

SA7 Benfield Valley			
Total Number of Responses		18	
Number of Representations that Support		12	
Number of Representations that Object		6	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Object to allocation for 100 houses given contrary to findings of the 2015 UFA and potential impacts of increased housing as well as compatibility with LGS designation	Question the number of dwellings suggested for this site, which is well above that considered in the 2015 Urban Fringe Assessment (UFA). The Reasoned Justification does not include any explanation of why an increase of 70 dwellings over the 2015 UFA figure is considered acceptable, particularly given the UFA conclusion that even a lower figure of 30 dwellings would have a high likelihood of significant impacts on landscape until new screening planting reaches maturity. The site is also listed for only 30 dwellings in the most recent SHLAA (Ref 690 and 691). The UFA also states that development of this site could have impacts on the LWS in terms of increased recreational disturbance; however this risk is reduced by the low number of dwellings being considered in the assessment. Whilst supporting the prospect of Benfield Valley as a gateway to the SDNP, there needs to be assessment of the potential impacts of increased access and recreation on the site. Also question the suitability of allocating housing on a site	DP289 Sussex Wildlife Trust	

	<p>designated as Local Green Space (LGS). This is not consistent with the NPPF which indicates that policies for managing development within a LGS should be consistent with those for Green Belts, where the NPPF indicates that the construction of new buildings is generally inappropriate. Therefore cannot see how the residential element of this policy can be delivered alongside the LGS designation.</p> <p>Therefore request that this housing allocation is removed from the Plan. Seek deletion from the policy of the whole paragraph starting “Residential development in accordance with the identified development areas...”</p>		
<p>Consider Benfield Valley can deliver a larger number of houses at a higher density</p>	<p>The respondent has a significant interest in land at Benfield Valley and has undertaken work to inform preparation of an initial concept plan (submitted with this representation). The concept plan sets out the areas of the site considered capable of accommodating new development following analysis of ecology, landscape, open space and access. The concept plan identifies a potential developable area of 6.25 hectares with potential to deliver up to 375 new homes (based on a density of 60 dwellings per hectare as used within CPP2 Policy H2).</p> <p>The detailed site specific assessment work undertaken by the previous promoter and contained in these representations concludes that a greater proportion of the site could be developed for housing. The council should seek to optimise housing delivery given that the City Plan housing requirement meets approximately only half of the identified need. Based on the work undertaken, consider that the site capacity set out within Policies SA7 and H2 should be increased from 100 to 375 homes.</p>	<p>D287 Fairfax Acquisitions Ltd</p>	

Considers the housing allocation figure to be unjustified and unsubstantiated and a higher density can be achieved

The respondent has undertaken work for two different clients to investigate the potential of Benfield Valley and has formulated and tested a number of options for the site, including working with visual landscape assessors, ecologists and transport specialist on preliminary detailed assessments of the site.

On this basis object to the current wording of SA7 and its supporting text and the supporting text to the Policy H2 housing allocation contained within Table 7. Consider that Benfield Valley is in a sustainable location within walking distance of a mainline railway station, numerous bus routes, a school, a supermarket and all local amenities. Given the City Plan shortfall against objectively assessed housing need, a larger proportion of the site should be used for housing. The ambitions for higher quality green space are also more likely to be deliverable if substantially more housing is allowed for.

The allocation of 100 dwellings is not substantiated or justified. The Urban Fringe Assessment suggests that the site is suitable for 30 new houses either side of Hangleton Lane, close to the roundabout, but provides no reasoning or justification. It states that its findings are based on the 2008 Open Space Study and subsequent updates, but these are disputed for the reasons given (elsewhere in the representation). Without any new evidence or justification, CPP2 identifies the potential for Benfield Valley as being approximately 100 dwellings, but this is also not substantiated in any way. Subsequent studies carried out by the respondent, including preliminary ecology and landscape visual assessment (testing specific proposals with basic massing modelled for the site) indicates that larger numbers can be

DP274 LCE Architects

	<p>accommodated.</p> <p>Specifying 100 dwellings for the site is likely to result in developers seeking to maximise the value by providing 4-5 bed homes, whereas public consultation on the site has confirmed that the demand is for smaller homes, which would be more appropriate in such a sustainable location.</p>		
<p>Object to allocation of housing development area within the SA7 Policy due to sites biodiversity value</p>	<p>Strongly support the policy objective to protect and enhance this Local Wildlife Site as an important 'green wedge' and the commitment to the protection and enhancement of biodiversity in the policy wording. However, strongly object to the allocation of development areas within the policy. Based on the NPPF, all LWS should be safeguarded against development to ensure that they are able to contribute to a robust ecological network within Brighton & Hove. Sites designated for their biodiversity value are a precious resource that must be protected for the public benefit.</p>	<p>DP289 Sussex Wildlife Trust</p>	
<p>Suggest areas with potential for development as consider they have lower ecological value</p>	<p>The respondent has undertaken an Extended Phase 1 Habitat Survey (submitted with this representation). This has identified areas of the site (shown on a plan submitted with the representation) which have lower ecological value and would be best for development subject to the replacement of habitat elsewhere on the site or the retention of portions where habitat can be enhanced; and areas that have higher ecological value which it is proposed to retain and enhance as part of the development.</p> <p>The respondent's Habitat Survey report indicates that it would be beneficial to limit the development areas to amenity grassland, disturbed ground, hard standing and poor semi-improved grassland and to retain as much as possible the semi-improved</p>	<p>D287 Fairfax Acquisitions Ltd</p>	

	<p>calcareous grassland and broadleaved woodland parcels as these are of higher ecological value. The assessment provides recommendations on a series of potential mitigation measures, to be delivered as part of new development. The northern part of Benfield Valley contains poor semi-improved grassland and semi-improved calcareous grassland where habitat could be enhanced to improve biodiversity.</p>		
<p>Assessment of landscape and visual impact opportunities and constraints provided</p>	<p>A landscape and visual appraisal prepared by Enplan was submitted as part of representations made by the previous site promoter to the CPP2 Scoping Document. Do not consider that there has been any material change in the landscape character of the site and therefore that document's conclusions remain relevant.</p> <p>The Enplan assessment included a constraints and opportunities plan which concluded that:</p> <ul style="list-style-type: none"> - development north of Hangleton Lane should be restricted to areas at the valley sides away from the existing ridgeline and should avoid impact to the setting of the Benfield Barn Conservation Area - the setting of the Conservation Area should be protected by the creation of a semi-natural public open space to its west - development should respect and reinforce the original field boundary that runs north-south through the area on the line of the footpath - opportunities should be taken to improve pedestrian and cycling linkages across Hangleton Lane 	<p>D287 Fairfax Acquisitions Ltd</p>	

	<p>For development south of Hangleton Lane, the assessment concluded that:</p> <ul style="list-style-type: none"> - new development could be accommodated as long as the existing tree belts are retained and the open, vegetated setting of the north-south public right of way is maintained - opportunities should be taken to improve east-west linkages <p>smaller areas of open space should be created at key public right of way junctions.</p> <p>Therefore support a more balanced approach which takes into account these factors, along with the amenity considerations of future residents.</p> <p>The respondent wishes to confirm that the existing golf course use would cease once the site is developed which would enable the retention of open grassland over a large area. The council's own assessment notes that this would offer greater potential for enhancement and would be more in keeping with the existing character of the landscape.</p>		
<p>Considers Benfield Valley to have limited public access and therefore makes limited contribution towards general open space provision in the city</p>	<p>Although Benfield Valley is mostly undeveloped, a significant part of land to the north of Hangleton Lane (and the A27) consists of private space with very limited public access and therefore it makes a relatively limited contribution towards general open space provision in the city. New development on the site has the potential to make a significant contribution towards the provision of open space. Whilst development south of Hangleton Lane would result in the loss of some natural/semi-natural open space, this could be mitigated through the provision of such space to the north of the A27 which currently forms part of the existing golf course. In addition, much of the existing golf course north of</p>	<p>D287 Fairfax Acquisitions Ltd</p>	

	<p>Hangleton Lane is proposed to remain open land opened up to general public access further increasing the supply of natural/ semi-natural open space. New areas of open space provided within the development could include new types of open space that do not currently exist at the site (e.g. amenity green space and children's play areas). Consider that new development at the site would result in the provision of new, fully publicly accessible, open space that meets the needs of both existing and future residents.</p>		
<p>Disagree with the findings of the 2008 Open Space Study that suggests Benfield Valley is need to address shortage of open space in the city</p>	<p>Consider that the proposed allocation of 100 residential units is extremely low and unsubstantiated, but stems from an even lower figure of 30 units in the Urban Fringe Assessment. Consider that the low figure stems principally from the conclusions of the 2008 Open Space Study that Benfield Valley is needed to address a chronic shortage of open space in the city. However strongly disagree with the findings of the 2008 Open Space Study which are at odds with everyday experience and common sense.</p> <p>Benfield Valley is located in an area well provided for by other open spaces (e.g Greenleas Rec, St Helen's Park and the South Downs National Park) which have catchment areas overlapping with the Valley. Therefore large areas of Benfield Valley are surplus to requirements as evidenced by the apparent infrequent use of large tracts of the land.</p> <p>Consider that Benfield Valley is not needed or suitably located to address perceived open space shortages in neighbouring wards, as these already have access to very large open spaces and/or are a lengthy walking distance from Benfield Valley.</p>	<p>DP274 LCE Architects</p>	

	Benfield Valley is not an isolated open space as it appears to be portrayed in diagrams and plans put forward by the Council (e.g in the Open Space Studies and now in CPP2).		
Objection to proposed Local Green Space designation	<p>Benfield Valley does not meet the criteria for Local Green Space as defined in the NPPF (para 77) as it is an extensive tract of land and cannot be claimed to be demonstrably special to the local community or have historic significance. CPP2 paragraph 2.280 indicates that the Local Green Space designation rules out development other than in very special circumstances and that It is not appropriate to designate sites as Local Green Space purely to resist development. Therefore object to its designation as Local Green Space before serious consideration being given to substantially more than 100 housing units for the site.</p> <p>The other proposed 'Green Corridors' providing access to the South Downs National Park are significantly smaller and narrower. This indicates that it would be possible to retain a considerable green corridor of enhanced ecology and open space quality at Benfield Valley whilst still allowing additional housing on either side.</p>	DP274 LCE Architects	
Comments on accessibility of the site	The respondent has explored potential options for providing safe vehicular access to the new development (full copies of the access plans are submitted with this representation). In general terms, it is considered that Benfield Valley is a sustainable location close to a range of facilities and services, all easily accessible by walking/cycling, therefore the site represents a sustainable location for additional residential development.	D287 Fairfax Acquisitions Ltd	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Concerns with potential traffic impacts	The proposed allocation would create extra traffic on surrounding roads which are already extremely busy especially at peak times of the day. The proposed development looks to be extremely close to the busy roundabout which often has queues of traffic from Fox Way and Hangleton Lane going right back to Towns Corner.	DP126	
Concerns with impact on local services	The proposed development will put additional pressure on local schools, doctors' surgeries and dentists.	DP126	
Relationship of CPP2 and proposed policies and allocations to the City Plan Part 1	Consider that proposed allocations including Policy SA7 should not be considered until after consideration of Policies DM1-DM6, Policy H2 and proposed changes to the Proposals Map as part of a re-opened City Plan Part One.	DP311	
Other comments	The proposed allocation would involve development of 100 houses close to the respondent's back garden which would ruin the outlook.	DP126	
	Support the assessment requirements listed in paragraph 3.8, but question why these are not included in the policy wording.	DP289 Sussex Wildlife Trust	
	Request confirmation that the Special Area does not encroach upon the highway boundary as this could impede essential highway works including safety maintenance works.	DP112 Highways England	
Support			
General support	Our green lungs and belts are vital. Welcome the policy.	DP091 DP307 Green Group of Councillors	

