

Appendix 2 - Overview of Consultation Responses and Summary of Key changes to City Plan Part 2 Policies

Policy	Overview of Consultation Responses	Summary of Key Changes to Policy
Topic – Housing, Accommodation and Community		
DM1 - Housing Quality, Choice and Mix	<p>45 representations [35 in support, 10 objecting]</p> <p>General support for aim of policy and inclusion of minimum space standards and accessibility and adaptability standards. Clarification sought on a number of criterion.</p> <p>Object to: requirement for seeking a range of dwelling types; question evidence to support requirement for space and access standards; standards should only apply to residential dwellings and allow flexibility for innovative new housing formats. Clarification on evidence to justify departure from standards.</p>	<p>Table 2 in Policy replaced with government's updated published version.</p> <p>Clarification to supporting text – of opportunities for custom build/ self-build and include reference to role of private amenity space in contributing to ecological and green infrastructure networks</p>
DM2 - Retaining Housing and residential accommodation (C3)	<p>28 representations [21 in support, 7 objecting]</p> <p>Support the aim of the policy to resist net loss of existing residential accommodation.</p> <p>Object to lack of council controls on short term residential lettings and consider the policy constraints the potential delivery of shared homes.</p>	Minor changes to supporting text
DM3 Residential conversions and the retention of smaller dwellings	<p>21 representations [18 supporting, 3 objecting]</p> <p>Support the aim of the policy to give more choice and options to preserve/ increase family housing.</p> <p>Object to restrictiveness/ lack of flexibility of the policy given the level of housing need/ changing needs in the city and lack of justification for increased size threshold.</p>	<p>Change to original floor area cited in DM3a) from 124 sqm to 115 sq metres to address consultation responses.</p> <p>Consequent amendments to supporting text</p>
DM4 Housing and	25 representations [20 supporting, 5 objecting]	Minor amendments to policy text for

	<p>Accommodation for Older Persons</p> <p>Policy allows for range of different housing/ accommodation suited to meet the differing needs of older people and responds to growth in elderly people. In line with government guidance and B&H Economic Strategy</p> <p>Object – require robust assessment of need and justification for affordable housing requirement. Ensure older people can remain within the same neighbourhood.</p>	<p>clarity: need to meet identified need; provision of internal/external space and reference to good practice design principles.</p> <p>Amendments to supporting text to reflect conclusions of Older People's Housing Needs Assessment study including the need to plan for a wide mix of accommodation options and the amounts of different types of accommodation that will be required. Clarification that accommodation falls within both C2 and C3.</p>
322	<p>DM5 - Supported Accommodation (Specialist and Vulnerable Needs)</p> <p>17 representations [15 supporting, 2 objecting]</p> <p>Support - policy aim sensible and would accord with the Brighton & Hove Economic Strategy.</p> <p>Object – policy should be strengthened to ensure needs are met within city boundaries and ensure people are not isolated. Question whether all of wording of policy is necessary/ clear.</p>	<p>Whilst still resisting loss the policy now includes criteria that set out the circumstances under which loss of residential accommodation for people with special needs will be allowed.</p> <p>Clarification in supporting text of application of policy.</p>
	<p>DM6 - Build To Rent Housing</p> <p>25 representations [18 supporting, 7 objecting]</p> <p>Support – will add to diversity of housing mix and quality. Support but request greater flexibility/ better reflect distinct nature of Build to Rent. 40% affordable housing provision unrealistic.</p> <p>Object – policy too restrictive (ownership/ on-site management and tenancies) lacks clarity/</p>	<p>Deletion of criteria relating to avoiding an over-concentration of build to rent within strategic allocations.</p> <p>Amendment to affordable housing criteria, confirming that up to 20% affordable housing at genuinely</p>

	<p>justification on reference to avoiding 'over-concentration' of build to rent housing; requirement for self-contained units. Affordable rents should be provided at genuinely affordable level.</p>	<p>affordable rents will be sought subject to viability.</p> <p>Updates to supporting text regarding rent levels and proportion of affordable housing.</p> <p>Updates to supporting text regarding viability background evidence undertaken.</p>
DM7 - Houses in Multiple Occupation (HMOs)	<p>37 representations [22 supporting, 15 objecting]</p> <p>Support – general support for policy criteria. Space standards should be included in the policy.</p> <p>Object – policy will reduce range of housing available to residents and disproportionately affect specific groups of residents; policy requirements unduly onerous and planning benefits unclear. Some respondents considered criteria not sufficiently robust to maintain balanced communities.</p>	<p>No change to policy.</p> <p>Clarification in supporting text on the size of communal living space.</p>
DM8 - Purpose Built Student Accommodation	<p>30 representations [16 supporting, 14 objecting]</p> <p>Support – general support for policy, some seeking clarification on requirements for outdoor amenity space and more flexibility on on-site security and length of tenancy requirements.</p> <p>Object – question the justification for some of the policy requirements – provision of cluster units, whole academic year occupancy and 24 hour security.</p>	<p>Through additional criterion clarification of communal space requirements for cluster flats and studio flats</p> <p>Replacing requirement for 'on-site' security presence with effective and 'appropriate' provision.</p> <p>Removal of requirement for tenancy</p>

		agreements to last full academic year. Consequential amendments to supporting text.
DM9 - Community Facilities	22 representations [16 support, 6 objecting] Support – general support for policy. Concern with loss of facilities and need for retention or community facilities or suitable re-provision Object - whilst support general aim policy, wording could be strengthened – in terms of exception tests. Should ensure provision of affordable and suitable rooms for community use.	Removal of ‘improved’ from policy as improvements (e.g. extensions/ enlargements or refurbishments would not be required to address a-c). Clarification of circumstances under which partial loss would be allowed.
DM10 - Public Houses	23 representations [19 supporting 4 objecting] Support – general support for policy – important part of local community. Pubs face unique challenges and this has been understood well. Object – marketing requirements are unduly onerous. General objection – health or amenity impacts of public houses.	No change to policy. Removal of requirements for verification of asking price with the local planning authority.
Topic – Employment and Retail		
DM11 New Business Floorspace	14 representations [12 supporting and 2 objecting] Support – appropriate to city’s context and ensure flexible future proofed space. Support but ensure existing commercial space is used first. Need to better understand how mixed use schemes in suburban areas are used and occupied. The policy intent should apply to existing commercial areas. Object – question what additional benefits the policy provides that’s not already covered by	Clarification of application of part of policy to B2 and B8 premises. Simplification of policy wording to aid clarity. Consequential changes to supporting text and updates to include reference

	<p>City Plan Part 1 policies. Second part of policy requires clarification.</p>	to designing out waste.
DM12- Primary, Secondary and Local Centre Shopping Frontages	<p>15 representations [9 supporting and 6 objecting]</p> <p>Support – some general support but query whether policy will have an impact. Support for recognition of Brunswick Town.</p> <p>Object – policy should support independent retailers (resilience and address vacancies) and better reflect the changing nature of high streets (need for diversification, support dual/mixed uses) and the NPPF. Query need for retail frontage policies given the government's permitted development rights supporting a wider range of uses, and which are more flexible than policy (e.g. marketing requirements). Avoid un-sympathetic shopfronts, protect historic fabric (e.g. harsh lighting). Need for a strategic and protective policy for St James's Street.</p>	<p>Rename policy for clarity. Widening the range of uses changes A1 retail unit can change to in order to better reflect changes to NPPF/ high streets.</p> <p>Simplification of policy wording to avoid duplication.</p> <p>Removal of the criteria seeking to avoid 3 or more non A1 uses other than in Lanes and North Laines.</p> <p>Marketing requirement reduced to 6 months in primary, secondary and local shopping centres.</p> <p>Clarification that residential uses would be permitted above retail unit or to the rear of units in shopping centres.</p> <p>Consequential amendments to supporting text including addition of table 3 listing defined shopping centres covered by policy for clarity.</p>
DM13 Important Local Parades, Neighbourhood	<p>14 representations [10 supporting, 4 objecting].</p> <p>Support - with caveats, consider the Lanes, North Laine and Rottingdean should be given</p>	Clarification on change of uses permitted in part B) and that residential uses would be permitted

