

Subject:	Proposed Submission City Plan Part Two		
Date of Meeting:	23 April 2020 5 March 2020 – Tourism, Equalities, Communities & Culture Committee		
Report of:	Executive Director, Economy, Environment & Culture		
Contact Officer:	Name:	Helen Gregory	Tel: 01273 292293
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Ward(s) affected:	(All Wards);		

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 This report seeks approval for the publication of the Proposed Submission City Plan Part Two, along with its supporting and background documents, for a six week period of public consultation May - June 2020 prior to submission to the Secretary of State for independent examination.
- 1.2 The main role of City Plan Part Two is to support the implementation and delivery of City Plan Part One (adopted March 2016) which sets out the strategic planning framework for the city to 2030. Part Two includes new policies and builds upon and complements the strategic plan and will help facilitate the delivery of high quality development by setting out an up to date suite of detailed development management policies and additional site allocations.
- 1.3 Once adopted, Part Two will also replace the currently retained 2005 Brighton & Hove Local Plan (BHLP) policies to provide a more streamlined and straightforward set of development management policies. This will result in one City Development Plan (Parts One and Two) which will provide local policies to manage new development as it comes forward. It will be simpler to use for developers, residents and the council's development management services.

2. RECOMMENDATIONS:

To receive the item referred from the Tourism, Economy, Culture & Communities Committee for approval.

- 2.1 That the summary of the main issues raised in the consultation on the draft City Plan Part Two carried out 5 July – 13 September 2018 (included at Appendix 2 with a full summary schedule set out in the Statement of Consultation published on the City Plan Part Two webpage be noted:

<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020>);

- 2.2 That the Proposed Submission City Plan Part Two (along with the policies map and other proposed submission documents) for statutory public consultation in accordance with Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012 be approved;
- 2.3 That the subsequent submission of the documents to the Secretary of State under Regulation 22 of the Town & Country Planning (Local Planning) (England) Regulations 2012 by the Executive Director for Economy, Environment & Culture be authorised; subject to no material changes, other than alterations for the purposes of clarification, improved accuracy of meaning or typographical corrections, being necessary;
- 2.4 That the Head of Planning be authorised to agree any draft “main modifications” to the City Plan Part Two necessary to make it sound and to authorise the publication of such draft modifications for public consultation save that should any draft modification involve a major shift in the policy approach of City Plan Part Two the draft modification shall be referred by the Head of Planning to the Tourism Equalities, Communities & Culture Committee for approval.

3. **CONTEXT/ BACKGROUND INFORMATION**

- 3.1 The Brighton & Hove City Plan Part One (CPP1) was adopted in March 2016 and contains strategic planning policies setting out the overall amounts of development (housing, employment, retail etc.) required across the city to 2030 and the broad locations and Development Areas where significant development will take place. It allocates key strategic sites and also sets out key citywide policies to guide development including urban design, transport, affordable housing, biodiversity and sustainability policies.
- 3.2 The role for the City Plan Part Two (CPP2) is to support the implementation and delivery of CPP1. It builds upon and complements the strategic planning framework; identifies and allocates additional development sites; and sets out a more detailed and positive development management policy framework to assist in the determination of planning applications. It covers the same time period (up to 2030) and geographical area as the CPP1. It will help to deliver other city council strategies, for example the Economic Strategy and Housing Strategy.

The City Plan Part Two

- 3.3 The Proposed Submission City Plan Part Two (included in Appendix 1) comprises:
 - **46 development management policies** arranged in the following topics: Housing, Accommodation and Community (including HMO and student housing policies), Employment and Retail, Design and Heritage, Transport and Travel and Environment and Energy.
 - A **Special Area Policy for Benfield Valley** to ensure a coordinated policy approach to ensure the positive and ongoing management and maintenance of Benfield Valley’s open spaces, wildlife habitats and heritage assets whilst allowing some development.
 - **7 Strategic Site Allocations** - larger mixed use sites (including the Brighton General Hospital site, Sackville Trading Estate and Coal Yard and Land at Lyon Close)

- A **schedule of 55 housing sites** (39 sites within the existing built up area and 16 urban fringe site allocations) and 3 Purpose Built Student Accommodation sites (Lewes Road Bus Garage and 118-130 London Road; 45 & 47 Hollingdean Road Brighton)
- An additional **employment site opportunity** at Hangleton Bottom alongside its safeguard as a waste site.