	Economic Strategy which states that we will protect and grow natural capital/green infrastructure in terms of green spaces.	Economic Partnership	
Support requirement for landscape and visual impact	Strongly support the requirement in the policy justification for detailed proposals to provide Landscape and Visual Character Assessment.	DP221 South Downs National Park Authority	
Support reference to access to South Downs National Park	Welcome the wording in bullet points 1 and 3 of the policy regarding connectivity through the site from the urban area to the South Downs National Park and the creation of gateway facilities. Support the wording regarding pedestrian and cycling links, the need to deliver an effective and visually attractive gateway to the National Park and the creation of a visitor centre as part of the gateway location.	DP221 South Downs National Park Authority	
Support positive proposals for Benfield Barn but need to ensure no detrimental impacts on Barn and association Conservation Area through housing allocation	The Special Area and housing allocation should be adequately assessed in relation to their potential impact on the significance of heritage assets or their settings. Note the positive proposal for the use of the Grade II listed Benfield Barn and its associated Conservation Area (which is on the Heritage at Risk Register), but have some concern that the housing allocation areas may have some detrimental effects on the setting of these assets. The siting, form and scale of the housing would have to be very carefully planned to ensure no harmful impacts arise and the positive benefits sought by the policy are realised.	DP284 Historic England	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Ensure consideration given to health infrastructure requirements; public rights of way	<p>Hope that the impact of this scheme on the NHS locally (especially on General Practice) will be reflected in the allocation of Section 106 and/or Community Infrastructure Levy funding.</p> <p>Draw particular attention to public rights of way - any application which cuts across a right of way directly contradicts the NPPF (paragraph 69) and the DEFRA guidance on rights of way (paragraph 7.11).</p>	<p>DP101 Brighton & Hove Clinical Commissioning Group;</p> <p>DP307 Green Group of Councillors</p>	
Reference to contamination in site allocations if required	<p>As a general point re the allocated sites, could not see any references regarding specific sites that are likely to be subject to contamination. It may be useful to make reference to this for sites where this is appropriate.</p>	<p>DP162 Environment Agency</p>	
Support (no comments)		<p>DP067; DP089; DP001 Pavilion Architecture</p>	

SSA1 Brighton General Hospital site			
Total Number of Responses		16	
Number of Representations that Support		9	
Number of Representations that Object		7	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Use building to support homeless	Suggest building could be used to combat homelessness and poverty.	DP091	
Site capacity is low and affordable housing yield should be 100% on a publicly owned site	A minimum of 300 (not 200) homes with 100% affordability is needed in line with the motion passed at July 2018 full council.	DP198; DP307 Green Group of Councillors; DP256 The Conservative Group	
	To accommodate more housing, health care facility can be moved to the Hangleton Village.	DP256 The Conservative Group	
	A policy of only approving 80-100% affordable housing schemes on development of publically owned sites in recognition of the site being for public benefit and also being necessary to tackle the demonstrable shortage of affordable housing.	DP307 Green Group of Councillors	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Health Hub cannot be viably delivered with 200 homes</p>	<p>Considers allocation is a 'roll over' of BHLP allocation and has not increased since the provision of new secondary school was removed from the policy.</p> <p>Delivering a mixed-use scheme to meet the requirements of Policy SSA1 in City Plan Part 2 without any central funding presents significant challenges.</p> <p>Abnormal costs associated with demolition, converting historic buildings and site levelling will jeopardise deliverability further.</p> <p>Current allocation does not take account of the funding gap. Up to 700 home will be needed to make the scheme viable and deliverable.</p>	<p>DP273 Sussex Community NHS Foundation Trust</p>	
<p>Higher floorspace allowance for healthcare component (D1 floorspace)</p>	<p>Higher floorspace limit (circa 16, 000 sq m) should be set to allow for flexibility in health needs/ healthcare provision over the plan period.</p>	<p>DP273 Sussex Community NHS Foundation Trust</p>	
<p>Non-compliance with CPP1 density policies</p>	<p>Current allocation indicates a density of 35 dph which is inconsistent with CP1 & CP14 in CPP1.</p>	<p>DP273 Sussex Community NHS Foundation Trust</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Requiring the preservation of the listed building setting and non-designated heritage assets is unnecessarily onerous	Criterion a) is unnecessarily onerous given the poor state of many of the hospital buildings and their limited architectural quality. Conversion of existing buildings will not yield sufficient numbers causing viability issues.	DP273 Sussex Community NHS Foundation Trust	
Criterion b) active frontage requires amending	The policy requirement for active frontages cannot be achieved without demolishing flint boundary wall which is a key heritage component. Suggest amending criteria.	DP273 Sussex Community NHS Foundation Trust	
Criterion c) on open/ green space provision needs amending	Some existing green space is poor quality. Amend the criterion to allow flexibility through a combination existing and new spaces.	DP273 Sussex Community NHS Foundation Trust	
Criterion e) needs to be deleted	Delete the criterion as this should not be an absolute development plan stipulation.	DP273 Sussex Community NHS Foundation Trust	
New criteria indicating alignment with Southern Water's reinforcement and maintenance works required	Proposals for 200 dwellings at Brighton General Hospital site will generate a need for reinforcement of the water and wastewater networks in order to provide additional capacity to serve the development. The development should be phased to align with the delivery of network reinforcement plans and layout is planned to ensure future access for maintenance and upsizing. Criteria need to be introduced to reflect this in line with paragraph 170(e) and 28 of the revised National Planning Policy Framework (NPPF) (2018).	DP201 Southern Water	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Traffic Impact Assessment required.	In conjunction with SSA7, development on this site will lead to potential increase in traffic on the A259 and B2123. Requires comprehensive Transport Impact Assessments.	DP303 Rottingdean Parish Council	
Support			
Policy needs updating to reflect council motion on 100% Affordable Housing	The policy wording does not include the Council's request for the land to be developed for "truly affordable housing, including options for development by the Joint Venture, B&H Community Land Trust, directly by the Council, or a combination" (Council 19 July 2018).	DP217 Brighton and Hove Community Land Trust	
Comprehensive HIA requirement	Support but request reference to comprehensive Heritage Impact Assessment in policy wording in SSA1.	DP284 Historic England	
Support with caveats on number of housing units and key workers' housing being identified as affordable housing	<p>The BGH development is supported in principle and, as planning on the scheme develops, support subject to the provision of certain assurances in the Final Business Case that SCFT are working on.</p> <p>Believe that a far greater use of housing could be provided from the part of the site surplus to healthcare use.</p> <p>Subject to viability Key workers housing should be identified as affordable housing to help in the recruitment of health and social care staff in a high cost of living city.</p> <p>Make reference to community health infrastructure needs.</p>	DP101 BH Clinical Commissioning Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Additional Criteria requested to safeguard swift nests	Redevelopment of Brighton General Hospital site is welcomed. However, this site holds around 15 swift nests and is considered to be the oldest breeding colony in Brighton and Hove. Suggest including a new criterion to safeguard Swift nests.	DP219 RSPB	
Appropriate response to GI needs in urban context	Improving existing amenity green space will increase its value as GI; biodiversity and the existing ecological network. Delivering sustainable transport infrastructure will help decrease vehicular emissions and air pollution.	DP189 Natural England	
If required refer to contamination in site allocations	Make reference to contamination in site allocations where this is appropriate.	DP162 Environment Agency	
Ensure accessibility and links to adjacent neighbourhoods	The BHEP supports the strategic allocations as set out above and at the recent BHEP meeting on 4.9.18 received assurances that any development will be readily accessible and will link with adjacent neighbourhoods (including business and retail areas).	DP208 BHEP	
Support – no comments		DP067, DP001	

SSA2 Combined Engineering Depot, Hove			
Total Number of Responses		9	
Number of Representations that Support		8	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Wastewater infrastructure currently insufficient	Local wastewater infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Southern Water proposes the following criterion be added to Policy SSA2: i. Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.	DP201 Southern Water	
Support			
Appropriate to Local context	This area needs regeneration and redevelopment.	DP269 London Road LAT	
Support with further reference to heritage assets/ heritage impact statement	Development should seek to enhance the setting of nearby heritage assets and contribute to the 'sense of arrival' into the city. A heritage impact statement should be prepared to identify the potential impacts of development on the assets.	DP284 Historic England	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support with caveat	Support as long as built in New England style.	DP091	
If appropriate refer to contamination	It may be useful to make reference to the potential for contamination.	DP162 Environment Agency	
Support with caveat	A minimum required amount of GI should be stated to ensure net gains can be achieved.	DP189 Natural England	
General comment	<p>Improving sustainable transport infrastructure will help decrease emissions and air pollution caused by private vehicle use.</p> <p>Support for criteria relating to improvements to air quality and green infrastructure.</p>	DP189 Natural England	
General comment	General support.	DP208 BHEP, DP067, DP001 Pavilion Architecture	

SSA3 Land at Lyon Close, Hove			
Total Number of Responses		10	
Number of Representations that Support		9	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Comments on planning for wastewater infrastructure	<p>Local wastewater infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. The proposals will generate a need for reinforcement of the water and wastewater networks in order to provide additional capacity to serve the development. Planning policies and planning conditions will be needed to ensure that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment in accordance with the NPPF. Therefore seek additional policy criterion:</p> <p>“h) Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.”</p> <p>There is existing Southern Water infrastructure under the site. This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which</p>	DP201 Southern Water	

	may affect the site layout. This easement should be clear of all proposed buildings and substantial tree planting. Therefore seek additional policy criterion: “i) Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.”		
Support			
General support	Support the strategic allocations as set out - the Brighton & Hove Economic Partnership meeting on 04.09.18 received assurances that any development will be readily accessible and will link with adjacent neighbourhoods (including business and retail areas).	DP208 Brighton & Hove Economic Partnership	
Proximity to Conservation Area	The proximity of the site to the Willett Estate conservation area should be noted in the policy and/or justification.	DP284 Historic England	
Comments on employment floorspace requirements	Request that the policy wording be altered to require provision of 700 sq.m of B1a floorspace at Peacock Industrial Estate rather than 1,000 sqm as drafted. This figure is based on the most recent viability assessment undertaken to support a current planning application (BH2018/01738) for development on that site.	DP283 Crest Nicholson South	
Comments on residential development requirements	Consider that the strategic allocation is capable of supporting a significantly higher quantum of housing than a minimum of 300 units. Existing planning consents together with the current application at the Peacock Industrial Estate for 163 residential units would in total exceed 300 units, and this excludes several parts of the site for which applications are yet to be made. It is recommended that the housing figure is increased to more accurately reflect the quantum that could be delivered, thereby making optimal use of the potential of the site. This would accord with the NPPF and the conclusions of the inspector examining City Plan Part 1.	DP283 Crest Nicholson South	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Ensure net gains in green infrastructure	<p>Improved sustainable transport infrastructure will help decrease emissions and air pollution caused by private vehicle use which is a key aim of the NPPF.</p> <p>Development should contribute to the existing ecological network, provide biodiversity improvements and make use of green infrastructure in line with the aims of the NPPF and DEFRA 25 year plan. A minimum amount of green infrastructure should be stated to ensure net gains can be achieved.</p> <p>Developing on brownfield sites helps protect green belt land and greenfield sites, which is a key aim of the NPPF.</p>	DP189 Natural England	
Refer to contaminated land if appropriate	No references are included regarding specific sites that are likely to be subject to contamination. It may be useful to make reference to this for sites where this is appropriate.	DP162 Environment Agency	
Building Design	Development must be attractive. Add wording stating that the Council is committed to building in Mansion block formation for attractiveness, longevity and sensitivity to Hove.	DP091	
Support (no comments)		DP067; DP157 Hove Civic Society; DP001 Pavilion Architecture	

