

**Title:** Brighton & Hove City Plan Update

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To thank the BHSP and family of partnerships for their involvement and comments during preparation of the City Plan.

**Purpose/Key Messages:**

To outline the changes made to the Plan in response to comments made.

To note the next stages towards adoption and other Plans to be prepared.

**Significance to BHSP and Delivering SCS outcomes:**

The City Plan is one of the main delivery mechanisms for the Sustainable Community Strategy

**What is BHSP being asked to do?**

To continue to engage in future planning documents.

To note the next steps towards adopting the City Plan Part 1.

**Next steps and report back mechanism:**

Update report to BHSP in late 2013

## **1. Context**

The draft City Plan, Part 1 will provide the strategic framework for development to 2030. It will ensure there is the right balance of uses in the city; it will help regenerate underused sites and secure investment; and ensure there is sufficient infrastructure in the city to meet needs.

The City Plan will help to deliver the priorities in the Sustainable Community Strategy and is aligned with this and other strategies in the city.

A report came to BHSP in June 2012 which outlined the content of the draft City Plan and provided details of the consultation to be undertaken for 8 weeks from May to July 2012.

The City Plan has since been amended and updated and was agreed at full Council on 31 January 2013 for submission to the Secretary of State.

## 2. Consultation Responses

Consultation on the draft City Plan Part 1 was undertaken from 28 May to 10 July 2012.

The following BHSP and Partnership events were attended and a number of special events set up:

- **City Engagement Partnership** – 22 May – presentation and questions at meeting
- **Transport Partnership** – 22 May – brief item to raise awareness of consultation.
- **Community and Voluntary Sector** – jointly drafted newsletter about the City Plan inviting comments was sent to CVSF members.
- **City Sustainability Partnership Working Group** – 14 June – specially arranged – presentation and workshops.
- **Strategic Housing Partnership** – 12 June – presentation and questions.
- **Public Service Board** – 12 June - presentation to Board.
- **CESSG Working Group** – 20 June - briefing and questions.
- **Arts and Creative Industries Commission** – 22 June - presentation and questions.
- **City Plan Stakeholder Workshops** – two sessions specially arranged (one in the morning and one early evening) and residents', neighbourhood and amenity groups and Community and Voluntary Sector Groups invited (26 June and 3 July).
- **Brighton & Hove Strategic Partnership** – 19 June - Report and presentation to meeting on 6 June.
- **Economic Strategy Special Event** – 3 July presentation and workshops
- **Special Transport Partnership Meeting** – 9 July – presentation and discussion.
- **B&H Healthy City Partnership** – 19 July – presentation and questions.

The comments made at these events were very welcome and have contributed to making the City Plan a more collaborative and effective document.

In addition to the discussions and comments captured at these events, over 920 representations were received from 254 formal written responses. The comments received have shaped the content of the

submission City Plan and have been included in the consultation statement (a supporting document for the City Plan).

### **3. Changes since summer 2012**

A number of changes were made to the City Plan in response to comments made. There was general support for the approach in the City Plan from the Partnerships. A full schedule of these changes is attached in appendix 1 though it is possible to see exactly how the city council has responded to each representation in appendix 5 of the Consultation Statement.

Further minor changes to the Plan were made in response to:

- government requirements – most significantly a new standard policy on a presumption in favour of sustainable development;
- the findings of further updated studies including the Energy Study, Employment Land Study Review and the draft Transport Assessment;
- the recommendations arising from supporting documents – Sustainability Appraisal and Health and Equalities Impact Assessments; and
- editorial changes and updates.

Nine further amendments to the Plan were agreed at full Council on 31 January. These will be incorporated into the Plan that will be submitted to Secretary of State.

### **4. Next Steps**

Before the City Plan can be submitted to the Secretary of State in late April 2013 it will be subject to a formal stage of consultation called publication stage. It will run for seven weeks from **25 February to 12 April**.

Representations at this publication stage are effectively objections to the Plan and can only be made on the basis of the 'soundness' of the plan and whether it has been prepared in accordance with legal and procedural requirements. Stakeholders and residents, including the BHSP and Partnerships, will be informed of the consultation and provided with guidance to assist with making representations.

The next stage is to submit the Plan, along with the supporting documents and comments made at publication stage, to the Secretary of State. The examination into the soundness of the City Plan should be held in September 2013, with a public pre-examination meeting in the summer.

The Inspector's report should be published in November/December 2013 and the City Plan Part 1 adopted in February 2014 at full Council.

## **5. Future Planning Documents**

Work on Part 2 of the City Plan will start in October 2013. This Plan will include site allocations and detailed development management policies.

In terms of Neighbourhood Planning, support and advice is being provided by officers to groups (Neighbourhood Forums and Parish Councils) interested in preparing a neighbourhood plan. However preparation of these documents will be led by local communities.

## Appendix 1 – Summary of Changes to Draft City Plan (May 2012)

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p><b>New Policy</b>  <b>SS1 Presumption in Favour of Sustainable Development</b></p>	<ul style="list-style-type: none"> <li>New policy reflecting wording in National Planning Policy Framework to be inserted into the Spatial Strategy.</li> </ul>	<ul style="list-style-type: none"> <li>Government requirement and standard wording for all new development plans as provided by Planning Inspectorate</li> </ul>
<p><b>DA1 Brighton Centre Area</b>  Secure a new and modern conference centre in a landmark new building to benefit the city and region and sustain the tourism economy; ensuring the redevelopment benefits the surrounding area through high quality design, townscape, public realm and biodiversity improvements and complements the seafront.</p> <p>Recognises the potential for the extension of Churchill Square shopping centre (c. minimum 20,000 sq m A1 retail) and supports new hotel and leisure facilities.</p> <p>Seeks to ensure high quality public and sustainable transport is provided and pedestrian and cycle access through the area and to the seafront is improved. Encourage a more diverse evening economy in the area by addressing community safety concerns along West Street and the lower seafront promenade.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>Seeking improvement to townscape and heritage assets, legibility and permeability</li> <li>Seeking balanced and diversified evening economy in West Street (in partnership with NHS and police)</li> <li>The developer should enter into a training place agreement to secure training for local people.</li> <li>Reference to district heating networks</li> <li>Amendment of 1b) text to clarify that edge of centre proposals will be determined in line with policy CP4.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>Policy will help to deliver against the local targets under the One Planet Living principles.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>In response to representations.</li> <li>Recommendation from Health Equalities Impact Assessment (HEQIA) 2012</li> <li>Recommendation from HEQIA 2012.</li> <li>Recommendations from Energy Study</li> <li>Clarification</li>   <li>Clarity.</li> </ul>