3.4 Planning policies in the City Plan Part Two will help deliver a fairer city with a sustainable future and support the priorities set out in the Council Plan (Our Plan 2020 to 23) Some of the key matters addressed within the City Plan Part Two include:

- Improving housing quality, choice and mix through introducing minimum internal space standards, higher optional accessibility standards for new housing and supporting the provision of a range of accommodation that meets the city's needs including new policies for older persons housing and community led housing (policies DM1 – DM5).
- New policy addressing concerns with Houses in Multiple Occupation (HMO) concentrations to consider impacts at both the immediate and wider neighbourhood level alongside an additional policy to manage the type and quality of purpose built student accommodation (policy DM7).
- Providing more flexibility within the city's defined shopping centres for a broader range of town centre uses to ensure future proofing retail centres against the changing nature of high streets (policies DM12-13).
- Updated and new policies recognising the role of community facilities, public houses, markets and local shops in providing access to local community facilities and shops (policies DM9, 10, 12-16).
- Policies to ensure attractive, high quality design and places; encouraging development in conservation areas to be of the highest quality; making clear that well designed new development of appropriate scale will be supported and that heritage policies do not preclude good modern design (policies DM18 – DM32).
- Protecting water quality and quantity; ensuring developments on the seafront are resilient to the effects of climate change. A new policy requires sustainable drainage to be included in the design and layout of all new buildings, car parking and hardstanding recognising the wider benefits they can play in providing improved biodiversity and enhanced landscape/ townscape (policies DM42 - 43).
- Policies seeking biodiversity net gains through new development and requiring development to demonstrate that it safeguards and/or contributes positively to green infrastructure recognising the multifunctional benefits (policy DM 37 and specific references in strategic site allocations).
- New policy extending the minimum sustainability standards set out in the adopted City Plan Part 1 to all development (not just new build residential). In addition requiring development to achieve a higher minimum energy performance in advance of government targets and encouraging opportunities for community energy and integrated heat network infrastructure/ communal heating systems (policies DM43-46). These policies will support the council ambition to become a carbon neutral city by 2030.

Consultation on the City Plan Part Two

- 3.5 Consultation on the Draft City Plan Part Two ended on 13 September 2018 after 10 full weeks of formal consultation (this was the second stage of consultation on the City Plan Part Two following an earlier issues and options consultation in 2016 that lasted 12 weeks). 1308 representations were received in relation to the draft City Plan Part Two policies from 349 respondents together with a petition signed by a further 518 residents. 66% of the representations were supporting policies in the draft CPP2. Of those, two-thirds were a mixture of general support, support with caveats and often with suggested changes to policies. There was particularly strong support for new policies introducing national minimum space standards and higher accessibility standards for new housing, the older person housing policy and additional restrictions on HMOs.
- 3.6 All the comments received during this consultation have been carefully considered and, where appropriate, changes have been made to the draft City Plan Part Two to reflect them. A summary of the main issues raised and how these have been addressed is set out in the Statement of Consultation (appendix 4) made available on the City Plan Part Two webpage: <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020>). This has been further summarised in Appendix 2 of this report.

