

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM10	24, 28, 29	2.7 2.12 2.19 2.20	<p>A Spatial Strategy for Brighton & Hove</p> <p>2.7 <u>Recognising the need to plan positively to meet the needs of a growing city</u>, the City Plan's aim is to seek to achieve a balanced and sustainable approach to accommodating growth over the plan period.</p> <p>...</p> <p>Strategy for the future of Brighton & Hove</p> <p>2.12 The assessed housing requirements (demand and need for new homes) for the city over the plan period are much higher than the city can realistically accommodate. The plan sets a minimum housing target of 11,300 <u>13,200</u> new homes to be achieved by 2030 and this reflects the capacity and availability of land/sites in the city; the need to provide for a mix of homes to support the growth and maintenance of sustainable communities; the need to provide land for other essential uses (such as employment, retail, health and education facilities and other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.</p> <p>...</p> <p>The Spatial Distribution of Development</p> <p>2.19 Spatially the majority of new housing, employment and retail development <u>will be located on brownfield (previously developed) sites within the city's built up area and will be directed to eight specific development areas (DA1 – 8)</u>. These are areas of the city which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration will secure substantial benefits for the city. This approach ensures that <u>opportunities for development of brownfield sites are maximised</u>, transport impacts will be minimised and the city's countryside and the South Downs National Park will continue to be protected.</p>

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			<p><u>2.20 Much of the land within the city's defined urban fringe forms part of the city's green infrastructure; either in terms of the city's open space framework (e.g. parks, recreation grounds, sports pitches and playing fields, allotments, cemeteries, natural/semi-natural space) or part of the city's biodiversity resource such as local nature reserves, sites of conservation importance or Nature Improvement Areas. However, in light of the significant scale of the city's housing need, objectively assessed as 30,120 new homes to 2030[#]; the requirement of the government's National Planning Policy Framework to plan positively to meet housing needs in full and; the need to adequately address the social dimension of sustainable development the potential for housing from the urban fringe has had to be reassessed^{##}. The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites but also includes the urban fringe as broad source of potential for housing development.</u></p> <p><i>Insert footnotes:</i> [#] Objectively Assessed Need for Housing: Brighton & Hove, June 2015, GL Hearn Limited ^{##} Urban Fringe Assessment Study June 2014</p>																																
MM11	31	Table 3	<p>Table 3 Summary of Development Proposals</p> <table border="1"> <thead> <tr> <th></th> <th>New Homes</th> <th>New Employment Floorspace (sq m)</th> <th>New Retail floorspace (sq m)</th> </tr> </thead> <tbody> <tr> <td>DA1 Brighton Centre and Churchill Square</td> <td>20</td> <td></td> <td>Minimum 20,000 comparison goods</td> </tr> <tr> <td>DA2 Brighton Marina</td> <td>1940</td> <td>2,000</td> <td>5,000</td> </tr> <tr> <td>DA3 Lewes Road</td> <td>810 875</td> <td>15,600</td> <td></td> </tr> <tr> <td>DA4 New England Quarter and London Road</td> <td>1185 1130</td> <td>20,000</td> <td></td> </tr> <tr> <td>DA5 Eastern Road and Edward Street</td> <td>470 515</td> <td>18,200 – 22,200 23,200</td> <td></td> </tr> <tr> <td>DA6 Hove Station</td> <td>630 525</td> <td>1,000</td> <td></td> </tr> <tr> <td>DA7 Toad's Hole Valley</td> <td>700</td> <td>25,000</td> <td></td> </tr> </tbody> </table>		New Homes	New Employment Floorspace (sq m)	New Retail floorspace (sq m)	DA1 Brighton Centre and Churchill Square	20		Minimum 20,000 comparison goods	DA2 Brighton Marina	1940	2,000	5,000	DA3 Lewes Road	810 875	15,600		DA4 New England Quarter and London Road	1185 1130	20,000		DA5 Eastern Road and Edward Street	470 515	18,200 – 22,200 23,200		DA6 Hove Station	630 525	1,000		DA7 Toad's Hole Valley	700	25,000	
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			DA8 Shoreham Harbour	400 <u>300</u>	7,500			
			Rest of the City:	3945				
			a) <u>Within the built up area</u>	<u>4130</u>	11,257 ³⁵			
			b) <u>Within the urban fringe</u>	<u>1060</u>				
			Small site development ³⁶	1250 <u>2015</u>				
			Total	44350 <u>13210</u>	100,500 to 105,500		25,000	
			<i>Amend footnote 36:</i>					
			³⁶ Development from small identified sites estimated to be 650 765 units pre-plan adoption and small windfall development across the plan period is 1,250 units in last 6 years of the plan allowance is for 600 units.					
MM12	34	DA1	<i>Amend introductory paragraph to the policy:</i>					
			The strategy for the development area is to secure a new state of the art conference centre in a landmark new building to benefit the city and the region and to sustain the tourism and service economy for the next 30 years, positioning Brighton & Hove as one of Europe's leading conference and meeting destinations. The redevelopment of the Brighton Centre will form part of a comprehensive scheme including the extension of the Churchill Square Shopping Centre and new leisure facilities.					
MM13	34	DA1	A. 3. Support the extension of the Churchill Square shopping centre to provide a minimum 20,000 sq m <u>net</u> of new retail comparison goods³⁷ floorspace and A2/A3 use floorspace;					
MM14	34	DA1	A. 5. To ensure high quality public and sustainable transport facilities serve new development, <u>in particular the need to improve the bus interchange facilities at Churchill Square;</u>					

Ref	Page	Policy/ Paragraph	Main Modification
			<p>A. 6. Improve pedestrian and cycle access through <u>and around</u> the area <u>particularly along Queens Road to Brighton Station</u> and reduce the severance between the northern side of the A259 and the seafront to accord with the Public Space Public Life Study;</p> <p>A. 7. Ensure improvements to local air quality <u>in at the West Street/ A259 Western Road, Churchill Square and North Street</u> transport corridor and along <u>Queens Road / West Street</u>[#] <u>junction</u> through the implementation of the council's Air Quality Action Plan. And ensure developments do not increase the number of people exposed to poor air quality. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.</p> <p><i>Additional footnote:</i></p> <p><i># See also SA2 Central Brighton part 7.</i></p>
MM15	35	DA1	<p>B. 1. New Brighton Centre and expansion of Churchill Square.</p> <p>Redevelopment of the Brighton Centre Area³⁸ to provide a new 25,000 sqm conference centre, and expansion of Churchill Square shopping centre to provide a minimum of 20,000sqm <u>net</u> new comparison goods A1 floorspace (and A2 and A3 use classes). New hotel and leisure facilities including a cinema will also be permitted. Proposals will be assessed against the local priorities set out above, citywide policies, informed by the adopted Brighton Centre SPD and the following criteria:</p> <p><i>Delete footnote 38:</i></p> <p>³⁸ As defined in the Brighton Centre SPD01 a core 'block' has been identified (comprising a number of smaller blocks) bounded by Western Road, West Street, Queensbury Mews and Cannon Place. Further detail is set out in the adopted SPD</p>
MM16	36	DA1	<p>3.4 The City Council will ensure that a strategy is devised so that the redevelopment of the Brighton Centre is adequately managed and does not result in a shortfall of music/conference venue space should Black Rock not be available.</p>
MM17	36, 37	3.6 3.7	<p>3.6 Proposals should promote strong linkages with the primary shopping frontages, along Western Road in particular and connectivity through to the seafront to address the problem of pedestrian severance. Improvements should include an enhanced <u>bus interchange and</u> pedestrian environment around Churchill Square, a new gateway link through from Churchill Square Shopping Centre to the seafront, and an improved junctions at West Street and Kings Road <u>and at the Clock Tower (Western</u></p>

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			<p>Road, North Street, and Queens Road). On completion of the redevelopment the primary retail frontage of the regional centre will be extended to include any new retail elements of the scheme.⁴¹</p> <p>3.7 Previous <u>Current</u> air quality assessments⁴² have indicated that the West Street/ A259 junction Western Road, Churchill Square and North Street transport corridor and Queens Road exceeds the Government's Air Quality Objective for Nitrogen Dioxide and the area is now included within the declared Air Quality Management Area (<u>AQMA</u>)⁴³. Improvements to local air quality in at the West Street/ A259 <u>these corridors junction will be</u> are a priority for the area. The movement of freight within the city centre can be is a significant contributor to <u>airborne pollution quality levels</u>. The potential to reduce, retime, reroute and/or revise <u>the mode of transport</u> will be assessed in order to look at measures to reduce the number of freight trips into the city centre <u>AQMA</u>. Measures will be developed that encourage <u>sustainable lower emission urban freight distribution</u> (see policy CP9 Sustainable Transport). <u>New development proposals should take account of their impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible.</u></p> <p>⁴² The 200711 Detailed Air Quality Assessment and subsequent updates ⁴³ 200813 Air Quality Management Area</p>
MM18	38, 39	DA2 3.13	<p>Amend illustrative diagram to remove 'shopping area'. Amend policies map to reflect this (see Appendix 1).</p> <p>3.13 The long term aspiration of the council is to address the deficiencies of the Marina, including the underperforming District Shopping Centre, and the wider area to facilitate the creation of a mixed use <u>district area</u> of the city. This will be achieved through the generation of a sustainable high quality marina environment which creates easier and more attractive access for residents and visitors, extends the promenade environment up to and around the Marina and creates stronger pedestrian and visual links with the sea from the Marina.</p> <p>Amend policy:</p> <p>DA2 Brighton Marina, Gas Works and Black Rock Area</p>

Ref	Page	Policy/ Paragraph	Main Modification
			The strategy for the development area is to facilitate the creation of Brighton Marina and the wider area as a sustainable mixed use district <u>area</u> of the city, through the generation of a high quality marina environment...
MM19	39, 44	DA2	<p>... by supporting proposals which:</p> <ul style="list-style-type: none"> • Secure a high quality of building design <u>that takes account of the cliff height issues in and around the Marina</u>, townscape and public realm while recognising the potential for higher density mixed development in accordance with the aims of the Spatial Strategy to optimise development on brownfield sites; • Do not breach the cliff height within the Marina; <p>...</p> <p><i>Add new paragraph in supporting text after 3.15:</i></p> <p><u>Fundamental to the strategy for the development area is the provision of mixed use development at a density that helps achieve a vibrant and sustainable place. However, proposed developments should ensure the preservation and/or enhancement of the setting of all listed buildings and conservation areas nearby, as well as the wider historic landscape and city skyline including views to and from the South Downs National Park. Applications for higher density development will be assessed in terms of their ability to meet the design and density considerations set out in CP12 and CP14. It is essential that any new development provides an attractive pedestrian environment, active retail and leisure frontages as well as easy access to the harbour, boardwalk, shoreline and other recreational areas within the Marina.</u></p>
MM20	39	DA2	<ul style="list-style-type: none"> • Contribute towards the production of or provide <u>Encourage</u> opportunities for the sustainable production of heat and power for the district;
MM21	39, 40	DA2	<ul style="list-style-type: none"> • Secure a more balanced mix of retail, including support for independent retailers, <u>and non retail uses such as</u> leisure, tourism, <u>and</u> commercial uses and non-retail uses, which accords with its District Centre status; <p>...</p> <p>A. 6. Balancing uses with an emphasis towards boating, surfing, leisure and recreation and the enhancement of the District Centre <u>retail offer</u> through encouraging the provision of</p>

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			<p>mixed retail activity and services to support any additional expansion in population (see CP4).</p> <p>3.17 The Marina is identified as a District Centre in the city's retail hierarchy (see Policy CP4). The majority of <u>existing</u> retail activity takes place in the Merchant's Quay and at the Asda superstore. Whilst the District Centre <u>Brighton Marina</u> contains a range of bars, restaurants and factory outlet stores related to its wider recreation and leisure role, it <u>currently</u> lacks the full range of shops and services, such as banks and post offices, found typically in District Shopping Centres to support the proposed expansion in residential population. The strategy for the development area is to enhance the choice and performance of retail activity in the District Centre <u>Marina</u> through the encouragement of mixed retail activity and improvements to the public realm. Ancillary <u>Retail development on the Black Rock and Gas Works sites should accord with CP4 Retail Provision. not compete with or prejudice the District Centre at the Marina. A detailed policy regarding the appropriate type and mix of A1 and non A1 uses in the Marina will be set out in Part 2 of the City Plan.</u></p>
MM22	40	DA2	<p>A. 12. Maximising opportunities to support the city's sustainability objectives through large-scale zero and low-carbon energy technologies, <u>subject to delivery and viability considerations</u>, to serve the Marina and wider city, particularly those that take advantage of the Marina's coastal location (see CP8).</p>
MM23	41, 42, 43	DA2	<p>B. Provision will be made for the following amounts of additional development to be provided by 2030:</p> <p>4,940 <u>1,938</u> residential units (including the 853 residential units already granted planning permission for the outer harbour, <u>1000 residential units allocated for the inner harbour and 85 residential units allocated for the Gas Works site</u>);</p> <p>5,000 sq m <u>(net)</u> retail (A1-A5) floorspace;</p> <p>...</p> <p>C. 1. Brighton Marina Inner Harbour</p> <p>Provision is made for a mixed use development comprising a minimum of 1,000 <u>additional</u></p>

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			<p>residential units (excluding the outer harbour scheme), 5,000 sq m of <u>net additional</u> retail development (A1-A5), 3,500 sq m of <u>additional</u> leisure and recreation use, community facilities (including health facility and community centre).</p> <p>C. 2 The Gas Works site has been identified for approximately 2,000 sq m of <u>business employment</u> (B1a, B1e) floor space to the north of the site, a minimum of 85 residential units and some ancillary retail development. The key criteria against which proposals will be addressed are:</p> <p>a) Employment provision - development should provide an appropriate mix of employment floor space of varying sizes that cater for business uses ranging from office to light industrial, including small starter units or managed units (Use Classes B1a, B1e);</p> <p>C. 3 The Black Rock site has been allocated for 7,000 sq m of community leisure and recreation <u>use purposes, in addition to not including</u> ancillary retail and café uses associated with the primary leisure use. Proposals will be assessed against the citywide policies and the following specific criteria:</p> <p>a) Provision of a high quality leisure and recreation facility that caters for the needs of the city, <u>complements Brighton Marina</u>, enhances the seafront leisure function, draws tourism to the city and attracts visitors and residents to the seafront;</p> <p>...</p> <p>Proposals for uses in addition to the recreation and leisure use will only be considered where it can be demonstrated that these uses support the delivery of a leisure and recreation facility and are not in competition with the District Centre status of <u>complement development at the Marina</u>. Supporting or enabling uses should perpetuate informal leisure uses associated with the seafront, conserve the historic environment and enhance linkages between Black Rock, the Marina and the Gas Works site.</p>
MM25	48, 49, 52, 53	DA3	<p>DA3.A.2. Promoting and investing in improved bus, cycling and pedestrian routes along Lewes Road from The Level to the Universities in partnership with public transport operators in order to achieve a modal shift and thereby help reduce the impact of traffic, <u>in particular on air and noise quality</u>. and ensure that new development does not negatively</p>

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			<p>impact on the air quality of the area</p> <p>...</p> <p>DA3.A.7. To ensure improvements to local air quality through implementation of the council's Air Quality Action Plan and ensure new developments do not increase the number of people exposed to poor air quality or traffic noise. <u>Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.</u></p> <p><i>Add to end of paragraph 3.31:</i></p> <p><u>New development proposals should take account of their impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible.</u></p> <p><i>Amend footnote 52:</i></p> <p><small>52...The area of Lewes Road south of the Vogue Gyrotory from the University of Brighton to the Level is included in the 200813 Air Quality Management Area as it exceeds the government's Air Quality Objective for annual Nitrogen Dioxides. This will be addressed through the implementation of the council's Air Quality Action Plan.</small></p>
MM26	49	DA3	<p>B. Provision will be made for the following amounts of additional development to be provided by 2030. Provision will be made through strategic site allocations (below) and through allocations made in the City Plan Part 2 for:</p> <p>810 880 residential units;</p>
MM27	49, 50	DA3	<p>C. Strategic Allocations in the Lewes Road Development Area are:</p> <p>1. Preston Barracks and Brighton University (Mithras House and Watts/Cockcroft Site)</p> <p>The city council will work with the University of Brighton and other partners to provide a mixed use employment-led development comprising a new business school, 10,600sqm B1 employment floorspace, including an Innovation Centre; 750 rooms of student accommodation; 300 residential units and other ancillary supporting uses. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies, <u>guidance in the</u></p>

