All three sites are suitable, available, achievable and</p>	<p>DP214 City of Brighton Design & Build Co.</p>	

	<p>ultimately deliverable over the Plan period. Subject to planning permission being granted, it is considered that the sites could be delivered within a 0-10 year period, and a timetable for delivery can be provided.</p> <p><u>Site Allocations Topic Paper June 2018</u> – appendix 3 site assessments. Reassess the sites within the Topic Paper and refer to the higher quantum of homes that can be delivered having regard to the site specific surveys and assessments undertaken by respondent to ensure that the sites can be delivered over the Plan period, and ensure that the CPP2 is effective and positively prepared:</p> <p>Portslade Site - notes reference in recommendations for site the accessibility of the site and ability of site do deliver 6 storeys (reference to submitted JAAP) quantum of development should be increased. The site should be put to the most efficient use possible, in line with the NPPF and objective of optimising vacant PDL</p> <p>Coldean site – notes assessment refers to landscape, heritage and biodiversity constraints but through their extensive survey work - which should be taken into consideration – suggests a scheme of c.300 homes can be delivered which would include appropriate mitigation.</p> <p>Whitehawk Site – site investigation, surveys and assessments suggest the CPP2 proposed developable area is not the most suitable area of land to accommodate development - it is recommended that the Plan showing the potential development area at Coldean is amended to reflect that outlined in their submission (Appendix A) - a reduced site area compared to that identified by BHCC, yet overall a large amount of development can be achieved. Statement in assessment as site having a 'high value</p>		
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	<p>as designated open space...’ should be amended as the areas is in part overgrown, and therefore offers no amenity or physical recreational value to the local community.</p> <p><u>Housing Provision Topic Paper 2018</u> - this report advises that BHCC expects to deliver 13,440 homes by 2030, resulting in 230 more homes than required by the CPP1 target. Although BHCC state that this is a "conservative assessment of potential housing supply , it is highlighted that if the 3 sites were optimised, the delivery against the CPP1 target would be considerably greater, going some way to address the shortfall against OAN which was ultimately accepted at examination. Table 3 of the topic paper advises that against policy CP1 provision of 5,190 homes in "the rest of the city" (excludes the DA8 Portslade site but includes the two Urban Fringe sites). Against this requirement, the total potential supply is only 4,916, a shortfall against CP1 of 274 homes. The two urban fringe sites at Whitehawk and Coldean could readily assist in making up this shortfall.</p>		
<p>Comment related to current applications</p>	<ul style="list-style-type: none"> • Concern with development of KAP garage site on Newton Road and potential development to the north. High rise development is not in keeping with the area – where there are no tall structures on this side of the railway. Keep the new development within the character of the existing area as a generally low rise area not a high rise canyon. • Representation sets out the background and objectives to the proposals for the Greater Brighton Metropolitan College. 	<p>DP009</p> <p>DP257 GBMET</p>	

General Comments on CPP2 Supporting Documents or Evidence Base			
<p>Local Wildlife Sites Review</p>	<p>Additional comments submitted related to Appendix 3 Local Wildlife Sites – 3 sites constitute land owned by Southern Water and containing operation water supply infrastructure and are managed in accordance with Southern Water’s duty to protect drinking water quality:</p> <p><u>Local Wildlife Site BH71 Hove Park Reservoir</u> - consider that LWS designation is not compactable with the sites primary function. Amendment of boundary is required to exclude Water supply reservoir. With regard to the remainder of the site, which is largely wooded, Southern Water would support any further independent ecological assessment of its biodiversity interest.</p> <p><u>Candidate Local Wildlife Site The Engineerium (38)</u> - having regard to the proper exercise of its functions, Southern Water considers that a LWS designation is not compatible with the site's primary function as a WSW and its associated maintenance routines and any future essential upgrade works that are required in order to safeguard public drinking water supplies.</p> <p><u>Candidate Local Wildlife Site Beaufort Terrace (74)</u> - consider an LWS designation could conflict with its use as operational land in use for public water supply. However, we also recognise that, as a public authority, Southern Water has a duty to have regard to the purpose of conserving biodiversity. We acknowledge therefore the need for a survey to be carried out on cLWS 74, in order to provide the evidence required as to whether it meets the requisite criteria for a LWS, and welcome any proposals the Council may have in this regard. Until the matter is decided on the basis of such evidence, we understand the site will continue to be listed as a Candidate LWS.</p>	<p>DP201 Southern Water</p>	