Development Management Policies

- 3.7 The development management policies were generally well received and it has not been necessary to make major changes in response to representations other than:
- **DM6 Build to Rent** – whilst there was general support for the policy, developers/ consultants raised concerns about a number of the policy requirements. A Build to Rent Study was commissioned and the recommendations from this Study have informed changes to the policy relating to the affordable housing target in the policy.
 - **DM12 Primary, Secondary and Local Shopping frontages** – in response to a number of representations concerned that the wording was too restrictive and did not sufficiently reflect the changing nature of high streets and changes brought forward in the National Planning Policy Framework (“NPPF”) the policy has been amended (and re-named) to widen the range of town centre uses that shop units can change to.
 - **DM37 Nature Conservation and Green Infrastructure** – in response to consultation responses the policy has been restructured to provide greater clarity and to better reflect the NPPF. The changes made clarify that development should conserve, enhance and provide net gains in biodiversity and clarify the approach to designated sites.
- 3.8 Some minor changes to policy wording have also been made to address representations from statutory consultees such as Heritage England and Natural England seeking clarity or to strengthen policies such as seeking biodiversity net gains on site allocations or Southern Water seeking reference to infrastructure requirements. There have also been some amendments to the supporting text for reasons of clarification and in response to changes in national policy and updated background evidence.

Site Allocations

- 3.9 Representations to some of the Strategic Site Allocations (**SSA1 – SSA4**) and to the Special Area policy for **Benfield Valley (SA7)** from landowners/potential developers sought to increase the indicative housing figures. Following consideration of these representations the amounts of development (expressed as a minimum) have remained unchanged to ensure that other policy objectives such as place-making, the need to bring forward a mix of uses (where relevant) and the protection of heritage / environmental assets can be achieved. In relation to Benfield Valley, it is not considered that Benfield Valley is a suitable site for large scale strategic development. Such development would lead to the loss of a high proportion of the existing open space which would irreversibly change the character of the valley, leading to unacceptable impacts on the landscape, ecology and heritage which would not be possible to mitigate.
- 3.10 A representation was put forward by the landowners/ operators of **Brighton Racecourse** seeking its allocation as an additional strategic site allocation to support the refurbishment and upgrade of the racecourse and allow for additional uses such as a hotel and residential. The site is recognised as a major sporting venue and its refurbishment and upgrade is supported in principle by the Council. However, the aspirations and masterplanning set out in the representation were acknowledged to be at an early stage and there was a lack of detailed information regarding the scale of development and siting. Given a number of identified constraints/ sensitivities which included: scheduled ancient monument designation, landscape sensitivities (due to the sites elevated and prominent position) the fact that the site was not identified as suitable for housing in the 2014 Urban Fringe Assessment and its close proximity to the South Downs National Park, the site was not considered suitable for a strategic site allocation in the CPP2.
- 3.11 With respect to **Policy H1 Housing Sites and Mixed Use Sites**, a number of representations were received from landowners/ developers which sought a higher amount of housing or a change to the mix of uses on sites than indicated in Tables 6 and 7 in Policy H1. Where appropriate the indicative housing number or the mix of uses has been amended. Eight housing sites have come out of Tables 6 and 7 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).
- 3.12 Policy H2 proposes to allocate a number of **urban fringe sites** for housing, this principle was clearly established through the adoption of City Plan Part One. Representations were received from landowners, developers, local residents and other stakeholders with regard to the suitability and deliverability of a number of the proposed urban fringe housing site allocations under Policy H2. Some representations considered the urban fringe and/or specific proposed allocations offer potential to achieve higher housing numbers. Of the proposed urban fringe allocations, the largest number of objections related to the two urban fringe housing sites in Patcham Ward. This included a petition against the allocation of Land at/adjacent to Horsdean Recreation Ground (UF Site 16). Representations

made raised a number of concerns including site capacity and density, impact on character of the area, loss of valued open space, site access, traffic & parking impacts, pressure on local services/ facilities and impacts on surface & foul water drainage and water extraction. Following consideration of the concerns, both sites are still considered suitable for housing development as identified in the policy, having regard to the evidence and recommendations in the 2014 and 2015 Urban Fringe Assessments.

- 3.13 **Policy H2 Housing Sites – Urban Fringe** has been amended to include new criteria requiring biodiversity net gains and opportunities for higher standards of energy efficiency and renewable energy provision and additional criteria relating to waste water infrastructure requirements. Indicative housing figures to a number of sites have been updated to reflect recent planning consents or updated information on deliverability (such as at Land at and adjacent to Brighton Race Course UF30 where the quantum of indicative development has been reduced). For clarity some clusters of sites have been split in Table 8 to reflect recent planning consents.
- 3.14 Policy **H3 Purpose Built Student Accommodation** has been amended to include a third site (45 & 47 Hollingdean Road, Brighton) for purpose built student accommodation to reflect the deliverability, suitability in principle and availability of the site established through a recent planning application.