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			<p><u>adopted Planning Brief for the site and the following criteria:</u></p> <p>...</p> <p>c) The development should aim to be zero carbon and through creative landscaping solutions (including features such as green walls) should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements <u>through creative landscaping solutions.</u></p>
MM28	50	DA3	<p>DA3. C. 2. Woollards Field South Provision of 5,000 sq m of B1 office <u>business</u> space or alternative employment generating development that helps to meet the city's infrastructure needs on land to the south of the new archive centre, known as The Keep.</p> <p>...</p> <p>c) As a greenfield site, the development will be expected to be zero carbon[#] and to achieve an Outstanding BREEAM rating and, through creative landscaping solutions (including features such as green walls), should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements.</p> <p><i>Add new footnote:</i></p> <p>[#] This will be subject to viability considerations and potential mitigation measures, as set out in policy CP8.</p>
MM29	51	DA3	<p><i>Add new criterion:</i></p> <p><u>DA3. C. 2. g) The development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.</u></p>
MM30	51	DA3	<p>DA3. C. 3. Falmer Released Land, Former Falmer High School</p> <p>Redevelopment for <u>some or all of</u> a range of uses including housing, purpose built student accommodation, offices (B1)₇ <u>and/or educational use.</u>₇ <u>Redevelopment should include a car</u></p>

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			<p>park related to the American Express Community Stadium and the provision, on or off site, of permanent accommodation for the Bridge Community Education Centre and for Brighton Aldridge Community Academy's Pupil Referral Unit. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies and the following criteria:</p> <p>a) The development will be required to achieve a high standard of design.</p> <p>b) Sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact.</p> <p>c) Development should ensure that there will be no adverse impacts on the setting of the South Downs National Park or any locally or nationally designated landscape, historic or ecological sites.</p> <p>d) The development should aim to be zero carbon and through creative landscaping solutions (including features such as green walls) should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements <u>through creative landscaping solutions.</u></p> <p>e) The developer will be required to enter into a training place agreement to secure training for local people.</p> <p><u>f) The development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.</u></p>
MM31	54	3.36	<p><i>Change last sentence of paragraph 3.36:</i></p> <p>A planning brief for Lewes Road (Preston Barracks and University of Brighton) was adopted in September 2011, <u>provides detailed guidance on the site.</u></p>
MM32	54	3.37	<p>3.37 Planning permission was granted in 2011 for an archive centre with related conference, education and research facilities on the Woollards Field site to the south of Falmer Station. The remainder of the site to the south is allocated for <u>5,000 square metres of office business</u> (B1) floorspace or other employment generating uses in connection with meeting the city's infrastructure needs totalling 5,000 square metres. <u>The site is earmarked in the Infrastructure Delivery Plan (Annex 2) as providing important infrastructure to meet the city's requirement for ambulance/paramedic rapid response</u></p>

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			<p>points. This development will help provide local training and employment opportunities and could help to strengthen the Universities' positive role within the local economy. Land at the southern end of the former Falmer High School site is no longer required for educational purposes. The site has potential for redevelopment for a range of uses, including student accommodation, residential, office and educational use. These uses could work in conjunction with car parking use for the nearby American Express Community Stadium. Permanent accommodation for the Bridge Community Education Centre and for Brighton Aldridge Community Academy's Pupil Referral Unit should also be provided, either on the Falmer Released Land or in an acceptable alternative location.</p>
MM33	57, 63	DA4 3.52	<p>6. Ensure improvements to local air <u>and noise</u> quality; through improvements to bus, pedestrian and cycle routes to achieve a modal shift and help reduce the impact of traffic; <u>and through the implementation of the council's Air Quality Action Plan and ensure developments do not increase the number of people exposed to poor air quality or traffic noise. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.</u></p> <p>3.52 London Road, south <u>either side</u> of Preston Circus has been designated as part of the 200813 declared Air Quality Management Area due to exceeding the government's Air Quality Objective for Nitrogen Dioxides. and The council's <u>new</u> Air Quality Action Plan 2014 <u>will</u> sets out measures to ensure improvement to air quality. <u>New development proposals should take into account impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible.</u> The massing of residential developments adjacent to particular roads in the area should be carefully designed so as not to increase the number of people exposed to poor air quality.</p>
MM34	58	DA4	<p><i>Amend DA4.B</i></p> <p>B. Provision will be made by 2030 for the following minimum amounts of development through strategic allocations (below) and through allocations in the City Plan Part 2:</p> <ul style="list-style-type: none"> • 4185 <u>1,130</u> residential units; ...
MM36	65	DA5	<p>8. Ensuring that there is satisfactory provision of water and wastewater infrastructure to serve new development: Development will need to provide connection to off-site water distribution and sewerage systems at the nearest point of adequate capacity.</p>

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MM37	65, 70	DA5	<p><i>Add paragraph 11 to Part A of policy:</i></p> <p><u>11. Support improvement to higher education teaching and library space in the Eastern Road and Edward Street Area.</u></p> <p><i>Insert at end of paragraph 3.60:</i></p> <p><u>Expansion and provision of additional teaching and library space for the universities, particularly the University of Brighton, at Circus Street and within the wider development area will be supported as an alternative use where other policy requirements are met (see paragraph 4.40 of CP3 Employment Land).</u></p>
MM38	66	DA5	<p><i>Amend DA5.B</i></p> <p>B. The minimum amounts of development to be secured by 2030 through strategic allocations (below) and through allocations in the City Plan Part 2 are: 470 <u>515</u> residential units; ...</p>
MM39	66	DA5	<p><i>Amend DA5.C.1</i></p> <p>1. Royal Sussex County Hospital</p> <p>Comprehensive redevelopment and enlargement of the hospital to provide 74,000sqm additional hospital (B1 <u>C2</u> use) floorspace ...</p>
MM40	66	DA5	<p><i>Amend introductory paragraph to C2 Edward Street Quarter:</i></p> <p>Employment-led redevelopment of the Edward Street Quarter (including former Amex House and the Job Centre) comprising demolition of the former Amex House and replacement with 15,000-20,000 sq m of high quality B1a office floorspace, <u>a minimum of 65 residential units and ancillary shops (A1) and cafes and restaurants (A3)</u>. The proposal will be considered in the context of citywide policies and the following criteria:</p>
MM41	68, 71	DA5	<p><i>Amendment to DA5, allocation C4 and supporting text:</i></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>C. 4. Freshfield Road Business Park and Gala Bingo Hall</p> <p>Long term opportunity for Mixed use redevelopment of the Freshfield Road Business Park and Gala Bingo Hall <u>sites comprising a comprehensive approach to the site to improvement to the provision of employment floorspace including B1 office/light industrial floorspace and B8 warehousing and provision of a minimum of 110 residential units. The proposals will be considered against citywide policies and the following criteria:</u></p> <ul style="list-style-type: none"> a) A comprehensive approach to the redevelopment of both sites will be required to ensure that <u>Provide modern employment space is provided alongside and residential development. and Re-provision or retention of that</u> a community or leisure facility (to retain or replace the Bingo Hall) <u>will be included</u> as part of the <u>Gala Bingo Hall site</u> scheme <u>appropriate to the needs of the local community.</u> b) The r<u>Redevelopment across both parts of the site</u> will be of a high standard of design, that is sympathetic to the surrounding historic built environment and will make efficient use of the site in terms of height of buildings and layout and re-introduce development along the frontage of Eastern Road. c) The developer will enter into a training place agreement to secure training for local people. <p><i>Amend supporting text at paragraph 3.65</i></p> <p>3.65 The final strategic allocation for the area, Freshfield Road Business Park and the Gala Bingo Hall <u>and car park, has been identified as a development opportunity. The Freshfield Road Business Park element of the site is well occupied and only likely to come forward in the longer term (post 2024).</u> The buildings within the Business Park are currently largely in storage and trade counter uses. Due to the accessible location of the site, which is on a sustainable transport corridor, and its topography (it is at a lower level than the surrounding area) it is considered there are major opportunities to use the site more effectively however it is recognised these units serve a useful function for the city. It is expected that the majority of residential development will be delivered on the Gala Bingo Hall and Car Park site, <u>which can be delivered earlier in the plan period, with the a leisure or community use retained or re-provided as part of the redevelopment as part of a comprehensive scheme.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM42	69	3.59	<p>3.59 Sustainable transport initiatives and improvements to the public realm⁶⁶ are a priority for the area, and will contribute to the aims of the Low Emissions Strategy (2011) to improve air quality in the area.</p> <p>⁶⁶ The Eastern Road Edward Street transport corridor has been identified in the 2007 Air Quality Detailed Assessment as exceeding the government's Air Quality Objective for nitrogen dioxide and is within the 2008<u>2013</u> Air Quality Management Area. <u>Air Quality is a priority in the vicinity of the Royal Sussex Hospital.</u></p>
MM43	74	DA6	<p>DA6. B. Provision will be made by 2030 for the following minimum amounts of development within this Development Area:</p> <ul style="list-style-type: none"> • 630 525 residential units; ...
MM44	76	3.70	<p>3.70 Growth that is based on utilising the sustainable transport connections, in particular Hove Railway Station is a priority in order to facilitate development within the area. The Part of the Hove Station Area lies within the 2008 <u>2013</u> declared Air Quality Management Area, within which development proposals should pay particular regard to air quality, especially adjacent to the main transport roads and junctions such as the of Sackville Road and Old Shoreham Road junction. Developments must avoid increasing the number of people exposed to poor air quality and should not cause deterioration in air quality. New development proposals should take into account impact on local air quality be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible. Also several of the junctions in the area are at or near capacity so any additional traffic is likely to add to delays.</p>
MM45	79-86	DA7 3.83- 3.101	<p>DA7 – Toad's Hole Valley</p> <p>The strategy for the development of Toad's Hole Valley and Court Farm is to secure a modern, high quality and sustainable mixed use development to help meet the future needs of the city, improve accessibility and provide new community facilities to share with adjacent neighbourhoods.</p> <p>A. The local priorities to achieve this strategy are:</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>1. That the site is used efficiently and effectively to assist in meeting the development and infrastructure requirements of the city.</p> <p>2. Ensure that <u>The development is of an</u> will aim to be an <u>exemplary standard in terms of environmental, social and economic sustainability, achieving</u> es a One Planet approach and <u>promoting</u> es the city's UNESCO Biosphere objectives.</p> <p>3. Ensure that development respects the setting of the South Downs National Park and <u>seeks to</u> enhances links to the National Park for local residents and tourists.</p> <p>4. To secure <u>The development that will</u> benefit <u>provide the opportunity to benefit</u> residents in terms of the mix of uses, an improved provision of community facilities, road safety improvements, training and job opportunities for local people and the provision of green infrastructure including public open space and natural green space.</p> <p>5. To improve sustainable transport links to the area.</p> <p>6. To incorporate appropriate landscaping and planting to maximise opportunities to increase biodiversity across the site.</p> <p>7. Conserve and enhance the designated Site of Nature Conservation Importance.</p> <p>8. Protect sensitive groundwater source protection zones from pollution and ensure the reduction of <u>no increase in</u> surface water run-off and flood risk.</p> <p>9. Provide the necessary infrastructure for the development including water distribution and sewerage.</p> <p>B. Provision will be made for t<u>The following amounts and types of additional development key elements to</u> will be provided by 2030:</p> <ul style="list-style-type: none"> • A minimum of 700 residential units • A minimum 25,000sqm of <u>B1 employment space – site area 3.5 - 4.5 ha</u> • <u>Site reserved for a</u> A <u>new secondary school – site area 5ha</u> • Public open space with children's play space and informal sports facilities – 2 ha hectares • Provision of ancillary supporting uses – shops and cafes <u>and multi-use community building</u> • Multi-use community facility • Food growing space – 0.5 ha hectares • Green infrastructure integrated through the site to deliver Biosphere objectives and contribute to Biodiversity Action Plan targets. • Energy infrastructure such as district cooling, heating and power networks

Ref	Page	Policy/ Paragraph	Main Modification
			<p>C. The strategic allocation for Toad’s Hole Valley is:</p> <p>1. Toad’s Hole Valley east of the SNCI and south of the A27 embankment</p> <p>Provision will be made for a high standard sustainable, mixed-use development across the site comprising a minimum of 700 residential units, 25,000sqm B1 employment space, a new secondary school, a multi-use community facility and ancillary supporting uses.</p> <p>The following criteria will form the framework for detailed planning guidance and the basis for considering development proposals <u>The proposals will be assessed against the citywide policies and the following criteria:</u></p> <p>a) New development will be expected to make the best use of the site and residential densities should fall within a range of 50 - 75 dwellings per hectare.</p> <p>b) There will be a minimum of 50 per cent 3+ bedroom family sized dwellings provided as part of the residential scheme.</p> <p>c) The office element of the scheme will be high tech, modern office space that will provide a range of unit sizes to attract new businesses to the city and support growing business.</p> <p>d) Due regard will be given to the impact of development on the purposes and setting of the South Downs National Park⁷⁹.</p> <p>e) Environmental sustainability will be central to the design and layout of the scheme which will be expected to meet <u>the requirements of policy CP8. Code for Sustainable Homes Level 6, BREEAM Outstanding and be zero carbon (or carbon neutral).</u></p> <p>f) Development within this area will be expected <u>aim</u> to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability <u>and deliverability.</u></p> <p>g) The scheme will make provision for 5ha of land to accommodate a new secondary school to be developed in partnership with <u>by</u> the city council <u>or its nominee.</u></p> <p>h) Development will make <u>contributions towards</u> provision for improved pedestrian and cycle links to the South Downs National Park.</p> <p>i) The provision of a new multi-use community facility to include a community meeting place, a doctor’s surgery and a resource promoting links to the National Park.</p> <p>j) Development proposals will address the issues of highways safety on King George VI Avenue, noise and other traffic impacts from the A27 and provide improved links to</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>adjacent residential areas.</p> <p>k) Improvements to public transport access and a good quality public realm that encourages healthy lifestyles (walking and cycling with connections to existing cycle infrastructure).</p> <p>l) Development will need to provide local infrastructure to the water and sewer system at the nearest point of adequate capacity.</p> <p>m) Provision of children's play facilities, public open space (2 ha. minimum), <u>contributions towards improved links to existing parks and food-growing space (0.5 ha.) and opportunities.</u></p> <p>n) Developer contributions will be sought to secure the sustainable conservation and enhancement of the adjacent Site of Nature Conservation Importance.</p> <p>o) The developer will enter into a training place agreement to secure training for local people.</p> <p>p) The site will be the subject of detailed guidance provided in a future planning brief <u>prepared in consultation with the landowners/developer and relevant stakeholders.</u></p> <p>q) Work in partnership with the Highways Agency and developer to improve the operational performance of the trunk road network and links to local roads that will be set out in a future planning brief for the area.</p> <p>Supporting Text</p> <p>3.83 Brighton & Hove is a tightly constrained urban area. With the sea to the south and the recently designated South Downs National Park boundaries drawn tightly to the city's edges there are few opportunities for the city to physically expand. The development needs of the city are such that making effective use of a scarce land supply is essential. This is particularly so given the need to balance development requirements with the city's need for open space and the need to safeguard the city's highly valued natural and historic environments.</p> <p>3.84 Identifying land at Toad's Hole Valley for development represents an opportunity to secure new housing, employment, education, open space and community facilities for the city. It is also an opportunity to achieve exceptionally high standards of development, improve accessibility to this part of the city and secure new community facilities, green infrastructure and open space for residents of the new development and for adjacent neighbourhoods. As a result, development at Toad's Hole Valley should provide aim to be an exemplar of sustainable development and demonstrate that the city's</p>

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			<p>UNESCO Biosphere Reserve objectives can be successfully integrated throughout the development scheme <u>subject to viability and deliverability</u>.</p> <p>3.85 In terms of design, care will be taken to ensure that future development will not adversely affect views to and from the South Downs National Park. A future planning brief for the area will provide guidance for the future development of the site.</p> <p>High standards of sustainable development</p> <p>3.86 Environmental sustainability will be central to the design and layout of development at Toad's Hole Valley which will be expected to meet <u>the requirements set out in CP8 Sustainable Buildings Code for Sustainable Homes Level 6, BREEAM Outstanding and be zero carbon or carbon neutral</u>. When it can be demonstrated that sustainable building standards cannot be met on site, mitigation measures will be sought in accordance with <u>the national zero carbon policy unless exemptions apply and City Plan</u> policy CP8 Sustainable Buildings and CP7 Infrastructure and Developer Contributions through Allowable Solutions or an agreed local offset mechanism. Development will be expected to address the principles of a One Planet approach⁸⁰ and incorporate measures to help mitigate or adapt to climate change, reduce greenhouse gas emissions, address fuel poverty and security and reduce the city's ecological footprint <u>subject to viability and deliverability</u>. Measures to help achieve the delivery of these objectives include:</p> <ul style="list-style-type: none"> • facilitating low ecological footprint lifestyles and practices, both on site and in the surrounding area; • rationalising site layout, street and building orientation to maximise passive design; • maximising the potential to generate energy renewably on the site; • delivering a decentralised energy network; • offering options to extend energy infrastructure to the surrounding built environment; • surface water run-off being controlled to maintain Greenfield run-off rates; and • on and off site tree-planting to help reduce the impact of urban heat island effect <p>3.87 The Brighton & Hove Energy Study has identified particular potential for networks for District Heating in and around this area as part of a long list of priority areas based upon straightforward installation opportunities and cost effectiveness. Development within the area will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks <u>subject to viability and deliverability</u>.</p>

