

Appendix 3 Further Details of the City Plan Part 2 Regulation 20 Consultation and Submission Stage

1. Following Council approval in April 2020 of the Proposed Submission CPP2 for consultation, the Plan was published for formal (Regulation 19) consultation September – October 2020. The consultation focused on whether the Plan had complied with legal requirements and met the government’s tests of soundness as set out in paragraphs 35 -36 of the National Planning Policy Framework (whether the Plan is positively prepared, justified, effective and consistent with national policy).
2. 272 respondents making 810 representations and 4 petitions were received with over 1000 signatures each relating to Urban Fringe sites. A number of comments were also made to supporting documents. A break-down of number of representations by policy are included in at the end of this Appendix along with further detail on the breakdown of representations by site with respect to Policy H2 Housing Sites - Urban Fringe.
3. A summary of the main issues raised is available to read in the Statement of Consultation made available as part of the Examination Library on the council website: [Submission documents \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/consultation/submission-documents) [document SD09ai appendix 9].
4. Many representations did not raise significant soundness issues and sought changes to policies to address issues of clarity. Other representations sought policies to be further strengthened (e.g. from amenity or wildlife groups) or made less onerous (e.g. from planning agents and planning consultants) or to be updated to reflect the 1st September 2020 Use Class Order changes.
5. The policies that attracted the most representations numerically were:
 - **H2 Housing Sites - Urban fringe** - 169 representations from residents, local environmental and wildlife groups. These included general objections to the allocation of any urban fringe sites on grounds of environmental/ amenity value and/or that housing targets can be met on brownfield sites alone. Specific objections to urban fringe site allocations that included local designations. Specific objections to some sites, in particular Land at Whitehawk Hill; the 2 stables sites on Warren Road (Land north of Warren Road Ingleside Stables and Land at South Downs Riding School & Reservoir Site) and to Benfield Valley and the 2 sites in Patcham (Land at and adjoining Horsdean Recreation Ground and Land at Ladies Mile, Carden Avenue). A small number of landowner/promoter representations sought to increase housing numbers on allocated sites.
 - **DM37 Green Infrastructure and Nature Conservation** - 71 representations largely from residents and local environmental/ wildlife groups objecting that the wording of the policy did not adequately reflect the (Habitats Regulations) mitigation hierarchy requirements or provide adequate protection for nationally and locally designated sites.

- **DM38 Local Green Space** - 64 representations from residents, local environmental and wildlife groups including Friends of Whitehawk Hill. Objections sought the designation of one or more additional sites as Local Green Space, with the vast majority seeking the designation of Whitehawk Hill as Local Green Space.
- **SA7 Benfield Valley** - 27 representations from residents, The Benfield Valley Project and local environmental/wildlife groups objecting to the allocation of part of the site for housing. Representation from Benfield Valley Investments Ltd sought to extend the developable area and increase the amount of housing.
- **H1 Housing and Mixed Use Sites** - 28 representations largely from landowners/developers seeking changes to the numbers of units/ range of uses permitted.

Submission

6. All the representations were collated and forwarded to the Secretary of State when the Plan was submitted for examination in May 2021.
7. As part of preparation for the examination, an update to the Urban Fringe Assessment background evidence was undertaken by consultants to address representations received at the 2020 consultation. The consultant (LUC) reviewed representations relating to specific sites where ecology issues had been raised. The work also updated the ecological assessments for specific sites where ecology was raised as a specific concern. The update took account of recent changes in legislation and planning policy including the forthcoming mandatory requirement to achieve biodiversity net gains. The study was made available as part of the Examination Library when the Plan was submitted, and the recommendations discussed at the hearing sessions.

Number of Representations by Policy

Policy	Total Reps
DM1	24
DM2	7
DM3	6
DM4	10
DM5	8
DM6	9
DM7	9
DM8	12
DM9	7
DM10	6
DM11	7
DM12	8
DM13	8
DM14	7
DM15	5
DM16	4
DM17	8
DM18	15
DM19	17
DM20	8
DM21	8
DM22	16
DM23	4
DM24	5
DM25	6
DM26	13
DM27	7
DM28	6
DM29	6
DM31	5
DM32	5

Policy	Total Reps
DM33	17
DM34	11
DM35	8
DM36	7
DM37	71
DM38	64
DM39	8
DM40	9
DM41	5
DM42	8
DM43	8
DM44	10
DM45	1
DM46	2
SA7	27
SSA1	12
SSA2	4
SSA3	21
SSA4	6
SSA5	5
SSA6	3
SSA7	10
H1	28
H2	169
H3	6
E1	3
Supporting Documents	12
Total	810

Number of Representations received to H2 Urban Fringe Housing Sites

H2 – Housing Sites – Urban Fringe	No. Representations ¹
ALL SITES (listed under H2)	26
Land at <u>Oakdene</u> , Southwick Hill / <u>Land</u> West of Mile Oak Road, Portslade	8
Land at Mile Oak Road, Portslade	7
Land off <u>Overdown Rise</u> , Mile Oak, Portslade	7
Benfield Valley	27
Land at and adjoining <u>Horsdean Recreation Ground</u> , Patcham	42
Land at Ladies Mile, Carden Avenue	34
Land to north east of <u>Coldean Lane</u>	20
Land north of Varley Halls, <u>Coldean Lane</u>	22
Land at and adjoining Brighton <u>Race Course</u>	71
Land at South Downs Riding School & Reservoir Site	62
Land north of Warren Road (<u>Ingleside Stables</u>)	66
Land at <u>Ovingdean Hall Farm</u> & Land at <u>Bulstrode</u> / <u>Ovingdean Farm</u>	8
Land adjacent to <u>Ovingdean and Falmer Road</u> , <u>Ovingdean</u>	5
Land at former nursery, Saltdean	6
Cluster at Coombe Farm and Saltdean Boarding Kennels, Westfield Avenue North, Saltdean	3
Land west of Falmer Avenue, Saltdean	4

¹ Please note respondents may have ticked one site or several sites or their representation was made to all the sites listed in H2. |