Parades and Individual Shop Units	<p>further protection to preserve independent retailers.</p> <p>Object – policy should better reflect the changing nature of high streets (need for diversification, support dual/mixed uses) and permitted development rights. Query missing important local parades.</p>	above retail units or to the rear of units in important local parades.
DM14 - Special Retail Area - Brighton Marina	<p>12 Representations [8 supporting, 4 objecting].</p> <p>Support – Opportunity to enhance retail offer and reflect people's needs; will protect greenfield sites and improve and enhance a currently blighted area. Suggest name could be changed as not just retail at Marina.</p> <p>Object – Marina is no longer designated centre so policy should clarify role and ensure no impact of new retail on designated centre. Policy should not restrict residential use on ground floor. Should allow broader range of uses and connectivity should be improved.</p>	<p>Changed name of policy for clarity.</p> <p>More flexibility for changes of use to range of commercial and leisure uses to reflect existing range and mix of shopping, commercial and leisure offer</p> <p>Simplification of policy wording to aid clarity.</p>
DM15 - Special Retail Area - The Seafront	<p>10 Representations [8 supporting, 2 objecting]</p> <p>Support – general support but need to ensure new development does not block arches/structures; encourage new 'regency style' architecture. Ensure policy enables high quality, sustainable, innovative and attractive development east of Brighton Pier which will boost tourism. Uses should not impede cycle routes.</p> <p>Object – no reference in policy to need to safeguard heritage assets of Hove lawns. Policy should support innovative uses in winter months.</p>	<p>Changed name of policy for clarity.</p> <p>No change to policy text.</p>
DM16 – Markets	<p>8 Representations [8 supporting]</p> <p>Support – concern with impact on cycle routes/ cycle parking. Include reference to 'boxpark style' market spaces on major sites awaiting development. Ensure sustainable transport links and further guidance on role of markets to access to healthier foods.</p>	Inclusion in policy to reference to impact of cycle routes and provision of cycle parking being needed to be considered with any proposals for new or improved markets and market

		stalls.
DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities	<p>18 Representations [7 supporting, 11 objecting].</p> <p>Support – policy approach for new hotel development; concern with effectiveness of wording of safeguarding conference facilities where the scenario is re-provision/replacement elsewhere and concerns with transport links between sites and central Brighton.</p> <p>Object- policy too restrictive in use of wording ‘suitable search areas’ - limits opportunities for new hotels outside the areas identified; given identified need for new hotel development sites should be allocated. Gas Work site and Madeira Terrace should be included in the opportunity area. Hove Station area should be removed from list of opportunity search area. Concern expressed about the suitability of the Waterfront Proposals.</p>	<p>Removal of word ‘suitable’ for clarity.</p> <p>Clarification of wording d) that re-provision within a development is permitted if accords with City Plan policies or strategic allocation.</p>
Topic – Design and Heritage		
DM18 - High quality design and places	<p>25 Representations [23 supporting, 2 objecting].</p> <p>Support – appropriate to city’s context and support emphasis on high quality design and/or place making. Seeks to conserve and enhance heritage assets while allowing for contemporary design. Support but ensure sustainability and reduction in carbon footprint of development; ensure policy wording is strong enough to support enforcement; ensure wording is flexible enough to allow for design responses to reinterpret local patterns. Ensure design advice is relevant to local policy, context and community needs where appropriate. Include guidance on assessment criteria, efficient use of public spaces and roof space, incorporation of artistic element, green infrastructure; food storage and production and action against graffiti in heritage areas; links between policy and forthcoming Urban Design Framework.</p> <p>Object – policy is prescriptive when it comes to accounting for instances when it may be</p>	<p>No change to policy text.</p> <p>Simplification and reduction of supporting text to reflect further guidance will be provided in forthcoming Urban Design Framework SPD. Update to text to refer circular economy principles.</p>

	appropriate to depart from prevailing height, scale and shape of surrounding areas. Prioritisation of heritage/ landscape issues against criteria is not clear.	
DM19 - Maximising Development Potential	<p>18 Representations [14 supporting; 4 object].</p> <p>Support - reflects NPPF emphasis on importance of making effective use of development land, balancing these with the need to prevent over-crowding and negative impacts on amenity; and reduces pressure on greenfield sites. City and Urban fringe sites can accommodate densities higher than minimum set in City Plan Part One Policy CP14 and Urban Fringe Assessments and policy needs to indicate numbers/densities can be exceeded whilst complying with all other relevant planning policies. Policy needs to actively promote increased mixed use developments, housing density and public space accessibility.</p> <p>Clarification sought in wording (links to South Downs National Park, tall buildings and reference to community facilities).</p> <p>Object – Policy is possibly redundant as sites are well used and proposals are generally reduced as part of the planning application process; densities quoted in the CP14 are generally too low (as evidenced in reports supporting proposals for the Sackville Road and Royal Mail, Goldstone Lane and Lyon Close sites), including on urban fringe sites. Tall buildings are not needed for increasing density. Policy needs to support sensitive and sensible best use of sites in which heritage, stability and sustainability are prioritised. Policy should address higher opportunities in commercial/ offices for high density formats.</p>	Clarification of role of policy to avoid underdevelopment of sites through minor changes to policy wording and supporting text.
DM20 - Protection of Amenity	<p>14 Representations [11 supporting, 3 objecting]</p> <p>Support - Overall, policy provides adequate response to protection of amenity issues however clarification on policy wording sought and amendment to wording to account for instances where certain levels of loss of amenity are unavoidable and/or remain within acceptable standards.</p> <p>Object - provide examples of acceptable levels of protection of visual privacy suitable for a</p>	Amendment to policy to clarify that development should not cause 'unacceptable' loss in recognition that some loss of amenity may be acceptable.

	dense city. Remove the word 'any' from policy wording and amend wording to account for instances where impact upon amenity is minimised and kept to an acceptable level.	
DM21 - Extensions and alterations	<p>9 Representations [8 supporting, 1 objecting]</p> <p>Support - Policy seeks to enhance and conserve the distinctive, historic character of the city and its heritage assets. Reflect the approach of, and refer to Residential Extension and Alterations Supplementary Planning Document. Incorporate wording to actively encourage extension of properties.</p> <p>Object – no comment given</p>	<p>Inclusion of consideration of 'scale' in criterion a) and minor changes to policy wording for clarity.</p> <p>Amendments to supporting text to clarify the design elements that will be considered. SPD referred to.</p>
DM22 - Landscape Design and Trees	<p>17 Representations [15 supporting, 2 objecting]</p> <p>Support - retention of trees during construction for privacy and amenity value. Support - with caveat; new mechanism for replacement of trees should be introduced to secure continuous tree cover; reference to net gains natural capital principles; need for effective implementation and enforcement of policy including appropriately detailed arboricultural report and plan; include reference to incorporating food growing and pollinator protection.</p> <p>Object –policy should address impact of temporary events and needs more flexibility regarding replacement of felled trees. Strengthen the policy with respect to street tree planting and clarity required on wording of policy regarding native/ traditional species.</p>	<p>Changes to first part of policy to clarify need to retain, improve and where possible provide landscaping, trees or planting.</p> <p>Inclusion of reference to natural capital.</p> <p>Reference to planting of wildlife/ pollinator friendly non-native species.</p> <p>Requirement for net gains in biodiversity and enhancements to green infrastructure.</p> <p>Changes to supporting text to clarify guidance on replacement of felled trees.</p>
DM23 –Shop Fronts	12 Representations [11 supporting, 1 objecting]	Changes to policy to clarify treatment