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			<p>Housing</p> <p>3.88 The city's housing requirements are such that it is important for the council to identify all suitable opportunities to secure new housing for the city's growing population (see Policy CP1). The scale of housing requirements forecast for the city coupled with the constrained nature of the city's urban land supply supports the planned release of this land at Toad's Hole Valley.</p> <p>3.89 The strategic allocation at Toad's Hole Valley will secure a significant amount of new housing provision of which a significant amount will be family-sized accommodation and affordable housing. Most of the city's urban sites are relatively small in terms of site area and more suited to flatted forms of development. The evidence base⁸¹ indicates that over the course of the plan period, an estimated 53 per cent of overall housing need and demand is likely to be for larger (3 and 4 bedroom) properties and in terms of house types demand/need is likely to be greater for houses (68 per cent) than for flats (32 per cent)⁸². In reality, the likelihood of delivering this mix of housing in the city is restricted by the types of sites likely to be brought forward for development. Planned development at Toad's Hole Valley allows for a better housing mix to be integrated within the overall development. For this reason the policy requires at least 50 per cent of the new housing to be family-sized. The specified density range should also enable the provision of a mix of housing types and sizes to achieve a choice in the range of housing at this location and ensure effective use of the site whilst recognising this is an area of lower densities compared to the other seven development areas.</p> <p>Employment Floorspace</p> <p>3.90 The allocation of <u>3.5 – 4.5 ha site area for employment use with the aim of accommodating a minimum of 25,000 sq m B1 employment floorspace at Toad's Hole Valley</u> <u>that</u> will support a key growth sector in the economy - the knowledge based economy. This will be done by providing the opportunity for high quality, sustainable and flexible business space offering move-on space for successful companies that need to expand and incubation space linked to the universities. The Employment Land Study Review 2012 indicated that in light of the identified needs for industrial floorspace over the plan period there was the potential for some of the B1a, B1b, employment floorspace to be substituted by B1c light industrial floorspace subject to appropriate masterplanning. Parking provided in connection with a future office use may be considered for informal weekend Park + Ride where the criteria set out in the supporting text of policy CP8 <u>CP9</u> Sustainable Transport can be met. <u>It is considered that the most appropriate location for the employment area is in close proximity</u></p>

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			<p><u>to the trunk road network in terms of accessibility and amenity.</u></p> <p>Secondary School and Infrastructure</p> <p>3.91 There is a strategic need for additional secondary school places in the city. Since 2005 the council has expanded a number of primary schools to provide an additional 11.5 forms of entry (345 more places) per year. These additional places will need to be provided in secondary schools by 2018. To go towards meeting this requirement it is proposed that <u>5 ha is reserved for a 6 form-entry secondary school is provided on the site</u> as part of the mixed use development. This would have a minimum space requirement of 5 hectares. Playing fields provided with the school should be made available for dual use with the local community when not being used by the school.</p> <p>3.92 Southern Water has identified the need for water and wastewater infrastructure to serve new development and new development will need to connect to water and sewerage systems off site. This will determined when development comes forward and where appropriate, developer contributions will be sought towards meeting these priorities.</p> <p>Phasing of Development</p> <p>3.93 It is important that new residential development is not completed and occupied prior to the provision of supporting, ancillary and community uses (including the school, ancillary shops and the multi-use community facility) <u>are provided at the appropriate time so as not to as this will lead to place an unacceptable burden on existing facilities.</u> Therefore careful consideration should be given to the phasing of development on the site. Additionally the new employment floorspace represents an important element of this mixed use scheme. <u>The land should be retained for employment purposes and development should be delivered to a phasing programme to be agreed. A minimum of a first phase of the employment land should be completed prior to completion of the housing element of the scheme to stimulate the market. This will ensure the site will contribute to the overall supply of office floorspace in the city and should be delivered alongside the residential phases of development with due regard to the overall delivery of office floorspace in the city (see CP3).</u></p> <p>Transport</p> <p>3.94 The key issue for any comprehensive redevelopment of Toad's Hole Valley is to ensure there are improved sustainable transport links to the area. Work will be undertaken with sustainable transport</p>

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			<p>providers to ensure that links are improved. In terms of promoting cycling and walking, improved links to adjacent neighbourhoods and to designated national cycle routes will be sought as part of a redevelopment scheme.</p> <p>3.95 The site is bounded by King George VI Avenue which is a main route into Hove from the A27 Bypass. The redevelopment of Toad's Hole Valley represents an opportunity to improve safety on this steep and curving road. Redevelopment proposals should give consideration to slowing traffic, realigning the road, providing off-street parking in accordance with parking standards and improving the local environment. More details will be provided in the future planning brief.</p> <p><u>3.96</u> The development is likely to have an effect on the operation of the Devils Dyke Junction with the A27. Work will be undertaken with the Highways Agency and developer, taking into account sustainable measures to reduce vehicular traffic, and mitigation measures will be identified to ensure the safe movement of traffic on the A27. Options will be developed as part of the future planning brief.</p> <p><u>3.97</u> 3.96 Improved walking and cycling links to the South Downs National Park will be expected to be provided as part of the redevelopment scheme. This may involve improving existing links or providing new links to the Park.</p> <p>Public Open Space</p> <p><u>3.98</u> 3.97 Toad's Hole Valley is privately owned and not accessible to local residents. As part of a redevelopment, provision a minimum of 2 ha of public open space should be provided as part of the scheme. This should include a children's playspace as well as a landscaped space and consideration should be given to ensuring long term maintenance.</p> <p><u>3.99</u> 3.98 As part of the scheme a minimum of 0.5 ha should be set aside for food growing by local residents within and in neighbourhoods near to, the site.</p> <p>Local Shops, Community facilities</p> <p><u>3.100</u> 3.99 In addition to a new school as part of the scheme <u>to the land reserved for a new school,</u> provision should be made for a multi-purpose community facility that may include a doctor's surgery, a community meeting place and National Park Interpretation/education facility. Further facilities required as part of a balanced and sustainable community will be for local shops and services.</p>

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			<p>Site of Nature Conservation Importance (SNCI)</p> <p>3.101 3.100 The western bank of Toad's Hole Valley is an identified SNCI and lies outside the strategic allocation for the area. As part of the proposed development a future redevelopment measures will be expected to be undertaken to improve the quality and biodiversity of the SNCI and to improve walkways through the area and to the National Park.</p> <p>Note: Footnotes for the policy have not been amended.</p>
MM46	87, 233	DA8	<p><i>Amend Policies Map, Key Diagram, and Key Illustration to remove Boundary Road / Station Road from the Development Area boundary, and to make the boundary definite rather than indicative (to be consistent with draft Shoreham Harbour Joint Area Action Plan).</i></p> <p><i>See revised maps attached at Appendix 1; see also PM112 for additional changes to Key Diagram.</i></p>
MM47	88	3.103	<p><i>Additional bullet point:</i></p> <ul style="list-style-type: none"> <u>To maximise opportunities to support the City's sustainability objectives through large-scale zero and low-carbon energy technologies to serve the harbour and wider city, particularly those that take advantage of the harbour's coastal location. In particular the City Council will encourage any opportunities that arise to incorporate waste heat or other heat sources into the heat networks for the city.</u>
MM48	88	DA8	<p>DA8 – Shoreham Harbour</p> <p>The Council will work with Adur District Council, West Sussex County Council, Shoreham Port Authority and other key partners to support the long term regeneration of Shoreham Harbour and immediately surrounding areas. A Joint Area Action Plan (JAAP) is currently being prepared that will contain detailed policies for the harbour area: <u>to address a range of issues, including the provision of infrastructure.</u></p>
MM49	88	DA8	<p><i>DA8.A. Development Capacity</i></p> <p>400 300 new residential, units within Brighton & Hove (which are included as part of the</p>

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			city's long term overall housing target)
MM50	89	DA8	<u>i) South Quayside / Port Operational:</u>
MM51	89, 90	DA8	<p><u>ii) Aldrington Basin:</u> Area priorities:</p> <p>a) <u>To designate Aldrington Basin as a Strategic Employment/Mixed-use Area to accommodate a vibrant mix of new and improved port operational facilities as well as compatible non-port employment uses, including A and B use classes. The balance of land uses will be determined in accordance with the future development brief that will form part of the JAAP.</u></p> <p>b) To maximise intensification and redevelopment opportunities of existing lower grade, vacant and under-used spaces.</p> <p>c) <u>To accommodate appropriately located mixed-use residential development, in accordance with a future brief that will form part of the JAAP.</u></p> <p>d) To improve access arrangements and townscape upgrades to create better linkages to surrounding areas.</p> <p>d) <u>To secure improvements to legibility, permeability and connectivity through high quality building design, townscape and public realm, whilst respecting and enhancing the character and environment of surrounding areas.</u></p> <p>e) To ensure that all development takes into account the findings and recommendations of the 2012 Strategic Flood Risk Assessment and any subsequent revisions <u>current Flood Risk Assessments.</u></p> <p>f) <u>To ensure that new development proposals take into account impact on local air quality and noise and that improvements and/or mitigation are sought wherever possible[#].</u></p> <p>Add new footnote:</p> <p>[#] Part of this character area lies within the 2013 Air Quality Management Area.</p>

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MM52	90	DA8	<p><u>iii) North Quayside / South Portslade</u> Area priorities:</p> <p>a) To develop North Quayside as a new and improved Port operational area accommodating new and relocated port uses with limited land reclamation and a new access road (within the Port boundary) in line with the Port Masterplan.</p> <p>b) To designate South Portslade Industrial Area as a Strategic Employment/Mixed-use Area, including some appropriately located residential development, in accordance with a future brief that will form part of the JAAP.</p> <p>c) <u>To secure improvements to legibility, permeability and connectivity through high quality building design, townscape and public realm, whilst respecting and enhancing the character and environment of surrounding areas.</u></p> <p>c) To improve connections and townscape around key linkages including Boundary Road/Station Road (B2194) district retailing centre, Church Road (B2193<u>A293</u>) and along the A259.</p> <p>d) To ensure that all development takes in to account the findings and recommendations of the 2012 Strategic Flood Risk Assessment and any subsequent revisions <u>current Flood Risk Assessment</u>.</p> <p>e) To ensure that new development proposals take account of impact on local air quality noise and air quality impacts and that improvements are sought wherever possible. <u>To ensure that new development proposals take into account impact on local air quality and noise and that improvements and/or mitigation are sought wherever possible.</u></p>
MM53	91	3.105 footnote 84	<p>3.105 These aspirations for the Shoreham Harbour area were subsequently identified in the Regional Spatial Strategy (RSS) for the South East (May 2009). The published South East Plan⁸⁴ indicated that the Sussex Coast was a priority area for regeneration (SCT2) and specifically identifies Shoreham Harbour as a Growth Point (SCT1). The harbour is one of three sites in Adur District described as requiring coordinated action to unlock economic development potential (Policy SCT3). An interim figure of 10,000 dwellings was identified subject to detailed studies.</p>

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			<p><i>Amend footnote 84:</i></p> <p>⁸⁴ Regional strategies remain part of the development plan until they are abolished by Order using powers taken in the Localism Act. The Regional Strategy for the South East (Part Revocation) Order 2013 came into force on 25 March 2013. Therefore, the South East Plan no longer forms part of the Development Plan for the Plan area.</p>
MM54	91, 92	3.109	<p>3.109 The Port is important regionally for the landing, processing and handling of minerals and as such mineral wharf <u>facilities</u> are safeguarded under "Policy WMP15 - Safeguarding railheads and wharves" of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (<u>adopted February 2013</u>). As a result development proposals affecting minerals wharves are required to demonstrate that there is no net loss of capacity for handling minerals within the port Port. A similar policy is likely to <u>may</u> be included within the emerging West Sussex Minerals Local Plan. The two waste mineral <u>mineral</u> planning authorities (<u>Brighton & Hove and West Sussex</u>) are currently preparing guidance in liaison with the Port Authority to set out clearly what the implications of the policy are and what is required of applicants as part of the planning process. <u>The mechanism for safeguarding minerals handling capacity within the Port is to be considered in detail in the JAAP.</u></p>
MM55	92	3.110	<p>3.110 The Shoreham Harbour Regeneration Partnership (comprising Adur District Council, Brighton & Hove City Council and West Sussex County Council) have prepared <u>are in the process of preparing</u> an Investment Strategy which <u>will</u> provides a work programme for delivering the regeneration proposals and will underpin the emerging JAAP. The infrastructure requirements for the Harbour area will be set out in the Infrastructure Delivery Plans (IDP) that underpins the City Plan and the Adur Local Plan.</p>
MM56	96	SA1	SA1.C.1 Provision of a <u>minimum</u> 400 residential units
MM58	99	3.122	<p>3.122 ... The Air Quality Further Review and Assessment (2010) and the Air Quality Action Plan (2011) identified certain junctions on the A259 as exceeding the annual nitrogen dioxide air quality objectives and the A259 between Arundel Road and the city boundary with Adur District Council is included within the 2008 declared Air Quality Management Area. <u>Much of the A259 corridor is included within the 2013 Air Quality Management Area.</u></p>
MM61	103	SA2	<u>7. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible. The council will work with public transport providers, freight transport operators and secure road junction and urban realm improvements to reduce congestion and emissions, to improve air quality and encourage improved pedestrian and cycling movements within the city centre (See CP13).</u>

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MM62	106	3.141	<p>3.141 Central Brighton is designated <u>within an Air Quality Management Area with North Street, Queen's Road and Western Road exceeding the annual nitrogen dioxide air quality objectives</u>¹⁰³. <u>New development proposals within the AQMA should take account of their impact on local air quality, be consistent with the council Air Quality Action Plan and minimise increased exposure to existing poor air quality. Where appropriate improvements and/or mitigation measures will be sought.</u> and † <u>The council's Air Quality Action Plan sets out the priorities to improve local air quality and the Local Transport Plan and subsequent updates will address junction improvements and traffic management in the area. The council is investigating the development of a Low Emission Zone in the central city area. Supporting this, there will be is a continuing programme scheme of urban realm improvements</u>¹⁰⁴ which will be informed, undertaken and developed as part of a consistent vision based on the findings of the Public Space, Public Life Study (2007).</p> <p><i>Amend Footnote 103:</i></p> <p>¹⁰³ Air Quality Management Area 2013 Further Review and Assessment (2010) and the Air Quality Action Plan (2011) identified that West St, North St, Queen's Road and Western Road exceed the government's air quality objectives for nitrogen dioxides.</p>
MM64	111-113	SA4 3.154 3.155	<p>3.154 In many instances the South Downs National Park boundary is contiguous with the built up urban edge of the city. The urban fringe is therefore now made up of 'pockets' of residual green space rather than any homogenous green 'belt' around the city. These areas are vulnerable to development pressures, farm fragmentation and anti-social behaviour such as fly-tipping, vandalism and inappropriate recreational activity such as illegal motor biking. Elsewhere there has been piecemeal enclosure both for the keeping of horses and garden use. Much of the city's urban fringe meets the NPPF definition of existing open space and represents a significant proportion of the city's open space resource. The urban fringe is also important in terms of biodiversity and designations include the South Downs Way Ahead Nature Improvement Area, Local Nature Reserves (LNRs) and Sites of Nature Conservation Interest.[#]</p> <p>3.155 <u>Within the urban fringe, there will be some opportunities for development to help meet citywide needs. The appropriate nature and form of any such development will need to reflect the need</u> Careful use and management of land within the urban fringe is therefore essential in terms of helping to retain the setting of the city in its downland landscape.</p> <p><i>Add new footnote:</i></p>

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			<p><u># SNCIs have been reviewed and will be renamed Local Wildlife Sites in Part 2 of the City Plan.</u></p> <p>SA4 Urban Fringe</p> <p>The <u>Where appropriate, the</u> council will promote and support the careful use and management of land within the urban fringe to achieve the following objectives:</p> <ol style="list-style-type: none"> 1. The protection and enhancement of the wider landscape role of land within the urban fringe, the setting of the South Downs National Park and the protection of strategic views into and out of the city. 2. Securing better management of the urban fringe, environmental improvements and safe public access to the countryside through sustainable means. 3. The promotion of the urban fringe <u>land</u> as part of the city's green network and, <u>where appropriate</u>, encouraging opportunities for multi-functional uses such as, appropriate recreation and cultural experience, new allotments and local food production and biodiversity conservation and enhancements (see CP10 Biodiversity). 4. The protection of sensitive groundwater source protection zones from pollution and encouraging land management practices that reduce rapid surface water runoff and soil erosion. 5. The creation of 'gateway' facilities and interpretative facilities in connection with the South Downs National Park to support sustainable tourism. <p>Development within the urban fringe will not be permitted except where:</p> <ol style="list-style-type: none"> a) a site has been allocated for development in a development plan document; or b) a countryside location can be justified; <p><u>and where it can be clearly demonstrated that:</u></p> <ol style="list-style-type: none"> c) the proposal has <u>had</u> regard to the downland landscape setting of the city;