City Plan Part Two Supporting Documents

- 3.15 The City Plan Part Two has to be prepared in accordance with the Planning and Compulsory Purchase Act 2004; the Town and Country Planning (Local Planning) (England) Regulations 2012; the Environmental Assessment of Plans and Programmes Regulations 2004; and the Conservation of Habitats and Species Regulations 2017. Therefore a number of supporting documents including proposed changes to the Policies Map are also required to accompany the Plan and these are summarised in Appendix 3 and published on the City Plan Part Two webpage: <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020>).

Background Evidence

- 3.16 This report also seeks approval of the following studies that provide background and supporting evidence for the City Plan Part Two. Full copies of each study are published on the City Plan Part Two webpage: <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020>). Appendix 4 provides an outline of the purpose of the studies and a summary of the key findings. Although background studies inform the policy approach they do not determine policy. The 7 studies are: Student Accommodation Study, Build to Rent Study, the Older Persons Housing Needs Assessment 2019, Gypsies and Travellers Needs Assessment Update, SHLAA 2019 Update, Local Wildlife Study Update, and Strategic Flood Risk Assessment Level 1 and 2 Screening.
- 3.17 A number of Background Topic Papers have been prepared to support the City Plan Part Two and to set out in more detail the rationale for and evidence to

support a number of policies in the Plan: Benfield Valley Background Topic Paper, Local Green Space Topic Paper, Housing Quality and Choice – Space and Accessibility Standards Topic Paper, Duty to Cooperate Update Topic Paper; Sequential and Exceptions Test Update and Transport Technical Paper. In addition Topic Papers prepared at the draft City Plan Part Two stage have been updated (Retail Topic Paper, Site Allocation Topic Paper and Housing Provision Topic Paper) to reflect changes made to the Plan. Copies have been published on the City Plan Part Two webpage: <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020>).

Next Stages

- 3.18 Subject to council approval, statutory consultation for six weeks at the proposed submission stage provides a formal opportunity for the local community and other stakeholders to make any further representations on the City Plan Part Two prior to its submission for independent examination. This consultation will, in accordance with the relevant legislation, specifically focus on whether the Plan is 'sound' and has been prepared in accordance with legal and procedural requirements. More information on the tests of soundness is included in Appendix 5.
- 3.19 Subject to there being no further material changes to the Plan in light of representations received during the next formal consultation stage, or no new issues raised that could risk the City Plan Part Two being found not 'sound' at examination, the Plan will be submitted to the Secretary of State who will appoint an Inspector to conduct an independent examination of the City Plan Part Two. The Inspector will be required to test the Plan for compliance with certain statutory provisions, including whether the Plan is 'sound'.
- 3.20 In examining the Plan, the Planning Inspector will consider the preparation process and content of City Plan Part Two and the background evidence submitted by the council together with the representations received as a result of the proposed submission consultation. It is anticipated that the examination will include public hearing sessions which are expected to take place in winter 2020/ early 2021. Following receipt of the Inspector's final report, the Plan will be brought back to council for formal adoption (estimated winter 2021).
- 3.21 It should be noted that as the City Plan Part Two moves closer to adoption, the greater the weight that may be given to its policies in the determination of planning applications depending on their compliance with the NPPF and the level of support (as explained in Appendix 5). Until the adoption of the City Plan Part Two, retained policies in the Brighton & Hove Local Plan 2005 will remain part of the Development Plan.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 It is important that the Council has a complete, up to date and robust planning policy framework. Whilst the City Plan Part One provides the overarching strategic planning framework for the City, including the eight Development Areas and 22 strategic site allocations, it does not allocate all of the sites that will be required to meet the city's identified needs such as housing. Nor does it include a

full set of up-to-date detailed development management policies. City Plan Part Two will provide a full policy framework to deliver the strategy. Without City Plan Part Two in place national policy will carry more weight and there will be loss of local control in shaping and managing new development.