SSA4 Sackville Trading Estate			
Total Number of Responses		11	
Number of Representations that Support		10	
Number of Representations that Object		1	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Wastewater infrastructure capacity issues	Local wastewater infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development.	DP201 Southern Water	
Southern Water Infrastructure needs to be reflected in policy criterion h)	There is existing Southern Water infrastructure under the site. This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout. This easement should be clear of all proposed buildings and substantial tree planting. Southern Water proposes the following criteria be added to Policy SSA4: h.) Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider. i.) Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.	DP201 Southern Water	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Appropriate to Local context	Support for the proposed allocation of the Site for comprehensive mixed-use development.	DP275 Moda Living Ltd, DP268 LaSalle, DP208 BHEP, DP067, DP001	
Support with caveat – more flexible and qualitative approach to employment uses	The current draft allocation identifies a requirement for the development of 6,000sqm of B1 employment floorspace as part of any redevelopment of the Site. There is no clear justification for this uplift in the supporting evidence base, with the City Plan Part One seeking provision of 5,000sqm of employment floorspace across the DA6 area as a whole (of which this site is just a part). The supporting text within paragraph 3.26 sets out that the 6,000sqm requirement makes an allowance for the current level on the Trading Estate to be increased by a minimum of 20%. It is considered that the Council has weighted this requirement too heavily in favour of 'like for like' re-provision in terms of quantum of floorspace, rather than adopting a more flexible and qualitative approach to diversification of employment uses and their socio-economic benefits.	DP275 Moda Living Ltd, DP268 LaSalle	
Indicative employment floorspace figure	An indicative figure of around 4650 sq.m. (50,000 sq.ft of B1 employment space) has been used to define the approximate amount of employment floorspace considered appropriate. We remain of the view that this is an appropriate level as part of a mixed-use scheme.	DP268 LaSalle	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Significant office employment would not be relevant, deliverable/ consistent	A requirement for significant B1 office employment as indicated in the Draft Plan would imply aspirations for a 'business park' element which is not considered relevant or deliverable, or consistent with DA6.	DP268 LaSalle	
Minor changes requested	Given the need for 3 rd party land and for the agreement of Network Rail for any new bridge the delivery of such a new link is not solely under the control of LaSalle (or Moda). Therefore, while this aspiration is shared between BHCC and LaSalle/Moda, the wording of this requirement should be modified to ensure that an inability to secure the agreement of relevant 3rd parties does not result in us being unable to comply with the Policy and bring the site forward.	DP268 LaSalle	
Clarification Source Protection Zone	The supporting text on Page 156 para 3.31 refers to the site being in SPZ 1 and 2. This site is in fact in SPZ 1, 2 and 3. We would recommend that reference to this is included in the policy wording especially as this site is likely to be subject to contamination.	DP162 Environment Agency	
Support reference to Neighbourhood Plan	Recognition that the development must meet the requirements of a future Hove Station Neighbourhood Plan is positive.	DP217 B&H Community Land Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support – reference to sustainable transport infrastructure	Support for criteria relating to sustainable transport infrastructure as this will help decrease emissions and air pollution caused by private vehicle use. Providing Improvements/ mitigation for potential air quality impacts will be beneficial for: GI, biodiversity, existing ecological network and public health/wellbeing.	DP189 Natural England	
Support – caveat more flexibility	Support for the principle of the policy, however policy needs more flexibility. In particular the employment floorspace requirement may be too high.	DP157 Hove Civic Society	
Support – caveat mansion block style buildings	Support but should require commitment to building in Mansion block formation.	DP091	

SSA5 Madeira Terrace and Madeira Drive			
Total Number of Responses		37	
Number of Representations that Support		9	
Number of Representations that Object		28	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Object to hotel (& hostel) being included in range of permitted uses	<p>A lot of crowdfunding money was raised with the thought that it was going to be independent shops and galleries not a hotel.</p> <p>Concerned about any potential hotel development which obscures views from the main road.</p> <p>Area unsuitable for hotel and youth hostel (or any other form of accommodation temporary or permanent including residential). There are numerous accommodation providers in the area and policy would have a detrimental effect on existing businesses, transport and infrastructure. Central Brighton is more suitable location with better transport links.</p>	<p>DP234</p> <p>DP031 NCLA</p> <p>DP182, DP183, DP184, DP197, DP210, DP211, DP231, DP253, DP237, DP239, DP309, DP241, DP242, DP244, DP246, DP308, DP236, DP230</p> <p>Madeira Terraces & Black Rock Past Present & Future, DP253</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Retain and restore Terraces, retain green wall and original function of terrace</p>	<p>Emphasis should be on historical importance which should be retained, restored suitably and sympathetically maintained. Restore with support of Victorian Society.</p> <p>Retain Green Wall.</p> <p>The arches and terraces should remain an open space for promenading as its main function.</p> <p>Brighton is losing too much of its heritage, so the Terraces need to be protected.</p> <p>There is a need to see an explicit commitment to a conservation driven approach to the fabric repair; this cannot just be taken as implicit. Restoration should be functional as well as physical with full access to actual terrace.</p> <p>Any development should respect and retain original ironwork.</p>	<p>DP182, DP183, DP241, DP242, DP236, DP230 Madeira Terraces & Black Rock Past Present & Future, DP239 DP197, DP091</p> <p>DP184</p> <p>DP207 The Regency Society</p> <p>DP246</p>	
<p>Concerned with impact of proposals on Event Space</p>	<p>Any changes should not affect regular annual events e.g. Speed Trials.</p> <p>Must be able to host national and historic events.</p> <p>No consideration appears to have been given to how the uses within the terraces would be affected by the closing off of the Drive for special events.</p>	<p>DP183, DP197, DP239, DP182, DP241, DP308, DP236, DP230 Madeira Terraces & Black Rock Past Present & Future</p> <p>DP207 The Regency Society</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Proposed uses should be small scale, independent uses</p>	<p>Commercial uses should be restricted to small business units in the arches for artists, start-ups, artisans or independent cafes/ bars ice cream parlours etc. art studios, independent shops – ‘North Laine’/ Lanes/ Kemp Town feel.</p> <p>Uses such as art gallery, running track and sports facilities plus beach huts/chalets for day more suitable.</p> <p>Commercial uses should on lower level to enable upper and middle levels to be retained as viewing areas for events held at ground level.</p> <p>Any development should be within footprint of existing arches and of sympathetic character. Commercial development should supply and not impede public amenity.</p> <p>Involving commercial partners is a popular option in financially stretched times, but you can only lose these precious spaces once and then they are gone for good.</p>	<p>DP183, DP308, DP197, DP242, DP236, DP230</p> <p>DP246</p> <p>DP235</p> <p>DP308</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Proposals should involve or be led by community</p>	<p>Project should be council led in conjunction with the people of Brighton and Hove. Speculators are being invited to work against the community interest. Broken promises at the Terraces (all but Harvester now boarded up). Council allowed building above road level obscuring sea views.</p> <p>More enlightened and community faced proposals would benefit city more.</p> <p>First occasion when the local people have been allowed to have a say and be a part - this should be expanded upon.</p>	<p>DP183, DP212, DP236</p> <p>DP235</p> <p>DP308</p> <p>DP230 Madeira Terraces & Black Rock Past, Present and Future</p>	
<p>Concerns with how proposals will affect structure and fund maintenance of structure</p>	<p>Madeira Drive was not intended for use proposed but to be an attractive sheltered promenade. A few artisan stalls fine but structure needs proper restoration to form perfect backdrop to vintage car rallies and other events – whose income could help support the Arches.</p> <p>No evidence that there are businesses who have the discernment, skills and resources to invest in units.</p> <p>Regret the loss of the interior of Walk and Terrace as an arcade experience; infilling of stone paving/ grass verges will reduce valuable sheltered marginal room for participants of annual Madeira Events (and reduce instance and viability of these events).</p>	<p>DP081</p> <p>DP156 Kingscliffe Society</p>	

	<p>Question the practicality of commercial users indefinitely subsidising the maintenance and management of structures raise broader issues as to how the funding model can be applied to rest of the features (top railings, step railings lamp shelter and benches etc. to the west of Palace Pier).</p> <p>Amendments - commercial development should not impede public amenity in any way and any development to be within footprint of existing arches and of sympathetic character.</p>	DP235	
<p>Transport concerns - parking , public realm and shared space</p>	<p>The public realm would be much improved if parking is reduced at all times.</p> <p>Consideration should be given to restricting parking to low emission vehicles and the provision of charging points.</p> <p>Holmes Report ("Accidents by Design"), which was published by the House of Lords on 1st July recommends an immediate moratorium on shared space schemes, which while dominated by parking can never be a fully pedestrian prioritised space.</p> <p>Shared space is not an adequate alternative to a cycle path. Concerned with neglect of seafront cycling by the council. There needs to be a cycling highway east-west along the seafront – the seafront cycle route (NCN2, the South Coast Cycle Route) needs to be wide to accommodate the increasing numbers of riders. Often cycle path is obstructed by events and alternative routes not provided/ problematic.</p>	<p>DP207 The Regency Society</p> <p>DP316 Bricycles and Cycling UK</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Amend supporting text – needs and interest of elderly and disabled	Amend 3.32 specific references to needs and interests of elderly and disabled people. For many people the comparative tranquillity and unencumbered space on the East Cliff and Hove promenades are an intrinsic attraction – providing open views and a calm approach to the sports and children’s amenities at Peter Pan.	DP156 Kingscliffe Society	
Amend supporting text – to include reference to Madeira Lift and Shelter Hall and direct connections	<p>Amend 3.36 to mention Madeira Lift and Shelter Hall and further explanation/ exploration of the direct connection in terms of wider transport policy.</p> <p>There should be a long-term commitment to maintain the lift and provide a convenient and quick connection for pedestrians. Currently the signage and lighting is poor so an improvement for these facilities should also be included.</p>	<p>DP156 Kingscliffe Society</p> <p>DP177 The Brighton Society</p>	.
Remove reference to small hard standings on ‘back of the beach’ parallel to Madeira Drive	<p>Policy should be clarified and restricted to comments on Madeira Drive alone and SSA6 should be retitled to include all the beach areas south of Madeira Drive and include implications of lease agreed with Sea Lanes.</p> <p>It should be specified that any further developments on the beach should be categorised as temporary - there should be an aim to ensure that the south side of Madeira Terrace does not become a continuous built up area of the seafront which would remove any views of the sea.</p> <p>Basic visitor amenities such as toilets, shelter and kiosks should preferably be housed within the terraces rather than by increasing development on the actual beach. Proposed uses of arches will require wider footpath in front of arches.</p>	<p>DP177 The Brighton Society</p> <p>DP207 The Regency Society</p>	.

	<p>Urgent need for a strategic approach to the area which can offer a joined up approach to restoration of the terraces, improvement of the public realm and greater overall accessibility.</p> <p>There remains a significant shortfall in funding and BHCC fully recognise that private investment partners will be needed to make a success of the area with much needed financial contributions within a commercial scheme that works yet remains sensitive to the site constraints.</p> <p>Boxpark fully support the Regeneration Framework and its objectives and has put forward a commercial scheme to help move forward the prospects of full regeneration of this area.</p> <p>Sensible to include hotel accommodation as part of any Madeira Terrace proposals given proximity and relationship between site and Black Rock.</p> <p>Policy balances the heritage and conservation issues with the pragmatic realisation that, to bring about successful regeneration, private funds will be necessary as part of a joint venture.</p>		
<p>Support – caveat on transport/ access links/ improvements</p>	<p>Any development needs to be readily accessible and link with adjacent neighbourhoods (including business and retail areas).</p> <p>Access improvements along to the East end of Madeira Drive, to Black Rock and the Marina are needed. Does not feel safe after dark (no street lights, coherent pavements or cycle paths).</p> <p>Consideration should be given to the extension of Volks Railway to the Marina in any Black Rock/Madeira Drive Scheme.</p>	<p>DP208 BHEP</p> <p>DP266 Brighton Marina Neighbourhood Forum Steering Group</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support	The site includes numerous heritage assets that contribute to its uniqueness and special character (i.e. the Terrace itself, street lamps, shelters, etc.), and it is located within the East Cliff conservation area which is registered as a Heritage at Risk asset.	DP284 Historic England	
Support – benefits which would accord with NPPF and DEFRA 25 year Plan	Benefit of proposals recognised with regard to decreasing emissions and air pollution (through sustainable transport improvements); increased natural capital value of beach and ocean as green and biodiversity infrastructure (through improved access); biodiversity net gain and positive impact on existing ecological network (through conserving and enhancing biodiversity); use of brownfield site which would support relevant sections of NPPF and DEFRA 25 year plan.	DP189 Natural England	
Suggested Amendment – Green infrastructure net gains	A minimum requirement of GI development should be stated to ensure net gains can be achieved. Maintaining and enhancing G/BI is in line with the aims of the NPPF (171.) and the DEFRA 25 year plan (3.3.i).	DP189 Natural England	
Suggestions additions to policy – employment space and reference to Block Rock	<p>The employment space needs to be added to the policy to create activity all week and all year and not be seasonal.</p> <p>Temporary, or indeed any, use for Black Rock should be included in the policy.</p>	DP266 Brighton Marina Neighbourhood Forum Steering Group	

Amend policy – reference to complement Former Peter Pan Leisure site	Include similar wording as outlined in SSA6: <i>Compliment the regeneration of the Former Peter Pan leisure site (SSA6) and contribute to a coordinated approach to enhance the public realm.</i>	DP249 QED Sustainable Urban Developments	
	As a general point with the allocated sites - could not see any references regarding specific sites that are likely to be subject to contamination. It may be useful to make reference to contamination if this is appropriate.	DP162 Environment Agency	
Support (no supporting comments)		DP067, DP001	