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			<p>d) at any adverse impacts of development are minimised and appropriately <u>mitigated and/or</u> compensated for; and</p> <p>e) where appropriate, the proposal helps to achieve the policy objectives set out above.</p> <p><u>Should proposals for development come forward prior to the adoption of Part 2 of the City Plan, the 2014 Urban Fringe Assessment will be a material planning consideration in the determination of applications for residential development within the urban fringe.</u></p> <p><i>Insert the following new Paragraph between 3.157 and 3.158 :</i></p> <p><u>Some land within the city's urban fringe has been identified as having potential to help meet the city's housing requirements (see Part B, Policy CP1 Housing Delivery). Sites identified through the 2014 Urban Fringe Assessment Study (or parts of sites where relevant) will be considered to have potential for housing in the Strategic Housing Land Availability Assessment exercise. Further consideration and a more detailed assessment of potential housing sites will be undertaken to inform allocations made in Part 2 of the City Plan with a particular emphasis on delivering housing to meet local needs. As part of this process, the City Council will consider how best to ensure that opportunities for community land trusts, community-led development, right to build, and housing co-operatives are brought forward/safeguarded in order to maximise housing opportunities that meet local housing needs. This will be taken forward through the City Plan Part 2. Sites coming forward for development ahead of the preparation of Part 2 of the City Plan will need to address criteria c) to e) set out in Policy SA4 above and satisfy detailed information requirements[#] at the planning application stage.</u></p> <p><i>Add new footnote:</i></p> <p><u>[#] This may include, for example, landscape assessment, ecology and archaeology surveys, traffic assessments and possibly Environmental Impact Assessment.</u></p>
MM65	114-117	SA5	<p>SA5 The <u>Setting of the South Downs National Park</u></p> <p>The Council will work in partnership with the South Downs National Park Authority and adjoining authorities and landowners to protect and enhance the natural beauty of the South Downs National Park. Proposals within the setting of the National Park must have regard to the impact on the National Park, in particular the purposes of the National Park and the ability of the South Downs National Park Authority to deliver its duty. Development within the setting of the National Park:</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>a. Must have due regard to its impact on the South Downs National Park, its setting and upon <u>Should be consistent with and not prejudice National Park purposes and, where appropriate, the duty of the National Park Authority</u> Any adverse impacts must be minimised and appropriate mitigation or compensatory measures included. Such measures, including proposed enhancements, should have regard to landscape character and impact;</p> <p>b. Should be consistent with National Park purposes and duty and m <u>Must respect and not significantly harm the National Park and its setting, in accordance with Section 62 of the Environment Act 1995. or prejudice National Park purposes. Any adverse impacts must be minimised and appropriate mitigation or compensatory measures included. Such measures, including proposed enhancements, should have regard to landscape character and impacts; and</u></p> <p><u>c. Should have due regard to the City Council's priorities for the South Downs where appropriate.</u></p> <p>The council, which is not the planning authority for the National Park but is a key landowner, recognises the following priorities for the south downs and National Park land that falls within the city's administrative area:</p> <p>1. To promote Biosphere Reserve principles and objectives, bringing people and nature together.</p> <p>2. To promote sustainable land use management systems on the downs with greater emphasis on local healthy food production, diversification and farming practices that are sympathetic to wider downland objectives;</p> <p>3. To conserve and enhance downland habitats and species to meet Biodiversity Action Plan (BAP) targets and recognise the role of the Downs in the city's Green Network/Nature Improvement Area/open space framework (see CP10 Biodiversity and CP16 Open Space);</p> <p>4. To protect scheduled ancient monuments¹¹¹ and other downland features;</p> <p>5. To protect sensitive aquifer protection zones and address catchment flood management issues.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>6. To increase the amount of accessible land adjacent to the urban area and enhance access from the urban area to the Downs by sustainable transport including by walking, cycling and public transport modes (see CP9 Sustainable Transport and CP18 Healthy City).</p> <p>7. To promote a stronger visitor experience between the city and the South Downs, facilitate sustainable eco tourism in the South Downs and the provision of gateway facilities to the South Downs National Park. In particular, to recognise the role of Stanmer Park within the National Park and the need to manage parking and traffic in order to reduce the risk of degradation of gateway areas and facilitate improved sustainable transport links. (See SA4 Urban Fringe, CP5 Culture and Tourism and CP9 Sustainable Transport).</p>
MM66	116-117	3.165 – 3.168	<p>3.165 The purpose of this policy is to provide clear planning guidance for proposals within the setting of the National Park and also as a strategic policy, to set out the council's aspirations for the South Downs <u>to inform planning proposals</u> or including land within the National Park future partnership working with the National Park Authority <u>as appropriate</u>. The majority of this land <u>the countryside within the city's administrative boundary</u> is owned and leased to tenants by the city council...</p> <p>3.166 An important role of the National Park Authority is to promote understanding of the South Downs and to promote access to the <u>National</u> Park by sustainable means. A number of these measures are likely to be implemented within the administrative area of Brighton and Hove and this emphasises the need for good partnership working. Stanmer Park is a Grade II registered park of special historic interest: a 485 hectare rural estate with landscaped park, buildings and gardens, a village, farmland, woodland and amenity grassland used as public open space and all falling within the National Park with much in the ownership of the city council. It is covered by a variety of nature conservation and conservation designations and is a major recreational resource for residents of and visitors to the city. <u>Stanmer Park itself will be covered by the South Downs National Park Local Plan, however, there may be planning implications for the City Council because it</u> Brighton & Hove City Council seeks to promote access to the South Downs by developing Stanmer Park as a gateway, promoting access and improving public transport. <u>Similarly</u> There is also the need to manage parking at gateway locations in order to reduce the risk of degradation of these areas and to link them to a sustainable transport system <u>could have planning implications for the City Council</u>.</p> <p><u>3.168 The council, which is not the planning authority for the National Park but is a key landowner, recognises the following priorities for the South Downs within the city's administrative area and will take them into account in future partnership working with the National Park Authority:</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>1. To promote Biosphere Reserve principles and objectives, bringing people and nature together;</u></p> <p><u>2. To promote sustainable land use management systems on the Downs with greater emphasis on local healthy food production, diversification and farming practices that are sympathetic to wider downland objectives;</u></p> <p><u>3. To conserve and enhance downland habitats and species to meet Biodiversity Action Plan (BAP) targets and recognise the role of the Downs in the city's Green Network/Nature Improvement Area/open space framework (see CP10 Biodiversity and CP16 Open Space);</u></p> <p><u>4. To protect scheduled monuments[#] and other downland features;</u></p> <p><u>5. To protect sensitive aquifer protection zones and address catchment flood management issues;</u></p> <p><u>6. To increase the amount of accessible land adjacent to the urban area and enhance access from the urban area to the Downs by sustainable transport including by walking, cycling and public transport modes (see CP9 Sustainable Transport and CP18 Healthy City); and</u></p> <p><u>7. To promote a stronger visitor experience between the city and the South Downs, facilitate sustainable eco tourism in the South Downs and provide gateway facilities to the South Downs National Park. In particular, to recognise the role of Stanmer Park within the National Park and the need to manage parking and traffic in order to reduce the risk of degradation of gateway areas and facilitate improved sustainable transport links. (See SA4 Urban Fringe, CP5 Culture and Tourism and CP9 Sustainable Transport).</u></p> <p><i>Insert new footnote:</i></p> <p><u># A statutorily protected building, structure or feature of national importance because of its archaeological and historic interest.</u></p>
MM68	120	SA6	<p>A. 8. Deliver balanced communities through the requirement for new residential development to provide an appropriate amount of affordable housing, mix of dwelling sizes and tenure types and through the City Plan Part 2 ensure new housing meets lifetime homes standards optional technical standards for access and the nationally described space standards. In areas where there is a concentration of social rented housing, a better choice</p>

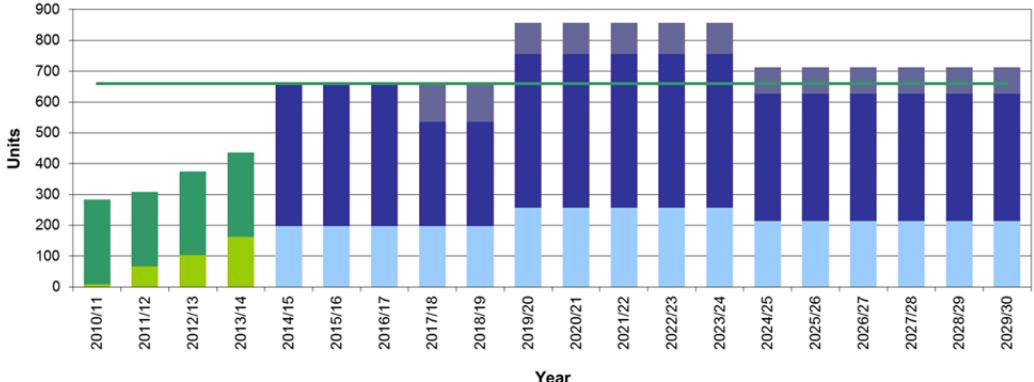
Ref	Page	Policy/ Paragraph	Main Modification														
			of housing tenures will be sought (see CP1 Housing Delivery, CP19 Housing Mix and CP20 Affordable Housing).														
MM69	121	3.172	<p><i>Add bullet point to the list of aims in paragraph 3.172:</i></p> <ul style="list-style-type: none"> • <u>ensure new residential development provides for an appropriate mix of dwelling types and tenures and meets the new national technical standards and through the City Plan Part 2 seek to apply the nationally described space standards and optional technical standards in respect to accessibility, adaptability and wheelchair standards.</u> 														
MM72	127-132	CP1	<p><i>Amend first sentence in Part A of policy:</i></p> <p>The council will make provision for at least 41,300 <u>13,200</u> new homes to be built over the plan period 2010 – 2030 (this equates to an annual average rate of provision of 565 <u>660</u> dwellings).</p> <p><i>Amend Part B of Policy:</i></p> <p>B: Distribution of new housing.</p> <p>New housing will be delivered broadly in line with the following distribution:</p> <table border="1"> <thead> <tr> <th>Area / Source of Supply</th> <th>No. of new homes</th> </tr> </thead> <tbody> <tr> <td>Development Area</td> <td></td> </tr> <tr> <td>DA1 – Brighton Centre and Churchill Square Area</td> <td>20</td> </tr> <tr> <td>DA2 – Brighton Marina, Gas Works and Black Rock Area</td> <td>1940</td> </tr> <tr> <td>DA3 – Lewes Road Area</td> <td>840 <u>875</u></td> </tr> <tr> <td>DA4 – New England Quarter and London Road Area</td> <td>1185 <u>1130</u></td> </tr> <tr> <td>DA5 – Eastern Road and Edward Street Area</td> <td>470 <u>515</u></td> </tr> </tbody> </table>	Area / Source of Supply	No. of new homes	Development Area		DA1 – Brighton Centre and Churchill Square Area	20	DA2 – Brighton Marina, Gas Works and Black Rock Area	1940	DA3 – Lewes Road Area	840 <u>875</u>	DA4 – New England Quarter and London Road Area	1185 <u>1130</u>	DA5 – Eastern Road and Edward Street Area	470 <u>515</u>
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			DA6 – Hove Station Area	630
				<u>525</u>
			DA7 – Toad's Hole Valley	700
			DA8 – Shoreham Harbour	400
				<u>300</u>
			Development Area Total	6155
				<u>6005</u>
			Development Across Rest of City:	3945
			a) <u>Within the built up area</u>	4130
			b) <u>Within the urban fringe</u> [#]	1060
			Small identified sites	650
				<u>765</u>
			Small Windfall Development	600¹²⁵
				<u>1250¹²⁵</u>
			Total	41,350
				<u>13,210</u>
			<i>Insert footnote:</i>	
			# As defined in policy SA4 the City Plan Part 1.	
			<i>Amend footnote 125:</i>	
			¹²⁵ An allowance for small windfall development has been made for the final 6 years of the plan period 2024 – 2030; although it is anticipated that small windfall development will contribute to meeting the housing target in earlier parts of the plan period. An allowance for small windfall development has been made across the plan period. See 2014 SHLAA.	
			4.2 Based on demographic factors, (reflecting scenarios of population and household growth), the city's full (unconstrained) housing requirement, for both market and affordable housing, over the plan period has been assessed at 15,800 new homes to 2030. This would equate to an annual average of 790 new homes per annum). To meet in full the city's 'objectively assessed housing need' (housing demand and need) over the plan period to 2030 could mean needing to build 1506 dwellings per	

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>annum or 30,120 dwellings to 2030</u>¹²⁷.</p> <p><i>Amend footnote 127:</i></p> <p>¹²⁷Brighton & Hove City Council, Housing Requirements Study Update, GL Hearn, October 2012 <u>Objectively Assessed Need for Housing: Brighton & Hove, June 2015, GL Hearn Limited.</u></p> <p>4.4 The City Plan housing target for a minimum of 41,300 <u>13,200</u> new homes reflects the capacity and availability of land/sites in the city, the need to provide for a mix of homes to support the growth and maintenance of sustainable communities, the need to make provision in the city for other essential development (for employment, retail, health and education facilities, other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.</p> <p>4.5 The fact that the city's housing delivery target does not match the objectively assessed full housing requirement means that there is a 'duty to cooperate' with the city's neighbouring local authorities. Brighton & Hove's strategic housing market and travel to work area extends westwards incorporating Adur District and parts of Worthing District; eastwards incorporating parts of Lewes and northwards to Mid Sussex, Horsham and Crawley. Many of these areas also face similar challenges in meeting housing requirements. <u>Within Brighton & Hove, the council acknowledges that there is a significant housing shortfall[#] against the objectively assessed housing requirement of 30,120 dwellings to 2030.</u> In accordance with government guidance, the council will <u>therefore continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas. This will include seeking commitment from neighbouring authorities to participate in further sub-regional work such as building upon the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area and the sub-regional work of the Greater Brighton Economic Board. This will allow long-term opportunities to be explored for meeting unmet housing needs and the identification of delivery mechanisms including local plan reviews.</u></p> <p><i>Insert footnote:</i></p> <p>[#] <u>Equivalent to 16,920 units over the plan period to 2030.</u></p> <p>4.6 The spatial strategy for the city is set out earlier in this Plan (see Spatial Strategy, Section 2). In broad terms, the strategy seeks to direct a significant amount of new development to eight identified Development Areas (see Policies DA1-8) which either already benefit from close proximity to good</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration and renewal will secure substantial benefits for the city. <u>The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites within the built up area but it also acknowledges that some housing development will come forward from some of the city's urban fringe sites. This is reflected in Part B of Policy CP1.</u></p> <p>4.7 The eight Development Areas account for just over half (54%) <u>45%</u> of the planned amount of new housing for the city. Within the Development Areas, the City Plan makes strategic allocations to secure the delivery of 3235 new dwellings (see spatial policies DA2 – DA8). In other parts of the city, there are also a significant range of opportunities for new residential development (through, for example conversions, redevelopment and changes of use) and such development will help to promote and secure the establishment of sustainable communities. Residential development will be required to respect the local character and distinctiveness of neighbourhoods (see also SA6, CP12 and CP14).</p> <p>4.8 Over the last 15 years¹²⁸ the average rate of new housing development in Brighton & Hove has been around 550 <u>540</u> dwellings per annum. More recently, annual rates of housing delivery have been far lower than this reflecting the ongoing impacts of global economic recession¹²⁹.</p> <p><i>Amend footnote 128:</i></p> <p>¹²⁸1997/8 – 2011/12, Residential completions data. <u>1999/00 – 2013/14 Residential Completions Data.</u></p> <p>...</p> <p>4.10 The city's housing target implies an annual average rate of 565 <u>660</u> dwellings per annum over the plan period as a whole. Based on the 20124 SHLAA update, the <u>housing trajectory¹³⁰ demonstrates that housing delivery in the city has been well below this in the first four years of the plan period (2010-2014), reflecting the impacts of economic recession. The trajectory anticipates that housing delivery is likely to achieve at least this rate in the first ten years after plan adoption (2014 – 2024) will increase in the (post adoption) five year supply period 2014 – 2019 and looks likely to achieve the planned average delivery rate of 660 units per annum. In the following six to ten year supply period (2019 – 2024), housing delivery rates are anticipated to increase significantly with delivery coming through from a number of the city's larger strategic development sites. For the post 2024 period, the trajectory indicates that housing delivery is again likely to exceed the planned average</u></p>