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<p><b>DA2 Brighton Marina</b> Facilitate the creation of Brighton Marina as a sustainable mixed use district of the city, creating a high quality marina environment that will attract residents and visitors and extend the promenade environment up to and around the Marina and create stronger pedestrian and visual links with the sea from the Marina. This will involve ensuring a more balanced range of uses and a good mix of new housing. New development must be supported by the necessary infrastructure (health, community facilities, school places), high quality building design, townscape and public realm, biodiversity improvements, better transport infrastructure and improved pedestrian and cycle access. Opportunities for large-scale renewable energy provision are set out in the policy along with a requirement that new developments are accompanied with a Flood Risk Assessment. Overall amounts of development across the area as a whole: minimum of 1,940 additional residential units are sought together with 5,000sq m additional retail floorspace; 4,000sq m additional industrial floorspace and 9,000 sq m additional leisure and recreation floorspace. Strategic allocations are made for the Inner Harbour; the Black Rock site and the Gas Works site.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Strategy bullet points (no. 5) and Local Priority 13 reference to district heat network and infrastructure and supporting text at 3.23.</li> <li>• Strategy bullet points (no.7). Reference to non-retail floor space</li> <li>• Amend Part B and Strategic Allocations and floorspace figures: clarify 10,500 sq m leisure and recreation space overall and 4,000 sq m employment floorspace identified at Gas Work Site reduced to 2,000 sq m; update reference to NHS Brighton &amp; Hove</li> <li>• Brighton Marina Inner Harbour allocation refer to sewerage capacity;</li> <li>• Gas Work allocation amend to refer to ‘a minimum of’ (85 residential units) and land contamination</li> <li>• Black Rock allocation - refer to National Cycle Network.</li> <li>• Para 3.6 – add sentence to investigate opportunities to reduce freight journeys into the city</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Refer to District Shopping Centre.; word ‘sustainable’ and one planet living approach</li> <li>• Reference to abnormal costs</li> <li>• New paragraph 3.16. regarding employment use on Gas Works</li> <li>• Refer to ‘high quality bus interchange’; to proximity of SDNP; reflect changes to CP7;</li> </ul>	<ul style="list-style-type: none"> <li>• Reflect findings of the Energy Study. Response to representation by Coast to Capital LEP and BHEP.</li> <li>• Address Retail Study update 2011 and representations.</li> <li>• Amend error in leisure floorspace figure; respond to representations and findings of the Employment Land Study</li> <li>• Update. Reflect changes in structure of health provision</li> <li>• To address comments by Southern Water about infrastructure.</li> <li>• Address issues raised by Coast to Capital LEP and BHEP about contamination and deliverability of housing</li> <li>• Address representations</li> <li>• in response to the Transport Assessment</li> </ul> <ul style="list-style-type: none"> <li>• Address comments about viability</li> <li>• Update – Employment Land Study Review 2012 and representations</li> <li>• Address representations</li> <li>• consistency</li> </ul>

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<p><b>DA3 Lewes Road</b>  Strategy is to promote and enhance the role of this area for higher education in Brighton &amp; Hove. Also to facilitate improved sustainable transport infrastructure to encourage different transport uses and reduce the impact of traffic; secure improvements to the townscape, public realm and air quality; deliver biodiversity improvements and additional amounts of housing, student housing, employment and community facilities to increase opportunities for and to meet the needs of the local communities.</p> <p>Strategic allocations are made for Preston Barracks and Brighton University; Woollards Field South and Falmer released land (former Falmer High School). Overall amounts of development: 885 residential units; 15,600 sq m employment floorspace; 16,000 sq m Business School and academic floorspace; 1300 student rooms and Community Building at Bevendean.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Add reference to protecting setting of National Park</li> <li>• Added reference to employment opportunities</li> <li>• Policy A 5 Add “accessible” before “shopfronts.”</li> <li>• Policy A 7 Add “or traffic noise.”</li> <li>• Amended figure for number of residential units from 885 to 810</li> <li>• Add new A9 to policy to work with ESCC and Highways agency to improve performance of Falmer interchange.</li> <li>• Added references to connections to water supply and sewerage systems and to protection of groundwater</li> <li>• Added reference to need for training place agreement</li> <li>• Reference to district heating networks</li> <li>• <b>Minor supporting text amendments:</b></li> <li>• One Planet Living text added.</li> </ul>	<ul style="list-style-type: none"> <li>• Response to consultation response from South Downs National Park Authority</li> <li>• Response to HEQIA recommendations</li> <li>• Response to consultation</li> <li>• Response to consultation</li> <li>• Reflect housing delivery summary tables based on SHLAA Update 2012</li> <li>• Response to findings of the Transport Assessment</li> <li>• Response to consultation response from Southern Water</li> <li>• Response to HEQIA recommendations</li> <li>• Recommendation from Energy study</li> </ul>

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	<ul style="list-style-type: none"> <li>• added reference to co-ordination with adjoining authorities for improved transport linkages</li> <li>• Added reference to public transport access to SDNP.</li> <li>• Para 3.27 – amend to “Better air and noise quality”. Amend references to bus and rail references</li> <li>• Para 3.33 of supporting text – added reference to other employment generating uses</li> </ul>	<ul style="list-style-type: none"> <li>• Response to consultation</li> <li>• Response to consultation</li> <li>• Response to consultation and Transport assessment.</li> <li>• To reflect policy and interest expressed for use as an Ambulance Make Ready Station</li> </ul>
<p><b>DA4 NEQ and London Road</b>  Strategy for the area is to revitalise the London Road shopping district; create a major new business quarter for the city (incorporating an additional 20,000 sqm office floorspace across several sites) connecting London Road with the New England Quarter and maintain and enhance a “green gateway” to the city to the west of Preston Road.</p> <p>Local priorities include supporting improvements in vocational training and further education in the area; ensuring that improvements to local air quality and the public realm are achieved; improved sustainable transport measures; strengthening the links between the New</p>	<ul style="list-style-type: none"> <li>• <b>Minor policy amendments:</b></li> <li>• 3.34 – 3.36 additional text referring to NCN 20 and Providence Place; amendments to Open Market Reference and amendments to one Planet Living Reference</li> <li>• Part 6 – inclusion of reference to noise quality</li> <li>• New local priority - Development within this area will be expected to incorporate infrastructure to support heat networks subject to viability</li> <li>• Part 7 inclusion of reference to public spaces</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• In response to representation raising reference to Noise Action Plan (see LTP and JSNA)</li> <li>• In response to findings of the Brighton &amp; Hove Energy Study.</li> <li>• Improving effectiveness of policy (also reflects Lively Cities work)</li> </ul>