SSA6 Former Peter Pan Leisure Site			
Total Number of Responses		18	
Number of Representations that Support		11	
Number of Representations that Object		7	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Object to development/ further development on the shingle beach	<p>No permanent buildings or structures should be permitted – inappropriate as public beach, supposed to be able to see the sea.</p> <p>We would welcome a stated confirmation that there will be no further development expanding beyond the delineated present and historical site, and that the length and integrity of the Volk's Railway Line will not be threatened.</p>	<p>DP091</p> <p>DP156 Kingscliffe Society</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Amendments sought – to preserve beach as a public facility, ensure sea views retained and restrict height of development	<p>Amend Policy: <i>The Council are committed to preserving the beach as a public facility with good sea views and preserving the special nature of Brighton and Hove. Attractive temporary structures for entertainment will be considered but not permanent structures.</i></p> <p><i>Commercial development only permitted where supplies public amenity. No residential, hotel or permanent event venues. No commercial development to impede public amenity in any way and any development to be small footprint, less than 10 foot high, not impeding sea views and of sympathetic character.</i></p> <p>Paragraph 3.41 - <i>development at beach level should <u>must</u> be primarily single storey and should <u>must</u> not exceed the height of the middle promenade.</i></p>	<p>DP091</p> <p>DP235</p> <p>DP156 Kingscliffe Society</p>	
Concerns policy criteria will be ignored	<p>Concerns with council breaking promises – for example at the Terraces - valuable community facilities been “given” to speculators and council have allowed developers to build above the level of the seafront road obscuring sea views. Concern this will happen again despite restrictions of policy wording on height of development on the Peter Pan site.</p>	<p>DP235</p>	
Object – hotel use	<p>Area of Maderia Drive and Maderia Terrace is an area entirely unsuitable for a hotel and Youth Hostel, far more suitable place with better transport links. Area should be restored and maintained in a suitable and sympathetic fashion – use would impact on events.</p>	<p>DP182</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object (no supporting comments)		DP270, DP234	
Support			
Support but seeks range of permitted uses to be widened	<p>Seeks 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 open air swimming pool so as to provide necessary flexibility for Madeira Drive to adapt and to complement proposals for Black Rock.</p> <p>3.40 – include <i>open air swimming pool</i>.</p>	DP249 QED Sustainable Urban Developments, DP250 Sealanes Brighton Ltd, DP251 Copsemill Properties Ltd.	
Additional criterion on temporary uses sought	<p>Additional criterion:</p> <p><i>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.</i></p> <p>So the site provides a flexible built environment as required.</p>	DP249 QED Sustainable Urban Developments, DP250 Sealanes Brighton Ltd, DP251 Copsemill Properties Ltd.	
Remove reference to 'open character' in supporting text	<p>3.41 – remove reference to 'open character' – consider historically/ photographic evidence shows the site has always supported a dense built environment and current wording will prevent any form of development of the site that blocks views of the sea event single storey development.</p>	DP249 QED Sustainable Urban Developments, DP250 Sealanes Brighton Ltd, DP251 Copsemill Properties Ltd.	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Amendments - cross reference to DM18 and guidance on minimum gap sizes	<p>Concern with who decides what counts as high quality (eg zip wire)</p> <p>A cross reference to DM18 High Quality Design and Places may be useful here.</p> <p>Suggestion that there should be views of sea through developed sites is welcomed - Some guidance on minimum gap sizes would be useful.</p>	DP207 The Regency Society	
Support with caveat	Development should be readily accessible and will link with adjacent neighbourhoods (including business and retail areas).	DP208 BHEP	
Support with caveat	General point with allocated sites – where sites are likely to be subject to contamination this should be referenced.	DP162 Environment Agency	
Support criterion c) with caveat	<p>Shared space is not an adequate alternative to a cycle path.</p> <p>Concerned with neglect of seafront cycling by the council. There needs to be a cycling highway east-west along the seafront – the seafront cycle route (NCN2, the South Coast Cycle Route) needs to be wide to accommodate the increasing numbers of riders. Often cycle path is obstructed by events and alternative routes not provided/ problematic.</p>	DP316 Bricycles and Cycling UK	
Support	Note criterion b).	DP287 Historic England	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support – benefits which would accord with NPPF and DEFRA 25 year Plan	Benefit of proposals recognised with regard to decreasing emissions and air pollution (through sustainable transport improvements); increased natural capital value of beach and ocean as green and biodiversity infrastructure (through improved access); biodiversity net gain and positive impact on existing ecological network (through conserving and enhancing biodiversity); use of brownfield site which would support relevant sections of NPPF and DEFRA 25 year plan.	DP189 Natural England	
Suggested Amendment – Green infrastructure net gains	A minimum requirement of GI development should be stated to ensure net gains can be achieved. Maintaining and enhancing G/BI is in line with the aims of the NPPF (171.) and the DEFRA 25 year plan (3.3.i).	DP189 Natural England	
Support (No supporting comments)		DP067, DP001 Pavilion Architecture	

SSA7 Land Adjacent to American Express Community Stadium, Village Way			
Total Number of Responses		12	
Number of Representations that Support		8	
Number of Representations that Object		4	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
General objection		DP274 LCE Architects	
	Concerned for potential increases in traffic on the A259 and B2123 generated by future developments.	DP303 Rottingdean Parish Council	
	The area is already saturated with development.	DP091	
Object, add word changes	<p>Amend policy to include:</p> <p>A1 retail directly associated with the stadium to be included as part of the range of acceptable uses. This would provide flexibility and allow Stadium’s retail store to be reconfigured to allow effective use of the Stadium and proposed East Stand building.</p> <p>Criteria d) unnecessary for any significant additional sustainable transport infrastructure given location and proposed uses. Remove reference to new sustainable transport infrastructure.</p>	DP264 The Community Stadium Limited	

	Criteria e) Object to reference to green walls and roofs – may not be best/ achievable solution and is too prescriptive and should be removed.		
Support			
General support		DP067, DP001 Pavilion Architecture	
	Notes that proposal could impact on the Strategic Route Network (SRN) and will need consideration by Highways England (HE). Due to close proximity of site to the SRN, HE must be consulted on any submitted applications.	DP112 Highways England	
Support with wording alterations – visual connectivity to South Downs National Park	<p>Very supportive, particularly justification para 3.45. Suggests referencing DM40 in a separate paragraph as independent issue.</p> <p>Suggest adding requirements to provide ‘visual connectivity’ to SDNP.</p> <p>In justification reference the proposal site as a gateway to the SDNP when exiting the city along a key transport route.</p> <p>Add reference to South Downs Integrated Landscape Character Assessment (in appendix a) when referencing the choice of materials and design approach of proposed developments.</p>	DP221 SDNPA	
Include reference to groundwater source and contamination (if appropriate)	<p>Text should state the site is in SPZ1, 2 and 3.</p> <p>Consistency in text between SSA4 and 7. Specific requirement f: <i>‘Development must ensure that groundwater sources are protected, to</i></p>	DP162 Environment Agency	

	<p><i>the satisfaction of the Environment Agency; Section 3 Special Area Policy, Strategic Site Allocations, Housing and Mixed Use Sites and other Site Allocations.'</i></p> <p>Reference specific sites that are likely to be subject to contamination.</p>		
Appropriate Response	Policy identifies potential for impact on surrounding heritage areas; should be reinforced by requiring heritage impact assessment.	DP284 Historic England	
	Support strategic allocations on assurance that developments will be accessible and link to adjacent neighbourhoods.	DP208 B&H Economic Partnership	
Reference to net gains of green infrastructure	<p>Notes that sustainable infrastructure provision, development requirements referring to biodiversity, wider landscaping - features such as green walls and requiring protection of ground water sources are methods which contribute to achieving many aims (reducing vehicular emissions, preserving ecological networks, etc) set out in the NPPF.</p> <p>A minimum requirement of GI development should be stated to ensure net gains can be achieved.</p>	DP189 Natural England	

H1 Housing and Mixed Use Sites			
Total Number of Responses		197	
Number of Representations that Support		25	
Number of Representations that Object		169	
Number of Representations – Other		3	
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
General objection	The Council should be deciding what is needed and inviting the community's input on what, when and where, not the developer's.	DP091	
General objection	Should not build on greenbelt or heritage assets. Brownfield sites should be developed first.	DP091, DP194, DP348, DP159	
General objection	Sites with capacity under 10 units should also be allocated to boost delivery.	DP002 Brighton YIMBY	
General objection	Housing target of 13,200 is too low.	DP002 Brighton YIMBY	
General comment	The Plan only allocates sites to provide 3,611 dwellings, leaving a significant shortfall of dwellings against the target.	DP131 Mid Sussex District Council	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	Windfall allowance is too high (1,250 units, which represents almost 10% of the total supply).	DP131 Mid Sussex District Council	
Further sites should be allocated	Sites identified through the Estates Regeneration programme, which are not currently formally allocated, should be assessed through the SHLAA process, and suitable sites allocated for inclusion.	DP131 Mid Sussex District Council	
Further sites should be allocated	An additional source of housing sites identified in the Council's Housing Provision paper is Council owned land; the paper notes that as these sites come forward, they will be identified in the annual SHLAA updates. We would strongly encourage the Council to review the availability of these sites now, and assess them through the SHLAA process so that they can be allocated.	DP131 Mid Sussex District Council	
Higher densities required	Criteria for accepting densities lower than 50dph are not justified and do not comply with paragraph 123 of the NPPF.	DP131 Mid Sussex District Council	
Tall Building guidance should be reviewed	Updated Tall Buildings Guidance should provide a more flexible framework which encourages the development of higher buildings within the City, where appropriate, to deliver more homes in sustainable, accessible locations.	DP131 Mid Sussex District Council	
Transport impacts must be considered to support major development	Brownfield sites at Shoreham and Brighton Marina will not deliver required housing numbers without major transport improvements.	DP002 Brighton YIMBY	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
General comment	BHCC should take every opportunity in CPP2 to deliver higher levels of much needed housing, where this is possible and where evidence is available to support such increases.	DP214 B&H Design/Build Co.	
Policies are inconsistent	The sites within H1 and H2 are entirely contradictory. H1 requires intense development with the resultant demolition of five large family homes, whilst H2 requires the developments to have 50% of 3+ bedroom large family homes because of the dire lack of such properties.	DP213 Patcham Ward Councillors	
Extra criterion requested	The majority of the sites listed in Table 5 and Table 6 are brownfield and therefore there is a big opportunity to achieve measurable net gains to biodiversity and green infrastructure provision through their development. We would like to see wording to this effect included.	DP289 Sussex Wildlife Trust	
Further justification required	It is not clear whether the OAN has been provided for as anticipated by Part 1 of the development plan. To ensure the soundness of the plan, we consider that further evidence is required to demonstrate exactly how the OAN is met. Without further clarification we do not support the policies.	DP281 Toads Hole Valley Landowners, Toads Hole Valley Ltd, Pecla Investments Ltd	
Clarification requested	For clarity it should be stated that all mixed use sites must have a substantial housing element within them.	DP258 B&H Planning Agents	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
More flexibility requested	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, e.g. requirement for 300 PBSA bedspaces at Pelham Street.	DP257 MET College	
Minor change requested	Should be stated in policy that the identification of sites should continue given growing discrepancy between supply and demand.	DP157 Hove Civic Society	
	General objection.	DP116, DP061, DP026, DP034	
46-54 Old London Road, Patcham	Development of the site will affect residential amenity (light/views/privacy etc).	DP092, DP090, DP018, DP022, DP040, DP038, DP213 (Patcham Ward Councillors), DP129, DP139, DP347, DP147, DP155, DP171	
46-54 Old London Road, Patcham	Development of the site will have a negative impact on biodiversity/trees/wildlife.	DP092, DP090, DP088, DP078, DP075, DP130, DP108, DP103, DP023, DP022, DP016, DP012, DP020, DP033, DP041, DP040, DP039, DP243, DP226, DP225, DP252 (Conservative Group), DP204, DP139, DP216, DP347, DP288, DP276, DP147, DP151, DP164, DP192, DP155, DP190, DP180, DP144, DP171, DP185	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
46-54 Old London Road, Patcham	<p>The quantum of development proposed represents overdevelopment of the site and/or will affect the village feel of Patcham.</p>	<p>DP092, DP088, DP081, DP079, DP078, DP062, DP073, DP074, DP071, DP070, DP069, DP068, DP075, DP115, DP133, DP267, DP130, DP128, DP125, DP118, DP094, DP106, DP105, DP104, DP103, DP102, DP099, DP059, DP018, DP032, DP029, DP025, DP024, DP023, DP022, DP035, DP016, DP013, DP012, DP010, DP020, DP048, DP060, DP058, DP057, DP056, DP055, DP052, DP051, DP033, DP049, DP138, DP046, DP045, DP043, DP041, DP040, DP039, DP038, DP050, DP229, DP228, DP227, DP226, DP225, DP220, DP215, DP252 (Conservative Group), DP213 (Patcham Ward Councillors), DP209, DP129, DP204, DP139, DP194, DP216, DP349, DP347, DP318, DP305, DP304, DP247, DP290, DP248, DP288, DP286, DP276, DP302, DP149, DP147, DP151, DP165, DP164, DP146, DP192, DP166, DP206, DP155, DP154, DP152, DP177 Brighton Society, DP190, DP141, DP142,</p>	