	<p>Support – general support for policy aim. Amalgamation of two shop units into one should be resisted in the North Laine. Policy should make clear that decoration of boarded up shop fronts should not include graffiti.</p> <p>Object – consider policy is convoluted and prescriptive. Shop front design can be managed under existing design, heritage and amenity policies, national and local.</p>	<p>of temporary security measures.</p> <p>Simplification of wording regarding application to shopfronts in town centres.</p> <p>Removal of unnecessary wording in supporting text.</p>
DM24 – Advertisements	<p>16 Representations [13 supporting, 3 objecting]</p> <p>Support – general support for policy aim. Policy should address ‘A boards’ on pavements. Additional wording requested regarding advertisements viewable from the Strategic Road Network. Clarity sought over whether graffiti can be regarded as an advertisement. Policy should encourage advertising for healthy food options and discourage advertising for junk food.</p> <p>Object – Policy does not cover banner signs on lamp posts. Concerned about conflict of interest between council as land owner and council as LPA. The policy does not recognise the impact of signage on pavement access arising from the clutter of ‘A boards’. Requirements of the policy are unnecessarily convoluted and prescriptive and the planning impacts can be appropriately managed under existing design, heritage and amenity policies and national policy</p>	<p>Additional policy criteria added to ensure consideration of sounds or animation.</p> <p>Amendments to policy to clarify that adverts outside built up area must respect setting of South Downs National Park.</p> <p>Advertisements must not distract road users (strategic route network).</p> <p>Clarification/ simplification of supporting text.</p>
DM25 - Communications Infrastructure	<p>12 Representations [11 supporting, 1 objecting]</p> <p>Support – policy ensures conservation of SDNP, natural and built environment.</p> <p>Object - Concerns regarding the clarity of policy regarding ancillary development, and maintenance of communication infrastructure (impact of graffiti/advertisements on infrastructure). Query whether the requirements of the policy can be appropriately dealt</p>	<p>Clarification and consistency of wording – unacceptable impacts. Include reference to associated ancillary development.</p> <p>Remove duplication of policy requirements for satellite antenna</p>

	<p>with under existing local and national policies.</p>	<p>Policy wording on digital connectivity amended to ensure policy is implementable.</p> <p>Consequential amendments to supporting text and to aid clarity.</p>
DM26 Conservation Areas	<p>19 Representations [11 supporting, 8 objecting]</p> <p>Support - welcome the policy's support for retention of trees and gardens integral to conservation areas. Supporting text should be consistent with NPPF. Suggested amendments to supporting text for clarification and to encourage high quality contemporary design for new development in conservation areas. Refer to gardens' contribution to the city's green infrastructure network. Regret that street furniture in conservation areas is not protected.</p> <p>Object - policy should state that applications should not be allowed where they would cause harm; wording should be consistent with NPPF. Not sure whether this policy adds much over and above the City Plan. Would rather expect a statement on the review of conservation areas. The council should prioritise the preparation of up-to-date character statements and management plans. Some Conservation Areas are of dubious quality and there should be far more leeway in what development is permitted in these areas. Needs to be greater flexibility, an emphasis on design analysis and a qualitative appraisal of the context. Refer to street clutter and resist demolition and roof extensions in North Laine and insist on the removal of UPVC windows and doors.</p>	<p>No changes to policy text.</p> <p>Amendments to supporting text to aid clarity and simplification of text.</p> <p>Reference in supporting text supporting contemporary and innovative design approaches.</p>
DM27 Listed Buildings	<p>13 Representations [8 supporting, 5 objecting]</p> <p>Support – general support. Heritage makes the city special. Policy is too conservative with regards to contemporary additions to listed buildings. The emphasis should be on retention rather than allowing change. Strengthen policy wording.</p>	<p>No changes to policy text.</p> <p>Amendments to supporting text to aid clarity and simplification of text.</p> <p>Reference in supporting text</p>

	<p>Object – policy does not address issues with the maintenance and repair of listed buildings which need to be more fully addressed. Council should also be prepared to exercise its powers for compulsory purchase. Phrasing of the policy seems to indicate a presumption in favour of permission. Policy is too conservative with regards to contemporary additions to listed buildings. It should be made explicit that a less interventionist but still economically viable use is preferable to a more commercially profitable but highly interventionist use. Some liberalisation in policy, for example making it easier to change windows, should be considered.</p>	<p>supporting contemporary and innovative design approaches.</p>
DM28 Locally Listed Heritage Assets	<p>12 Representations [10 supporting, 2 objecting]</p> <p>Support – heritage assets are at risk. With the caveat that the council takes listing extremely seriously and will do all in its power to preserve the special nature of Brighton and Hove. Policy too narrow in scope - include public assets such as cast iron street furniture and historic paving. Would make development of Badgers Tennis club difficult as wall is locally listed.</p> <p>Object - approach appears overly prescriptive and at odds with the more balanced policy approach on non-designated heritage assets in the NPPF. It sets too high a threshold for the loss or substantial alteration of an asset. Protection for non-designated heritage assets is lower in the NPPF than for designated heritage assets. The first paragraph of the policy should therefore be reworded to be compliant with the NPPF. If it is not listed then it should not be considered a heritage asset. If it is valuable, it should be listed.</p>	<p>Clarification that policy requires the potential for retention and reuse to be explored in order for an informed and balanced judgement to be made.</p> <p>Consequential changes to supporting text.</p>
DM29 The Setting of Heritage Assets	<p>12 Representations [10 supporting, 2 objecting]</p> <p>Support - Agree that opportunities should be taken to enhance the setting of a heritage asset through new development. But concerned that opening part of the policy is open to interpretation and at worst will prevent densification of the city centre, which is the most desirable and sustainable location for densification due to proximity to amenities and</p>	<p>No changes to policy.</p> <p>Amendments to supporting text to support where appropriate bold architectural approaches and that other considerations may be</p>

	<p>availability of public transport. Policy important as many of the heritage buildings are adjacent to the sea and this is important for views. The focus should not only be on the visual connection between a heritage asset and its setting, but also take account of historic, social and economic connections. Support but not if it enables modern development or 'regeneration' of a heritage asset as this would cause losing first the integrity of the heritage asset and finally the asset itself.</p> <p>Object - The policy is at best wildly open to interpretation and at worst inherently prevents densification of the City Centre. The wording means that close to a listed building in the city centre it can easily be argued that no new building taller than its existing surroundings will be permitted. This city has a housing crisis, not a views crisis. The majority of people in this city will accept having their view of a non-listed building slightly damaged in return for more homes built.</p>	applicable.
33	<p>DM30 - Registered Parks and Gardens</p> <p>13 Representations [10 supporting, 3 objecting]</p> <p>Support - clarification is sought on how temporary uses will be assessed and when an informal event becomes formal. Concern with overuse for profit making activities means that public space is being eroded steadily at weekends, in particular. The Council's encouragement of management and improvement plans is welcome, but is of little value without a strategy for funding the work required. Positively encouraging the production of management plans and identified enhancement works for registered parks and gardens will increase their worth as Green Infrastructure which in turn increases their value as natural capital assets. It could also potentially enhance their biodiversity. The revamped Valley gardens could do with a cafe to encourage people to use the new gardens as a leisure destination.</p> <p>Object - Temporary events should be precisely that; wording should be qualified to mean a maximum period of 6 weeks In addition, a statement setting out what investigations have been carried out on the feasibility of using alternative sites must be carried out and included</p>	<p>Amendment to policy to include expectation that applicant should demonstrate that alternative, non-registered sites have been considered and assessed for temporary uses.</p> <p>Consequential changes to supporting text.</p>