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<p>England Quarter, London Road and the North Laine shopping areas and strengthening the digital media and creative industries business cluster in the area by helping to ensure that workshops and premises remain affordable, appropriate and available for use.</p> <p>Strategic allocations are made to secure 20,000 sqm additional office floorspace; to safeguard New England House as the city's creative industry and digital media hub and achieve mixed use (office/residential) development at 125 – 163 Preston Road</p> <p>Overall amounts of development: 1,140 residential units; 20,000 sqm office floorspace and 300 student rooms.</p>	<ul style="list-style-type: none"> <li>• Part 8 – change of terminology of cluster as CDIT</li> <li>• Section B – amounts of development updated</li>   <li>• C. Strategic Allocation 1 NEQ and London Road Area – site a) amendment employment floorspace figures</li>   <li>• C. Strategic Allocation 1i) – NEQ and London Road Area – amendment reference to CDIT</li> <li>• C. Strategic Allocation 1v) – new criterion relating to local training</li> <li>• C. Strategic Allocation 2) – amend reference to CDIT</li> <li>• C. Strategic Allocation 3) – 2 new criterion</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representation (Wired Sussex, BHEP and LEP)</li> <li>• Housing figures amended to reflect SHLAA 2012 update and to clarify that 300 bed spaces is not a minimum in response to representations.</li> <li>• No net loss of employment floorspace – in response to representation and findings of capacity study which indicate that there may capacity and townscape issues for additional employment floorspace and residential on this site.</li> <li>• Consistency and in response to representation (Wired Sussex, BHEP and LEP)</li> <li>• In response to HEQIA</li> <li>• Consistency and in response to representation (Wired Sussex, BHEP and LEP)</li> <li>• In response to HEQIA,</li> </ul>

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	<p>relating to local training and sewerage capacity and updated housing figures</p> <ul style="list-style-type: none"> <li>• <b>Minor supporting text amendments:</b></li> <li>• 3.43- 3.44, 3.46 – 3.47 – additional text to reflect policy amendments regarding sewerage, NCN20, heat network infrastructure, noise quality and the open market</li> <li>• Addition to footnote explaining affordable workspace</li> </ul>	<p>representations (Southern Water) and in response to updated SHLAA 2012</p> <ul style="list-style-type: none"> <li>• In response to representations</li> </ul>
<p><b>DA5 Eastern Road and Edward Street</b> Secure significant improvements to the public realm and townscape by making the area more attractive, accessible and safer for residents, employees and visitors and contribute towards increased business investment in the area. Help secure additional high quality employment floorspace in the Edward Street Quarter, more efficient use of employment sites and facilitate a high quality, sustainable mixed use development on the former Municipal Market, Circus Street.</p> <p>Strategic site allocations made for the Royal Sussex County Hospital; Edward Street Quarter, Circus Street and for Freshfield Road Business Park and Gala Bingo Hall.</p>	<p><b>Main Policy Amendments:</b></p> <ul style="list-style-type: none"> <li>• Local priorities reference to potential for district heating;</li> <li>• Amounts of development expected at Edward Street Quarter reduced: 30,000sqm to 15-20,000sqm B1s and from 165 residential units to 65. Reference to public realm improvements and ancillary uses permitted.</li> <li>• Freshfield Road Business Park and Gala Bingo Strategic Allocation– Reduce residential units from 215 to 110.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> </ul>	<ul style="list-style-type: none"> <li>• Recommendation for Brighton &amp; Hove Energy Study 2012</li> <li>• Consultation Response and reflects findings of a Capacity Study undertaken by Amex which indicated site capacity/ deliverability issues.</li> <li>• Response to recommendations of the Employment Land Study Update that estate is effective and serves an important role in the city.</li> </ul> <ul style="list-style-type: none"> <li>• In response to representations</li> </ul>

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<p>Overall amounts of development: 600 residential units; 33,200 sqm employment floorspace; 74,000 sqm hospital floorspace; 400 student rooms and 3,800 University education floorspace with Dance Studio.</p>	<ul style="list-style-type: none"> <li>• Reference to conservation areas;</li> <li>• Amendments related to policy text amendments</li> </ul>	
<p><b>DA6 Hove Station</b>  Secure long term regeneration opportunities around Hove Station and enable its development as an attractive and sustainable employment-led mixed use area. Through redevelopment, secure public realm and townscape improvements focusing on the Conway Street area and the industrial/ retail frontages along Sackville Road, Old Shoreham Road and Goldstone Lane as well as public safety, environmental and open space improvements. Enhance the sustainable transport interchange at Hove Station and protect identified employment sites. Strategic allocation for Conway Street Industrial Area. Overall amounts of development: 575 residential units; 4,000 sqm employment floorspace.</p>	<p><b>Main Policy Amendments:</b></p> <ul style="list-style-type: none"> <li>• Change emphasis in opening paragraph from employment-led to employment focussed and emphasis on the efficient use of land through, predominantly employment and residential, mixed use developments.</li> <li>• Add to local priority – require high quality design of an acceptable height, mass and scale that takes into account impacts on factors such as townscape, strategic views and infrastructure</li> <li>• Add to local priority emphasis on open space, community facility provision and acceptable sense of place</li> <li>• Add to local priority encouraging accessibility improvements over the railway at the station and beyond.</li> <li>• Include priority on to district heating networks</li> <li>• Include priority on protecting groundwater sources from pollution and reference to sewerage capacity</li> </ul>	<ul style="list-style-type: none"> <li>• Reflect updated assessment of potential of area to accommodate additional employment floorspace – Employment Land Study Review 2012</li> <li>• In response to representations</li> <li>• Recommendations from Energy Study</li> <li>• Response to representation (Southern Water)</li> </ul>