- 4.2 The process of preparing the City Plan Part Two involves testing of reasonable alternative policy options. This testing includes consultation, a robust evidence base and the Sustainability Appraisal.
- 4.3 The Committee could defer or decide not to publish the proposed submission City Plan Part Two for formal consultation, however, this would delay the progress of City Plan Part Two towards adoption and the Council would not have a complete, up to date Development Plan to guide development across the city. This could increase the risk of planning applications being allowed at appeal where out of date policies are relied upon. This option is therefore not recommended.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 A Statement of Consultation has been prepared which details the consultation undertaken on the draft City Plan Part Two, the consultation responses received through formal written representations and the officer responses to address the representations.
- 5.2 The Planning Policy Cross-Party Working Group met on 21 October 2019 and was advised of the outcomes of the draft City Plan Part 2 consultation and the proposed key changes to be made to the plan as a result of the consultation responses.
- 5.3 Consultation on the Proposed Submission City Plan Part Two will accord with the approach and standards set out in the council's adopted Statement of Community Involvement and will take into account the Community Engagement Framework (CEF). This will include directly notifying statutory consultees together with individuals or organisations that previously commented on the City Plan Part Two or have asked to be kept informed on progress on the City Plan Part Two. The consultation will also be publicised on the council's website, through press releases and social media. The proposed submission CPP2 along with all the supporting documents will be made available on the council's website and through the consultation portal. It would also normally be made available at the council's main deposit points (the customer service centres and Jubilee, Hove and Portslade Libraries). Copies of the CPP2, policies map and non-technical SA would also normally be made available at the other city libraries. Careful consideration will therefore be given to the timing of the consultation in light of the current coronavirus situation and given the current closure of libraries.
- 5.4 The statutory consultation period is for at least six weeks rather than the twelve-week requirement set out in the CEF. The consultation will specifically focus on whether the document is 'sound' and has been prepared in accordance with legal and procedural requirements (the test of soundness are explained in Appendix 5).

6. CONCLUSION

- 6.1 The main role of City Plan Part Two is to support the implementation of City Plan Part One (adopted March 2016) and to help deliver high quality and sustainable development and places in the city. Through the Plan, additional development sites are allocated and a suite of detailed, updated and new development management policies that complement the strategic policies set out in the City Plan Part One.
- 6.2 In accordance with statutory requirements, before the City Plan Part Two can be adopted it is required to go through the next formal stage of consultation before it can be submitted to the Secretary of State for independent examination.
- 6.3 Approving the proposed submission Plan for public consultation before it is submitted for examination will ensure the City Plan Part Two is progressed towards adoption in a timely manner, thereby supporting the implementation and delivery of the City Plan Part One.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The costs of preparation and consultation for the City Plan Part Two, and of holding an examination, will be met from within existing PPH revenue budgets.

Finance Officer Consulted: Jessica Laing

Date: 17/10/19

Legal Implications:

- 7.2 Once adopted, the City Plan Part Two will be a Development Plan Document ("DPD") within the meaning of the Planning and Compulsory Purchase Act 2004 and will be a material consideration in the determination of planning applications. The detail as to the preparation of this type of document is found in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 of the 2012 Regulations provides that, prior to submission to the Secretary of State for independent examination, a DPD must be publicised for a period of at least 6 weeks and representations invited. Any representations received by the local planning authority within the timescale set out will be forwarded to the Secretary of State for consideration.

Lawyer Consulted: Hilary Woodward

Date: 16/10/19

Equalities Implications:

- 7.3 The Plan will help deliver equalities outcomes from new development. A Health and Equalities Impact Assessment (HEQIA) has been carried out on the draft City Plan Part 2 and revisited following changes to the policies to ensure that the policies are coordinated to address equalities, health and well-being outcomes throughout the city. This is set out in an addendum to the HEQIA. The HEQIA concludes that CPP2 represents a comprehensive and inclusive suite of policies geared to fostering a healthy, vibrant, cohesive and sustainable population. The

plan addresses various health objectives, with certain policies specifically addressing some of the health needs of people with certain protected characteristics, including younger people, older people and disabled people.