		DP143, DP145, DP144, DP171, DP168, DP196, DP245, DP030	
46-54 Old London Road, Patcham	Development of the site would add to congestion/parking problems in Patcham.	DP090, DP087, DP081, DP079, DP062, DP074, DP071, DP068, DP064, DP063, DP267, DP130, DP128, DP125, DP121, DP118, DP094, DP108, DP106, DP105, DP104, DP103, DP099, DP059, DP117, DP018, DP032, DP029, DP023, DP022, DP035, DP016, DP015, DP012, DP011, DP107, DP048, DP056, DP052, DP051, DP033, DP049, DP138, DP047, DP046, DP045, DP041, DP040, DP039, DP038, DP050, DP243, DP232, DP228, DP226, DP225, DP215, DP252 (Conservative Group), DP209, DP129, DP204, DP216, DP348, DP347, DP247, DP290, DP288, DP286, DP276, DP302, DP149, DP161, DP147, DP151, DP165, DP164, DP192, DP166, DP159, DP155, DP148, DP142, DP180, DP173, DP171, DP196, DP245, DP030	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
46-54 Old London Road, Patcham	The site is at risk of flooding and should therefore not be allocated.	DP090, DP088, DP087, DP079, DP078, DP073, DP074, DP068, DP064, DP075, DP128, DP094, DP108, DP106, DP103, DP018, DP023, DP022, DP035, DP016, DP015, DP012, DP011, DP048, DP060, DP053, DP033, DP049, DP138, DP041, DP040, DP038, DP243, DP232, DP229, DP227, DP226, DP215, DP213 (Patcham Ward Councillors), DP209, DP129, DP204, DP139, DP200, DP194, DP216, DP348, DP347, DP318, DP307 Green Group, DP305, DP304, DP247, DP248, DP288, DP276, DP262, DP302, DP161, DP147, DP165, DP164, DP166, DP159, DP155, DP148, DP180, DP173, DP171, DP185, DP196, DP245	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
46-54 Old London Road, Patcham	A planning application for the development of the site has recently been refused which demonstrates that the site is unsuitable for more intensive development.	DP087, DP084, DP081, DP062, DP072, DP069, DP267, DP130, DP118, DP108, DP102, DP117, DP029, DP025, DP024, DP019, DP014, DP020, DP039, DP037, DP232, DP227, DP193, DP216, DP349, DP304, DP247, DP248, DP302, DP151, DP165, DP146, DP206, DP148, DP190, DP141, DP145, DP144, DP174, DP173, DP171	
46-54 Old London Road, Patcham	Not all landowners may be prepared to sell.	DP232, DP213 (Patcham Ward Councillors), DP286, DP159	
46-54 Old London Road, Patcham	Development would set a precedent for other large scale developments in the area.	DP019	
46-54 Old London Road, Patcham	No detailed information is provided which makes responding difficult.	DP005	
46-54 Old London Road, Patcham	The proposed development would have a negative effect on property values.	DP033, DP220	
46-54 Old London Road, Patcham	Development of the site would cause disruption during construction.	DP033, DP043	
46-54 Old London Road, Patcham	Development of the site would cause more pressure on local community facilities.	DP046, DP039, DP232, DP129, DP200, DP185, DP196, DP030	
46-54 Old London Road, Patcham	Design, height and density is unknown.	DP039, DP180	
46-54 Old London Road, Patcham	Loss of five family homes.	DP252 (Conservative Group)	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
46-54 Old London Road, Patcham	There is no interest from developers except McCarthy & Stone.	DP213 (Patcham Ward Councillors)	
46-54 Old London Road, Patcham	Proposed design not in keeping.	DP166	
46-54 Old London Road, Patcham	General objection.	DP188	
Land between Manchester Street/Charles Street, Brighton, BN2 1TF	Concern over potential complaints from future residential occupiers regarding noise and general on-street activity from the existing lawful late-night premises adjacent (Charles Street Tap) – see NPPF para 182.	DP119 Stonegate Pub Company	
270 Old Shoreham Road	Allocation for residential uses is not supported. Site is in an industrial area and landowner intends to redevelop for employment use (B1a/B8).	DP065 Big Yellow Storage Ltd	
Former Hollingbury Library	Concerns regarding access, drainage surface and sewers, parking and traffic congestion and educational capacity.	DP029	
Belgrave Centre and ICES, Clarendon Place, Portslade	Proposed allocation of the Portslade site in policy H1 supported subject to the deliverable quantum of development being increased to reflect the proposals now being prepared (120 units). NPPF places great emphasis on the need for previously developed land (PDL) / brownfield sites, to be put to the most efficient use.	DP214 B&H Design/Build Co.	
Kingsway/Basin Road North (site AB4 in Shoreham Harbour JAAP)	There is nothing in the supporting text of City Plan Part Two, e.g. paragraph 3.50, to explain that the figures in table 6 may include permissions and completions. Our concern is that in the future the figure in Table 6 could be misinterpreted as being for development on the parts of site AB4 remaining after the completion of development on the Britannia House and Portzed sites.	DP195 KAWRA	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Land between Marina Drive and rear of 2-18 The Cliff	<p>Site should not be allocated as it is designated in CPP2 as a Local Wildlife Site. If the council choose to pursue this allocation, then there must be acknowledgement of the designation and the presence of priority habitat and species within the policy wording, along with suggested measures to avoid adverse impacts.</p> <p>Object to site allocation.</p>	<p>DP289 Sussex Wildlife Trust</p> <p>DP317 Rottingdean Coastal Councillors</p>	
Former St Aubyn's School, 76 High Street Rottingdean	<p>Allocation for 40 units supported to redevelop dilapidated brownfield site.</p>	<p>DP317 Rottingdean Coastal Councillors</p>	
27-31 Church Street, Brighton	<p>The provision of additional retail space in this location is considered unlikely to attract tenants or contribute towards an active street frontage. The policy should allow for complementary uses including food and drink establishments, professional services and appropriate leisure uses that would make a positive contribution to the regional centre. We consider that the policy should not be overly restrictive and should not limit any one area of the site to a specific use. Any future proposals should be considered on their merits, accepting the general desire to retain an active ground floor frontage and deliver a balanced and sustainable development.</p>	<p>DP261 Hargreaves</p>	
25 Ditchling Rise / rear of 57-63 Beaconsfield Road	<p>Landowner has undertaken viability analysis based on redevelopment for 15 units and found that it is not sufficiently viable. Increasing the number of units or reducing requirements such as affordable housing/CIL may make redevelopment more attractive.</p>	<p>DP186</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Various sites	<p>Local wastewater infrastructure in closest proximity has limited capacity to accommodate the proposed development at these sites: <i>87 Preston Road, 251-253 Preston Road, Preston Park Hotel, Downsman Pub, Victoria Road Former Housing Office.</i></p> <p>There is existing water and/or wastewater infrastructure under the following sites;</p> <p><i>76-79 & 80 Buckingham Road, Brighton Eastergate Road Garages, Moulsecoomb, Brighton Land between Manchester Street/Charles Street, Brighton Baptist Tabernacle, Montpelier Place, Brighton Old Ship Hotel (garage), 31-38 Kings Road Brighton Saunders Glassworks, Sussex Place, Brighton Selsfield Drive Housing Office, Selsfield Drive, Brighton Tyre Co, 2-16 Coombe Road, Brighton Whitehawk Clinic, Whitehawk Road, Brighton Buckley Close garages, Hangleton 189 Kingsway, Hove Kings House, Grand Avenue, Hove Land at and surrounding Downsman Pub, Hangleton Way, Hove Victoria Road Former Housing Office, Victoria Road, Portslade Land at the corner of Fox Way and Foredown Road, Mile Oak Land south of Lincoln Street Cottages, 15-26 Lincoln Street, Brighton Belgrave Centre and ICES, Clarendon Place, Portslade City College, Pelham Tower (and car-park), Pelham Street The Astoria, 10-14 Gloucester Place, Brighton Post Office site, 62 North Road, Brighton Former Brewery site, South Street, Portslade 27-31 Church Street Former Dairy Crest Site, 35-39 The Droveaway, Hove Kingsway/Basin Road North Church Road/Wellington Road/ St Peter's Road.</i> This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout. This easement should be clear of all proposed buildings and substantial tree</p>	DP201 Southern Water	

	planting. For the sites in the first list above, where wastewater capacity is limited, we recommend the following criterion be added; Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider. For the sites in the second list above, where there is existing infrastructure under the site, we recommend the following criterion be added; Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.		
Support			
Former St. Aubyn's School 76 High Street Rottingdean	The indicative number of 40 residential units for the former St Aubyn's site is noted and RPC is pleased to see the St Aubyn's Planning Brief referenced as a guiding document.	DP303 Rottingdean PC	
St. Aubyns	Important to maximise housing within the City by developing appropriate sites.	DP196, DP066, DP208 BHEP, DP251 Copsemill Properties	
Support with caveat regarding traffic modelling	Confirmation required that the cumulative impact of the development sites has been included within the strategic modelling and therefore included within the agreed junction mitigations. If not, further consideration of appropriate mitigation may be required.	DP112 Highways England	
General comment	Key worker housing should be provided in the city.	DP101 B&H Clinical Commission Group	
Support with caveat	All sites should be assessed for heritage impacts and where appropriate a heritage impact assessment required as part of the site allocation assessment.	DP284 Historic England	
Minor changes requested	The following sites are within 500m of LNRs and as such consideration could be made regarding specific mitigation: 46-54 Old London Road, Patcham BN1 8XQ; Eastergate Road Garages, Moulsecoomb, Brighton, BN2 4PB.	DP189 Natural England	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Consider reference to protecting groundwater	There is nothing in the policy acknowledging that development must ensure that groundwater sources are protected (consistency with the writing of SSA4 and SSA7 would be recommended).	DP162 Environment Agency	
	No references regarding specific sites that are likely to be subject to contamination.	DP162 Environment Agency	
	We 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 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).	DP162 Environment Agency	
	General support.	DP122, DP001, DP067, DP082, DP095, DP245, DP160, DP277, DP030, DP167	
46-54 Old London Road	Site is suitable for more intensive development, however a less dense scheme with houses would be more appropriate , with measures to prevent parking on street and mitigate other issues such as flood risk.	DP294	
46-54 Old London Road	Housing density is lower in Patcham so there is capacity for additional dwellings.	DP054	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
46-54 Old London Road	Developer contributions could be used to improve flood defence mechanisms.	DP054	
46-54 Old London Road	New housing supply needed to lessen price rises.	DP054	
PO Site 62 North Road Brighton	Allocation supported, however quantum of development represents underdevelopment. Council shouldn't impose arbitrary caps on development. Indicative scheme has been submitted with representation.	DP282 Royal Mail	
PO Site 62 North Road Brighton	Should not specifically reference the commercial use class. Flexibility may bring forward offices, leisure uses, or retail, or a mixture which would reduce risk of vacancy.	DP282 Royal Mail	
Land between Manchester Street/Charles Street, Brighton	The freeholders do not wish for the potential future uses of the plot to be restricted or limited to residential led development. A more flexible allocation might include an allocation that allows a stand-alone hotel or other commercial, retail or leisure use in addition or as alternatives to residential led development.	DP224 NEK Holdings	
Former St Aubyn's 76 High Street Rottingdean	Allocation supported, however housing requirement should be increased to be consistent with the amount proposed as part of the current planning application.	DP279 Fairfax Acquisitions	
COMMENT			
General comment	There doesn't seem to be anything new here (sites are already identified in SHLAA and BLR) and a number of these sites are either not available (yet) or are owned by the Council and will probably be developed by them or are already being developed.	DP217 B&H Community Land Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
OMISSION SITES			
Dolphin House, Manchester Street, Brighton	Site is suitable for housing development (20 units). Hargreaves - as freeholders of the property - consider it unlikely that there will be sufficient market interest in the site for office accommodation once the existing use cease.	DP261 Hargreaves	
Hove Sorting Office Site, 88 Denmark Villas	Allocated in SHLAA and should be identified for housing if it becomes available to help achieve aims of Policy DA6 and Neighbourhood Plan.	DP282 Royal Mail	
12 Richmond Parade, Brighton	Landowner intends 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.	DP251 Copsemill Properties	
RSCH Outpatients Department	Site should be allocated for residential development under policy H1 for an indicative 80 residential units.	DP265 Mid Group	
Patcham Bowling Green & tennis courts, Mackie Park and Horsedean Lane rec	These sites are underused and could be used for much needed Housing.	DP167	