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	<ul style="list-style-type: none"> <li>• Floorspace figures revised for area as a whole: residential increased to 630 and employment floorspace amended to reflect changes to Conway Street allocation;</li> <li>• Conway Street Strategic Allocation – amend amount of development from replacement (18,000sqm) and an additional 3000sqm office space and 150 residential units to replacement of 12,000sqm employment space and provide 200 residential units.;</li> <li>• New criteria DA4.c.1.e the developer will enter into a training place agreement to secure training for local people</li> </ul>	<ul style="list-style-type: none"> <li>• In light of updated assessment – Employment Land Study Review 2012 of the potential of the allocation to accommodate additional employment land and in response to representations</li> <li>• Recommendation from HEQIA</li> </ul>
<p><b>DA7 Toad’s Hole Valley</b> Secure a modern, high quality and sustainable mixed use development which achieves One Planet Living principles to help meet the strategic development needs of the city for housing, employment, education and new open space and also to improve accessibility and provide new community facilities to share with adjacent neighbourhoods.</p> <p>A strategic allocation is made for Toads Hole Valley, east of the designated SNCI Overall amounts of development: minimum of 700 residential units; 25,000 sqm employment floorspace; a new secondary school; 2 ha new public open space,</p>	<p><b>Main Policy Amendments:</b></p> <ul style="list-style-type: none"> <li>• Part A2 local priorities and para 3.77 supporting text - Amend from One Planet Living principles to a One Planet Approach</li> <li>• Part A3 local priorities and C1d relating to National Park - Amend from ‘complements’ the SDNP and there will be no adverse impacts to ‘development should respect the setting of SDNP and its purposes</li> <li>• Part A4 add development benefit - Amend to add ‘training and job opportunities for local people’</li> <li>• Additional part added to Section A of the policy and new sections to the supporting text and new section k to part C1. New part – provide necessary infrastructure for the</li> </ul>	<ul style="list-style-type: none"> <li>• In response to protocol with Bio-Regional and in response to comments made</li> <li>• Amend references to impact on National Park to standard wording in response to comments</li> <li>• Amended in response to the findings of the HEQIA</li> <li>• Response to comments made to objectors in relation to concerns regarding lack of infrastructure and in response</li> </ul>

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<p>supporting uses, food growing space 0.5ha; energy and green infrastructure.</p>	<p>development including water and sewerage infra. Supporting text sections added under 3.81 on connecting to water and sewerage off site.</p> <ul style="list-style-type: none"> <li>• Amend bullet 5 part B - Add ancillary to supporting uses in Part B</li> <li>• Amend C1 f - Remove first sentence – which states that development should contribute to a reduction the ecological footprint of the city</li> <li>• Part C1 j - Amend j from outlining the requirements for a Transport Assessment to addressing issues of highways safety, noise and linkages to established residential areas</li> <li>• C1k – Add ‘with connections to existing cycle infrastructure’.</li> <li>• Amend Part C1 o (formerly n) and update paragraph 3.76 supporting text - Remove reference to Supplementary Planning Document and replace with Planning Brief</li> <li>• New C1q – Add – Work in partnership with the Highways Agency and developer to improve the trunk road junction which will be addressed in planning brief</li> </ul>	<p>to Southern Water.</p> <ul style="list-style-type: none"> <li>• Editorial change for clarity – supporting uses should be ancillary only</li> <li>• In response to comments made that this may not be achievable.</li> <li>• In response to comments made – it is accepted that a TA will be required as part of the planning application.</li> <li>• In response to Transport Assessment</li> <li>• Planning Brief is a preferred approach and in response to comments</li> <li>• In response to the Transport Assessment</li> </ul>

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	<p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Para 3.75 Minor wording changes</li> <li>• Para 3.77 reference to sustainable building mitigation measures to achieve standards</li> <li>• Para 3.79 Additional explanation for the density range set out in the policy.</li> <li>• Para 3.80 start - Amend wording on amount of office/emp floorspace to remove range and have a minimum of 25,000sqm</li> <li>• Para 3.80 end - Amend wording relating to possible informal Park and Ride emphasising it 'may' be considered subject to meeting criteria in policy CP9</li> <li>• Amend C1j and new paragraph 1 below 3.81 New part j to policy text and explanatory text on Energy Study and District Heating Networks</li> <li>• New paragraph 3 below 3.81 Phasing Development – paragraph added seeking community and supporting uses to be completed prior to occupation of the first phase of residential accommodation.</li> <li>• New paragraph 3 below 3.81</li> <li>• Para 3.83 Reference added to providing off-street parking in accordance with maximum</li> </ul>	<ul style="list-style-type: none"> <li>• Editorial – more clarity</li> <li>• In response to the Energy Study</li> <li>• In response to comments</li> <li>• For clarity and to correspond more closely with the wording of the policy.</li> <li>• Amended in response to comments</li> <li>• In response to the findings of the Energy Study</li> <li>• In response to the findings of the HEQIA and in response to concerns raised by local residents</li> <li>• Office development should be delivered alongside the residential phases of development.</li> <li>• In response to concerns raised by local residents</li> </ul>

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	<p>parking standards</p> <ul style="list-style-type: none"> <li>• para 3.83 – add ‘and designated national cycle routes.</li> <li>• Para 3.88 Editorial amendments to wording.</li> <li>• Para 3.77 Two bullet points added in relation to environmental sustainability</li> <li>• New 3.84 supporting text added relating to work to be done on trunk road network with the Highways Agency</li> </ul>	<ul style="list-style-type: none"> <li>• In response to the Transport Assessment</li> <li>• Editorial only to improve clarity</li> <li>• In response to the recommendations of the SA.</li> <li>• In response to the Transport Assessment</li> </ul>
<p><b>DA8 Shoreham Harbour</b>  Strategy for this broad location is to deliver high quality sustainable mixed use developments including new housing, employment space, leisure opportunities, improved public realm and associated supporting infrastructure including flood defences and measures to encourage the use of sustainable transport. Strategy also recognises the consolidation and enhancement of the operations of Shoreham Port and the role it will play in the local economy.  A Joint Area Action Plan (JAAP) is being prepared in partnership with Adur District Council and West Sussex County Council that will contain detailed policies for the harbour area. Overall amounts of development falling within Brighton &amp; Hove part of the harbour area to be further tested through the JAAP process: 400 residential</p>	<ul style="list-style-type: none"> <li>• New point c) added to subsection i). South Quayside/Port Operational referring to Waste Water Treatment Works</li> <li>• Point d) subsection i) policy wording amended</li> <li>• Point e) in subsection i. "non-port operations" amended to "uses not requiring a port location".</li> <li>• Under subsection ii) point c) amended to read "...To accommodate appropriately located mixed-use residential development, in accordance with a future brief that will form part of the JAAP."</li> </ul>	<ul style="list-style-type: none"> <li>• To reflect Southern Water's comments on the need to provided for potential expansion of the Shoreham Waste Water Treatment Plan (in Adur)</li> <li>• Minor editorial amendment to reflect comments received and to clarify intent.</li> <li>• Minor editorial amendment to clarify intent.</li> <li>• For clarification, to reflect emerging development briefs and consistency with iii)b).</li> </ul>