	as part of a planning application. Events are taking place too invasively, pervasively and for excessive periods in spaces such as the Pavilion Estate, Hove Lawns and Valley Gardens.	
DM31 - Archaeological Interest	10 Representations [10 supporting] Support – general support for policy aims. Pleased to see the recognition of the importance and role of above ground archaeology. Policy offers a pragmatic solution to complicated sites where it is not always possible to carry out a full program of archaeological investigation prior to the grant of planning consent. Welcome the pragmatic approach and making full use of the opportunity to use planning conditions for such investigations.	No changes.
DM32 - The Royal Pavilion Estate	14 Representations [12 supporting, 2 objecting] Support - amend policy to include more ambitious encouragement for biodiversity gains within the gardens. Particularly encouraged by the plan to co-ordinate with other adjacent sites including Valley Gardens. Support a careful approach to temporary uses of the Gardens but would not wish to see any restriction of access or charging for entry to them during daylight hours. Particularly welcome the intention to ensure a wider integrated conservation scheme for the estate as a whole including further development at the Dome. Object - Consider that apart from the visibility of the estate from New Road which could be improved, most of current problems arise from a lack of management and supervision of the estate. The proposal to fence the estate is not a suitable solution. Concerned that any plans must take into account the needs of the local population who use the gardens and cafe as one of the only useable green space within the city and the North Laine. Temporary events should be precisely that; wording should be qualified to mean a maximum period of 6 weeks In addition, a statement setting out what investigations have been carried out on the feasibility of using alternative sites must be carried out and included as part of a planning application.	Policy wording amended to clarify that proposals should be informed by adopted Conservation Plan. Amendment to criteria to ensure a clutter free environment and net gains in biodiversity. Inclusion of new criterion that regard should be had to the impact of temporary events on planting and biodiversity. Consequential changes to supporting text.

Topic - Travel and Transport			
DM33 Safe, Sustainable and Active Travel	<p>25 Representations [19 supporting, 6 objecting]</p> <p>Support - Much general support with requests for more detail on certain specific points – e.g. more robust wording for cycle parking to ensure that it is accessible for childrens' and non-standard cycles; reference to cycle desire lines; more detail on nature of cycle network improvements. Clarification requested that developer contribution would not be sought in all circumstances. Development should align with pre-existing transport infrastructure.</p> <p>Some respondents felt the policy could be additionally used to counter disjointed management of the public realm and maintenance of existing cycle routes.</p> <p>Object - Separating requirements of different users could predicate against shared surfaces. Policy is inappropriate for areas outside of the city centre. Wording should be strengthened in a number of areas (including more detailed requirements for bus shelters, reference to national design standards, improvement of poor quality cycle network, protection of bus services, and ensure footways are not obstructed).</p>	<p>Clarification on certain policy provision 1b); 2b) and 3b) apply 'where appropriate'.</p> <p>Clarification that cycle parking provision should be universally accessible.</p> <p>Clarification in supporting text with regards to non-standard cycle parking provision.</p>	
DM34 - Transport Interchanges	<p>17 Representations [6 supporting , 11 objecting]</p> <p>Support – general support. New transport interchanges will reduce vehicular use which will help Brighton and Hove reach key aims set out in NPPF. Supports Economic Strategy 'Growing City' theme and Coast to Capital priorities.</p> <p>Object - Provision of park and ride facilities could encourage longer distance car journeys to the city. Park and ride will not be effective unless there is a corresponding decrease in the provision of city centre parking. Would represent under-utilisation of land that could be used for other purposes. Oppose the use of public funds for park and ride instead of investment in public transport or cycling/walking facilities. Does not go far enough in tackling parking issues related to coaches and vans.</p>	<p>Minor wording changes to aid clarity of policy and inclusion of footnote referencing relevant government guidance.</p>	

DM35 - Travel Plans and Transport Assessments	<p>20 Representations [17 supporting, 3 objecting]</p> <p>Support - general support for the policy. Only 'committed developments' should be included in cumulative impact assessments as 'planned' developments aspirational. Support with caveat that development that would increase emissions in AQMAs should be refused permission. Support with caveat that Transport Assessments are inappropriate for smaller developments within/adjacent AQMAs. Support with added text that Highways England may have their own requirements for Transport Assessments.</p> <p>Object – The requirement for Transport Assessments for development within or adjacent to an Air Quality Management Areas (AQMA) is insufficient as traffic from larger developments can have an impact on more distant AQMAs. Policy should take account of the increasing number of sites that are likely to end up in close proximity to an AQMA by considering the need for air quality provision at all developments, irrespective of its proximity to an already established AQMA.</p>	<p>Amendments to policy clarifying requirements for Transport Statements/ Transport Assessments in relation to Air Quality Management Areas to include consideration where development is outside AQMA.</p> <p>Require proposals that cause significant noise/air quality impacts to submit a Construction and Environmental Management Plan.</p> <p>Reference to impact of SRN to be considered in assessments in consultation with Highways England.</p>
DM36 - Parking and Servicing	<p>18 Representations [11 supporting, 7 objecting]</p> <p>Support – general support. Requiring developments to include supporting infrastructure for low emission cars will encourage greater adoption of these vehicles which will reduce private vehicular emissions, air pollution and water pollution within Brighton & Hove.</p> <p>Support with caveats that requirement for electric vehicle charging points is strengthened and greater support for accessible cycle provision. Avoid overloading on-street parking.</p> <p>Object - Policy should aim to reduce car parking as much as possible in new developments. Policy criterion should be more flexible to allow for safe manoeuvring space on the public highway to avoid inefficient use of space on site. No up to date data on parking needs. Policy should recognise that around the periphery of Brighton and Hove closer to the main road network there may be a need for additional parking, especially for the larger family properties. Where justification can be provided (or a need is demonstrated) the council should allow parking provision in excess of the standards. Permit-free approach is totally</p>	<p>Addition to part 2 to clarify infrastructure includes electric vehicle charging points.</p>

	unfeasible.	
Topic - Environment and Energy		
DM37 - Green Infrastructure and Nature Conservation	<p>29 Representations [20 supporting, 9 objecting]</p> <p>Support – general support. Policy should support green initiatives (green energy etc.). Encourage community-led development as these yield more green benefits. Extend the focus of the policy to development outside designated sites; other open space typologies. Ensure GI/natural capital and biodiversity net gain is achieved from all developments. Ensure effective implementation of GI policy requirements. Relevant areas of tranquillity should be identified and protected, such as Local Green Spaces and the South Downs National Park to make it aligned with NPPF. BHCC should commit to publishing and regularly updating its own Green Infrastructure Strategy. Potential environmental value of brownfield land and Priority Habitats and species should be mentioned. Suggest wording amendments to ensure policy and supporting text is clear that impacts on designated sites should be avoided. Policy should be amended to ensure robust protection of locally designated sites. Suggest changes to policy and supporting text to strengthen the need to protect swifts. Add reference to marine environment. BHCC should commit to regular reviews of existing and proposed LWSs. Consideration could be given to how developments can contribute to a process of ‘nature recovery’ in line with WWF.</p> <p>Object - Policy is too focused on designated sites and is not strong enough on Green Network/ green linkages. Concerned with robustness of 2017 LWS Review and considers sites are missing. Policy not robust or ambitious enough to protect and enhance biodiversity. Lacks reference to the national strategies, relevant acts and Defra’s 25 year Plan. Extend the duty to protect geodiversity in line with the importance conferred by England Biodiversity 2020 and to accord with NPPF. Policy is not positively worded or effective and could undermine the delivery of allocated sites. Policy is too prescriptive. Policy should protect the</p>	<p>New sub-headings for “Green Infrastructure” and “Nature Conservation” to add clarity;</p> <p>New requirement for green infrastructure to be integral to design and layout, and to achieve a variety of sustainability benefits.</p> <p>Section on nature conservation now requires development to conserve and enhance, rather than protect and prevent damage to features. Now also required: net gains in biodiversity, protection of priority species/habitats; habitat management secured; and control of invasive species. Deletion of text “where possible”. Reference to nature recovery networks.</p> <p>Marine and coastal biodiversity, and geodiversity added to the list of nature conservation features.</p> <p>Division of a) international, b) national, and c) local sites to aid clarity, with specific criteria which</p>

