

DEPUTATIONS FROM MEMBERS OF THE PUBLIC

A period of not more than fifteen minutes shall be allowed at each ordinary meeting of the Council for the hearing of deputations from members of the public. Each deputation may be heard for a maximum of five minutes.

Deputations received:

(i) Deputation: Whitehawk Hill and the Racecourse Landscape and City Plan Part 2

Whitehawk Hill and the wider Racecourse Landscape are one of Brighton and Hove's most important assets, on a par with the Royal Pavilion and Preston and Hove Parks, for example. Whitehawk Hill is a statutorily designated Local Nature Reserve and most of it is statutory access land. It supports a range of rare and scarce habitats and species. It is the South Downs in our city and is a gateway to the wider Downs. It is well used and well loved by people from across the City, and especially by its neighbouring communities. Volunteers from these communities are working with the council's ranger to conserve and restore its habitats and landscapes for people and wildlife.

Despite all of this, this landscape is threatened with damaging development because sites within it are included in the list of housing allocations in City Plan Part 2. These allocations are based on the conclusions of the Urban Fringe Assessments, conclusions that were not adequately evidenced and are unsound. Further, despite meeting all the criteria, this landscape was not proposed for Local Green Space designation in the Urban Fringe Assessments and was not included as such in the City Plan. When asked, council officers were unable to offer any explanation for this. Public opposition to development on Whitehawk Hill was clearly demonstrated during the Save Whitehawk Hill campaign, which opposed the Homes for Brighton and Hove proposals which emerged last year. This included full public meetings, the 'Beating the Bounds' walk with at least 120 people and a petition which attracted more than 1400 signatures.

Friends of Whitehawk Hill have submitted a document to the council setting out their case for the removal of these sites from the allocations in City Plan Part 2, as well as for the designation of this landscape as a Local Green Space. This includes evidence, for example, from ecological surveys carried out this year by professional ecologists. It demonstrates that development of these sites would damage ecology, landscape and views and people's access to and enjoyment of this landscape.

Friends of Whitehawk Hill have tried repeatedly to engage with councillors and officers over this but whilst some councillors have been supportive, it seems clear that officers do not want to engage with us over the substance of our case. Instead, they have rejected our attempts to engage and indicated that this is something that should be dealt with by the Planning Inspectorate, a national body remote from our city and landscapes. This is a plan for Brighton and Hove and Brighton and Hove Council can and should take ownership of the decisions involved in its preparation, including the decisions about the future of these sites. It should not wash its hands of them.

We ask Brighton and Hove Council to do the right thing, remove these sites from the list of housing allocations, designate it as a Local Green Space and develop a positive vision for the whole of this landscape. We would be happy to work with the council to make this case and deliver this vision and to this end we further urge the council to engage with us so that we can work together.

Signed by:

Richard Bickers (Lead Spokesperson)

David Bangs

Kim Turner

Anne Glow

Anne Herzog

Sue Craig

Jane Hawkins

Bryan Coyle

Paul Hughes.

Supporting Evidence

Proposed Development Areas/Allocated Sites

Site 30 Land at and adjoining Brighton Race Course (Whitehawk Hill)

1822 Deed of Inclosure - of the Parish of Brighton's extensive ancient Tenantry Down commons and open fields created the 105 acre 'Race Ground', a typical post-enclosure 'recreational common', with new recreational rights replacing economic rights and a clause preventing the 'break up' the Race Ground, which was included in the **1888 Indenture** relating to the purchase of the 'Race Ground' by Brighton Corporation.

BHCC Planning Policy – states that development that would have an adverse effect on a Local Nature Reserve should not be permitted unless it is of regional significance.

Urban Fringe Assessments – the site appears on the list of allocations because these assessments concluded that the effects of development could be mitigated. However, we believe the site could have been excluded from the assessments and that we have provided evidence which demonstrates that the conclusions are unsound for the following reasons.

