

2nd September 2026 Planning Committee – Additional Representations

Page	Site Address	Application No.	Comment
All	All applications on the agenda	All applications on the agenda	Since the Officer committee reports were finalised, a new National Planning Policy Framework (the Framework) was published on 17 August 2026. This has introduced significant changes to its structure and presentation, including the incorporation of development management policies. However, having carefully considered the new Framework, Officers are satisfied that, insofar as the issues determinative to the cases on this committee agenda are concerned, the relevant policy approach has not fundamentally changed and does not alter the Officer recommendation set out in the Officers reports.
7-40	Cowley Drive,	BH2025/02480	Up-dated Land Supply Paragraphs as a result of the new NPPF;
41-78	36 Kingsthorpe Road,	BH2026/00110	<i>Policy CP1 in City Plan Part One sets a minimum housing provision target of 13,200 new homes for the city up to 2030. However, local housing need calculated using the Government's standard method should be used in place of the local plan housing requirement because the council cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer) and, separately, because the most recent Housing Delivery Test indicates that the delivery of housing is less than 75% of the housing requirement over the previous three years. The local housing need figure for Brighton & Hove using the standard method is 2,487 homes per year. A 20% buffer is then applied to this figure to reflect the most recent Housing Delivery Test measurement (published in August 2026) for the council being less than 85%.</i> <i>The council's most recent housing land supply position is published in the SHLAA Update 2025 which shows a five-year housing supply shortfall of 10,442. This is equivalent to 1.5 years of housing supply.</i>
105-140	Land Adjacent to Westfield Rise	BH2025/00293	
141-160	6 Westbourne Place	BH2026/01171	
7-40	104 Cowley Drive	BH2025/02480	Regarding NPPF August 2026; Condition 24 – Ecology Measures and condition 25 ecological design strategy – paragraphs 187 and 193 now Policy N2 of the NPPF (August 2026).

			Paragraph 9.38 – paragraphs 102 and 109 of NPPF Dec 2024 now Policy TR6. Paragraph 9.44 – wording referenced now covered by Policy TR6 Final Net Zero Officer comments: Final comments received which do not alter the draft comments previously provided and as set out in paragraph 6.3 of the officer report, nor do they alter the sustainability assessment in paragraphs 9.46 to 9.48 or the recommended conditions. The full response can be viewed on the public register. Additional Representations: Five (5) further representations of <u>objection</u> have been received. These raise grounds already covered within the report plus issues of the development not providing satisfactory access for disabled people, no disabled parking, that the accessible flat is at the bottom of the hill and lack of children play space. Officer Response: The proposal is not of a scale to require a children's play area. The other matters raised above are covered within the report and addressed via conditions, including those amended below. Revised condition 12 - as the scheme involves demolition as well as construction officers consider that this condition should also refer to demolition. Condition 12 is now as worded as below; No development, including demolition, shall take place until a Construction and Demolition Environmental Management Plan (CDEMP) has been submitted to and approved in writing by the Local Planning Authority. The CDEMP shall include: (i) Timescales for the Proposed Development including details of any phases and the forecasted completion date;
--	--	--	---

			(ii) Details of how the contractors will liaise with local residents to ensure that residents are kept aware of site progress and how any complaints will be dealt with reviewed and recorded and contact details (including details of any considerate constructor or similar scheme); (iii) Measures to minimise disturbance to neighbours regarding issues such as noise and dust management, vibration, site traffic, and deliveries to and from the site; (iv) Measures to prevent mud/dust from tracking onto the highway; (v) Details of hours of construction/demolition including all associated vehicular movements; (vi) Details of the construction/demolition compound including plant and material storage and manoeuvring areas; (vii) Details of the type, height and siting of any construction/demolition hoardings and boundary treatments; (viii) A plan showing construction traffic routes and details of any traffic management/signage; (ix) Details of site waste management. The construction/demolition of the development shall be carried out in full compliance with the approved CDEMP. Reason: As this matter is fundamental to the protection of amenity, highway safety and managing waste throughout development works and to comply with policies DM20, DM33 and DM40 of Brighton & Hove City Plan Part 2, policy CP8 of the Brighton & Hove City Plan Part One, and WMP3d of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan 2013 and Supplementary Planning Document 03 Construction and Demolition Waste.
41-78	36 Kingsthorpe Road	BH2026/00110	Regarding NPPF August 2026; Condition 16 (Foundation Scheme) – paragraph 187 NPPF (Dec 2024) now replaced by Policy N2 of the NPPF (August 2026). Paragraph 10.31 refers to high standard of accommodation in NPPF (Dec 2024) – this is now covered by Policy L2 and Policy P3 of the NPPF (Aug 2026)