	<p>Urban Fringe from development.</p>	<p>must be met for each including requirement for relevant assessments such as HRA or EIA.</p> <p>Clarity over criteria which do not apply to allocated local sites.</p> <p>All proposals must still ensure integrity of designations maintained, enhancement through management plans; and mitigation to result in net gains.</p> <p>Deletion of requirement for greater reductions in CO2 emissions (included in H3) and improvements to public appreciation of the site.</p> <p>Consequential changes to supporting text to reflect policy changes, reference to swift bricks/boxes, bee bricks and further reference to the mitigation hierarchy and emerging green infrastructure/ nature recovery strategies added.</p>
DM38 - Local Green Spaces	<p>55 Representations [17 supporting, 38 objecting]</p> <p>Support – general support for policy. Local green space designation protects valuable sources of Green Infrastructure and biodiversity but policy could refer to increasing accessibility to and within Local Green Space. Ensure no building close to Local Green</p>	<p>Additional paragraph added clarifying that development within an LGS will not be permitted unless there are very special circumstances where public</p>

	<p>Spaces. Support but additional sites put forward to be included as Local Green Space. Council should undertake an audit of green spaces with a view to further designating areas not currently afforded protection under Policy CP16.</p> <p>Object – policy needs to reflect the NPPF tests of ‘special circumstances’. Too much emphasis on designated spaces and ignores wider Green Network within the city & urban fringe. Policy should be changed to ensure urban fringes are not eroded by development. LGS designation lacks sound analysis. Consider three listed sites (Benfield Valley, Ladies’ Mile and Hollingbury Park) to not meet the NPPF tests. 29 objections related to St Aubyn’s Playing Field not being included as LGS. One objector considered Benfield Valley should be removed from the list as is not consistent with national guidance (NPPF paragraph 100) as the site is an extensive tract of land.</p>	<p>benefits outweigh the harm.</p> <p>Footnotes added to direct to NPPF policies regarding how development within LGS is managed and to provide examples of what constitutes an enhancement.</p> <p>Supporting text amended to reflect the greater protection afforded to the designation and to clarify that development should be compatible with the designation; reference to the NPPF regarding the consistency with LGS designations and wider planning policy; additional text relating to provision of outdoor sports facilities at Benfield Valley. Scope for further sites to be designated through preparation of neighbourhood plans clarified in supporting text.</p>
DM39 - Development on the Seafront	<p>15 Representations [13 supporting, 2 objecting]</p> <p>Support - Appropriate policy response – enhancing public access to the beach; addresses climate change adaptation; sea defences and coastal conditions; ensures important biological and geological aspects of coast are not negatively impacted and limits negative impact on the marine environment, and; safeguards open space role of beach. Concern with piecemeal encroachment on the beach Old Town and East Cliff Conservation areas. Need to maintain and enhance public access to and along the coast and to sea-based activities.</p>	<p>Addition to criterion d) of access routes.</p> <p>Reference in policy to Beachy Head West Marine Conservation Zone.</p> <p>Simplification of supporting text.</p>

	Object - Blanket restriction against development extending onto the shingle beach restricts effectiveness of plan; is not positive and could undermine delivery of regeneration schemes such as the development at Black Rock. City Plan should protect the beach-front east of the Yellow wave site as far as the Marina from further development.	
DM40 - Protection of the Environment and Health – Pollution and Nuisance	<p>19 representations [14 supporting, 5 objecting]</p> <p>Support – reference should be made to impact of pollution on water environment, biodiversity and other green initiatives. Reference requested to safeguarding chalk block aquifer. Financial contributions should be directed to initiatives in the Air Quality Management Plan. Monitoring is critical.</p> <p>Object - Strengthen policy to ensure measures to tackle emissions from all sources and have a positive impact on air quality drawing on the Environmental Audit Committee's report. Additional criterion on how spatial planning can reduce need to travel and encourage development in accessible locations. Should cover areas immediately adjacent to or near AQMAs and to buildings or areas frequented by high-risk residents. Refer to positive role building design can play a role in pollution dispersal. New way of conducting air quality impact surveys should be introduced. Policy needs to be strengthened to address immediate air quality concerns in AQMAs (Rottingdean). Criteria for needing Air Quality Impact Assessments should be included in Site Specific policies. Inadequate focus on air quality issues in outlying areas. Question robustness of CPP1 STA methodology and mitigation measures (Rottingdean) in tackling traffic congestion. Align with Corporate KPIs.</p>	<p>Additional criterion related to siting of biomass combustion/ CHP plants near AQMA or sensitive receptors.</p> <p>Inclusion in criterion d) to consideration of impact of lighting on biodiversity in particular priority habitat and species.</p> <p>Clarity in supporting text to 'agent of change' principle.</p> <p>Consequential changes to supporting text in relation to new criterion.</p> <p>Reference to indoor air quality in supporting text and updated guidance.</p>
DM41 - Polluted sites, hazardous substances & land stability	<p>10 Representations [9 supporting, 1 objecting]</p> <p>Support – general support for policy. Support the reference to ecosystem services within this policy. Appropriate Policy and good alignment with NPPF and the DEFRA 25 year plan.</p> <p>Object - There should be site surveys on all proposed developments regardless of Council's resource issues.</p>	<p>Clarification in policy that seeking to protect natural capital and the quality of the environment.</p> <p>Include definition of natural capital in footnote.</p>

DM42 Protecting the Water Environment	<p>18 Representations [17 supporting, 1 objecting]</p> <p>Support – general support. Changes to policy wording required to reflect OFWAT’s new approach to water and wastewater connections charging. Refer in supporting text to Beachy Head West MCZ; impact of nitrates on water quality and the ChaMP project. Amend policy to give prominence to water quantity as well as quality. Concerns raised regarding general/plastic waste in sea water and beaches.</p> <p>Object - Policy ignores issues of flooding and sewerage (in Patcham)</p>	<p>Inclusion reference to water ‘quantity’ in policy.</p> <p>Amendments to policy wording regarding phasing of waste water infrastructure to align with occupation of development and also streamline wording to avoid duplication.</p> <p>Reference to emerging Greater Brighton Water Plan.</p>
DM43 - Sustainable Urban Drainage	<p>13 Representations [12 supporting, 1 objecting]</p> <p>Support - Policy is an appropriate and strong response; would accord with NPPF - would protect biodiversity, ecological networks, GI and natural capital and improve water quality. Include reference in policy to delivery of improved biodiversity and net gains. Policy should require larger development to modernise drainage system (or alternatively include this in DM42) Include in policy wording role of SUDS, and type of SUDS, in management of water quality.</p> <p>Object - Feel standards are being ignored in Patcham.</p>	<p>Amendment to policy to clarify that subterranean development would not be permitted where other sources of flooding have occurred.</p> <p>Amendment to policy to clarify that suds should be located and designed in accordance with best practice and adopted Sustainable Drainage SPD and that proposals should provide where possible improved biodiversity.</p> <p>Changes to supporting text to clarify certain types of SUDs more appropriate than others given aquifer.</p> <p>Updated reference to SFRA and SPD and other available good practice guidance.</p>