H2 Housing Sites – Urban Fringe			
Total Number of Responses		75	
Number of Representations that Support		18	
Number of Representations that Object		55	
Number of Representations – Other		2	
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
General comments on housing numbers	Seek clarification that the housing allocations proposed in Policy H2 meet the housing requirements set out in City Plan Part One Policy CP1.	DP281 Toads Hole Valley Landowners	
General concerns about development on urban fringe	<p>Concerned that allocation of H2 sites will lead to further development on the urban fringe.</p> <p>Development of the urban fringe would considerably diminish the quality of life of local people in these areas.</p> <p>Over-development with lack of infrastructure.</p>	<p>DP213 Conservative Councillors for Patcham Ward</p> <p>DP096</p> <p>DP091</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Too little development proposed on urban fringe	<p>The proposed housing allocations on the urban fringe have been reduced, which will result in more development pressure in the built up part of the city. Also consider that the proposed allocations are too small to support necessary community facilities and sustainable transport. The council should seek to identify a larger area in the eastern part of the city for a new city quarter where a proper infrastructure can be supported.</p> <p>With the current housing situation in the city not enough of the urban fringe is being used. The entire area under the council's jurisdiction should be earmarked for some form of housing.</p> <p>Some of the sites identified in the 2015 Urban Fringe Assessment have been removed.</p>	<p>DP157 Hove Civic Society</p> <p>DP002 Brighton YIMBY</p> <p>DP217 Brighton & Hove Community Land Trust</p>	
Need to prioritise development of brownfield sites	<p>Consider that there are numerous brownfield sites in the city and these should be developed ahead of urban fringe sites.</p> <p>Concerned that greenfield urban fringe sites will be more attractive to developers and developed ahead of brownfield sites.</p> <p>Development could potentially be intensified on identified brownfield sites in the city (to relieve pressure on the urban fringe).</p>	<p>DP095; DP113; DP136; DP229; DP262; DP276; DP286; DP288; DP300; DP348</p> <p>DP213 Conservative Councillors for Patcham Ward</p> <p>DP307 Green Group of Councillors</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
More flexibility needed in policy	<p>The policy does not allow for site specific evidence to inform proposals or for viability to be considered. Flexibility must be incorporated into the policy to ensure the Plan is effective and ensure that housing is delivered on these sites. Recommend including a sentence in policy to allow site specific considerations and local housing needs evidence, to be taken into account in determining whether the stated criteria and requirements should be applied.</p>	<p>DP214 City of Brighton & Hove Design & Build Company</p>	
Site capacity / development densities	<p>Planning applications on urban fringe sites should be required to demonstrate that maximum density is being achieved. Because of the sensitivity of the urban fringe each site needs to be individually assessed.</p> <p>Sites on the urban fringe could be built at an increased density, and this should be encouraged. Given the proximity of the National Park, the provision of open space (except for parks and public recreation) is unnecessary and wastes the limited land available.</p> <p>Three of the proposed sites have a higher number of dwellings than assessed in the Urban Fringe Assessment, however there is no explanation in the draft Plan or background papers to justify these changes.</p> <p>The density identified for the Urban Fringe sites is well below the other proposed allocations in the draft Plan and contradictory to</p>	<p>DP207 The Regency Society</p> <p>DP002 Brighton YIMBY</p> <p>DP289 Sussex Wildlife Trust</p> <p>DP217 Brighton & Hove Community Land Trust</p>	

	<p>Policy DM19 above and the new NPPF. The suggested densities should be increased to match the surrounding grain of development in the areas where the sites are situated. The low densities do not recognise the desperate lack of affordable housing in these areas and will attract volume house builders who will build large 4/5 bed 'executive homes' which will be unaffordable for most of the city's residents.</p> <p>The proposed densities are well below what is recommended in the NPPF and in the Draft City Plan Part Two. The dwelling numbers are based on the Urban Fringe Assessment which is not based on detailed studies. More flexibility is required to ensure efficient use of land in the context of location and detailed ecological, visual, landscape and other assessments (e.g transport). At worst, the numbers should be stated as a minimum.</p> <p>The need for family homes is recognised and it is accepted that the urban fringe sites are good locations to provide them. However, the lower densities will attract major house builders that will provide 4/5 bed detached houses. More affordable options should be considered, e.g 2.5 and 3 storey terraced houses.</p> <p>Given that the City Plan housing target only seeks to deliver a proportion of the city's housing needs (less than half) and even that target is not being met, there is a vital need for development management policies which positively and appropriately improve delivery.</p>	DP258 Brighton & Hove Planning Agents Forum	
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Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Affordable housing	The sites listed in Table 7 should be developed as 100% genuinely affordable housing. This should include providing housing at affordable rents, e.g based on the 'living wage/rent' concept and 'Good Landlord' scheme rents.	DP307 Green Group of Councillors	
	Development of the urban fringe sites should keep use of private vehicles to a minimum. Discussions should be undertaken with public transport providers in order that sustainable modes of transport are designed into development proposals.	DP307 Green Group of Councillors	
Wording of policy introduction	The wording "some housing development" is not clear or precise and does not indicate that the council is seeking to maximise the development potential of the proposed sites. The word "some" should be deleted as it contradicts the aims of national policy. Any restrictions on the opportunities at a site to deliver housing will become evident from site specific assessment and surveys.	DP214 City of Brighton & Hove Design & Build Company	
Planning for wastewater infrastructure	<p>Assessment of existing capacity shows that local wastewater infrastructure in closest proximity to the following sites has limited capacity to accommodate the proposed development: Land at Mile Oak Road, Portslade; Land at and adjoining Brighton Race Course; Land at Ovingdean Hall.</p> <p>Planning policies and planning conditions will be needed to ensure that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment in accordance with the NPPF. For these sites, we</p>	DP201 Southern Water	