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<p>units; 7,500 sqm additional employment floorspace.</p>	<ul style="list-style-type: none"> <li>• Character Area ii). Point d) moved to point e)</li> <li>• Character Area iii, point b). delete " and promote a comprehensive redevelopment approach" and "mixed-use"</li> <li>• Character Area iv, point a) "and beach environment " added</li> <li>• Paragraph 3.95. New sentence added at end of Paragraph</li> <li>• New Paragraph 3.96 added.</li> <li>• New paragraph 3.97 on mineral wharves added</li> </ul>	<ul style="list-style-type: none"> <li>• Minor editorial amendment.</li> <li>• To reflect approach within emerging Development Brief that have indicated a comprehensive redevelopment approach is unlikely to deliverable in the short-medium term given fragmented land ownership and concerns over loss of employment floorspace.</li> <li>• For clarity in response to representations received.</li> <li>• To reflect the fact the Partnership will support the needs of existing businesses.</li> <li>• For clarity and consistency with the Adur Local Plan</li> <li>• To indicate the City Plan is aware of wharves issue which is dealt with in Minerals Local Plans.</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<ul style="list-style-type: none"> <li>• Paragraph 3.98. Various amendments</li> <li>• New paragraph 3.99</li> <li>• New paragraph 3.100</li> <li>• New paragraph 3.101</li> <li>• Various (small) amendments to wording</li> </ul>	<ul style="list-style-type: none"> <li>• To improve understanding of policy</li> <li>• Explanation of issues regarding Waste Water Treatment plant in response to Southern Water's comments.</li> <li>• New paragraph subsequently revised to reflect findings of Strategic Energy Study</li> <li>• New standard paragraph added to address One Planet approach</li> <li>• To clarify intent of policy and for consistency.</li> </ul>
<p><b>SA1 Seafront</b>  The council will work in partnership to ensure the ongoing regeneration and maintenance of the seafront in an integrated and coordinated manner.  Proposals should support the year-round sport, leisure and cultural role of the seafront for residents and visitors whilst complementing its outstanding historic and natural landscape value. Proposals should ensure a good marine environment, enhance biodiversity and consider options for small</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Local priorities - Promote high quality architecture urban design and public art; reference to noise quality</li> <li>• Reference to district heating networks</li> <li>• Western seafront – townscape improvements should respect local context; reference to improvement of strategic cycle route;</li> <li>• Central Seafront – reference to Hove Lawns; editorial changes to West Pier bullet point</li> <li>• East of marina reference to geological interest</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• To reflect recommendations of Energy Study.</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p>scale renewable energy provision. Priorities are set out for the Western Seafront; Central Seafront; East of Palace Pier to the Marina and East of the Marina. A strategic allocation is made for the King Alfred/ RNR site to ensure the replacement of sports facilities and to provide a mixed use development including 400 residential units.</p>	<p>and SDNP</p> <ul style="list-style-type: none"> <li>• King Alfred/ RNR strategic allocation – reference to connect to the sewerage system off-site at the nearest point of adequate capacity;</li> <li>• training place agreement to secure training for local people,</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• editorial amendments for clarity of wording</li> <li>• reference to emerging Seafront Strategy</li> <li>• role of the seafront health and well-being</li> <li>• Presumption against proposals involving an increase in hard surfacing of the seafront at or in the vicinity of the sites of city-wide nature conservation importance.</li> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representation by Southern Water.</li> <li>• In response to HEQIA recommendation</li> <li>• In response to representation; Emerging council strategy;</li> <li>• In response to HEQIA;</li> <li>• In response to representations.</li> </ul>
<p><b>SA2 Central Brighton</b> Reinforce central Brighton’s role as the city’s vibrant thriving regional centre for shopping, tourism, cultural, office and commercial facilities. Sets out the approach to the cultural quarter, new retail development, a balanced range of complementary evening and night-time economy uses, mixed use development, safeguarding office accommodation and securing urban realm improvements.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Where other key policy issues are addressed, the Council will welcome proposals to create flats over shops and commercial premises.</li> <li>• Reference to district heating networks</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> <li>• Reference to Stress Areas under section on Cumulative Impact Zone</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representation.</li> <li>• To reflect recommendations of the Energy Study</li> <li>• In response to representations.</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p><b>SA3 Valley Gardens</b> The council will work with public and private sector partners to enhance and regenerate the Valley Gardens area in an integrated manner that reinforces its strategic significance, emphasises its historic and cultural character, reduces the adverse impact of traffic, improves air quality and creates a continuous green boulevard that reconnects the area to the surrounding urban realm.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Additional reference to safety and legibility as outcomes of improving key pedestrian and cycle links.</li> <li>• Reference to district heating networks</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• more detail on biodiversity aims of the policy;</li> <li>• reference traffic modelling to precede any traffic scheme and reference to improving the Aquarium Roundabout as part of any traffic scheme;</li> <li>• deletion of York Place as needing repairs to historic buildings and addition of reference to vacant historic buildings at Old Steine and Gloucester Place</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• To reflect recommendations of Energy Study.</li> <li>• In response to representations.</li> </ul>
<p><b>SA4 Urban Fringe</b> Sets out a framework to better manage and conserve land between the built up area boundary and the proposed South Downs National Park boundary. Sets out the approach to assessing development proposals and establishes priorities for enhancement: green network opportunities; environmental improvements; protecting ground water aquifers and the wider landscape role of the urban fringe.</p>	<ul style="list-style-type: none"> <li>• Minor policy text amendments:</li> <li>• Change to criteria e) in policy which required one or more policy objective to be met.</li> <li>• Minor supporting text amendments:</li> <li>• Remove reference to gateway facility to National Park by sustainable transport means to reflect fact that we are no longer looking for Park and Ride sites.</li> <li>• Additional minor changes to the supporting text.</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations and to update the policy wording</li> </ul>
<p><b>SA5 The South Downs</b> Following the establishment of the National</p>	<p><b>Main Policy text amendments:</b></p>	<ul style="list-style-type: none"> <li>• To reflect the representations</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
<p>Park Authority (SDNP), work in partnership with it and adjoining authorities and landowners to protect and enhance the natural beauty of the South Downs, recognising council priorities for the national park land that falls within the city's administrative area.</p>	<ul style="list-style-type: none"> <li>• Separate DC planning policy issues re setting of National Park and additional criteria a and b, from strategic landownership issues re council priorities</li>   <li>• Policy amendment to make clear Stanmer Park falls within the National Park</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Para 3.142 inclusion of National Park duty</li> <li>• Para 3.143 removal of some of the references to AONB and minor additional wording</li> <li>• Para 3.144 minor amendments</li>   <li>• Para 3.145 minor amendment at start of para to be clearer on the purpose of the policy and planning controls</li>   <li>• Para 3.145 addition to reference to One Planet approach</li> </ul>	<p>from the South Downs National Park Authority and to better reflect the lack of weight this plan has in respect of planning policy considerations in the National Park.</p> <ul style="list-style-type: none"> <li>• To reflect representations from the South Downs National Park Authority.</li>   <li>• To reflect representations from the South Downs National Park Authority, to be more in line with legislation and to add clarity and to aid understanding of the new reference to this duty in the policy.</li>   <li>• To reflect that National Park is now established. Also to reflect consultation responses.</li> <li>• To reflect representations from the South Downs National Park Authority and the amendments to the policy</li> <li>• Response to Consultation</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
		response and update in line with current context.
<p><b>SA6 Sustainable Neighbourhoods</b>  Relates to all residential areas and neighbourhoods in Brighton &amp; Hove. The aim is to create sustainable neighbourhoods bringing together the priorities agreed in the city's Sustainable Community Strategy and other citywide strategies. The policy provides a strategic policy for Neighbourhood Planning alongside other policies in the Plan.</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Part A9 Add references to tree planting. Tree planting added to part A9 of the policy</li> <li>• Include reference to access to public art under reference of a sustainable community. Reference to 'access to public art' added to paragraph 3.152</li> <li>• Paragraphs 3.148 (intro) and 3.152 amended to clarify that the city council will be facilitator, working with partners to deliver aims of the policy and that applicants will be expected to set out how new development addresses priorities in the policy.</li> <li>• Reference to lifetime homes has been added to Part 8. Reference to travellers added to para 3.161 of the supporting text.</li> <li>• Part 5 of policy amended to provide more clarity on how public transport access will be improved.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Composting schemes in paragraph 3.162. Reference to community composting has been extended to encouraging this across the city using the two wards cited as examples. EA standards addressed through a footnote</li> <li>• Text changes made to para 3.154 of the supporting text relating to what is expected</li> </ul>	<ul style="list-style-type: none"> <li>• In response to comments added change improves policy</li> <li>• In response to comments added change improves policy</li> <li>• In response to comments added change improves policy</li> <li>• In response to comments</li> <li>• In response to comments improves clarity and soundness</li> <li>• In response to comments</li> <li>• In response to comments</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<p>from a Neighbourhood Plan (improving disabled access to local and community facilities)</p> <ul style="list-style-type: none"> <li>• Update and clarify references to the need to provide for additional school places across the city and that sites will be allocated through part 2 of the City Plan</li> <li>• Para 3.154 more information provided on Neighbourhood Forums</li> <li>• Paragraphs 3.148 (intro) and 3.152 amended to clarify that applicants will be expected to set out how new development addresses priorities in the policy.</li> </ul>	<ul style="list-style-type: none"> <li>• In response to comments</li> <li>• In response to HEQIA findings</li> <li>• In response to HEQIA findings</li> </ul>
<p><b>CP1 Housing Delivery</b> Sets out the housing delivery strategy; the overall amount and broad distribution of new housing development in the city over the plan period to 2030. Provision will be made to achieve a minimum of 11,300 additional dwellings over the plan period.</p>	<p><b>Minor Policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Minor changes to policy wording in criteria a) and b) in Part A of the policy;</li> <li>• Changes to policy wording in criteria d) of Part A of policy. Remove figure for site allocations to be made;</li> <li>• Update figures in Part B of the Policy (distribution);</li> <li>• Minor amendments to policy wording in Part C of policy - clearer statement regarding management of housing delivery;</li> </ul> <p><b>Minor Supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Reference to One Planet Living principles in</li> </ul>	<ul style="list-style-type: none"> <li>• Response to consultation representations –emphasis on efficient use of available sites across the city.</li> <li>• Improve effectiveness of policy.</li> <li>• Site allocations will be made through Part 2 of City Plan - no need to state an overall figure in Part 1 (as the figure required is likely to change.)</li> <li>• In response to SHLAA 2012 Update work.</li> <li>• Consistency across Plan</li> </ul>

