

Analysis of Article 4 Direction representations				
Total Number of Responses		39		
Total Number of Support		29		
Total Number of Objections		5		
Total Number of Neutral		5		
Respondent Type / Organisation	Summary of representation		Support / Object / Neutral	Officer Response
Support				
1	Resident	Support the A4D proposal. Concern this level of protection is not afforded to Conservation Areas as well.	Support	Support noted. Prior approval is required for sites in conservation areas to allow consideration of the impact of the change of use on the character or sustainability of the conservation area;
2	Resident	Support the A4D proposal.	Support	Support welcomed.
3	Resident	Support the A4D proposal for the city centre and local shopping parades.	Support	Support welcomed.
4	Resident	Some spaces are not suitable for residential conversions leading to cramped conditions.	Support	. The A4D will allow the Council to fully consider the living conditions for future occupants as part of the determination of planning applications.
5	Resident	The views of local people need to be taken into account when determining a planning application to reach an appropriate decision.	Support	The A4D would mean that applications for a change of use within the proposed areas would require a formal planning application with associated public consultation.
6	Resident	Support the A4D which will help control sub-standard conversions of offices to flats.	Support	Support noted. The A4D will allow the Council to review applications for housing and assess the proposed conditions for future occupants
7	Resident	Already too much housing in the heart of the city.	Support	Support noted. The A4D will allow the Council to review planning applications on a case-by-case basis to assess their sustainability and impact on the city centre.
8	Resident	Encourage any move that tries to protect local independent shops that are close by in Portslade.	Support	Support noted. The A4D will allow applications for a change of use in local shopping parades found

				across the city, including Portslade, to be reviewed on a case-by-case basis.
9	Resident	Support the A4D proposal as it's important to protect local shops.	Support	Support welcomed.
10	Resident	Crucial to protect grassroots music venues.	Support	Support noted. The A4D will allow the Council to determine planning applications on a case-by-case basis to assess their impact on music venues.
11	Organisation/Business	Must protect those businesses that make the city centre special, including pubs, live music venues and clubs.	Support	Support noted. The A4D will allow the Council to determine planning applications on a case-by-case basis to assess their impact on pubs, live music venues and clubs.
12	Resident	An A4D is essential.	Support	Support welcomed.
13	North Laine Community Association	Support the A4D proposal. PDR would result in a negative impact on the vitality and vibrancy of the city centre and undermine the sustainability, tourism, employment and commercial roles, particularly in the primary retail frontages and district centres.	Support	Support welcomed.
14	Resident	All the A4D proposal areas serve a public need and should not be turned into housing without consideration and consultation on a case-by-case basis.	Support	Support welcomed. The A4D would mean that applications for a change of use within the proposed areas would require a formal planning application with public consultation.
15	Resident	Support the A4D proposal to help maintain the cultural and independent vibrancy of Brighton.	Support	Support welcomed.
16	Resident	The A4D should include the Coombe Road shops as well, a high-risk area for more student housing and competition from larger national companies.	Support	Support noted. Coombe Road is not identified in the City Plan Part Two as a Local Centre or Important Local Parade.
17	Resident	If not adopted, then there is a risk of more student HMOs.	Support	Planning applications for HMOs are considered against relevant policies in the City Plan.
18	Resident	Planning decisions are best made at a local level to protect businesses and maintain the vibrancy of Brighton.	Support	Support noted. The A4D would mean that applications for a change of use within the proposed areas would require a formal planning application with public consultation.