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			<p><u>delivery rate</u>. The council's Housing Implementation Strategy (HIS) identifies a range of <u>positive planning management actions and measures</u> to ensure that <u>housing delivery is achieved</u> assist in <u>across the plan period in accordance with guidance in the NPPF for maintaining a five year supply of deliverable housing</u> bringing forward sites for development should this prove necessary. The HIS also identifies that further site allocations will be made through the preparation of Part 2 of the City Plan.</p> <p><i>Amend footnote 130:</i></p> <p>¹³⁰As informed by the 2012 SHLAA Update <u>the 2014 Revised Trajectory</u>.</p> <p><i>Replace Figure 2 with revised Housing Trajectory:</i></p> <p>Figure 2: Housing Trajectory 2010 – 2030 (Based on 2012 SHLAA)</p> <p style="text-align: center;">Brighton & Hove Housing Trajectory as at 1st April 2012</p> <table border="1"> <caption>Brighton & Hove Housing Trajectory as at 1st April 2012</caption> <thead> <tr> <th>Year</th> <th>Total Actual Supply</th> <th>Total Identified Supply</th> <th>Small Unidentified Supply (Small windfall)</th> </tr> </thead> <tbody> <tr><td>2010/11</td><td>280</td><td>280</td><td>0</td></tr> <tr><td>2011/12</td><td>310</td><td>310</td><td>0</td></tr> <tr><td>2012/13</td><td>0</td><td>450</td><td>0</td></tr> <tr><td>2013/14</td><td>0</td><td>450</td><td>0</td></tr> <tr><td>2014/15</td><td>0</td><td>650</td><td>0</td></tr> <tr><td>2015/16</td><td>0</td><td>650</td><td>0</td></tr> <tr><td>2016/17</td><td>0</td><td>650</td><td>0</td></tr> <tr><td>2017/18</td><td>0</td><td>650</td><td>0</td></tr> <tr><td>2018/19</td><td>0</td><td>650</td><td>0</td></tr> <tr><td>2019/20</td><td>0</td><td>680</td><td>0</td></tr> <tr><td>2020/21</td><td>0</td><td>680</td><td>0</td></tr> <tr><td>2021/22</td><td>0</td><td>680</td><td>0</td></tr> <tr><td>2022/23</td><td>0</td><td>680</td><td>0</td></tr> <tr><td>2023/24</td><td>0</td><td>680</td><td>0</td></tr> <tr><td>2024/25</td><td>0</td><td>450</td><td>130</td></tr> <tr><td>2025/26</td><td>0</td><td>450</td><td>130</td></tr> <tr><td>2026/27</td><td>0</td><td>450</td><td>130</td></tr> <tr><td>2027/28</td><td>0</td><td>450</td><td>130</td></tr> <tr><td>2028/29</td><td>0</td><td>450</td><td>130</td></tr> <tr><td>2029/30</td><td>0</td><td>450</td><td>130</td></tr> </tbody> </table>	Year	Total Actual Supply	Total Identified Supply	Small Unidentified Supply (Small windfall)	2010/11	280	280	0	2011/12	310	310	0	2012/13	0	450	0	2013/14	0	450	0	2014/15	0	650	0	2015/16	0	650	0	2016/17	0	650	0	2017/18	0	650	0	2018/19	0	650	0	2019/20	0	680	0	2020/21	0	680	0	2021/22	0	680	0	2022/23	0	680	0	2023/24	0	680	0	2024/25	0	450	130	2025/26	0	450	130	2026/27	0	450	130	2027/28	0	450	130	2028/29	0	450	130	2029/30	0	450	130
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			<p>Table 4: Housing Delivery, Supply Breakdown 2010 – 2030 (Based on 2012 2014 SHLAA)</p> <table border="1"> <thead> <tr> <th>Spatial Area</th> <th>Already Built or Committed</th> <th>Strategic Allocations</th> <th>Broad Locations / Source</th> <th>Further Capacity Identified in SHLAA</th> <th>Allowance For windfall</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>DA</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>DA1</td> <td>13</td> <td>0</td> <td></td> <td>7</td> <td></td> <td>20</td> </tr> <tr> <td>DA2</td> <td>855</td> <td>1085</td> <td></td> <td>0</td> <td></td> <td>1940</td> </tr> <tr> <td>DA3</td> <td>120 126</td> <td>300</td> <td></td> <td>390 449</td> <td></td> <td>850 875</td> </tr> <tr> <td>DA4</td> <td>285 380</td> <td>615</td> <td></td> <td>285 135</td> <td></td> <td>1185 1130</td> </tr> <tr> <td>DA5</td> <td>0 10</td> <td>335</td> <td></td> <td>135 170</td> <td></td> <td>470 515</td> </tr> <tr> <td>DA6</td> <td>120 90</td> <td>200</td> <td></td> <td>310 235</td> <td></td> <td>630 525</td> </tr> <tr> <td>DA7</td> <td>0</td> <td>700</td> <td></td> <td>0</td> <td></td> <td>700</td> </tr> <tr> <td>DA8</td> <td>0 52</td> <td></td> <td>400 248</td> <td></td> <td></td> <td>400 300</td> </tr> <tr> <td>DA Total</td> <td>1390 <u>1525</u></td> <td>3235</td> <td>400 <u>250</u></td> <td>1130 <u>1000</u></td> <td></td> <td>6155 <u>6005</u></td> </tr> <tr> <td>Rest of City</td> <td>1190 <u>1450</u></td> <td></td> <td>500 <u>390</u></td> <td>1856 <u>1890</u></td> <td></td> <td>3945 <u>4130</u></td> </tr> <tr> <td> a) Urban area</td> <td></td> <td>400</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> b) Urban Fringe</td> <td></td> <td></td> <td></td> <td><u>1060</u></td> <td></td> <td><u>1060</u></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Spatial Area	Already Built or Committed	Strategic Allocations	Broad Locations / Source	Further Capacity Identified in SHLAA	Allowance For windfall	Total	DA							DA1	13	0		7		20	DA2	855	1085		0		1940	DA3	120 126	300		390 449		850 875	DA4	285 380	615		285 135		1185 1130	DA5	0 10	335		135 170		470 515	DA6	120 90	200		310 235		630 525	DA7	0	700		0		700	DA8	0 52		400 248			400 300	DA Total	1390 <u>1525</u>	3235	400 <u>250</u>	1130 <u>1000</u>		6155 <u>6005</u>	Rest of City	1190 <u>1450</u>		500 <u>390</u>	1856 <u>1890</u>		3945 <u>4130</u>	a) Urban area		400					b) Urban Fringe				<u>1060</u>		<u>1060</u>							
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			Small id. Sites	650 <u>765</u>					650 <u>765</u>
			Small Windfall					600 <u>1250</u>	600 1250
			Total	3230 <u>3740</u>	3635	900 <u>640</u>	2985 <u>3945</u>	600 <u>1250</u>	1135 0 <u>1321</u> 0
			<p>4.13 Brighton & Hove is a tightly constrained city. In many instances, the boundaries of the South Downs National Park are contiguous with the built up area of the city. As a consequence, the majority (94%) (<u>87%</u>) of new residential development will take place on previously developed land or 'brownfield' sites. The Plan does however make a strategic allocation for the development of land at Toad's Hole Valley to the north of the city which is a large greenfield site falling outside the boundaries of the National Park (<u>See DA7</u>). Development at this location will contribute a significant amount of new housing development for the city and, as part of a mixed use comprehensive development, will secure many other benefits for the city (see DA7). <u>Part B of Policy CP1 also indicates that some sites within the city's wider urban fringe will contribute to housing land supply. Sites will be taken forward for further consideration and detailed assessment as site allocations through Part 2 of the City Plan. The 2014 Urban Fringe Assessment Study will be a material consideration in the determination of any applications for residential development on urban fringe sites that come forward prior to the adoption of Part 2 of the City Plan (see Policy SA4 Urban Fringe).</u></p> <p>...</p> <p>4.15 Government National <u>planning policy guidance</u> requires sufficient specific sites and/or broad locations to be identified to meet planned housing targets for at least the first ten years of the plan¹³³. In reality, small 'windfall' site development (as described above) will come forward throughout the plan period and will contribute towards meeting the planned housing requirements for the city and ongoing five year supply requirements. <u>The potential supply from small windfall site development is reflected in the planned housing target for the city (see Part B of Policy CP1).</u> In this way,</p>						

Ref	Page	Policy/ Paragraph	Main Modification
			<p>development from small windfall development activity will supplement housing supply achieved from identified sites and also provide a measure of contingency should there be an element of non-delivery from some of the large development sites. Given the NPPF requirements, a minimal allowance for development from this source has only been included as part of the city's projected land supply after 2024.</p> <p><i>Amend footnote 132:</i></p> <p>¹³²Small site development <u>has</u> accounted for approximately <u>35%</u> 36% of total residential development across the city over the last 10 years.</p> <p>4.16 The housing trajectory is based upon reasonable <u>and realistic</u> assumptions about the deliverability of housing over the plan period. The trajectory illustrates that the rate of housing delivery in the city is expected to increase over the first ten years of the plan period (post-adoption) reflecting anticipated recovery in the economy and financial markets which has severely affected development rates in the early years of the plan period. The trajectory will be updated and reviewed on an annual basis to track delivery progress against planned housing requirements and the requirement to maintain a five year supply of housing land/sites. This will be reported through the council's annual Authority Monitoring Report. The council's Housing Implementation Strategy outlines how housing delivery will be managed over the plan period.</p>
MM73	133, 136- 137	CP2	<p><i>Include new criteria between CP2.5 and CP2.6:</i></p> <p><u>6. Recognise the importance of employment-generating non-B Class uses to the local economy. Appropriate allocations for non-B Class uses will be made through the City Plan Part 2.</u></p> <p><i>Amend paragraph 4.26:</i></p> <p>4.26 The city contains a number of major employment generators including the two universities and the Royal Sussex County Hospital and the council will work with the higher and further education sector, Sussex University Hospital NHS Trusts and NHS Brighton & Hove to support appropriate expansion (see DA3 Lewes Road Area, DA5 Eastern Road and Edward Street Area and CP18 Healthy City). Other non-traditional employment generators (non-B class uses) in the city include retail and leisure uses. <u>Non-B Class uses are estimated to account for approximately 71% of all jobs in Brighton & Hove. This is expected to remain broadly consistent over the plan period to 2030.</u> Development Area proposals, SA2 Central Brighton, CP4 Retail Provision and CP6 Culture and Tourism set out how the</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>City Plan will address addresses retail, <u>culture</u>, leisure and tourism needs to 2030. <u>Appropriate allocations for employment-generating non-B Class uses will be included in the City Plan part 2.</u></p>
MM75	138-139	CP3	<p>3. Protection of the following primary industrial estates and business parks for business, manufacturing and warehouse (B1, B2 and B8) use:</p> <p>Centenary Industrial Estate English Close Industrial Area, Old Shoreham Road Home Farm Industrial Area Hove Technology Park, St Josephs Close, Old Shoreham Road Moulsecomb & Fairways Industrial Estate Sussex House (including BT depot) Woodingdean Business Park Hyde Business Park, Bevendean Bell Tower Industrial Estate Hollingbury Industrial Estate Hollingdean Industrial Estate Victoria Road Industrial Estate Newtown Road Industrial Estate</p> <p>The council will support proposals for the upgrade and refurbishment of these estates and premises so that they meet modern standards required by business, are more resource efficient and improve the environment or townscape of the site or premise.</p> <p>Sui generis uses, <u>including waste management facilities</u>, appropriate in nature to an industrial estate location will also be acceptable, provided that they generate employment which is quantitatively and qualitatively comparable to uses within B1- B2 B8 Use Classes[#]; do not harm the continuation of existing uses within those Classes and comply with other City Plan policies <u>and for waste management facilities the Waste and Minerals Plan.</u></p> <p>4. In order to secure good quality modern, flexible employment floorspace the council will allow employment-led (residential and employment) mixed use development on the following employment sites:</p> <p>Franklin Road Industrial Estate</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>School Road, Hove Melbourne Street Industrial Area Portland Road Trading Estate (including EDF and Martello House) Land North of Newtown Road</p> <p>There should be no net loss in employment floorspace: <u>unless this can be justified.</u> <u>Paragraph 4.36 sets out the factors that will be taken into consideration.</u></p> <p>5. <u>Loss of Unallocated sites or premises in, or whose last use was,</u> employment use (Use Classes B1-B8) will not be released to other uses unless <u>only be permitted where the site or premises it can be demonstrated to be both redundant and incapable of meeting the needs of modern alternative employment uses (Use Classes B1-B8).</u> Where release loss <u>is permitted the preference priority</u> for re-use will be for alternative employment generating uses or affordable <u>housing (in accordance with CP20 Affordable Housing).</u></p> <p><i>Insert new footnote:</i> <u># Employment generation as compared with average employment densities as set out in Table 3 of the HCA/Offpat Employment Densities Guide, 2010 or subsequent updates.</u></p>
MM76	140-143	4.30 – 4.36	<p>4.30 ... This will be informed by the preparation of an office delivery trajectory setting out a realistic pipeline of supply of <u>The Employment Land Supply Trajectory 2013 indicates the potential delivery of new employment floorspace employment sites over the short, medium and long-term....</u></p> <p>4.31 In light of the Employment Land Study Review 2012 identifying a qualitative and quantitative need for additional employment land over the plan period it is important that the strategic allocations set out in the Development Areas bring forward high quality employment floorspace as indicated in Table 5 to meet the council's priorities regarding high quality job creation and to support its growth potential over the next 20 years, with appropriate flexibility. <u>It is important that the strategic allocations set out in the Development Areas bring forward high quality employment floorspace. The Employment Land Supply Trajectory indicates the need for close monitoring of the office developments identified to come forward in 2014-2019 to ensure they are delivered.</u> However, it is also important to allow for reasonable flexibility, in the short term to promote successful regeneration and enable viable schemes to be delivered. Therefore proposals which bring forward employment floorspace less than proposed on sites identified in Table 5 will be considered, taking into account whether:</p> <ol style="list-style-type: none"> 1. There is demonstrable benefit for early redevelopment and clear commercial and financial

Ref	Page	Policy/ Paragraph	Main Modification
			<p>viability evidence that the figures in Table 5 are unlikely to be delivered within the next 5 years;</p> <p>2. Allowing a different scale or mix of development will secure particularly strong planning benefits;</p> <p>3. It is appropriate in light of ongoing monitoring of <u>delivery of new employment floorspace against the 2013 Employment Land Supply Trajectory and subsequent updates.</u> regarding the delivery of the overall employment forecast targets and of economic growth. To ensure that this is assessed on a consistent basis a delivery trajectory for employment sites will be prepared to inform the implementation of the policy.</p> <p>4.34 These industrial estates/ premises are also considered suitable for certain “sui generis” uses, that is, those with industrial characteristics which are not included within the Use Classes Order. For example, car breaking, or metal recycling which could potentially harm residential amenity are thus likely to be considered most suited to an industrial estate. <u>With modern design and operation techniques, waste management facilities can increasingly be accommodated in general industrial areas as a B2 use[#].</u></p> <p><i>Insert new footnote:</i></p> <p><u># See Policy WMP 7 of the Waste and Minerals Plan for East Sussex, South Downs and Brighton & Hove, adopted February 2013</u></p> <p>4.36 In considering proposals where a net loss of employment floorspace is being proposed the council will take into consideration the following factors:</p> <ul style="list-style-type: none"> - Site constraints (current site coverage and opportunities for more effective and efficient use of the site) - The need for environmental and townscape improvements - Access arrangements (improved access/circulation space). - Safeguarding the amenity of surrounding users and occupiers - The quality of the employment offer in terms of the type of employment and density of jobs. - <u>Viability</u>
MM77	143	4.40	<p>4.40 Alternative employment generating uses are any uses that generate employment but are not classified as an employment use (uses falling outside the Use Class B1- B8) <u>including educational teaching space and health facilities.</u> This excludes retail or leisure uses unless they comply with the tests of national planning policy.</p>

Ref	Page	Policy/ Paragraph	Main Modification																							
MM78	144	CP4	<p>Brighton & Hove's hierarchy of shopping centres will be maintained and enhanced by encouraging a range of facilities and uses, consistent with the scale and function of the centre, to meet people's day-to-day needs, whilst preserving the predominance of A1 use classes:</p> <table border="1"> <thead> <tr> <th>Centre Definition</th> <th>Defined Centres</th> <th>Linked Policies</th> </tr> </thead> <tbody> <tr> <td>Regional Centre</td> <td>Brighton</td> <td>DA1, SA2</td> </tr> <tr> <td rowspan="2">Town Centres</td> <td>Hove</td> <td></td> </tr> <tr> <td>London Road</td> <td>DA4</td> </tr> <tr> <td rowspan="4">District Centres</td> <td>St James's Street</td> <td></td> </tr> <tr> <td>Lewes Road</td> <td>DA3</td> </tr> <tr> <td>Boundary Road/Station Road</td> <td>DAB</td> </tr> <tr> <td>Brighton Marina</td> <td>DA2</td> </tr> <tr> <td>Local Centres</td> <td>Mill Lane, Portslade Portland Road, Hove 'The Grenadier' , Hangleton Road Richardson Road, Hove Eldred Avenue ,Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell's Vale, Saltdean Longridge Avenue ,</td> <td>SA6 (all centres)</td> </tr> </tbody> </table>	Centre Definition	Defined Centres	Linked Policies	Regional Centre	Brighton	DA1, SA2	Town Centres	Hove		London Road	DA4	District Centres	St James's Street		Lewes Road	DA3	Boundary Road/Station Road	DAB	Brighton Marina	DA2	Local Centres	Mill Lane, Portslade Portland Road, Hove 'The Grenadier' , Hangleton Road Richardson Road, Hove Eldred Avenue ,Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell's Vale, Saltdean Longridge Avenue ,	SA6 (all centres)
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MM79	145	CP4	Applications will be required to complete an impact assessment at a locally set threshold of 1,000 sqm (gross) (net) floorspace or more.																							
MM81	146	4.44	4.44 The Brighton & Hove Retail Study Update (2011) ¹⁶⁰ has reviewed the vitality and viability of each of the shopping centres. The Study does not recommend that any new centres need to be designated																							