DM44 - Energy Efficiency and Renewables	<p>16 Representations [11 supporting, 5 objecting]</p> <p>Support – General support. Whilst supportive of general approach seek removal of application of policy to conversions and change of use to and removal of policy relating to improving Energy Performance. Question why an EPC target is required in addition to the 19 % carbon reduction target. Both are seeking to reduce carbon emissions and use of both may introduce confusion and not be consistent with 2015 Ministerial Statement. Greater reductions should only be sought subject to clearly demonstrable viability and feasibility considerations.</p> <p>Object - More constructive discussions should be happening with professionals and other LPAs about how we build above what is required by law, in order that we achieve wellbeing and social justice within ecologically-sound limits. EPC requirement in policy should be amended to require: EPC A (new build) and EPC B (conversion/ change of use). Should not be overreliance on BREEAM accreditation and query on how it relates to non-residential schemes.</p>	<p>No change to policy wording (inclusion of footnote).</p> <p>Clarifications in supporting text to some aspects of implementation including assessments of carbon emissions.</p> <p>Updates to supporting text to refer to council's ambition to be carbon neutral by 2030 and refer to emerging Greater Brighton Energy Plan.</p>
DM45 - Community Energy	<p>11 Representations [7 supporting, 4 objecting]</p> <p>Support – general support. Will help to reduce and mitigate the impacts of climate change Accords with Economic Strategy, the NPPF and DEFRA 25 year plan. Need to consider lack of choice and regulation.</p> <p>Object - Consider the policy to be aspirational rather than a measurable, effective and deliverable policy. Prefer a stronger policy – i.e. should be a requirement, rather than encouragement. Council needs to take more of leadership role to ensure policies are meaningful.</p>	<p>No change to policy wording.</p> <p>Reference in supporting text to social value and council social value framework.</p>
DM46 - Heating and cooling network	<p>15 Representations [13 supporting, 2 objecting]</p> <p>Support - Important to lower energy consumption and CO2 emissions. Complements wider</p>	<p>Amendment to policy to require that proposals must meet CHP Quality Assurance standards and demonstrate</p>

infrastructure	<p>energy work in the city region. Policy prioritises less well off and vulnerable.</p> <p>Object - Policy does not consider that alternative means of achieving reducing carbon emissions are actually more effective than District Heating, and can be cheaper. As such, the policy should not be restricted to one means of meeting the objective. Policy does not add anything above DM44 and should be removed; or altered to allow for other methods of achieving carbon emissions reduction</p>	suitability to a future connection.
Special Areas, Strategic Site Allocations and Housing and Employment Site Allocations		
Special Area SA7: Benfield Valley	<p>18 Representations [12 supporting, 6 objecting]</p> <p>Support – support the policy objective to protect and enhance the Local Wildlife Site as an important 'green wedge' and the commitment to the protection and enhancement of biodiversity. Policy would protect and enhance Benfield Valley's value to biodiversity and green infrastructure which would accord with the NPPF and DEFRA 25 year plan. Support policy wording promoting connectivity through the site from the urban area to the National Park and the creation of gateway facilities. Support the requirement in the policy justification for detailed proposals to provide Landscape and Visual Character Assessment. Additional flexibility on housing numbers could help to bridge gaps in housing provision if windfall sites do not produce the numbers envisaged. Some concern that the housing allocation areas may have some detrimental effects on the setting of Grade II listed Benfield Barn and its associated Conservation Area - 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.</p> <p>Object - The site has potential to deliver considerably more than 100 dwellings (375 dwellings is suggested by the site promoter based on site level assessments of ecology, landscape, open space and access). The ambitions for higher quality green space are more likely to be deliverable if more housing is allowed for. Proposed allocation would create extra traffic on surrounding roads which are already extremely busy especially at peak</p>	<p>Policy amended to include reference to enhancing wildlife connectivity and buffer zones.</p> <p>Paragraph added to supporting text to reflect ANA designation and potential for archaeology.</p>

	<p>times, with particular impacts likely on Fox Way and Hangleton Lane. The number of residential units has been increased from the UFA 2015 figure of 30 dwellings to 100 dwellings without a clear justification. The increased housing numbers contradict the conclusions of the UFA in terms of impacts on landscape and recreational disturbance. The allocation of housing on a site proposed for designation as Local Green Space is inappropriate. The site does not meet the criteria for designation as Local Green Space as defined in the NPPF.</p>	
SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road	<p>16 Representations [9 supporting, 7 objecting]</p> <p>Support - policy needs to reflect the council motion seeking affordable housing. Policy should require comprehensive Heritage Impact Assessment. Support principle of provision of health facility. Greater use of housing/ key housing could be provided from the part of the site surplus to healthcare use. Need to safeguard swift colony. Reference to contamination is requested if appropriate. Ensure development will be readily accessible and link to adjacent neighbourhoods.</p> <p>Object - Policy needs to adopt a flexible approach to housing numbers/density. Site capacity is low and affordable housing yield should be 100% on a publicly owned site whilst health facility can be moved elsewhere. Allocation does not reflect funding gap, a higher housing number (700 homes) is needed. Higher limit to healthcare provision floorspace can be set. Consider the allocation does not comply with density policy in City Plan Part 1. Criterion a) is unnecessarily onerous (retention of some listed/non designated heritage buildings is onerous and affects the viability of the scheme), Criterion b) and c) need rationalising for clarity and flexibility. Criterion d) needs deleting. Capacity of sewage network requires alignment with phasing and reinforcement plans. Add a criterion to reflect the need for the phasing of development to be aligned with their reinforcement. Allocation requires comprehensive TA in view of potential traffic increase in A259 . Make provision for swift colony.</p>	<p>Requirement for Heritage Impact Assessment added.</p> <p>Amendment to criterion b) regarding creation of openings in the wall, for clarification.</p> <p>Additional criteria f) and g) to address waste water infrastructure requirements</p> <p>Additional criteria h) to address site specific biodiversity and green infrastructure requirements (including swift colony).</p> <p>Consequential changes to supporting text related to policy changes and reference to potential for contaminated land.</p>

SSA2 Combined Engineering Depot, New England Road	<p>9 Representations [8 supporting, 1 objecting]</p> <p>Support – some general support. Further reference to heritage assets/ heritage impact statement sought. A minimum required amount of Green Infrastructure should be stated to ensure net gains can be achieved.</p> <p>Object - Wastewater infrastructure currently insufficient, suggest wording changes to ensure delivery of sewerage network reinforcement.</p>	<p>Clarification of criterion g) to enhance setting of nearby heritage assets.</p> <p>Including of criteria i) in relation to waste water infrastructure requirements</p> <p>Inclusion in supporting text to potential for contaminated land.</p>
SSA3 Land at Lyon Close, Hove	<p>10 Representations [9 supporting, 1 objecting]</p> <p>Support – some general support. The proximity of the site to the Willett Estate conservation area should be noted in the policy and/or justification. Employment floorspace figure for Peacock Industrial Estate should be reduced. Residential development requirement should be increased to make optimal use of site potential which is much higher than 300 units. A minimum amount of green infrastructure development should be stated to ensure net gains can be achieved. Development must be attractive, require mansion blocks.</p> <p>Object - Policy needs additional criteria to ensure coordination of wastewater infrastructure provision with development.</p>	<p>Addition to criterion d) in relation to biodiversity and green infrastructure requirements.</p> <p>Including of criterion h) and i) in relation to waste water infrastructure requirements</p> <p>Inclusion in supporting text to potential for contaminated land and further guidance on design principles and nearby heritage assets.</p>
SSA4 - Sackville Trading Estate and Coal Yard	<p>11 Representations [10 supporting, 1 objecting]</p> <p>Support – support comprehensive redevelopment but a more flexible and qualitative approach to employment uses is requested. No justification provided for amount of employment floorspace required. The amount suggests a 'business park' element which is not considered relevant or deliverable, or consistent with DA6. Indicative figure preferred. Refer to Source Protection zone and contamination. A minimum amount of GI development should be stated to ensure net gains can be achieved. Recognition that the development</p>	<p>Inclusion of criterion h) in relation to biodiversity and green infrastructure requirements.</p> <p>Including of criterion i) and j) in relation to waste water infrastructure requirements</p>