19	Resident	Too many commercial spaces are being converted for residential use, which impacts negatively on local businesses.	Support	Support welcomed.
20	Resident	Support the A4D proposal to maintain control of planning permissions. There is already little scrutiny on the quality of residential properties, particularly student housing.	Support	Support welcomed.
21	Resident	Support the A4D proposal to help prevent more properties converting into residential use which end up as Airbnbs in the North Laines.	Support	Support welcomed.
22	Resident	Support the A4D proposal as without proper planning scrutiny, PDR presents a risk of undermining the commercial structure of the city.	Support	Support welcomed.
23	Resident	The unique shops in Brighton are turning into poorly maintained and expensive rentals and holiday accommodation. The city is losing the vibrancy that makes it special.	Support	Support welcomed.
24	Brighton & Hove Economic Partnership (BHEP)	Support the A4D proposal which is important in protecting business activities that have evolved overtime in these city locations. However, the BHEP appreciates the balance needed for the delivery of new homes, recognising that the demand for commercial space may have changed post-pandemic.	Support	Support welcomed. The A4D does not prevent the conversion of commercial space to residential, but it will allow the council to fully consider proposals against the development plan policies to ensure losses occur in a planned way where redundancy of the existing use is demonstrated.
25	Resident	Support the A4D proposal as would retain the ability to assess individual planning applications. Confused why the Valley Gardens area is included within the proposal justification.	Support	Support noted. The justification for including the Valley Gardens area is set out in the supporting document for the consultation.
26	Resident	Support the A4D proposal, as PDR will destroy the nature of Brighton allowing commercial to residential conversions without planning consultation. Shops and cafes bring visitors and creates jobs which support the economy.	Support	Support welcomed.

27	Resident	PDR is not appropriate for Brighton as we need to protect the vibrancy of the city's independent shops.	Support	Support welcomed.
28	Resident	Support the A4D proposals as the loss of businesses and community facilities to residential, likely Airbnbs, would be a disaster for local residents.	Support	Support welcomed.
29	Theatres Trust	Support the A4D proposal to help maintain the supply of commercial floorspace within the city centre. Concerned about the negative impact PDR will have on theatres and other live performance venues where neighbouring buildings are converted to residential.	Support	Support welcomed.
<b>Objections</b>				
30	Resident	Need to deliver more affordable housing. Redundant office/commercial space could be used for housing and reduce commuting.	Object	The A4D will not prevent proposals for affordable housing coming forward. The Council will be able to review planning applications on a case-by-case basis to assess their sustainability. City Plan Part 1 Policy CP20 requires the provision of affordable housing on all sites of 5 or more dwellings.
31	Resident	Let the market adjust the balance between housing and offices.	Object	Comment noted. The A4D will allow change of use proposals to be fully assessed against development plan policies. It does not prevent change of use occurring as the market evolves, but would ensure that redundancy of the existing use is fully demonstrated so that change occurs in a planned manner.
32	Resident	Brighton city centre would benefit from more office to residential conversions. It would breathe new life into the centre as new residents could support local businesses and restaurants.	Object	The A4D will not prevent changes use from occurring. It allows the Council to fully consider planning applications on a case-by-case basis to ensure that redundancy of the existing use is fully demonstrated.
33	Resident	With online shopping, high streets are becoming a thing of the past. Housing is better than empty shops.	Object	Commercial areas will continue to play an important role in providing communities with the services and facilities they need. It is recognised

				that their role is evolving, but the unplanned introduction of significant residential uses would undermine their viability and ability to adapt and thrive in the future.
34	Whaleback Planning & Design Ltd.	The blocking of permitted development rights across a number of shopping parades outside of the centre, is not necessary to avoid wholly unacceptable adverse impacts	Object	The Local Centres and Important Local Parades located outside the city centre have been identified through the City Plan for their important role in providing communities with access the services and facilitates.
		Expansion of the existing office to residential A4D eastwards to include the eastern side of the Old Steine is inappropriate, as the current Article 4 area was accepted as the maximum area possible by DCLG under the previous policy and guidance.		The justification for this small alteration to the boundary is set out in the consultation document.
		The NPPF specifically states that an Article 4 could be proposed to avoid the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre.		The justification for the proposed area is set out fully in the consultation document. The area does not include the whole of the city centre. The wider area within part of the centre has been covered by an office to residential A4D for some years which has functioned well.
		The A4D should only apply to ground floor uses		Important commercial space can be located on both the ground and upper floors of a premises, so it is appropriate to allow full consideration of proposals for change of use through a planning application.
<b>Not specified</b>				
35	Resident	Lots of unoccupied vacant homes in the city. Students need healthy living environments. Support the 15-minute neighbourhood approach.	Neutral	Comment noted.
36	Resident	Make it easier to visit the city with a park and ride.	Neutral	Comment noted.
39	Resident	Need to deliver more affordable housing.	Neutral	Comment noted. The A4D will allow policies relating to the provision of affordable housing to

				be applied to proposals for changes of use from class E to residential.
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