Ref	Page	Policy/ Paragraph	Main Modification																				
			but recommends that the District Centre designation for Brighton Marina should be removed. The Council's preferred approach for Brighton Marina is to maintain its designation as a District Centre <u>enhance the choice and performance of retail activity through the encouragement of mixed retail activity and improvements to the public realm</u> , and to continue to address the development and future uses at this location using site specific policy DA2. A detailed policy regarding the appropriate type and mix of A1 and non A1 uses in the Marina will be set out in Part 2 of the City Plan.																				
MM84	157	4.73	<p><i>Insert into supporting text 4.73 after 2nd sentence:</i></p> <p>4.73 ... to support the needs of new development. <u>The timely connection to provision of utilities including water, wastewater infrastructure and sewerage systems will be required by developer's liaising directly with service/utility providers.</u> Priorities will also derive...</p>																				
MM85	160 - 165	CP8	<p>CP8 Sustainable Buildings</p> <p>The council will require <u>seek that all new development to</u> incorporate sustainable design features to avoid expansion of the city's ecological footprint, help deliver the principles of the One Planet approach, radical reductions in greenhouse gas emissions, particularly CO2 emissions, and mitigate against and adapt to climate change.</p> <p>Unless it can be demonstrated that doing so is not technically feasible and/or would make the scheme unviable:</p> <p>1. All development will be required to achieve the minimum standards as set out below or equivalent standards from a quality assured scheme <u>unless superseded by national policy or legislation</u>;</p> <p><i>Delete table:</i></p> <table border="1"> <thead> <tr> <th rowspan="3"></th> <th colspan="3">Development size</th> <th rowspan="2">Post 2016</th> <th rowspan="2">Post 2019</th> </tr> <tr> <th colspan="3">2013-2016</th> </tr> <tr> <th>-Non-major</th> <th>Major</th> <th>Greenfield</th> <th>AH</th> <th>AH</th> </tr> </thead> <tbody> <tr> <td>NEW-BUILD Residential Code for Sustainable Homes</td> <td>Level 4</td> <td colspan="2">Level 5</td> <td colspan="2">Level 6</td> </tr> </tbody> </table>		Development size			Post 2016	Post 2019	2013-2016			-Non-major	Major	Greenfield	AH	AH	NEW-BUILD Residential Code for Sustainable Homes	Level 4	Level 5		Level 6	
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			Non-residential BREEAM	Very Good	Excellent	Outstanding
			CONVERSIONS Residential	Non-major (3-9 units) and Major BREEAM Very good		
			<i>Insert new table:</i>			
			<u>Residential (New Build)</u>			
			<u>Energy Performance</u>	<u>19% carbon reduction improvement against Part L 2013¹</u>		
			<u>Water Performance</u>	<u>Water efficiency 'optional' standard²</u>		
			<u>Non-residential</u>	<u>Development size</u>		
				<u>Non-major</u>	<u>Major and Greenfield</u>	
			<u>BREEAM</u>	<u>Very Good</u>	<u>Excellent</u>	
			Standards may be updated in other DPD documents and/or a review of this policy.			
			2. All development proposals including conversions, extensions and changes of use are required to <u>will be expected to</u> demonstrate how the development:			
			a. addresses climate change mitigation and adaptation;			
			b. contributes to a reduction in the city's current level of greenhouse gas emissions by			

Ref	Page	Policy/ Paragraph	Main Modification
			<p>delivering significant reductions in fuel use and greenhouse gas emissions via: passive design and orientation; fabric performance; energy efficiency measures; and low carbon solutions;</p> <ul style="list-style-type: none"> c. incorporates <u>facilitates</u> on-site low or zero carbon technologies, in particular renewable energy technologies³; d. connects, makes contributions to low and zero carbon energy schemes and/or incorporates provision to enable future connection to existing or potential decentralised energy schemes; d. aspires towards water neutrality⁴ by meeting high water efficiency standards and incorporating facilities to recycle, harvest and conserve water resources; e. improves the sustainability of existing buildings, makes the most effective use of land and re-uses existing buildings; f. protects occupant health and the wider environment by making the best use of site orientation, building form, layout, landscaping and materials to maximise natural light and heat, whilst avoiding internal overheating by providing passive cooling and ventilation; g. reduces 'heat island effect'⁵ and surface water run-off; h. uses materials that are sustainable and have low embodied carbon⁶; i. enhances biodiversity; j. minimises waste and facilitates recycling, composting and re-use; k. reduces air, <u>land</u> and water pollution <u>and safeguards water supplies if development is within groundwater Source Protection Zones</u>; l. maximises operational efficiency through ongoing evaluation, monitoring and improvement of building performance especially in relation to energy and water use; m. introduces means to encourage users, tenants and householders to reduce their ecological footprint; n. is adaptable to respond to changing needs; and o. encourages food growing. <p>When onsite sustainability standards cannot be met mitigation measures may be sought, including those in accordance with Policy CP7 Infrastructure and Developer Contributions and Allowable Solutions⁷ or a local offset mechanism using this approach.</p> <p>Technical guidance and clarification will be produced to help planning applicants meet the requirements of <u>address</u> this policy.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>The Sustainability Checklist and the Authority Monitoring Report (AMR) will be used to assess planning applications, and monitor the effectiveness of the policy and inform the council of revised standards over the plan period.</p> <p>Supporting text</p> <p>4.76 The way in which buildings are designed, constructed, operated and decommissioned have significant impacts on the built and natural environment and require major resource inputs such as energy, water and materials. Designing and constructing buildings that help to reduce or avoid adverse impacts can reduce not only resource inputs and the city's ecological footprint but also costs for developers and occupants. As such, raising <u>encouraging high</u> standards of sustainable building design and construction in new and existing buildings is an essential part of the City Plan's response to the challenges of climate change, natural resource depletion, energy security, habitat loss, and wider environmental issues.</p> <p>4.77 Brighton & Hove is particularly vulnerable to the impacts of present and future climate change. Opportunities for growth and expansion are constrained by the South Downs to the north of the city and the sea to the south. The city also contains a high proportion of protected and/or old buildings⁸. Within this context, the need to secure improvement in the environmental performance of the existing stock as well as more resource efficient and <u>low carbon neutral</u> development whilst delivering homes and jobs through development is challenging. The combination of standards with provisions for viability assessments will help address this challenge. This will provide the flexibility needed to ensure the right balance between the economic, environmental and social objectives of the City Plan. The standards set out in this policy are commensurate with the scope of this challenge. Energy, water and waste have been identified as key resource issues of particular concern in relation to growth in the city⁹.</p> <p>4.78 The City Plan reflects the council's and the city's commitment towards achieving excellence in sustainable building design and pioneering the delivery of zero carbon development in particular. The purpose of this policy is to ensure development in Brighton & Hove fulfils this commitment whilst helping deliver European, national and Sustainable Community Strategy targets¹⁰. As such, all development will be encouraged is expected to contribute to <u>the</u> City Plan's vision for energy, water and waste neutral, high-standard, cost-effective, resource-efficient future and the development of a</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>low carbon economy for the city.</p> <p>4.79 The council's approach to deliver <u>low carbon neutral</u> growth is through highly energy efficient buildings which incorporates low and zero carbon (LZC) energy generation on-site¹¹ and connections to existing or planned local energy infrastructure. Energy efficient design is an essential element of the excellence in design envisioned in the City Plan being the most cost-effective, efficient way of reducing carbon emissions from buildings (focusing on building fabric, orientation, layout, insulation, natural light, solar gains and shading, and passive ventilation). Once the demand for energy has been reduced to a minimum in a building the next step is to supply energy efficiently via renewable and low carbon energy and connection to decentralised heat and energy networks¹².</p> <p>4.80. A Renewable and Sustainable Energy Study has been undertaken for Brighton & Hove assessing opportunities for carbon reduction in the city. The study informs planning policies around low and zero carbon energy particularly for Development Plan and Supplementary Planning Documents. <u>Any wind turbine proposals will be considered against the Written Ministerial Statement (HCWS42) published on the 18th June 2015 or the latest government guidance thereafter.</u></p> <p>4.81. The Study recognises that to deliver significant carbon savings during the Plan period emissions associated with the existing building stock must be addressed in addition to setting standards for new development. A combination of approaches will be required. This includes: retrofit improvements to the existing building stock; supplying low carbon decentralised energy solutions such as district heating; and installing renewable energy technologies.</p> <p>4.82. The Study explores opportunities for district heating in the city and identifies areas with enhanced potential to implement district heating solutions and decentralised energy schemes. Where appropriate new development and retrofit projects will be required to connect to and/or make contributions to low or zero carbon energy schemes and/or to incorporate provision to enable future connection to any existing / potential decentralized energy schemes¹³. The energy study also provides an energy opportunities map which identifies particular areas of opportunity for different low and zero carbon technologies.</p> <p>4.83 The Building Research Establishment Environmental Assessment Method (BREEAM) and the Code for Sustainable Homes (CSH) <u>are</u> is a widely recognised, accredited, independent methods for assessing environmental performance of non-residential and residential buildings; respectively. These tools will be used to support policy decision making because they cover a wide range of sustainability</p>

Ref	Page	Policy/ Paragraph	Main Modification						
			<p>issues within a simplified score that provides flexibility for developers in meeting standards set in this policy. Successors to these tools and/or <u>Until superseded by nationally prescribed standards, the BREEAM standards for non-residential buildings will be required. eEquivalent standards for non-residential buildings by nationally recognised certification bodies may also be accepted¹⁴.</u></p> <p>4.84 An assessment of the energy demand and carbon dioxide emissions will be expected from <u>all residential and proposed major developments</u>, which should demonstrate the expected energy and carbon dioxide emission savings from energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP and community heating systems. The assessment should include:</p> <ul style="list-style-type: none"> • calculation of baseline energy demand and carbon dioxide emissions; • <u>compliance against Part L of the Building Regulations;</u> • proposals for the reduction of energy demand and carbon dioxide emissions from heating, cooling and electrical power; • proposals for meeting residual energy demands through sustainable energy measures; and • calculation of the remaining energy demand and carbon dioxide emissions. <p>4.85 The National Home Energy Rating (NHER), Standard Assessment Procedure (SAP), Energy Performance Certificates (EPC) and Simplified Building Energy Model (SBEM) and other recognised, certified energy and carbon assessment procedures will be used to assess building performance and quantify emissions.</p> <p>4.86 Standards set in this policy reflect the types of development that are expected to come forward across the city. Rather than an inflexible blanket policy for all development, standards are set specifically by development type and size, see Table 7 below.</p> <p>Table 7 - Definition of Development Size</p> <table border="1" data-bbox="600 1169 1733 1415"> <thead> <tr> <th data-bbox="600 1169 1238 1222">Development size</th> <th data-bbox="1238 1169 1733 1222">Definition</th> </tr> </thead> <tbody> <tr> <td data-bbox="600 1222 1238 1385"> Non-major New Non-residential and/or mixed use; residential extensions, conversions and changes of use; retail and other development </td> <td data-bbox="1238 1222 1733 1385"> 1-9 residential units; £Retail 151-999 sq m; or other development 236 sq m – 1000 sqm. </td> </tr> <tr> <td data-bbox="600 1385 1238 1415"> Major </td> <td data-bbox="1238 1385 1733 1415"> 10 or more residential units; other </td> </tr> </tbody> </table>	Development size	Definition	Non-major New Non-residential and/or mixed use; residential extensions, conversions and changes of use; retail and other development	1-9 residential units; £Retail 151-999 sq m; or other development 236 sq m – 1000 sqm.	Major	10 or more residential units; other
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Ref	Page	Policy/ Paragraph	Main Modification		
			<table border="1" data-bbox="607 256 1736 359"> <tr> <td data-bbox="607 256 1238 359">New <u>Non-residential and/or mixed use</u> developments. Retail and other development.</td> <td data-bbox="1238 256 1736 359">Development over 1,000 sq m; or development on a site of 0.5ha or more.</td> </tr> </table> <p data-bbox="600 395 1989 815">4.87 More is asked of larger, new build and greenfield types of development as these tend to benefit from economies of scale and easier, cheaper ways in which sustainable design and construction features can be designed in. A growing number of flagship schemes in the UK¹⁵ and in Brighton & Hove¹⁶ have demonstrated the viability of such developments. In order to provide clarity and flexibility for developers, criteria for considering instances where compliance with standards may not be possible as well and opportunities and mechanisms for mitigation are identified. In assessing technical feasibility and/or viability the council will consider site constraints, technical restrictions; financial viability and the delivery of additional benefits to the city <u>where the requirements of the policy cannot be met</u>. In order to provide options and help planning applicants make successful applications, the council will produce guidance identifying, among other things, options and opportunities for off-site carbon compensation and opportunities for retrofit in existing buildings. This guidance may identify backstop standards for instances where targets cannot be met on-site. Given the contextual nature of these issues, the council will expect developers to make a case on a site by site basis.</p> <p data-bbox="600 850 1989 1042">4.88 The challenge to reduce the ecological footprint of the city means that there is a need to for the council and planning applicants to identify opportunities for improving standards in retrofitting the existing stock. Measures should be implemented which lower the environmental impact from the existing stock through reuse and refurbishment of buildings, reducing carbon dioxide emissions and fossil energy use, increasing thermal efficiency, reducing waste and noise impacts, and conserving water, materials and other resources.</p> <p data-bbox="600 1077 1989 1268">4.89 While the standards set in this policy are central to the delivery of sustainable buildings in Brighton & Hove, there are other aspects of sustainability that are integral to sustainable design and construction. These are also outlined in the latter part of the policy. Developments will, where appropriate, be required to demonstrate how sustainability has been addressed by submitting a completed Sustainability Checklist. An Energy Statement and other relevant information may also be needed as part of an application.</p> <p data-bbox="600 1303 1422 1335">4.90 This policy has important links with CP12 Urban Design.</p>	New <u>Non-residential and/or mixed use</u> developments. Retail and other development.	Development over 1,000 sq m; or development on a site of 0.5ha or more.
New <u>Non-residential and/or mixed use</u> developments. Retail and other development.	Development over 1,000 sq m; or development on a site of 0.5ha or more.				

Ref	Page	Policy/ Paragraph	Main Modification
			<p><i>Modify footnotes:</i></p> <p>¹ This standard is equivalent to Code for Sustainable Homes level 4 in energy use. See paragraph 4.84-4.86 for guidance on demonstrating this standard.</p> <p>² The 'optional' enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency' March 2015, page 15, G2(3). At 2015 this is defined as consumption 110 litres per person per day to be demonstrated http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD_G_2015.pdf</p> <p>³ Zero Carbon Technologies are those that harness renewable non fossil fuel energy to create heat or generate electricity, i.e. sun, wind, and water. They are called zero carbon because they produce no carbon dioxide (CO2) emissions when producing heat or power. These are also referred to as 'renewable' energy sources (solar thermal, photovoltaic's, wind turbines, hydropower and combined heat and power using renewable fuels such as biomass, biodiesel or renewable gas). These technologies are sometimes referred to as micro generation, producing heat or energy locally on a small scale. Low carbon technologies are those that use fossil fuels in a highly efficient way.</p> <p>⁴ SEERA's 'Sustainability Appraisal Sounding Board'. See Environment Agency 'Water Neutrality: An improved and expanded water resource management definition'. Water neutrality is where 'for every new development, total water use ... after the development [is] equal to or less than total water use ...before the development'.</p> <p>⁵ On hot days urban areas can have temperatures 20 to 60% higher than the surrounding countryside. This is due to a phenomenon called the urban heat island effect that causes air temperatures in large cities to be warmer than in neighbouring suburbs and rural areas. Warmer air temperatures can impact on air quality, public health and the demand for energy. Heat island effect can be mitigated by the greening of buildings via for instance green roofs, green walls and tree planting.</p> <p>⁶ These include materials that are produced locally where possible, procuring materials sustainably and ethically, and seeking to avoid materials which are polluting or with high embodied carbon and energy inputs;</p> <p>⁷ These are part of the measures supporting the Government's 2016 Building Regulations target. Allowable Solutions present mitigation measures for carbon that will be emitted from development and cannot be addressed on-site by fabric performance, energy efficiency or renewables. Allowable Solutions introduce an option for financial payment towards mitigating carbon emissions not addressed on-site.</p> <p>⁸ 17.4% of the city's built up area is within conservation areas. The proportion of stock built before 1919 and during the inter-war period is 43.4% for England and 65.7% for Brighton & Hove (Brighton and East Sussex Together House Condition Surveys – Overview Report October 2008).</p> <p>⁹ The latest data (2009) indicates that activities in Brighton & Hove emit about 1,230 kilo tonnes (1.2m tonnes) million tonnes of CO2 every year, with the domestic sector alone accounting for 42% of total direct emissions (mostly from energy use), significantly higher than 31% regionally and 30% nationally. The city is within a 'highly water stressed' region (Environment Agency) with above regional average per capita consumption (South East average 150-160 litres per person per day (l/p/d); Brighton & Hove's is 169 l/p/d – Audit Commission). At present, the bulk of Brighton & Hove's untreated waste is disposed to landfill. The adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan identifies a need for additional waste recycling and recovery capacity to support further increases in the diversion of waste from landfill.</p> <p>¹⁰ The Brighton & Hove Sustainable Community Strategy commits to reducing the city's carbon emissions by 42% by 2020 and by 80% by 2050 from the 2005 baseline of 5.7 tonnes per person reflecting the national commitment via the Climate Change Act. It also commits to: 'from a starting point of no increase in 2012/13 on the 2006 per capita City Ecological Footprint baseline of 5.72 global hectares (gha) per person, achieve a reduction to: 2.5 gha per person by 2020; and 1.25 gha per person by 2050'. Commitment to delivering these targets are further detailed in the city's Climate Change Strategy.</p> <p>¹¹ Zero carbon technologies harness non fossil fuel energy to create heat and generate electricity (e.g. wind, sun and water). Low carbon technologies use grid electricity or mains gas to generate heat or power more efficiently or use fuels that have small CO2 footprint (e.g. biofuel).</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>¹² Decentralised energy generation is a series of local systems generating heat and power, at or near the point of use, connected to local distribution networks.</p> <p>¹³ See Brighton & Hove Renewable and Sustainable Energy Study. This includes maps identifying opportunities for renewables and priority areas with enhanced potential for district heat networks.</p> <p>¹⁴ Such as Passivhaus or AECB standards.</p> <p>¹⁵ See Homes and Communities Agency's Carbon Challenge website.</p> <p>¹⁶ A number of high standard developments have already been achieved under the 2005 adopted Local Plan policy SU2.</p>
MM90	166	CP9	<p>A. 2. c. Ensuring that all new, major development schemes submit a Transport Assessment to identify the likely effects of the demand for travel they create and include measures to mitigate their impacts by reducing car use, <u>implementing agreed travel plans</u> and making appropriate contributions towards sustainable transport measures (see CP7 Infrastructure and Developer Contributions).</p>
MM91	167	CP9	<p>B. 1. Bus, Coaches and Taxis Implement strategic bus network investment including priority lanes on key routes into and across the city. Priority routes are:</p> <ul style="list-style-type: none"> • Lewes Road (A270) • Edward Street and Eastern Road • A259 Seafront serving Brighton Marina, Brighton Centre & Churchill Square and Shoreham Harbour Development areas. • London Road • <u>Valley Gardens</u>
MM92	168	CP9	<p>B. 4. Walking and Cycling Improve the public realm in key areas, and the routes leading to them, to encourage and enable walking (including wheelchair access) and cycling. Measures will be undertaken in a number of areas including the following:</p> <ul style="list-style-type: none"> • Valley Gardens • <u>Brighton Station Gateway, Queens Road and West Street</u> • Lewes Road • London Road • Edward Street and Eastern Road • Old Shoreham Road • A259 Seafront • Seven Dials