<p>Policies Map</p>	<ul style="list-style-type: none"> • West and East policies map should clearly show the SDNP boundary on the proposals map given proximity of proposed allocations if urban fringe site should be clearly marked. • Support amendment to the draft policies map which now illustrates that the Outer Harbour Site would fall within the ‘Built up areas’ including phases 2 and 3 of the consented Brighton Marina Outer Harbour planning permission (B2006/01124). • Policies Map has not been updated with the 2013 selected wildlife sites. • On-line map of sites are not legible – shading style used for Local Wildlife Sites (LWSs). The map is too obscure to distinguish between formally notified Local Nature Reserves (LNR) and other features included under the Local Nature Conservation Designation (SD9) Policy. It is not acceptable for LNRs to be so poorly represented on The Plan. It is strongly recommended that a shading is used to ensure the Eight Local Nature Reserves are clearly shown with their correct name and boundary and are explicitly listed in The Plan. 	<p>DP221 South Downs National Park Authority</p> <p>DP278 Outer Harbour Developments</p> <p>DP285 Eco 21st Ecologically</p>	
<p>Appendix 1 - Glossary</p>	<p>Affordable housing definition does not include Affordable build to Rent (Discounted Market Rent) – the glossary should be amended to reflect Annex 2 of NPPF.</p>	<p>DP271 Legal & General</p>	
<p>SFRA</p>	<ul style="list-style-type: none"> • Note that the Shoreham Harbour Development Area (which we understand the Kingsway/Basin Road North) site allocation falls within was included in a Sequential and Exception Test completed in June 2014. For clarity and transparency purposes, we would recommend that this site is referenced in the Level 2 SFRA that is currently being undertaken (presumably as supporting evidence to this plan). This could outline any SFRA, Sequential and Exception Test work that has already taken place 	<p>DP162 Environment Agency</p>	

	for this allocation for City Plan Part 1 and the Shoreham Harbour Regeneration Area Action Plan. It could also make reference to whether there has been any change with regard Climate Change Allowances that came into effect in February 2016 (i.e. since the 2014 work).		
General Comments related to Sustainability Appraisal	See separate summary table.		

Sustainability Appraisal			
Total Number of Responses		7	
Number of Representations that Support			
Number of Representations that Object		4	
Number of Representations – Other		3	
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
SA site assessments	SA site assessments don't consider new Local Wildlife Site designations.	DP289 Sussex Wildlife Trust	
	Unclear why SA site assessment process has not been used to discount sites.	DP289 Sussex Wildlife Trust	
	Site allocation assessments for H1 and H2 should include Heritage Impact Assessments to help inform quantum.	DP284 Historic England (in response to H1 and H2)	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	Disagreement with SA scores for certain site assessments (Belgrave Centre, Land north east of Coldean Lane, and Land at and adjoining Brighton Race Course). SA scores should be amended more positively to: reflect status of site (e.g. vacant PDL); reflect ecological surveys undertaken by the representor; and reflect proposals being put forward by representor including an increased quantum of housing; and should be awarded a “no impact” score until certain assessments have been carried out including for transport, archaeology, heritage, water quality and air quality.	DP214 Brighton & Hove Design and Build	
Disagreement with SA policy assessments	Appraisal for DM37 is too positive and doesn't reflect that the policy will allow for development on designated sites. Appraisal contrary to SA Framework.	DP289 Sussex Wildlife Trust	
	Appraisal of DM1 doesn't assess certain aspects of the policy, including space standards, accessibility standards and requirement for amenity space and how these impact on viability or cost of housing.	DP260 Lewis & Co (in response to DM1)	
SA not assessed reasonable alternatives	No consideration of reasonable alternatives to policy DM1 i.e. approach of “not including standards”.	DP260 Lewis & Co (in response to DM1)	
Likely future baseline questionable	Information sources not included for likely future baseline.	DP289 Sussex Wildlife Trust	
Incorrect terminology	SA refers to “proposed LWS” rather than “designated LWS”.	DP289 Sussex Wildlife Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Other			
Suggested SA site assessment for new site	Additional site (Dolphin House, Manchester Street) put forward for residential development. Suggested SA site assessment submitted.	DP261 Hargreaves	
Suggested SA site assessment for allocated site with different use proposed	Existing H1 site (27-31 Church Street) recommended for PBSA Suggested SA site assessment submitted relating to the site being allocated for PBSA.	DP261 Hargreaves	
Consideration of proximity to LNRs in H1 and H2 sites	Some H1 and H2 sites are in close proximity to LNRs and should include consideration of mitigation.	DP189 Natural England (in response to H1 and H2)	
Consideration of Groundwater Source Protection Zones in H1, H2 and H3 sites	Some H1, H2 and H3 sites are within GSPZ and should include this as a consideration within policy wording.	DP162 Environment Agency (in response to H1, H2 and H3)	
No comments	No comments provided directly on the SA due to time constraints.	DP162 Environment Agency	