	<p>recommend that the following criterion is added: “Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.”</p> <p>Assessment undertaken shows that there is existing Southern Water infrastructure under the following sites: Land at Mile Oak Road, Portslade; Benfield Valley; Land at Ladies Mile, Carden Avenue; Land at South Downs Riding School & Reservoir Site; Land north of Warren Road,(Ingleside Stables); Land at former nursery, Saltdean; Cluster at Coombe Farm and Saltdean Boarding Kennels.</p> <p>This infrastructure needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout. This easement should be clear of all proposed buildings and substantial tree planting. For these sites, we recommend the following policy criterion be added: “Layout is planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.”</p>		
Transport impacts	Require confirmation that the cumulative impact of the development sites has been included within the strategic modelling and therefore included within the agreed junction mitigations. If not, further consideration of appropriate mitigation may be required.	DP112 Highways England	
Impact on existing rights of way	Development on some of the urban fringe sites would cut across existing rights of way, including the Brighton and Hove Way, which would be contrary to policy in the NPPF (para 69) and DEFRA guidance (para 7.11).	DP307 Green Group of Councillors	
Ecology	A renewed ecology study needs to be undertaken.	DP307 Green Group of Councillors	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Biodiversity impacts	<p>Seven of the sites listed in Table 7 are designated for their biodiversity value, with a further allocation on a candidate Local Wildlife Site. Consider this is contrary to the NPPF and the objective for local plans to promote sustainable development. Local Wildlife Sites are a critical component of the city's ecological network and therefore must be safeguarded through the local plan. Consider these allocations conflict with the requirements of draft Policy DM37 and that the council has not demonstrated why the sites listed in Table 7 are justified.</p> <p>Consider that the following site allocations should be removed from Table 7 and the Policies Map – or the boundaries redrawn to remove land within a site designated for its biodiversity value: Land at Oakdene, Southwick Hill / Land West of Mile Oak Road; Land at Mile Oak Road, Portslade Benfield Valley; Land at and adjoining Brighton Race Course Land; Land North of Warren Road (Ingleside Stables); Land to north east of Coldean Lane / Land north of Varley Halls / Land south of Varley Halls; Land adjacent to Ovingdean; Falmer Road, Ovingdean; Land at and adjoining Horsdean Recreation Ground, Patcham (subject to progression of Local Wildlife Site designation).</p> <p>If the council chooses to pursue these allocations, there must be acknowledgement of the designation and the presence of priority habitat and species within the policy wording, along with suggested measures to avoid adverse impacts. However, even with the addition of more comprehensive policy wording, the Sussex Wildlife Trust will continue to object to these allocations.</p>	DP289 Sussex Wildlife Trust	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Environmental standards and requirements	<p>Development on the urban fringe sites should constitute environmentally visionary development, incorporating measures to help mitigate or adapt to climate change and reduce greenhouse gas emissions. Development should be BREEAM Outstanding, carbon neutral and charged with opening up access to the National Park. The local planning authority should liaise with the South Downs National Park Authority and local amenity organisations to ensure that particular attention is paid to archaeological remains, protection of fauna and flora, and that important views and vistas are protected. The thoughts of Councillors through temporarily convened meetings of the Asset Management Board could be incorporated too for particularly difficult decisions.</p>	DP307 Green Group of Councillors	
Criterion a) – provision for family-sized dwellings	<p>The ability of the sites to deliver a specific quantum of family homes will be dependent upon site survey results and characteristics, which the council has not yet assessed. The Urban Fringe Assessment is a high level assessment only. The council should seek to ensure that a range of housing sizes, types and tenures are delivered to meet local needs. In some locations, it is possible that a higher demand may exist for smaller homes. The policy should therefore allow some flexibility.</p> <p>Providing a set requirement for housing types on the urban fringe sites also contradicts the aims of draft Policy DM1 which states that proposals should include a range of dwelling types, sizes and tenures that reflect and respond to the city's needs, and that is subject to the character, location and context of the site.</p>	DP214 City of Brighton & Hove Design & Build Company	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Criterion b) – open space	The policy supports opportunities to secure additional and improved publically accessible open space yet some of proposed allocations are already designated as open space (e.g Urban Fringe Sites 16 and 17), so the policy will have the opposite effect.	DP213 Conservative Councillors for Patcham Ward	
Criterion c) – green infrastructure	Development of urban fringe sites will adversely impact on the Green Infrastructure network and is contrary to Policy SA4 Urban Fringe and draft Policy DM37 Green Infrastructure and Nature Conservation.	DP213 Conservative Councillors for Patcham Ward	
Criterion d) – linkages to the SDNP	Policy H2 states that there must be improved linkage and access to the South Downs National Park yet developing Urban Fringe Sites 16 and 17 impedes this.	DP213 Conservative Councillors for Patcham Ward	
Comments on Reasoned Justification	Paragraph 3.55 should be worded more strongly to encourage community-led housing, i.e “Community-led housing will be encouraged on these sites.”	DP217 Brighton & Hove Community Land Trust	
Benfield Valley (Sites 10,11 & 12)	Consider that Benfield Valley has potential for significantly more housing development than indicated in Table 7 (detailed comments are provided in response to Policy SA7).	DP274 LCE Architects; DP287 Fairfax Acquisitions	
Land at/adj Horsdean Recreation Ground (UF Site 16)	Insufficient detail is provided to guide development in terms of access, style, density, character, impact on adjacent properties, privacy, overlooking and amenity.	DP286; DP213 Conservative Councillors for Patcham Ward	
	The site is too small to accommodate 25 dwellings.	DP093	
	If the site is developed, it should be provided as affordable housing.	DP113	
	Development would damage the character of the local area/Patcham.	DP039; DP196; D243; D262	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	The site provides open space for the local community – e.g for recreation, walking etc, which is well used and valued by local people.	DP027; DP098; DP113; DP123; DP160; DP196; DP229; DP243; DP262; DP276; DP286; DP288; DP318; DP213 Conservative Councillors for Patcham Ward	
	Development/access to the site would impact on the adjoining recreation ground and allotments.	DP136; DP027; DP229; DP262; DP277; DP318	
	Access to the site is very difficult as it would have to cross playing fields cutting across Horsdean Recreation Ground, Vale Park and Braeside Linear Woods. Access from Barrhill Avenue would require demolition of a house.	DP093; DP159; DP196; DP262; DP277; DP348; DP213 Conservative Councillors for Patcham Ward	
	Development would create traffic impacts/add to congestion/ parking problems/cause noise and pollution.	DP027; DP039; DP093; DP123; DP136; DP229; DP232; DP276; DP286; DP288; DP318; DP213 Conservative Councillors for Patcham Ward	
	Development would create severe traffic/parking impacts on Vale Avenue and its exit onto the A27/A23 roundabout junction.	DP027; DP093; DP123; DP136; DP196; DP232; DP276; DP288; DP213 Conservative Councillors for Patcham Ward	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	Development (in combination with the other proposed housing sites in Patcham) will lead to more pressure on local facilities (e.g schools, doctors, dentists etc).	DP136; DP196; DP232; DP276; DP286; DP288; DP213 Conservative Councillors for Patcham Ward	
	Development will have potential impacts on surface and foul water drainage on already over-capacity drains and sewers. The policy provides no detail on how these impacts would be mitigated.	DP136; DP159; DP229; DP243; DP276; DP288; DP318; DP213 Conservative Councillors for Patcham Ward	
	Development will cause potential impacts/risks with regard to water supply collection and extraction zones, however this issue is not mentioned in the policy.	DP213 Conservative Councillors for Patcham Ward	
	Development would cause potential noise/air pollution impacts due to the site's proximity to the A27 Bypass.	DP213 Conservative Councillors for Patcham Ward	
	Object to allocation/ the site is unsuitable for housing (no reasons given).	DP087; DP256 The Conservative Group	
Land at Ladies Mile (UF Site 17)	Insufficient detail is provided to guide development in terms of access, style, density, character, impact on adjacent properties, privacy, overlooking and amenity.	DP286; DP300; DP213 Conservative Councillors for Patcham Ward	
	The proposed housing density would be higher than that of the surrounding residential development.	DP095; DP163	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	Development would damage the character of the local area/Patcham.	DP039; DP082	
	The site is provides open space for the local community – e.g. for recreation, walking etc.	DP082; DP116; DP229; DP276; DP286; DP288; DP306; DP213 Conservative Councillors for Patcham Ward	
	The site is currently designated as open space – School Playing Fields.	DP213 Conservative Councillors for Patcham Ward	
	Development would create a threat to the Local Nature Reserve.	DP163; DP229; DP232	
	Development would create traffic impacts/add to congestion/ cause parking problems/cause noise and pollution.	DP039; DP082; DP095; DP116; DP276; DP286; DP288; DP213 Conservative Councillors for Patcham Ward	
	Development would cause potential severe traffic impacts on Ladies Mile Road.	DP095; DP348; DP213 Conservative Councillors for Patcham Ward	
	Access to the site is extremely difficult.	DP095; DP277	
	Access should be from Carden Avenue not Ladies Mile Road.	DP160; DP277	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	The site poorly located for sustainable transport due to a lack of nearby public transport connections.	DP213 Conservative Councillors for Patcham Ward	
	Development (in combination with the other proposed housing sites in Patcham) will lead to more pressure on local facilities (e.g schools, doctors, dentists etc).	DP116; DP163; DP232; DP276; DP286; DP288; DP213 Conservative Councillors for Patcham Ward	
	The policy includes no detail regarding the impact of development on surface and foul water drainage, or consideration of mitigation and how it will affect already over-capacity drains and sewers.	DP232; DP276; DP288; DP213 Conservative Councillors for Patcham Ward	
	Development will cause potential impacts/risks on water supply collection and extraction zones, however this issue is not mentioned in the policy.	DP213 Conservative Councillors for Patcham Ward	
	Object to allocation/ the site is unsuitable for housing (no reasons given).	DP256 The Conservative Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
<p>Land at Coldean Lane / Land north of Varley Halls (Sites 21 & 21a)</p>	<p>Consider that Site 21 has potential for up to 250 homes based on site specific surveys and assessments being undertaken, which go beyond those undertaken to inform the Urban Fringe Assessment and draft CPP2. Table 7 should be updated to show a potential housing figure of c250 homes. Failing this, the housing numbers should be shown as a minimum requirement.</p> <p>The suggested site capacity of 100 homes does not reflect the Urban Fringe Assessment which suggested that 130 homes could be achieved.</p> <p>Provision of 35% 3+ bedroom houses is not appropriate given the site specific characteristics, topography and housing needs in the area, especially given the prospective developer’s focus on maximising affordable housing on the site and the lack of requirement for 3+ bed flatted units. Development of flats on this site would maximise the development opportunity, utilise land efficiently and reflect the character of the site’s immediate setting. However, flats containing 3 or more bedrooms may not necessarily be required by the community.</p>	<p>DP214 City of Brighton & Hove Design & Build Company</p>	
	<p>Land north of Varley Halls should be allocated for Purpose Built Student Accommodation (PBSA), rather than residential units, due to its proximity to the university - it is likely to become HMOs in the long term anyway.</p>	<p>DP317 Rottingdean Coastal Councillors</p>	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Land at and adj Brighton Race Course (Site 30)	<p>Consider that the site has potential for up to 220 homes in the form of flatted development reflecting the development immediately adjacent to the site. Table 7 should be updated to show a potential housing figure of c220 homes. Failing this, the housing numbers should be shown as a minimum requirement.</p> <p>Provision of 35% 3+ bedroom houses is not appropriate given the site specific characteristics, topography and housing needs in the area, especially given the prospective developer's focus on maximising affordable housing on the site and the lack of requirement for 3+ bed flatted units. Development of flats on this site would maximise the development opportunity, utilise land efficiently and reflect the character of the site's immediate setting. However, flats containing 3 or more bedrooms may not necessarily be required by the community.</p>	DP214 City of Brighton & Hove Design & Build Company	
Land at South Downs Riding School & Reservoir Site (UF Sites 32 & 32a)	Development at Site 32a could not be undertaken whilst the reservoir is in use as it would damage the existing structures within the flint wall boundary.	DP120; DP169	
	Development would have an unacceptable visual impact which would be much greater than concluded in the 2015 Urban Fringe Assessment.	DP120; DP140; DP169; DP240	
	Development would have an unacceptable impact on the amenity of 6 to 11 Belle Vue Cottages causing issues of visual privacy and overlooking, outlook and overshadowing, and sunlight and daylight.	DP120; DP140; DP169	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	Development would alter the character of the area making it more suburban and adversely impact on the 19 th century Belle Vue Cottages and the surrounding flint walls which have historic significance.	DP120; DP140; DP293; DP299	
	Development would lead to the loss of the South Downs Riding School which is an existing employment use and important community/ recreational asset.	DP120; DP140; DP169; DP240; DP299	
	The site is not close to local facilities (e.g shops, schools, doctors' surgeries etc) and is poorly served by public transport. Development would be car dependent which would create parking issues.	DP120; DP140; DP169; DP240; DP299	
	The site has significant ecological value which is greater than identified in the 2015 Urban Fringe Assessment (citing local evidence with regard to species onsite and in the local area, e.g badgers, bats etc).	DP120; DP140; DP169; DP240; DP293; DP299	
	The site has archaeological value.	DP120; DP140	
	Development would have an adverse impact on water supply and quality.	DP169	
	Development adjacent to the existing reservoir would create a potential flood risk.	DP120; DP140; DP240	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
	Development would cause noise and light pollution, including adversely affecting the South Downs International Dark Sky Reserve.	DP120; DP140; DP240; DP293; DP299	
	Object to the allocation of UF Site 32 as the site is surrounded on both sides of the hill by land that is within the National Park. The non-designated land has high landscape significance and was only not included in the National Park because of the desire not to have Woodingdean as an outlier, or sitting like a polo in the National Park. Building here would have an unacceptable impact on the National Park.	DP298 Friends of the Earth	
Land north of Warren Road (Ingleside Stables) (UF Site 33)	This is not a suitable site for any housing development. The site entrance sits on a blind corner of a very busy road that is highly susceptible to low cloud and fog. The site entrance of any housing development would also be shared with horses, walkers and cyclists who use Drove Road to access the South Downs and cycle trail to Lewes.	DP122	
	Object to the allocation of UF Site 33 as the site is surrounded on both sides of the hill by land that is within the National Park. The non-designated land has high landscape significance and was only not included in the National Park because of the desire not to have Woodingdean as an outlier, or sitting like a polo in the National Park. Building here would have an unacceptable impact on the National Park.	DP298 Friends of the Earth	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Land at Ovingdean Hall Farm (UF Sites 38, 38a & 39)	Object to development on this site (no reason given).	DP317 Rottingdean Coastal Councillors	
Land adj to Ovingdean and Falmer Road (UF Site 42)	Object to development on this site (no reason given).	DP317 Rottingdean Coastal Councillors	
Former nursery, Saltdean (UF Site 46a)	Object to development on this site (no reason given).	DP317 Rottingdean Coastal Councillors	
Cluster at Coombe Farm and Saltdean Boarding Kennels (UF Sites 48, 48a, 48b & 48c)	Object to development on this site (no reason given).	DP317 Rottingdean Coastal Councillors	
Object (no comments)		DP150; DP200	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
General support for Urban Fringe allocations	<p>Support the need to provide more dwellings on urban fringe sites, but have reservations about some sites and the impact that increased numbers of people, and in particular traffic, will have on some areas.</p> <p>The policy takes account of the existing use of the land and seeks to maintain some balance.</p> <p>We need more housing. We have a housing crisis in the city so need to identify and use sites that would be improved and made useful through sensitive and appropriate housing developments such as brownfield and urban fringe sites.</p> <p>The Brighton & Hove Economic Strategy supports the allocation of these sites through its strategic themes 'A growing city' and 'an open city'.</p>	<p>DP066</p> <p>DP032</p> <p>DP167 DP175 Nub Brighton</p> <p>DP208 Brighton & Hove Economic Partnership</p>	
Too little development proposed on urban fringe	<p>The overall numbers in Table 7 should be increased in view of the recently revised NPPF.</p>	<p>DP086</p>	
Self/custom build housing	<p>The policy should recognise that community self-build is particularly well placed to build on awkward/smaller sites that may not be attractive for larger scale housing, and also provide sustainable and innovative additions to mixed-use larger developments.</p>	<p>DP175 Nub Brighton</p>	