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> • Hove Station • Pool Valley • Local shopping areas
MM93	168	CP9	<p>B. 6. Parking Co-ordinate the provision of parking and traffic management measures across the city through an integrated approach to car parking charges, car park improvements (including signing and information), controlled parking zones and ensure that the capacity of public car parks <u>used by the public</u> is not increased in central areas.</p>
MM119	175	4.126	<p>4.126 In terms of new development, it will be a priority to review and prepare an up to date Supplementary Planning Document (SPD) setting out parking and servicing standards for new development. Car parking standards will be based on maximum standards, and cycle and disabled driver parking will be minimum standards accord with the NPPF and the SPD will also include standards for cycle, disabled driver and motorcycle parking. Consideration will also need to be given to the level of provision of motorcycle parking. Standards and requirements for meeting the needs for new technologies including electric vehicle charging points and <u>opportunities</u> for 'car free' housing proposals will <u>also</u> be addressed in the SPD.</p>
MM120	185-186	4.150	<p>4.150 ... With regard to adaptability, <u>the government has introduced national technical standards related to accessibility, adaptability and wheelchair standards. Through the City Plan Part 2 the council will provide evidence and seek to introduce a policy to provide enhanced accessibility or adaptability#.</u> this policy requires that new development should comply with Lifetime Homes206 standards. Further guidance is set out in the Council's Accessible Housing and Lifetime Homes Planning Advice Note.</p> <p><i>Amend Footnote 206:</i> #Housing built to standards to cater for various lifestyle stages, e.g. wider corridors to cater for pushchairs and wheelchairs, scope for adaptations for disability need, needs of the elderly etc. Optional, enhanced accessibility requirements are set out in Part M of the Building Regulations.</p>
MM99	194	CP16	<p>Planning permission resulting in the loss of open space, including the beach, will not be granted unless will only be granted where:</p> <p>...</p> <p><i>Delete d):</i></p> <p>d) The site is physically incapable of meeting the city's wider open space needs; is not part</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>of the beach or a playing field (current or historical) and, in accordance with the Open Space Study Update 2011, is of a poor quality (current and potential) and there is an identified surplus (current and future) in all types of open space within the locality (ward and sub area). In order to test the importance of the site to the local community the site must be actively marketed at a price that reflects its use, condition and local market prices for at least a year with no success before alternative proposals can be considered.</p> <p><i>Replace with:</i></p> <p><u>d) The site is :</u></p> <ul style="list-style-type: none"> • <u>physically incapable of meeting the city' s wider open space needs;</u> • <u>is not part of the beach or a playing field (current or historical) and,</u> • <u>in accordance with the Open Space Study Update 2011 (or subsequent approved revisions), is of a poor quality without potential for improvement (current and potential) and there is an identified surplus (current and future) in all types of open space within the locality (ward and sub area). In order to test the importance of the site to the local community the site must be actively marketed at a price that reflects its use, condition and local market prices for at least a year with no success before alternative proposals can be considered.</u> <p>...</p> <p>Add at the end of section 1:</p> <p><u>e) The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p>
MM101	196-197	4.174 – 4.175	<p>4.174 Due to the city's housing requirements a review of the capacity and need for open space was required and the findings of the Open Space, Sport and Recreation Study 2008 were further assessed through the Open Space Study Update 2011. The Update Study endorsed the local open space standards and the approach taken in the 2008 study. It devised a scoring system to assess open space which was applied to private open spaces and used to inform the 2010 Strategic Housing Land Availability Assessment. However the factors that produce a low open space offer (a combined assessment of 'quantity', 'accessibility' and 'quality' including potential) also limit a site's suitability for housing and no additional open space sites were identified through the study as suitable for housing.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>However through the 2014 Urban Fringe Site Assessment Study some open spaces within the city's urban fringe have been identified as having potential to help meet the city's housing requirements (see Policies SA4 and CP1). Unlike other urban open spaces the loss of these sites can more readily be mitigated through the provision of new publically accessible space, enhancements to existing space or by alternative provision within the National Park and/ or compensated for by the National Park's open space offer.</u></p> <p>4.175 When the open space standards are applied, a significant increase in open space will be required by 2030 (an additional 237 <u>293</u> hectares should be created <u>provided</u> when ONS population projections are applied, which however is reduced to 202 hectares when the City Plan housing target of <u>13,200</u> is taken into account <u>the generated demand equates to approximately 167 hectares</u>²¹⁴). It is therefore important new developments seek to provide the open space requirements generated respectively. However due to the city's physical constraints, between the sea and the South Downs National Park, it is recognised that the future open space requirements are unlikely to be met in full. To compensate, more intensive use of existing open space will be needed in an attempt to maintain current quality of life including the opening up of school grounds to the community/public and an expectation that owners should endeavour to enable better open space use of under-used private spaces. There will also be a need to better connect green spaces together to improve accessibility and to improve access for quiet recreation to the South Downs National Park.</p> <p><i>Amend footnote 214:</i></p> <p>²¹⁴ONS stands for Office for National Statistics. <u>The 2030 population figure applied is 310,900 based on ONS 2012-based Subnational Population Projections. The indicative generated demand of 13,200 residential units is calculated using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in open space arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. These figures apply a population figure of 302,806 and 294,072 respectively which are based on information in the ONS 2010 based Sub National Population Projections March 2012 and 2011 based interim projections covering 2011-2012 (published Sept 2012) — Initial release of 2011 Census Data. The population figures are detailed and explained further in the Housing Requirements Study (Update of 2011 HRS Study).</u></p>
MM102	200-201	CP17	<p>... Planning permission resulting in the loss of indoor and outdoor sports facilities and spaces will not be granted except where:</p> <p><i>Amend penultimate part to section 2:</i></p> <p>In respect of <u>outdoor sports facilities and spaces</u>sports open space:</p>

Ref	Page	Policy/ Paragraph	Main Modification								
			<p>• The land has been marketed as detailed above and the proposal complies with the Open Space policy (CP16).</p> <p>...</p> <p>Add at the end of section 2:</p> <p><u>The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p> <p>...</p> <p>5. Require new development to contribute to the provision and improvement of the quality, quantity and accessibility of sports services, facilities and spaces to meet the needs it generates in accordance with the local standards set out below (or subsequent approved revisions <u>and/or approved assessments/strategies</u>) (See also CP7 Infrastructure and Developer Contributions).</p> <p>...</p> <table border="1" data-bbox="602 938 1733 1398"> <tr> <td colspan="2" data-bbox="602 938 1733 975">Standard for Indoor and Outdoor Sports Facilities</td> </tr> <tr> <td colspan="2" data-bbox="602 975 1733 1011">Indoor Sports</td> </tr> <tr> <td colspan="2" data-bbox="602 1011 1733 1048">Quantity (indoor sport)</td> </tr> <tr> <td data-bbox="602 1048 1151 1398">Modelling undertaken in line with Sport England parameters. Standards to comply with national best practice.</td> <td data-bbox="1151 1048 1733 1398">The Open Space, Sport and Recreation Study recommends the council should aim to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice rink (See also the Sports Facility</td> </tr> </table>	Standard for Indoor and Outdoor Sports Facilities		Indoor Sports		Quantity (indoor sport)		Modelling undertaken in line with Sport England parameters. Standards to comply with national best practice.	The Open Space, Sport and Recreation Study recommends the council should aim to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice rink (See also the Sports Facility
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Ref	Page	Policy/ Paragraph	Main Modification			
			Plan for further recommendations).			
			Accessibility (indoor sport)			
			Standards to comply with national best practice.			
			Quality (indoor sport)			
			All facilities should be built or provided in accordance with national best practice			
			Outdoor Sports			
			Quantity (outdoor sport)			
			Current Provision	Current Provision (Ha/1,000 pop)	Proposed Standard (Ha/1,000 pop)	Additional Space required by 2030 ²¹⁵
			Approx 118.5 Hectares	0.47	0.47	Approx 20 to 23 <u>15.5 to 28</u> hectares
			Accessibility (outdoor sport)			
			20 minute walk time (960 metres)			
			Quality (outdoor sport)			
			Clean, litter-free sports facilities should be provided with appropriate, well drained, well maintained surfaces. Ancillary accommodation should include toilets, changing facilities, dog waste bins and litter bins and appropriate amenity and sports lighting.			
			Standard for Indoor and Outdoor Sports Facilities			
			All sites should meet the minimum specifications of the appropriate National Governing Body of sport and meet Equality Act 2010 guidance.			
			<i>Amend footnote 215:</i>			
			²¹⁵ <u>Applying a 2030 population figure of 310,900, based on ONS 2012-based Subnational Population Projections, an additional 27.6 hectares of outdoor sport space will be required. However, when the indicative generated demand of the City Plan's housing target of 13,200 residential units is calculated (using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms) an additional 15.5 hectares is required. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in outdoor sport arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. ONS stands for Office for National Statistics. Based on information in the Office for National Statistics 2010-based Sub National Population Projections March 2012 and 2011-based interim projections covering 2011-2012 (published Sept 2012) – initial release of 2011 Census Data. Applying the respective 2030 projection figure of 299,777 an additional 22.9 hectares will be required however on the assumption that the City Plan housing targets will restrict the growth in population to 292,886 this will reduce the additional outdoor sport requirement to</u>			

Ref	Page	Policy/ Paragraph	Main Modification
			19.66 hectares. The population figures are detailed and explained further in the Housing Requirements Study (Update of 2011 HRS Study).
MM105	207	4.197	<p><i>Add after last sentence of 4.197:</i></p> <p><u>Poor air quality can cause serious health problems and reduces the quality of life and life expectancy. Development proposals will be expected to protect and improve local air quality and should be appropriately and sensitively designed to mitigate negative impacts on air quality.</u></p>
MM106	209, 210	CP19	<p><i>Add new criterion a. iii) to the policy:</i></p> <p><u>iii) Seek to apply the requirements of the nationally described space standard in Part 2 of the plan to secure the quality and sustainability in new residential development.</u></p> <p><i>Insert new penultimate sentence within paragraph 4.202:</i></p> <p>4.202 ... and the need for developments to be inclusive, adaptable and accessible is addressed in CP12 Urban Design. <u>Part 2 of the plan will, subject to evidence of need and impact on viability, include a development management policy relating to requiring the nationally described space standard. This policy and those ...</u></p>
MM107	217, 218	CP21	<p>i) Purpose Built Student Accommodation</p> <p>A. 6. Schemes should <u>demonstrate that they have entered into a formal agreement with the support of</u> one of the city's two Universities or other existing educational establishments within Brighton & Hove.</p> <p>A. 7. Permanent purpose built student Accommodation will not be supported on sites <u>allocated for housing or</u> with either an extant planning permission for residential development or sites identified as potential housing sites.</p> <p>ii) Houses in Multiple Occupation (HMO's)</p> <p>In order to support mixed and balanced communities and to ensure that a range of housing needs continue to be accommodated throughout the city, applications for <u>new build HMO, and applications for</u> the change of use to a Class C4 (Houses in multiple occupation) use, a mixed C3/C4 use or to a sui generis House in Multiple Occupation use (more than six people</p>

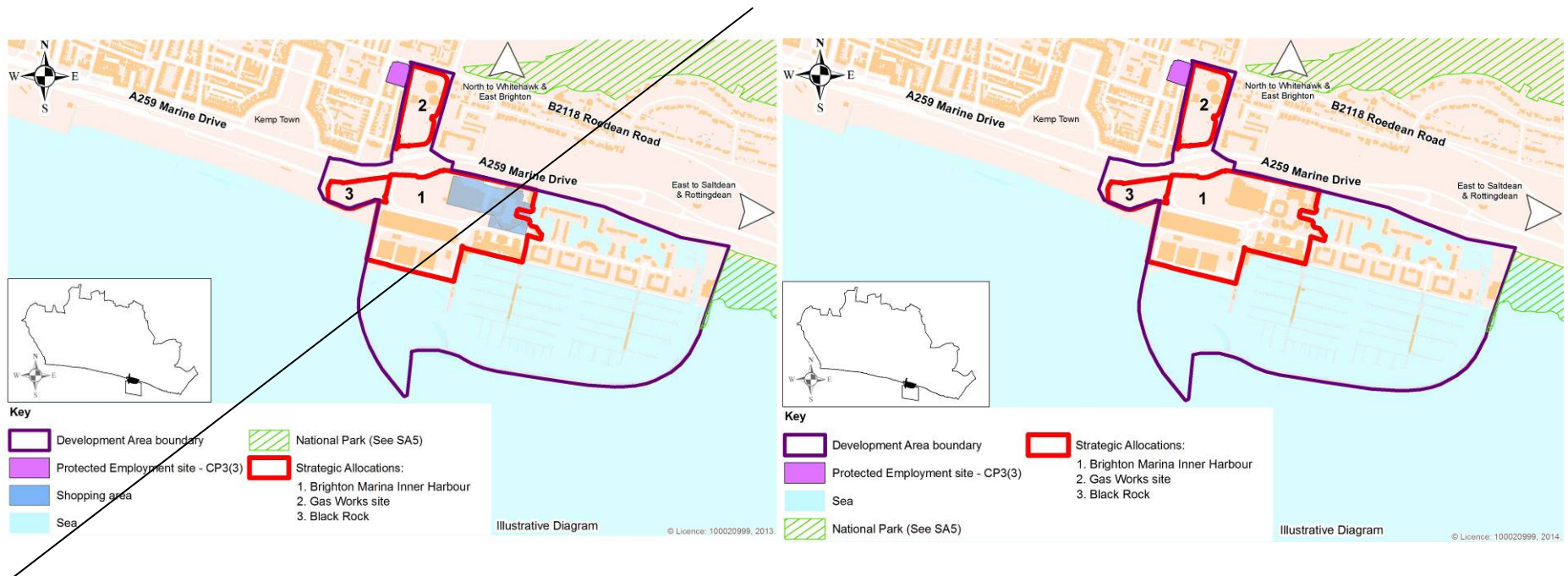
Ref	Page	Policy/ Paragraph	Main Modification
			<p>sharing) will not be permitted where:</p> <ul style="list-style-type: none"> • More than 10 per cent of dwellings within a radius of 50 metres of the application site are already in use as Class C4, mixed C3/C4 or other types of HMO in a sui generis use.
MM109	220	4.234	4.234 In assessing planning applications for new Houses in Multiple Occupation, a circle with a radius of 50 metres will be drawn from the centre point of the application site's highway frontage <u>front curtilage boundary</u> . Residential properties...
MM112	233	Appendix 2 Key Diagram	<p><i>Full diagram shown at Appendix 1 below. (See PM046 for additional changes to Key Diagram.)</i></p> <p><i>Amend headings:</i></p> <p>Local Development Framework Core Strategy <u>City Plan Part One</u> Key Diagram</p> <p><i>Amend key:</i></p> <p>Shopping centres (CP15 <u>CP4</u>)</p>
MM113		Annex 1 – Implement ation and Monitoring Plan	<i>Full Annex shown with amendments in Appendix 2 (separate document).</i>
MM114		Annex 2 – Infrastructu re Delivery Plan	Amendments made to Annexe 2 in Appendix 3 (separate document).
MM115		Annex 2 – Infrastructu re Delivery Plan	Addendum made to Annex 2 in Appendix 3 (separate document).
MM116		Annex 3 – Housing	Full Annex, dated December 2015, shown with amendments in Document BP/074.