Equalities			
Total Number of Responses		12	
Number of Representations that Support		2	
Number of Representations that Object		7	
Number of Representations – Other		3	
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Some policies discriminate against certain people/groups	DM8: Restricting car-ownership for students is discriminatory.	DP001 Pavilion Architecture	
	Housing policies will exacerbate chronic housing shortage, will benefit home-owners and disadvantage non home-owners including young, low-incomed, BAME and recent immigrants.	DP002 Brighton YIMBY	
	Development on H2 sites, as well as some within H1 policy, affects the human rights of those living in close proximity.	DP096	
	DM2 will constrain delivery of shared housing and increase housing in-affordability for those reliant on private rental market including young adult/people on low incomes. HEQIA failed to accurately assess impacts of this policy on this group. Contrary to Article 14 of Human Rights Act and Equalities Act 2010.	DP260 Lewis & Co	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	DM7 will constrain delivery of shared housing and increase housing in-affordability for those reliant on private rental market including young adults/low incomes HEQIA failed to accurately assess impacts of this policy on this group. Contrary to Article 14 of Human Rights Act and Equalities Act 2010.	DP260 Lewis & co	
	DM33: Concentrating on provision for pedestrians and cyclists, as well as public transport discriminates against older and disabled people.	DP315 Saltdean Residents Association	
The Plan as a whole has adverse equalities implications	CPP2 has not identified those who are worse off with the Plan than without it and does not address the needs of the “10%” which do not benefit from the implementation of CPP1 and CPP2.	DP100	
	CPP2 as a whole adversely impacts upon children and older people through lack of progress on meeting air quality objective.	DP100	
	CPP2 has major equalities implications. Nb: representation suggested further information would follow, however none has been submitted to qualify the comment.	DP311	
Support			
Some individual policies have positive equalities implications for certain people/groups	DM1: community self-build helps deliver affordable housing, therefore supports people on low-incomes. Support for community self-build could be more explicit.	DP175 Nub Brighton	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	DM1 has positive implications for disabled people through consideration of accessibility requirements.	DP189 Natural England	
	DM4 has positive implications for older people as helps to meet housing needs of older people.	DP189 Natural England	
	DM5 has positive implications for vulnerable people as helps to meet housing needs of vulnerable people.	DP189 Natural England	
	DM22 has positive implications for disabled people as includes consideration of accessibility requirements.	DP189 Natural England	
	DM23 has positive implications for disabled people as includes consideration of accessibility requirements.	DP189 Natural England	
	DM32 has positive implications for disabled people as includes consideration of accessibility requirements.	DP189 Natural England	
	DM33 has positive implications for disabled people as includes consideration of accessibility requirements.	DP189 Natural England	
Other comments			
Plan could further address equalities issues through various measures	<p>CPP2 should consider issues such as traffic management (Walpole Road area).</p> <p>CPP2 should consider issues of rough sleepers (Whitehawk Hill).</p> <p>CPP2 should promote employment opportunities for young adults with learning difficulties.</p> <p>CPP2 should support charities to reduce transport carbon emissions through electric vehicle charging point provision on site.</p> <p>CPP2 should support social enterprises which support young adults with autism in gaining employment skills.</p>	DP110 St John's School & College	
General Comment	Progress should benefit everyone.	DP266 Brighton Marina Neighbourhood Forum Steering Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Need to acknowledge cyclists can have disabilities	Mobility issues of some cyclists should be considered and has implications for cycle facilities including access and cycle parking as well as infrastructure such as signage and the requirement for cyclists to dismount. Disabled cyclists find cycling easier than walking.	DP316 Bricycles and Cycling UK	