	<p>must meet the requirements of a future Hove Station Neighbourhood Plan is positive.</p> <p>Object – local wastewater infrastructure capacity in closest proximity to the site has limited capacity to accommodate the proposed development. Additional wording suggested to address the existing Southern Water infrastructure under the site.</p>	<p>Consequential amendments to supporting text and inclusion in supporting text to potential for contaminated land.</p>
SSA5 Madeira Terrace and Madeira Drive	<p>36 Representation [9 supporting, 27 objecting]</p> <p>Support - The policy is a pragmatic approach; need for strategic and joined up approach and need for private investment. Supports inclusion of hotel in range of uses. The benefits of proposals are recognised with regards to green infrastructure and biodiversity improvements/ gains but this should be specified in the policy. Ensure transport/ access improvements and include employment space to create activity all year round.</p> <p>Consideration should be given to the extension of Volks Railway to the Marina in any Black Rock/Madeira Drive Scheme. Include reference to proposals should complement Former Peter Pan Leisure site.</p> <p>Object - Object to hotel being included in range of permitted uses – not appropriate, out of keeping and wrong location. Emphasis should be on retaining and restoring the arches, terraces and walkways, retain green wall and original function of terrace – open space, viewing and promenade space. Concerned with impact of proposals on event space – proposals should not impede regular events and whether events will impact on businesses. Proposed uses should be small scale independent uses, artist studios and galleries – include leisure and sport facilities (running track). Proposals should involve/led by community</p> <p>Concerns with how proposals will affect the historic Madeira Terrace structure and fund the maintenance of structure. Concerns with reference to shared space and whether still appropriate. Ensure appropriate reference to seafront cycle route and ensure separate cycle path is not obstructed by events. Amendments sought to include reference to needs and interest of elderly, the use of Madeira Lift and Shelter hall in terms of pedestrian connections. Remove reference to allowing hard standing on back of beach.</p>	<p>Inclusion in policy of reference to refurbishment, restoration and revitalisation of terraces; clarification on small/ boutique hotels; cycling infrastructure; event and shared spaces and greater detail on biodiversity/ landscaping improvements sought.</p> <p>Consequential amendments to supporting text.</p>

SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive	<p>18 Representations [11 supporting, 7 objecting]</p> <p>Support – Support policy but seek a wider range of additional permitted uses for the site. Include an additional criterion to encourage temporary/ pop-up uses. Changes requested to supporting text to remove reference to ‘open character’ being maintained. Welcome reference to open views to the sea; additional guidance should be provided in supporting text. Green infrastructure and biodiversity improvements/ gains should be specified in the policy. Need for better maintained seafront cycle route.</p> <p>Object - Concern with development on the beach, concern loss of public amenity. Should only be temporary small scale developments. Concerned policy criteria will be ignored and seeking strengthening of policy. Concern with height of development obscuring sea views.</p>	<p>Clarification through policy amendments to main and ancillary uses permitted.</p> <p>Additional criterion c) relating to density of development</p> <p>Further detail on biodiversity improvements sought.</p> <p>Consequential supporting text improvements.</p>
SSA7 Land Adjacent to American Express Community Stadium, Village Way	<p>12 Representations [8 supporting, 4 objecting]</p> <p>Support – proposed development could impact on Strategic Route Network, Highways England should be consulted on any submitted application. Additional wording suggested to better reflect visual connectivity to South Downs National Park. Include reference to groundwater source protection zones and contamination (if appropriate). Suggest requirement for heritage impact assessment. Require biodiversity net gains.</p> <p>Object- concerned with potential increases in traffic on the A259 and B2123 generated by future developments. Area saturated with development. Policy should be amended to allow for A1 retail development. Criteria should be amended to be less prescriptive regarding specific types of landscape solutions and additional sustainable transport improvements.</p>	<p>Clarification in criterion b) that proposals should enhance heritage assets and provide visual connectivity to the South Downs National Park</p> <p>Removal from criteria e) of specific examples of landscape solutions.</p> <p>Consequential amendment to supporting text to address the setting of the National Park and provide information on the sites location within a Groundwater Source Protection Zone.</p>
H1 Housing Sites and Mixed Use Sites	<p>197 Representations [25 supporting, 169 objecting, 3 other]</p> <p>Support – general support; confirmation required that the cumulative impact of the development sites have been included within the strategic modelling and included within</p>	<p>Requirement for development on some sites to align with sewerage network reinforcement and/or to</p>

	<p>the agreed junction mitigations. Include reference to protection of groundwater source protection zones and contaminated land where appropriate. Sites should be assessed for heritage impacts. Support for allocation of St Aubyn's School site. Some sites were considered suitable for more development/ less prescription on mix of uses proposed. A number of new ('omission sites') were put forward for consideration for inclusion in CPP2 for housing.</p> <p>Object – general objectives. Brownfield sites should be developed first. Sites with capacity under 10 units should be allocated to boost delivery. Housing target is too low. Need to demonstrate whether Plan is meeting Objectively Assessed Housing Need. Windfall allowance is too high. Additional sources of supply should be allocated (council owned land and Estates Regeneration programme sites). Densities should comply with NPPF and tall buildings guidance should be updated to encourage the development of higher buildings in the city. Transport improvements required at Shoreham and Brighton Marina to deliver required housing numbers. Ensure net gains in biodiversity and green infrastructure. Local waste water infrastructure requirements should be referred to. Allocations should not be prescriptive and mixed use sites should have a substantial housing element. Significant objection to the proposed allocation at 46-54 Old London Road, Patcham for reasons including impact on residential amenity, biodiversity and wildlife, over-development , additional congestion/ parking problems, flood risk unsuitability and query if all of site is available. Objections made to a number of other specific site allocations – availability/ adjacent uses/ proposed mix of uses/ suitability of allocation given wildlife designations. The indicative minimum figure was objected to for a number of sites.</p>	<p>ensure layout allows future access to water infrastructure</p> <p>Additional supporting text highlighting the potential for contamination on some brownfield sites</p> <p>Additional supporting text highlighting the need to protect groundwater resources when located within a GSPZ</p> <p>Tables 5 and 6: quantums updated for some sites. Eight housing sites removed where development has now commenced or where information submitted with representations indicated sites were no longer considered available within the plan period or where a lack of information was not able to confirm site availability. Two new sites have been added in response to the 'call for sites' exercise (Outpatients Department, RSCH and Royal Mail Sorting Office, Denmark Villas).</p>
H2 Housing Sites – Urban Fringe	<p>75 Representations [18 supporting, 55 objecting, 2 other] Petition of 518 signatures against the allocation of Land at/adjacent to Horsdean Recreation Ground (UF Site 16).</p> <p>Support - Urban fringe allocations will contribute towards the City Plan housing target &</p>	<p>Clarification that the developable areas of the sites are allocated for housing.</p>