	<p>respected, brought into the design and results in a development that visually reflects the setting and natural beauty of the National Park.</p> <p>In para 3.58, suggest making it a requirement rather than an option for developers to provide a Landscape Visual Impact Assessment at the planning application stage because of the proximity to the National Park.</p>		
Impact on Local Nature Reserves	<p>The following allocations are in close proximity to Local nature Reserves and as such careful consideration must be made regarding following the mitigation hierarchy and ensuring net gains are delivered: Land at Ladies Mile, Carden Avenue (UF Site 17); Land to north east of Coldean Lane / Land north of Varley Halls / Land south of Varley Halls (UF Sites 21, 21a & 21c); Land at South Downs Riding School & Reservoir Site (UF Sites 32 & 32a); Land north of Warren Road (Ingleside stables) (UF Site 33).</p>	DP189 Natural England	
Impact on historic environment	<p>The sites in Table 7 that are noted to have historic environment (i.e. archaeology, heritage) or related (i.e. landscape) considerations should be required to have a heritage impact assessment undertaken to help inform the appropriate form and quantum of development in each case.</p>	DP284 Historic England	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Impact on water sources/drainage	<p>The following sites have environmental constraints (relating to Groundwater Source Protection Zones): Land at Mile Oak Road, Portslade (SPZ 1, 2 and 3); Land at and adjoining Horsdean Recreation Ground, Patcham (SPZ 2 and 3); Land at Ladies Mile, Carden Avenue (SPZ 3); Land to north east of Coldean Lane/ Land north of Varley Halls/ Land south of Varley Halls (SPZ 1,2 and 3); Land adjacent to Ovingdean and Falmer Road, Ovingdean (SPZ 3); Land at former nursery, Saltdean (SPZ 1, 2 and 3); Cluster at Coombe Farm and Saltdean Boarding Kennels, Westfield Avenue, North Saltdean (SPZ 3); Land west of Falmer Avenue, Saltdean (SPZ 2 and 3).</p> <p>Welcome the references to aquifers in the 'Key Site Considerations' column of Table 7, however the policy does not state how this will be addressed.</p>	DP162 Environment Agency	
Potential contamination	Under 'Key Site Considerations' in Table 7 it may be useful to include reference to where sites are likely to be subject to contamination.	DP162 Environment Agency	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Criterion c) – green infrastructure	<p>Support incorporating green infrastructure and local food growing opportunities into proposed schemes which will provide and increase in the value of green infrastructure assets, therefore increasing total natural capital. This could also lead to an increase in biodiversity and benefit the wider ecological network.</p> <p>Maintaining and enhancing green/blue infrastructure and increasing its value aligns with the aims of the NPPF and the DEFRA 25 year plan. A minimum requirement for green infrastructure development could be stated to ensure net gains can be achieved, this could be added to Table 7.</p>	DP189 Natural England	
Criterion d) – linkages to the SDNP	Improving linkages and access to the National Park will increase the value of the South Downs as a green infrastructure asset by allowing more people to benefit from its ecosystem services.	DP189 Natural England	
Criterion e) – renewable energy provision	Giving appropriate regard to renewable energy provision will help reduce carbon usage and contribute to meeting climate change. Supporting community led initiatives for renewable/low carbon energy is an aim of the NPPF. Having specific key site considerations ensures the aspects which are important to the areas surrounding the allocations will be mitigated (using the mitigation hierarchy).	DP189 Natural England	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Other general comments	<p>For any significant planned housing schemes, expect to be consulted on the impact of on NHS services, particularly primary care. Plans should take account of this in any allocation of S106/CIL contributions.</p> <p>Seek amended wording in the second sentence of policy: “...which address <u>positively contribute</u> to all of the site considerations <u>wherever feasible</u> and indicative ... “</p>	<p>DP101 Clinical Commissioning Group</p> <p>DP189 Natural England</p>	
Land at Mile Oak Road (Sites 4 & 4a only)	<p>The respondent acts as agent for the landowner of Sites 4 and 4a and welcomes the allocation. Has prepared a draft proposal as a sketch scheme for residential development (submitted with the representation as a Feasibility Masterplan together with details of house types). The proposed scheme would also provide a doctors and dentist surgery / community hall (500 sq.m), convenience shops (180 sq.m), and nursery/creche. Consider that the site could provide 240-260 residential units and should have the suggested complementary uses.</p>	DP080	
Land at/adj Horsdean Recreation Ground (UF Site 16)	<p>In principle consider that housing could be built on this site, but consider that providing vehicular access would be potentially difficult. Careful consideration would be needed for providing access from Vale Road which is a busy road.</p>	DP066	

	Consider the site is generally suitable for development, but careful planning will be needed in terms of access to site, minimising loss of green space, noise and pollution impacts for new residents from the A27, impact on surrounding uses, and ensuring adequate sewer and groundwater capacity.	DP294	
Land at Ladies Mile (UF Site 17)	In principle consider that housing could be built on this site, however the key issue would be providing vehicular access without increasing traffic in Ladies Mile Road which is already congested due to on-street parking. Consider that access should be provided from Carden Avenue as far up the hill as possible, away from the current junctions to retail outlets which would provide quicker and safer access to the surrounding area and A27.	DP066	
	Consider the site is generally suitable for development, but careful planning will be needed in terms of access to the site, minimising loss of green space, avoiding adverse impact on adjoining nature reserve, and avoiding landscape and amenity impacts on adjacent properties.	DP294	
	Consider this site is the best of the three proposed development options in Patcham, being close to existing housing and providing adequate space for the 35 homes proposed.	DP053	
Land at Ovingdean Hall Farm (UF Sites 38, 38a & 39)	The respondent's clients own land at this site and support comprehensive development.	DP086	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Land at former nursery, Saltdean (UF Site 46a)	<p>Representation submitted on behalf of the landowner who is the freeholder of the site. Consider the site provides an appropriate location for new residential development and support its inclusion as a site allocation in Policy H2 of the draft CPP2.</p> <p>However, consider that a denser form of development is appropriate given the site's location to the north of existing medium density suburban development, and its location close to public transport links (buses 27, 27C and 47). As a minimum, the site should be developed at a density of 40 dwellings per hectare which would yield c36 units. It is anticipated that the full policy requirement for affordable housing and mix of unit type/size would be achievable, leaving room for public open space, parking and landscaping. Developing the site at a higher density would align with the NPPF aims to make efficient use of brownfield land and to seek to maximise the provision of housing on identified sites. Therefore seek amendment to the policy to require the site to be developed at a density of 40 dph.</p>	DP222	
Support (no comments)		DP030; DP067; DP001 Pavilion Architecture	
Not Specified			
Consideration of food production	It is important that the value of undeveloped land for food production is considered. Previous work has been done to assess urban fringe sites for food production could be revisited to assess if any of the urban fringe sites should specifically have a small farm / horticulture element included.	DP233 Brighton & Hove Food Partnership	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Land adj to Ovingdean and Falmer Road (UF Site 42)	<p>Note the inclusion of this site but it is not correctly recorded as in Rottingdean Parish.</p> <p>Concerned at the comment that planning applications could still be still be submitted which Rottingdean Parish Council deems wholly unsuitable for development. The map on Page 211 appears to rightly demonstrate that only a very limited space is suitable for building on.</p>	DP303 Rottingdean Parish Council	
Land west of Falmer Avenue (UF Site 50)	<p>Note the inclusion of this site but it is not correctly recorded as in Rottingdean Parish.</p> <p>Concerned at the comment that planning applications could still be still be submitted which Rottingdean Parish Council deems wholly unsuitable for development. The map on Page 211 appears to rightly demonstrate that only a very limited space is suitable for building on.</p>	DP303 Rottingdean Parish Council	
Urban Fringe sites not allocated	Pleased to see the omission of the three other potential sites previously identified (in the parish).	DP303 Rottingdean Parish Council	

H3 Student Housing Sites			
Total Number of Responses		28	
Number of Representations that Support		18	
Number of Representations that Object		10	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Local Waste Water infrastructure	Local wastewater infrastructure in closest proximity to the following site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.	DP201 Southern Water	
Higher densities requested	Sites should be higher densities and more emphasis on encouraging local universities to build more on-campus housing.	DP002 Brighton YIMBY	
Further site allocation proposed	Enterprise Point site should be allocated for 350 bedspaces (mixed use with employment) as it is a more suitable and deliverable site for PBSA than Lewes Road Bus Garage, whilst sharing many of the same locational characteristics that are identified as positives.	DP297 Vita Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Lack of evidence for delivery of Lewes Road Bus Garage site	There is no evidence to suggest that there is a viable solution to re-providing the bus garage on the Lewes Road site.	DP297 Vita Group	
Lewes Road Bus Garage Site	The Lewes Road bus depot is part of our business infrastructure and is absolutely essential to the delivery of the city's bus services. 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.	DP259 Go-ahead Group	
Site areas for PBSA suggested	Areas near Falmer and the university campus should be explored. Particularly areas near the AMEX stadium and station.	DP002 Brighton Yimby	
Insufficient sites allocated to meet the need for PBSA	The draft City Plan - Part Two estimates that there are just 12,445 purpose-built student housing bedspaces within the city. With 39,000 students attending courses at the University of Sussex and University of Brighton, as well as other higher education providers across the city with accommodation requirements of their own (only 1,132 of those bedspaces are not managed by either of the two Universities) - there is a clear need for additional purpose-built student housing bedspaces in appropriate locations within the city.	DP261 Hargreaves	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Further PBSA site allocation proposed	27 - 31 Church Street, Brighton should be allocated for PBSA (minimum 70 bedspaces) as it provides an appropriate location given sustainable location within city centre whilst remaining connected to Falmer and Moulsecoomb campuses. There have been a number of schemes proposed for this site and two planning permissions remain extant. However, for a wide range of reasons these developments are unlikely to come forward. There is the potential with city centre sites to improve the quality of life of both student residents and non-student residents within areas where high concentrations of student tenants is considered to cause a significant amenity impact to surrounding neighbours.	DP261 Hargreaves	
Further PBSA site allocation proposed	45 & 47 Hollingdean Road should be an allocation as the Council indicated in pre-app advice that has confirmed that 'in principle' PBSA is acceptable.	DP310 CKC Properties Ltd	
Minor change requested	Should be an indication that windfall sites will also be considered for PBSA.	DP258 B&H Planning Agents Forum	
General comment	There is already too much PBSA, few students can afford it and demand is dropping.	DP091	
General comment	General objection.	DP001	
Additional criterion requested	There should be an additional aim for the design of the development to be sympathetic to the surrounding area and where they are adjacent to locally listed heritage assets.	DP177 Brighton Society	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Support with caveat	The Lewes Road Bus Garage site is in SPZ 1, 2 and 3. There is no mention in the policy wording regarding what this means and how this will be dealt with. No references regarding specific sites that are likely to be subject to contamination.	DP162 Environment Agency	
Support with caveat	General support but suggest provisos should be put in place that students remain in PBSA for their time at university.	DP031 North Laine CA	
Concern with London Road site	Concern about proposed allocation of 118-132 London Road site which we consider unacceptable given the high density with the adjoining building, the existing student (Co-op) development, and the Circus Street development. Within a half mile radius there are more students than residents. This has had an effect on St Barts Primary School where only 20 pupils have enrolled for September.	DP031 North Laine CA	
Support with caveat	Support, however we expect to be consulted on the impact of this on NHS services, particularly primary care, and would see the new developments as a further opportunity for integration across health, social care and education. Plans should take account of this in any allocation of S106/CIL.	DP101 Clinical Commissioning Group	
General comment – net gains in GI development	<p>Both sites are on previously developed brownfield sites and as such do not impact greenfield sites Protecting greenfield sites and greenbelt land is a key concept of the NPPF found throughout section 13.</p> <p>A minimum requirement of GI development could be stated to ensure net gains can be achieved.</p>	DP189 Natural England	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
General comment	Support the opportunity to free up HMOs through the provision of purpose built student accommodation.	DP208 BHEP	
General comment	The Regency Society supports the decision not to set a target for the amount of student housing. We welcome the new on-site student housing being constructed at Moulescomb and hope that similar further on-site development will be possible at Falmer to free up more properties elsewhere for non-student use. There does not seem to be any reference to this in Part 2 of the Plan.	DP207 Regency Society	
General comment	More on campus out of town near the Amex/Falmer, plenty of room to build hundreds more and free up family housing.	DP067	
General comment	General support for policy.	DP095, DP082, DP096, DP066, DP030, DP122, DP160, DP167, DP255, DP277	

E1 Opportunity Site for business-warehouse uses			
Total Number of Responses		12	
Number of Representations that Support		9	
Number of Representations that Object		3	
Number of Representations – Other			
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Object			
Site boundary overlaps with Benfield Valley LWS	A small section of the allocation overlaps with Benfield Valley LWS. LWS should not be allocated for development. Boundary of allocation should be amended to exclude designation. Refer in supporting text to Benfield Valley and Foredown Allotments LWSs which are adjacent the site and should be taken into consideration.	DP289 Sussex Wildlife Trust	
Object to allocation of the site for a waste management facility	Remove mention of a strategic scale waste management facility both in section E1 and elsewhere within the City Plan Part Two proposals - any such facility proposals are yet to be finalised and could negatively impact on other future proposals for use of the land.	DP254 Councillor Tony Janio, DP256 The Conservative Group	

Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	
Support			
Appropriate Response – employment land requirements/ job creation	<p>The recent Industrial Estates research by SHW highlighted the need to save light industrial sites within the city boundary.</p> <p>Support policies that enhance employment opportunities and wider economic regeneration as a whole.</p> <p>Recognises the demand for employment floorspace in the city over the plan period.</p>	DP208 BHEP, DP101 BH Clinical Commissioning Group, DP065 Big Yellow Self Storage Co. Ltd	
Support with suggested amendments – net gains in Green Infrastructure	Sites on previously developed brownfield sites would help protect greenfield sites. A minimum requirement of GI development could be stated to ensure net gains can be achieved in line with the aims of the NPPF (171.) and the DEFRA 25 year plan (3.3.i).	DP189 Natural England	
Reference if appropriate to contamination	May be useful to make reference in site allocations to contamination where any sites are likely to be subject to contamination.	DP162 Environment Agency	
	If attractive and unobtrusive development.	DP091	
Support (no specified comments)		DP085, DP067, DP001	