- The decision not to exclude Local Nature Reserves from the UFAs was BHCCs and was not prescribed by the planning inspector;
- The UFAs do not give sufficient recognition or weight to the Local Nature Reserve designation;
- There are significant omissions from the UFAs which undermine their credibility;
- Damage to the integrity, and fragmentation of, a core part of the Local Nature Reserve, which would be cut in half, is not discussed or assessed in the UFAs;
- There are errors and omissions in the UFA ecological survey, including the failure to identify the presence of chalk grassland (BAP Priority Habitat/Habitat of Principal Importance Lowland Calcareous Grassland) in the reserve, one of its most important habitats, which undermine the credibility of the UFAs assessments;
- They do not recognise that development would cause the loss of notable features of ecological interest within and adjoining the proposed development area, including;
 - The gorse scrub, a historic landscape feature and habitat which occurs on this part of Whitehawk Hill and not elsewhere, reflecting local differences in soils that form part of the diversity of the reserve, and which is barely recognised in the UFAs;
 - A group of distinctive and notable breeding birds intimately linked to the gorse scrub as a breeding habitat, including BoCC red listed species such as Linnet (breeding in the area in 2019), as well as Dartford Warbler and Stonechat (which have bred in recent years).
 - Elements of a chalk heath flora;
 - Notable invertebrate species associated with chalk heath and/or heathland habitats.
 - Development would threaten a population of the BAP Priority Species/Species of Principal Importance brown banded carder bee;
- There would be a loss of statutory Access Land and Open Space, which is not discussed or addressed;
- Significant negative visual impact effects on the landscape and on important views within the local visual catchment, along the hill and from the valley, which would compromise the naturalness of the landscape and views and its sense of space and place - are not properly addressed as this is considered largely from the perspective of effects on the wider landscape and the National Park;

- They make inappropriate mitigation proposals, such as tree planting, when management of the hill to conserve and restore its historic landscapes and notable habitats requires the removal of trees;
- They do not address the effect development would have, by severing this green wedge and gateway to the Downs, on peoples experience and enjoyment of this landscape; and
- They wrongly conclude that that effects of development could be mitigated.

Reptile translocation – Whitehawk Hill was used as a receptor site for more than 2,000 reptiles in a translocation from a site in Mile Oak in 2018. National guidance states receptor sites should be safe from future development.

Transport – additional vehicle movements could have impacts on traffic flows in Whitehawk and on local residents.

Topography and feasibility – were cited as reasons for dropping the Homes for Brighton and Hove proposal and it appears likely that these factors would apply to future proposals.

Exclusion and Inequality – the lack of weight given to the importance of Whitehawk Hill and its multiple values by decision makers, compared with other Downland sites around the City, reflects broader inequalities of treatment of the Whitehawk and East Brighton communities.

Sites 32 and 32a Land at South Downs Riding School & Reservoir Site and 33 Land north of Warren Road (Ingleside Stables)

Both these sites are in very sensitive elevated locations outside the built up area of the City and immediately adjoining the South Downs National Park. The proposed development areas extend beyond the footprint of existing built development. Development of these sites would have significant negative effects on;

- Landscape and views – of the wider South Downs landscape and views from, and the setting of, the National Park; and
- Wildlife – which includes a range of notable and protected species.

It would also increase future development pressure on the wider Warren Road ridge landscape.

The City Plan Part 1 (3.16.1) states "*The NPPF advises that local planning authorities should avoid new and isolated homes in the countryside*". Though the numbers proposed at Ingleside (30 units) and at South Downs Riding School (15 units) are larger, they are still within the spirit of the NPPF advice.

The South Downs National Park Local Plan (Strategic Policy SD4: Landscape Character) states "*Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that: (...)*

3. The settlement pattern and individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined."

Isolated developments of the sort proposed would be inconsistent with this policy.

The small number of units that could be delivered at these sites are insufficient benefit to justify the costs associated with development.

Local Green Space Designation

Despite meeting all the criteria for designation as a Local Green Space Whitehawk Hill/Race Hill was not identified in the 2014 Urban Fringe Assessment for potential designation. No supporting evidence, such as a matrix indicating which sites met or did not meet the relevant criteria, was presented by them in support of the sites they selected, or excluded. Council officers, when asked, could offer no explanation for this.