			Paragraph 10.48 – wording referenced now covered by Policy TR6 of the NPPF (Aug 20206). Biodiversity Net Gain (BNG) and a Habitat Management Maintenance Plan (HMMP); Further discussions with Ecology Officers have confirmed that Officers would not consider the amount of BNG provided onsite in this particular context significant, and therefore no HMMP, and associated costs are required to be secured by a S106 Agreement. Normal BNG and Ecology conditions to provide the uplift onsite will still be imposed and are included in the Committee Report. Additional condition 33 to be attached - to ensure parking for the proposed disabled unit and visitors following further discussion with Transport Officers; The development hereby permitted shall not be first occupied until details of disabled car parking provision for the occupants of, and visitors to, the development has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be fully implemented and made available for use prior to the first occupation of the development and shall thereafter be retained for use at all times. Reason: To ensure the development provides for the needs of disabled staff and visitors to the site and to comply with policy DM36 of Brighton & Hove City Plan Part 2, and SPD14: Parking Standards.
79-104	Brighton Hove And Sussex Sixth Form College 205 Dyke Road Hove	BH2025/02901	Additional Representations: Twelve (12) <u>objections</u> from individuals and organisations including Friends of Dyke Road Park. These raise grounds already summarised in the Committee Report, as well as: - Floodlights are of poorer specification than those at the nearby tennis courts <u>Support</u> from Councillor Bagaeen, Ward Councillor. A copy of the representation is attached.

			<u>Objection</u> from Councillors Barton Ahmad, Miller and Muten, neighbouring Goldsmid Ward councillors A copy of the representation is attached. Officer Response: The points raised in the additional representations are for the most part already covered within the report. In terms of the specification of the proposed floodlights, this is considered to be appropriate for the application site, which is noted to be subject to fewer ecological constraints than the nearby tennis courts. Additional consultee comment from Environmental Health: Previous holding objection withdrawn, subject to securing the proposed hours of use, an updated Noise Management Plan, and post-completion noise validation testing by condition. Additional condition 16: Within the first complete Brighton Open Air Theatre operating season following first use of the artificial grass pitch and multi-use games area hereby permitted, a noise validation review shall be undertaken by a suitably qualified acoustic consultant and submitted to the Local Planning Authority for approval in writing. The noise validation review shall include: 1. a review of actual pitch use and any simultaneous operation with BOAT; 2. a review of booking, complaint and incident records; 3. attended monitoring during representative pitch activity; 4. attended monitoring at BOAT during a representative permitted overlap, where one occurs; 5. where no permitted overlap occurs, monitoring of representative worst-case pitch use at BOAT during BOAT's operating season; 6. identification, where practicable, of the source, level, frequency and timing of LAfmax events; 7. assessment of compliance with the approved Noise Management Plan; 8. monitoring at representative BOAT audience locations, including an elevated seating position; and
--	--	--	--

			9. identification of any further reasonably practicable mitigation or operational controls required. Where the review demonstrates that the approved controls have not been effective in preventing unacceptable effects attributable to use of the AGP or MUGA, a remedial mitigation strategy and implementation timetable shall be submitted to and approved in writing by the Local Planning Authority. The approved remedial measures shall be implemented in accordance with the approved timetable and retained thereafter. Reason: To verify the effectiveness of the approved noise mitigation measures under representative operating conditions and to safeguard the operation of a neighbouring cultural venue, in accordance with policies DM5 and DM20 of the Brighton & Hove City Plan Part Two. Additional informative 4: The revised Noise Management Plan secured by condition should include, but not be limited to: • Identification of BOAT as a sensitive receptor; • Establishment of an annual performance-notification process; • Application of the relevant controls to College, community and third-party use; • Prevention of use during notified unamplified spoken-word performances where use would otherwise overlap; • Prohibition of whistles during other notified BOAT performances occurring simultaneously with pitch use; • Establishment of responsibility for recording performances in the booking system; • Briefing of College staff, hirers, coaches, referees and users; • Retention of booking, complaint, investigation and action records; • Provision of proportionate sanctions for non-compliance; and • provision for review and additional mitigation where substantiated complaints or monitoring demonstrate that the controls are ineffective.
--	--	--	---

105-140	Land Adjacent To Westfield Rise Saltdean	BH2025/00293	Regarding NPPF August 2026; Paragraph 10.26 – wording referenced now covered by Policy L2 and Policy P3 of the NPPF (Aug 2026) Paragraph 10.55 – paragraph 116 of NPPF Dec 2024 now Policy TR6.
---------	--	--------------	---