Sustainability Implications:

- 7.4 A Sustainability Appraisal (SA) incorporating the requirements of Strategic Environmental Assessment (SEA) has been prepared to inform and support the City Plan Part Two. This included assessment of options at draft stage to ensure the Plan is the most sustainable approach and will therefore support the delivery of sustainable development and outcomes. The SA has assessed the changes to the City Plan Part 2 and concludes that the plan provides a policy framework that seeks to avoid, reduce and mitigate the risk of any adverse effects, thereby resulting in positive social, economic and environmental effects overall. The Plan contributes positively to delivering a Carbon Neutral City by 2030.

Crime & Disorder Implications:

- 7.5 The City Plan Part 1 addressed crime and disorder issues through Development Area proposals, Special Area policies and a number of citywide policies. During the preparation of the City Plan Part 2 the site assessment and sustainability assessment process has considered crime and disorder issues. A number of policies also address crime and public safety issues (DM8, DM18, DM20, DM23, DM24, and DM40).

Risk and Opportunity Management Implications:

- 7.6 Formal consultation on the proposed submission City Plan Part Two will ensure that any new issues that risk Plan being found unsound can be considered before it is submitted to the Secretary of State for examination.

Public Health Implications:

- 7.7 A HEQIA assessment has been carried out to inform the draft version of the City Plan Part Two to ensure that the policies are co-ordinated to address health and well-being outcomes throughout the city and revisited following changes to the policies to ensure that the policies are coordinated to address equalities, health and well-being outcomes throughout the city. This is set out in an addendum to the HEQIA, see also paragraph 7.3.

Corporate / Citywide Implications

- 7.8 The City Plan Part Two will help with the implementation and delivery of priorities set out in the City Plan Part One. It will contribute to delivering the Corporate Plan, Plans and Strategies across the city council directorates and the Sustainable Community Strategy. The City Plan Part Two will also help to deliver city-wide strategies of public and voluntary sector partners and promote investment and economic growth.

SUPPORTING DOCUMENTATION

Appendices:

1. Proposed Submission City Plan Part 2 (copies circulated to Members and published on the City Plan Part Two webpage: <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020>)
2. Summary of main issues raised at Draft CPP2 Consultation and summary of changes to policy wording
3. Summary of Supporting Documents
4. Summary of Background Studies
5. Tests of Soundness
6. Protocol

Background Documents

Proposed Submission City Plan Part Two Supporting Documents

1. CPP2 Policies Map
2. Sustainability Appraisal and non-technical Summary
3. Implementation and Monitoring Targets
4. Statement of Consultation
5. Health and Equalities Impact Assessment
6. Habitats Regulation Assessment

Background Evidence Documents

7. Gypsy and Traveller Accommodation Assessment 2019 Update
8. Student Accommodation Study
9. Older Person Housing Needs Assessment 2019
10. Build to Rent Study 2019
11. Strategic Housing Land Availability Assessment (SHLAA 2019)
12. BHCC Level 1 and 2 Strategic Flood Risk Assessments 2018
13. Brighton & Hove Wildlife Study 2017 – Update 2020

CPP2 Topic Papers

14. Benfield Valley Background Topic Paper,
15. Local Green Space Topic Paper
16. Housing Quality and Choice – Space and Accessibility Standards Topic Paper
17. Duty to Cooperate Update Topic Paper
18. Sequential and Exceptions Test Update
19. Transport Technical Paper
20. Retail Topic Paper
21. Site Allocation Topic Paper
22. Housing Provision Topic Paper

Previous versions of CPP2

23. Draft City Plan Part 2 – Tourism, Development & Culture Committee 21 June 2018
24. Draft City Plan Part 2 (June 2018)
25. City Plan Part Two Report 16 June 2016 Economic Development & Culture Committee
26. City Plan Part Two Scoping Report (June 2016)