	<p>overall housing requirements. Potential for sites to improve linkages to the South Downs National Park, contribute to green infrastructure and provide biodiversity gains. Sensitive development is needed to avoid/limit impacts on South Downs National Park. Need to avoid or mitigate impacts on Local Nature Reserves/ ecological/ biodiversity designations.</p> <p>Development of sites will need to consider impacts on the historic environment (through heritage impact assessments). Development will need to consider impacts on water sources/drainage. Support for higher housing numbers/increased densities from landowners at Mile Oak Road and Land at former nursery, Saltdean.</p> <p>Object - Sufficient brownfield sites exist in city to avoid need for development on the urban fringe / brownfield sites should be developed first. Urban fringe sites should be developed at higher densities / proposed densities are too low. Indicative housing figures for 3 sites are higher than recommended in the Urban Fringe Assessments (no explanation is provided for this). Several of the proposed sites are subject to ecology/biodiversity designations. Require updated transport modelling to test cumulative impact of development on strategic highways network (inc A27 junctions) and ensure adequate mitigation. Objections from local residents to several proposed UF allocations: Land at/adj Horsdean Recreation Ground (15 objections and petition signed by over 500 residents); Land at Ladies Mile (15 objections); Land at South Downs Riding School & Reservoir Site (5 objections) Objections from landowners/developers seeking higher housing numbers at Benfield Valley, Land at Coldean Lane & Land adj to Brighton Race Course (Whitehawk).</p>	<p>Cross references to SA4 and SA5 within policy text.</p> <p>Clarification that percentages for family housing are indicative.</p> <p>New criteria requirements adverse biodiversity impacts to be mitigated and net gains provided.</p> <p>Criteria regarding renewable energy strengthened through reference to achieving higher standards of energy efficiency.</p> <p>Explanation of additional criteria relating to phasing of development with sewerage network reinforcement and planning layout to ensure future access to water infrastructure.</p> <p>Table 7 updated: some clusters of sites split into two sites to reflect recent planning consents with consequential amendments to site area and quants and updated information on deliverability; key site consideration amended to reflect updated evidence.</p> <p>Supporting text amended to include</p>
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		further justification on the proportion of family housing to be sought; reference to seeking biodiversity net gains in site allocations; reference to design and materials reflecting the Integrated Landscape Character Assessment; reference to ecological survey requirements relating to designated biodiversity sites; reference to some sites being within GSPZ; reference to the potential for contamination on some sites.
H3 Purpose Built Student Accommodation (PBSA)	<p>28 Representations [18 supporting, 10 objecting]</p> <p>Support – general support for policy. Support PBSA as it can free up HMOs. Support not setting a target in policy. Support PBSAs being provided at Moulsecoomb and Falmer campuses – more should be accommodated there. Refer to opportunities for biodiversity net gains. Include reference to surface water protection zone with one site allocation (Lewes Road Bus Garage site). Students should remain in PBSA. Concern with London Road site allocation – large number of students in area - concern with impact on primary school. Ensure impact on primary care services considered.</p> <p>Object - Should be a greater emphasis on campus developments. Insufficient site allocations to meet need for student housing. Sites should be developed at higher densities. Windfall sites should also be encouraged. Alternative sites proposed at Enterprise Point, 27-31 Church Street and at 45 & 47 Hollingdean Road. It is a pre-requisite with the allocation of Lewes Road Bus depot that the operational requirements of bus depot are to be maintained. Concern over phasing of development at Lewes Road Bus Garage to ensure that delivery of sewage infrastructure aligns with the development. Need for sympathetic design adjacent</p>	<p>Clarification of indicative numbers of bedspaces in policy wording and table.</p> <p>Following assessment of sites put forward for consideration additional PBSA site allocated at 45&47 Hollingdean Road.</p>

	heritage assets. Too many PBSAs.	
E1 Opportunity site for business and warehouse uses	<p>12 Representations [9 supporting, 3 objecting]</p> <p>Support – consider appropriate response given need to safeguard industrial land and demand for employment land. Supports job creation. Include in policy reference to requiring a minimum requirement of GI development to ensure net gains to biodiversity. Could refer to contaminated land if relevant.</p> <p>Object – amend boundary to reflect Benfield Valley Local Wildlife Sites. 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.</p>	<p>No changes to policy wording or site boundary.</p> <p>Additional wording to supporting text to clarify biodiversity requirements re Local Wildlife Sites</p>
Any Other Comments	<p>51 Representations making a range of comments:</p> <p>Consider CPP2 does not address challenges facing city – lacks ambition and foresight - not creative; need for good quality and bold architecture and greater density; challenges facing high streets; accommodating housing needs; CPP2 needs to address well-being, social justice and quality of life While easier to navigate – query length and detail of reasoned justification and query why it is not called supporting text. Object to CPP2 in its entirety – draft CPP2 policies should be incorporated into a re-opened CPP1 consultation. Need to ensure CPP2 is consistent with new NPPF. Duty to cooperate section should include role of Neighbourhood Plans</p> <p>Housing Numbers/ Housing Delivery – too low – suggestions put forward – increase density in certain areas; look outside city and work with community self-build groups; relocate allotments to free up land. Housing Numbers/ Housing Delivery – concerns with government targets – emphasis should be on brownfield sites first. Urban green space must be protected and development restricted to Brownfield sites. More explicit support and detail should be included in CPP2 on Community Self Build (CSB)</p>	<p>References to NPPF have been updated where appropriate and opportunities sought throughout plan to streamline the supporting text.</p> <p>See Housing Provision Topic Paper update.</p>

	<p>Concern about implementation and enforcement of policies; ensure coordination of proposals and greater transparency in developer contributions.</p> <p>Transport – radical measures required to tackle traffic pollution and need for investment in public transport (eg metro systems). Considers CPP2 has not addressed the impact of planned development on eastern urban fringe on traffic congestion and air quality targets and would therefore be found unlawful. Cycle network requires improvements and upgrade.</p> <p>Parking Provision – specific request for Hove Neighbourhood Area</p> <p>Retail related concerns- omission of Special Retail Area (St James Street)</p> <p>Design and Heritage -plan should map of sculpture/ installations; Make spaces age friendly; gaps in protection of certain areas of Hove.</p> <p>Nature conservation – failure to fulfil formal duty to consider biodiversity. Need clarity in identifying and naming sites includes LGSs. Consider lack of engagement with wildlife specialists in particular with Local Wildlife Sites Review.</p> <p>Need for additional policies – swift boxes, biodiversity and green infrastructure/ natural capital and soils. Need for Food SPD.</p> <p>Potential for health hub should be considered adjacent SSA7.</p> <p>Consultation and timetable - question format of consultation and whether communities involved and listened too. CPP2 timetable needs to be achievable but ambitious.</p> <p>Specific queries on background evidence documents – local wildlife sites review, policies map and emerging Strategic Flood Risk Assessment.</p>	<p>See summary of changes to DM37</p> <p>See schedule of changes to Policies Map; Local Wildlife Site Study Update and Sequential and Exception Test Topic Paper</p>
Omission Sites	3 Representations	Addressed in Site Allocations Topic

	<p>Opportunity to consolidate and develop primary care and community health infrastructure: extend SSA7 (land adjacent to the Amex stadium) to effectively become a strategic site zone that incorporates the existing leisure centre, community centre, children's services and miscellaneous other sites in order to facilitate a multi-sector community infrastructure proposal that is developed in the most coherent way possible.</p> <p>The Brighton Racecourse and Adjacent Land should be included as a strategic allocation in the CPP2 to allow for refurbishment of racecourse and other uses (hotel, residential).</p> <p>Should be no further sites allocations focus on utilising and fillings empty buildings and clamp down on second homes and holiday lets. Audit of existing assets.</p>	Paper.
Sustainability Appraisal	<p>7 representations [4 objecting, 3 general comments]</p> <p>Query particular site assessments content and process. Sustainability Appraisal not assessed reasonable alternative for one policy. Disagreement with policy appraisals for particular sites or policies. Query information sources for likely future baseline.</p>	Addressed in Proposed Submission CPP2 Sustainability Appraisal
General Equalities Question	<p>12 Representations [2 supporting, 7 objecting, 3 general]</p> <p>Certain policies have positive equalities implications for certain groups including people with low incomes, disabled people, vulnerable people and older people e.g. DM1, DM4, DM5, DM22, DM23, DM32, DM33</p> <p>Certain policies have adverse equalities implications for certain groups including non-home-owners (young, low-incomed, BAME and recent immigrants), students, older and disabled people and are discriminatory e.g. H1, H2, DM2, DM7, DM8, DM33</p> <p>HEQIA failed to accurately assess impacts of DM2 and DM7 on young adults and people with</p>	Addressed in Health & Equalities Impact Assessment Addendum

	<p>low incomes.</p> <p>DM2 and DM7 contrary to Article 14 of Human Rights Act and Equalities Act 2010 due to impacts on young adults and people with low incomes.</p> <p>Development on urban fringe affects the human rights of those in close proximity. Plan as a whole failing to meet air quality objective, adversely impacting upon younger and older people. Plan does not address the needs of those who do not benefit from CPP1.</p>	
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