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	supporting text; <ul style="list-style-type: none"> <li>• Minor amendments to supporting text ; updates to figures as necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Improve effectiveness of policy</li> </ul>
<p><b>CP2 Sustainable Economic Development</b>            Sets out strategy to achieve sustainable economic development.            Promotes inward investment opportunities; supports transition to low carbon economy; encourages a mix of employment space to come forward for development; supports provision and delivery of ICT (information and communications technology) infrastructure; supports expansion plans of hospitals, higher and further education establishments and apprenticeships, training and job opportunities for local residents.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Reference to start up business space</li> </ul> <p><b>Minor supporting text amendments</b></p> <ul style="list-style-type: none"> <li>• Reference to City Prospectus and emerging Economic Strategy Refresh;</li> <li>• Reference to updated Employment Land Study Review 2012;</li> <li>• Clarification of terminology - the creative, digital and information and technology sector (CDIT);</li> <li>• Reference to potential for local jobs to be created through a move towards renewable energy provision in the city;</li> <li>• Cross reference to definition of sustainable development</li> <li>• Reference to non B use class uses (retail, leisure) as generators of employment</li> <li>• Reference to local labour market and CESP priorities</li> </ul>	<p>Update in light of Employment Land Study Review</p> <p>Updates</p> <p>Update in light of Employment Land Study Review</p> <p>In response to representations</p>
<p><b>CP3 Employment Land</b>            Sets out the approach to ensure that sufficient employment sites and premises will be safeguarded to meet the needs of the city to 2030 to support job creation; the needs of modern business and the attractiveness of</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Add to Part 3 – ‘...and their upgrade/ refurbishment supported.’</li> <li>• Add to Part 6 of policy ‘Preparing Part 2 of the City Plan to allocate additional employment sites and mixed use allocations to help ensure</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• As a result of the Employment Land Study Review 2012 - updated forecast requirements</li> </ul>