Ref	Page	Policy/ Paragraph	Main Modification
		Implement ation Strategy	
MM117			Add Document BP/073 as Annex 4 to the City Plan and add Annex 4 to the list of Annexes on page 2 of the Plan.

Appendix 1 – Amendments to Maps

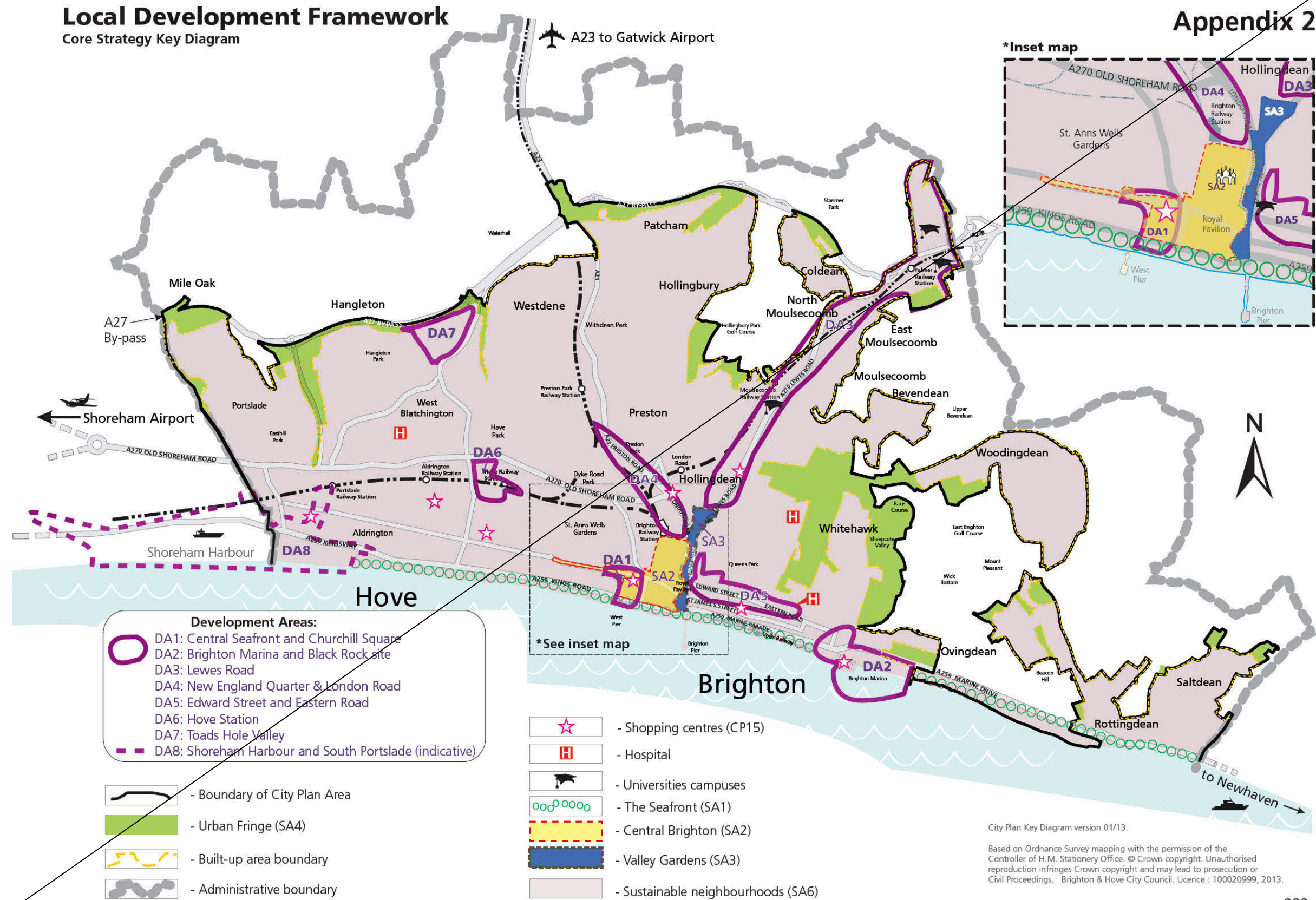
See PM018, PM046, PM112 for details of proposed modifications.

DA2 Brighton Marina, Gas Works and Black Rock Area, page 38





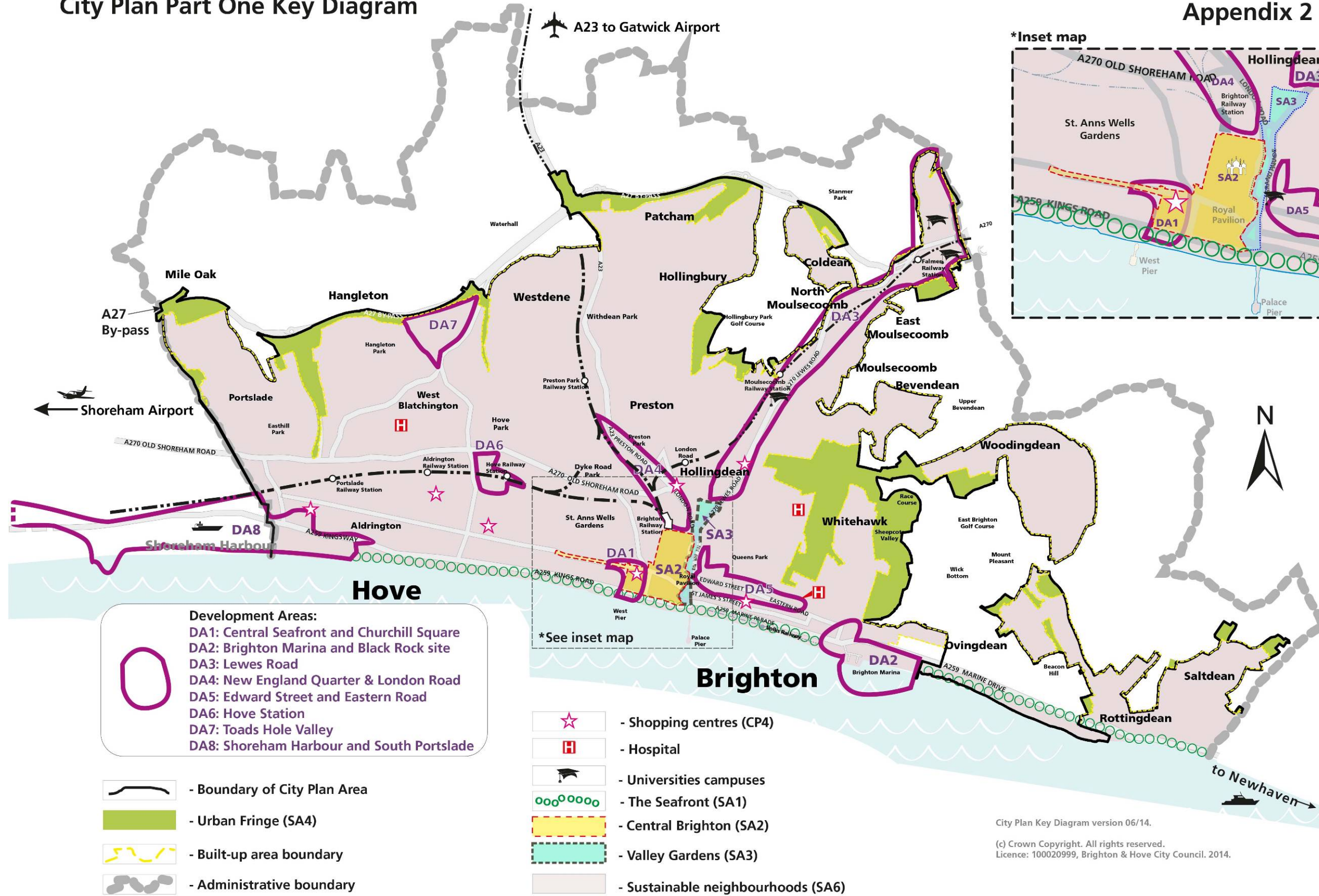
Key Diagram, page 233



Appendix 2

City Plan Part One Key Diagram

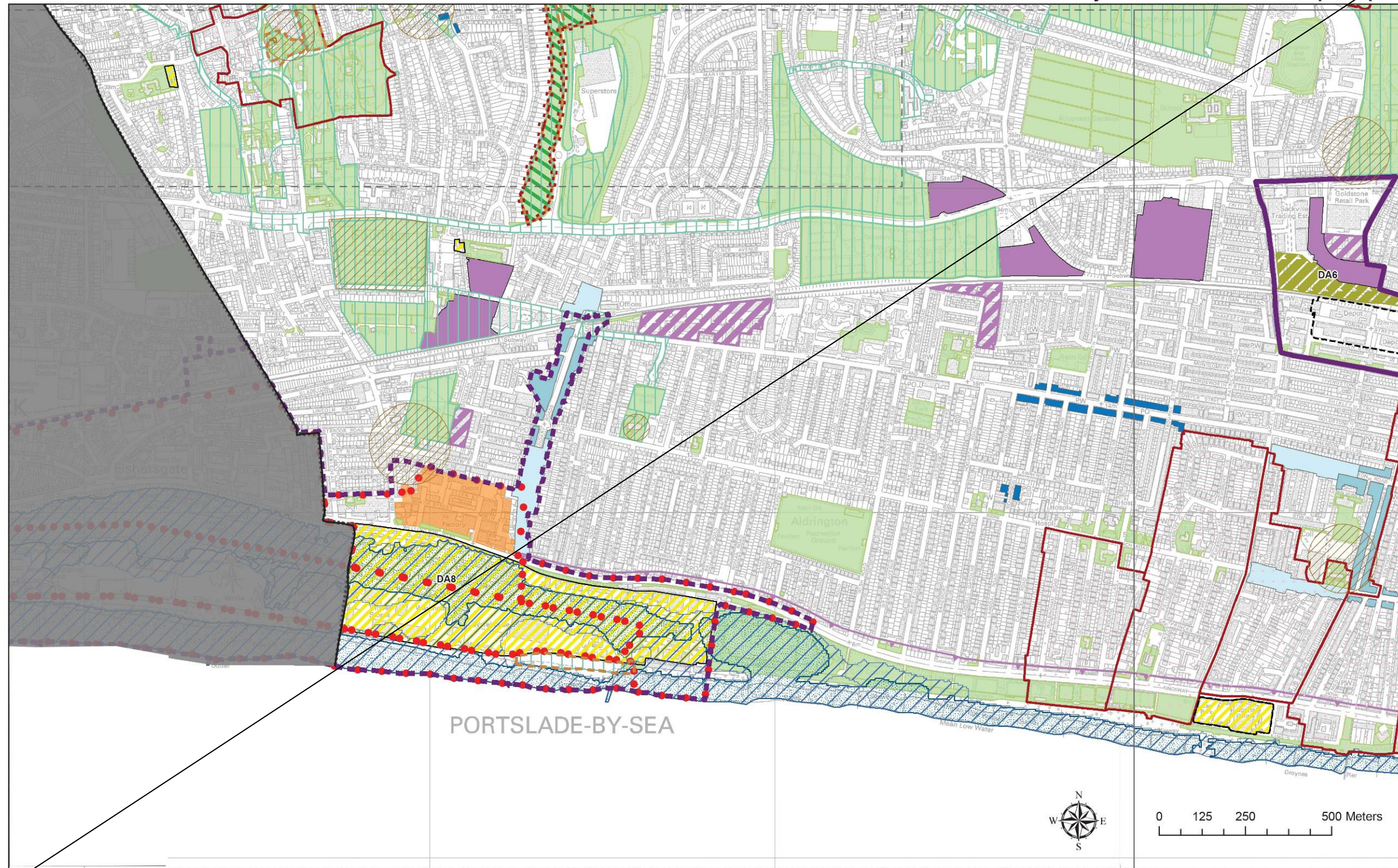
Appendix 2



City Plan Key Diagram version 06/14.
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Policies Map

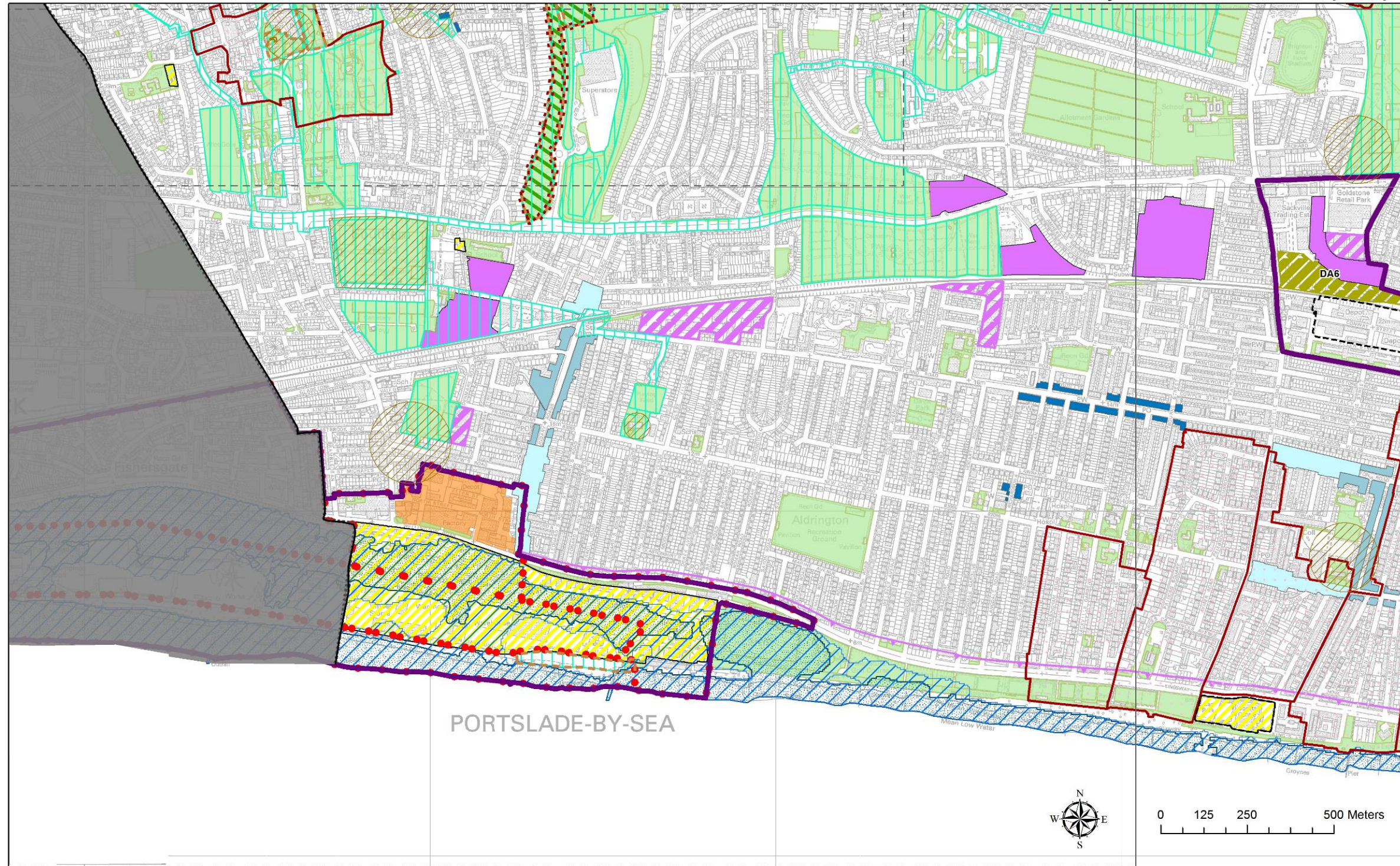
Submission City Plan Part One Policies Map - map 8



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Scale: 1:10,000

City Plan Part One Policies Map - map 8



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Submission City Plan Part One Policies Map - map 13



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City Plan Part One Policies Map - map 13



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Appendix 2

Appendix 2

Amendments to Annex 1 – Implementation and Monitoring Plan. Full annex with amendments shown in separate document.

Appendix 3

Amendments to Annex 2 – Full Annex with amendments shown in separate document