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<p>the city as a business location. Establishes a hierarchy of employment sites allocated and protected for B1, B2 and B8 uses and clarifies approach to mixed use and secondary employment sites.</p>	<p>employment land delivery is maintained over the plan period.'</p> <ul style="list-style-type: none"> <li>• Amendments to Table 5 Employment Land provision</li> </ul> <p><b>Minor supporting text amendments</b></p> <ul style="list-style-type: none"> <li>• Various amendments to the supporting text to CP3.</li> </ul>	<p>and supply figures indicate a quantitative shortfall in employment floorspace over the Plan period that will need to be addressed in the City Plan Part 2</p> <ul style="list-style-type: none"> <li>• To reflect the Employment Land Study 2012 recommendations on forecast figures for the plan period and the need for updated supply figures as a result of representations, capacity and viability studies.</li> <li>• To clarify and reflect the Employment Land Study Review 2012</li> </ul>
<p><b>CP4 Retail Provision</b> Policy to maintain and enhance shopping centres in the city. The regional shopping centre will be the focus of any future significant retail development (cross-reference to DA1) and applications for new retail development within defined shopping centres will be permitted subject to consideration of scale and mix of uses. Applications for new edge and out of centre retail development will be required to meet the tests of the National Planning Policy</p>	<p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> <li>• Addition of text to table 6 footnote</li> </ul>	<p>In response to representations Clarification of source of figures</p>

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Framework (NPPF)		
<p><b>CP5 Culture and Tourism</b>  Seeks to maintain and enhance the cultural offer of the city to benefit residents and visitors. Supports the role of the arts, creative industries and sustainable tourism sector in creating a modern and exciting visitor destination with a range of high quality facilities; spaces, events and experiences. Recognises role of the South Downs as a visitor, education and recreation asset. Promotes and protects provision of affordable and appropriate arts and creative industries work spaces.  Strengthens protection of cultural infrastructure and establishes approach to any proposals for changes of use.</p>	<p><b>Minor policy text amendments;</b></p> <ul style="list-style-type: none"> <li>• Expectations that any new visitor attractions should contribute to sense of place and benefit economy;</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Editorial relating to policy text change;</li> <li>• Remove reference to SEEDA; refer to SDNPa;</li> <li>• Clarification around affordable workspace provision</li> <li>• Policy will help to deliver against the local targets under the One Planet Living principles;</li> </ul>	<p>In response to representations</p>
<p><b>CP6 Visitor Accommodation</b>  Supports the provision of a wide range of visitor accommodation in the city. Outlines the approach and the criteria to apply in the assessment of proposals for new hotel and guest accommodation, Updates Hotel Core Zone.</p>	<p><b>Main policy text amendments</b></p> <ul style="list-style-type: none"> <li>• Opening paragraph of policy remove words ‘and cost’</li> <li>• Part 2 – replace ‘are encouraged’ with ‘should’ with regard to preparation of Impact assessment. Whilst NPPF does not require impact assessment for town centre uses within defined town centre, consider current local circumstances could justify approach</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representation by Brighton &amp; Hove Hoteliers Association (BHHA) – cost is no longer so linked to type of accommodation.</li> <li>• In response to representations requiring a strengthened approach to assessing new hotel accommodation proposals given the significant increase in hotel bed spaces</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<ul style="list-style-type: none"> <li>• Re-numbering of policy parts due to error.</li> <li>• Part 6 – new wording of tests for loss of visitor accommodation within the Hotel Core Zone and related changes to Paragraphs 4.66 and new paragraph 4.65 – 4.66 Includes new test around precedent of loss on surrounding visitor accommodation and that new use would be compatible with surrounding area.</li> </ul> <p><b>Main supporting text amendments</b></p> <ul style="list-style-type: none"> <li>• Paragraph 4.57 – 4.58 updated text and new</li> </ul>	<p>built/ committed in last 5 yrs and impact that this is having on visitor accommodation sector.</p> <ul style="list-style-type: none"> <li>• Editorial</li> <li>• In response to representations seeking a more flexible approach to assessing change of use from hotel to other uses (evidence requirements in paragraph 4.64 reduced in terms of length of marketing etc). However HCZ still retained as it is considered appropriate to focus the application of the policy to the main accommodation clusters rather than city wide. The supporting text does acknowledge that over the life time of the plan new drivers of accommodation could emerge impacting on the attractiveness of certain areas of the Hotel Core Zone.</li> </ul> <ul style="list-style-type: none"> <li>• In response to representations</li> </ul>

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	<p>paragraph 4.59</p> <ul style="list-style-type: none"> <li>• Paragraph 4.60 updated text</li>   <li>• Paragraph 4.67 – reference to work with City College Brighton &amp; Hove to encourage the creation of apprenticeship schemes/ local jobs in the visitor accommodation sector.</li> </ul>	<p>regarding the need for policy to reflect the current conditions visitor accommodation sector is experiencing.</p> <ul style="list-style-type: none"> <li>• In response to representations regarding current conditions visitor accommodation sector is experiencing and need to ensure that proposals for new hotel accommodation are accompanied by impact assessment.</li>   <li>• In response to representations by BHEP and LEP.</li> </ul>
<p><b>CP7 Infrastructure CIL and Developer Contributions</b>  Sets out approach to ensure that necessary social, environmental and physical infrastructure is appropriately provided in time to serve new development in the city. Outlines approach to the Community Infrastructure Levy (CIL) and to developer contributions.</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• Reduced emphasis on Community Infrastructure Levy: reference to CIL removed from policy title and parts 3 and 4 removed;</li> </ul> <p><b>Main supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Restructure of whole policy, so several minor textual changes. Renumbering and splitting out of paragraphs for ease of reference</li> </ul>	<ul style="list-style-type: none"> <li>• To reflect economic circumstance and the need to encourage regeneration.</li>   <li>• Deletion of wording “city wide” to reflect contributions being ‘directly related’. Update in line with current context for further emphasis for contributions to be mostly sought via s106.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Para 4.67 Supporting text Insertion of wording that CIL is subject to further evidence gathering and investigation. Deletion of reference “creating sustainable neighbourhoods as a whole” which has been inserted into Para 4.68.</li> <li>• Para 4.68 Insertion reference to provision “affordable housing” and “direct mitigation” by s106 through “Infrastructure Delivery Plan” “for creating sustainable neighbourhoods as a whole”.</li> <li>• Para 4.69 Insertion of additional government guidance for clarification on seeking s106 contributions</li> <li>• Para 4.70 Insertion of additional wording</li> <li>• Para 4.71 under Local Employment requirements “young people who are NEET” – HEQIA 18/9/12 Recommendation. Deletion of word “Local” Utility infrastructure</li> <li>• Para 4.72 insertion wording of s106 requirements further detailed in “Developer Contributions Technical Guidance”.</li> </ul>	<ul style="list-style-type: none"> <li>• Update in line with current context.</li> <li>• Update in line with current context and for Improving effectiveness of Policy</li> <li>• for improving effectiveness of Policy</li> <li>• to improve effectiveness of Policy</li> <li>• to improve effectiveness of Policy now includes</li> <li>• To update in line with current context and Improve Effectiveness of Policy</li> </ul>
<p><b>CP8 Sustainable Building</b> The council will require all development to deliver minimum standards of building sustainability and demonstrate how proposals will address climate change mitigation and adaptation; reduce</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• New reference requiring development to deliver the principles of the One Planet approach;</li> <li>• amendments to the BREEAM and CSH requirements in the pre-2016/2019 period;</li> </ul>	<ul style="list-style-type: none"> <li>• Consistency across Plan</li> </ul>

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<p>greenhouse gas emissions and avoid an expansion of the city's ecological footprint. Revised standards will be set out in other DPD documents and/or through a review of the policy.</p>	<ul style="list-style-type: none"> <li>• amendment of the requirement relating to conversions;</li> <li>• additional wording relating to orientation of development;</li> <li>• additional wording relating to low carbon solutions;</li> <li>• additional reference to incorporating renewable energy technology;</li> <li>• new requirement for development to connect or contribute towards low/zero carbon energy schemes and/or incorporates provision for decentralised energy;</li> <li>• requirement that development improves the sustainability of existing buildings;</li> <li>• amended wording relating to sustainable materials;</li> <li>• commitment to provide technical guidance on meeting policy requirements.</li> </ul> <p><b>Main supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• additional information relating to the findings of the Energy Study;</li> <li>• additional reference committing to production of guidance, which will include options for off-site carbon compensation and opportunities to retrofit existing building stock.</li> </ul>	<ul style="list-style-type: none"> <li>• In response to representations</li> <li>• Reflect the findings of the Energy Study.</li> </ul> <ul style="list-style-type: none"> <li>• In response to representations</li> <li>• Reflect the findings of the Energy Study</li> </ul>

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<p><b>CP9 Sustainable Transport</b>  Seeks to secure an integrated, safe and sustainable transport system for the city that will accommodate new development; support the city's role as a sub-regional service and employment hub; and improve accessibility. Policy sets out priorities and traffic management measures at a regional and local level and also priorities for travel by bus, rail, cars and freight, walking and cycling and sets out a framework for parking provision.</p>	<p><b>Main policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• New Bullet added to B3 Cars and Freight and to B4 Walking and cycling relating to disabled parking bays and wheelchair friendly access.</li> <li>• Measures – 2. Rail – amend second bullet point Bullet amended to confirm that both <u>inward</u> and outward journeys by public transport should be encouraged</li> <li>• Text added to second para of part 6 Parking Add references to guidance providing information on new technologies for example electric vehicle charging points</li> <li>• Text added to second para of part 6 Parking - Add – ‘allow disabled parking bays for new development- to end of second paragraph</li> <li>• B6 Measures, Parking – text inserted – ‘in accessible locations’ after minimising off-street parking</li> </ul> <p><b>Main supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Paragraph 4.85 Amend reference to One Planet approach to provide more clarity</li> <li>• Para 4.89 Add references to improvements to bus services beyond the city boundaries</li> <li>• Para 4.89 Add references to ongoing joint working with adjoining authorities re projects on boundaries</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment requested by the Federation – Centre for Independent Living (late response)</li> <li>• Amendment in response to representation</li> <li>• Amendment made to provide clarity on content of future supplementary planning document</li> <li>• Amendment in response to representation</li> <li>• In response to the Transport Assessment</li> <li>• Amendments in response to representation</li> </ul>

City Plan Policy Number and Title and summary	Type of Change Proposed	Reason
	<ul style="list-style-type: none"> <li>• Partial deletion of para 4.93 Removal of second part of para relating to locations of shopping centre improvements</li> <li>• Para 4.95 Increased emphasis on the importance of buses and how the city has secured and will continue to secure funding for improvements</li> <li>• Para 4.95 Added reference to upgrading bus information system into East Sussex</li> <li>• Para 4.96 Editorial amendment for clarity – replace particularly with including. Remove ‘Additionally’.</li> <li>• Para 4.98 Replace NRA with Network Rail</li> <li>• Add sentence seeking minimisation of car use and promoting car sharing to stations</li> <li>• Para 4.108 Remove reference to Edward Street</li> <li>• 4.109 Amend wording to soften references to committing 10% transport budget to walking and cycling</li> <li>• 4.109 add ‘capacity’ after increased train patronage</li> <li>• 4.113 Strengthen reference to importance of travel plans in promoting modal shift</li> <li>• 4.115 Clarify that the aim of the parking strategy is to reduce congestion in the city centre</li> <li>• 4.115 Add sentence that justifies the need for disabled parking for the mobility impaired.</li> </ul>	<ul style="list-style-type: none"> <li>• In response to those who raised concerns about the location of investment.</li> <li>• Editorial</li>   <li>• In response to representations</li> <li>• Editorial</li>   <li>• Correction</li> <li>• response to ESCC</li>   <li>• response to comment</li> <li>• editorial</li>   <li>• In response to the Transport Assessment</li> <li>• clarity</li>   <li>• clarity</li> </ul>

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	<ul style="list-style-type: none"> <li>• Sentence added to paragraph 4.107</li> <li>• 4.85 reference to OPL strengthened</li> <li>• 4.116 Freight Strategy – look at air quality</li>   <li>• 4.123 – Travel Plans – amend text to add reference to residential development</li> </ul>	<ul style="list-style-type: none"> <li>• Recommendation of HEQIA</li> <li>• Energy Study</li> <li>• In response to the Transport Assessment</li> <li>• In response to the Transport Assessment and clarity</li> </ul>
<p><b>CP10 Biodiversity</b> Sets out a clear strategy to conserve, restore and enhance biodiversity and promote improved access to it. Brighton and Hove is working with local partners to achieve designation of the city and surrounding area as a UN Biosphere Reserve.</p>	<p><b>Minor policy text amendment:</b></p> <ul style="list-style-type: none"> <li>• Protect existing biodiversity from noise (as well as light) pollution.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Amendments to biosphere reserve paragraph</li> <li>• Reference to role of arts and culture in involving local communities in delivering Biosphere Action Plan objectives.</li> </ul>	<p>In response to representations.</p>
<p><b>CP11 Flood Risk</b> Set out the approach to managing flood risk to accord with the recommendations of the Strategic Flood Risk Assessment and National Planning Policy Framework and ensure development incorporates flood defences and suitable arrangements for sustainable surface water drainage where appropriate.</p>	<p><b>No change</b></p>	
<p><b>CP12 Urban Design</b> Sets out the general strategic design criteria expected of new development and to require highest standards of design. A city-wide</p>	<p><b>Main Policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• addition of design criteria relating to the setting of the National Park;</li> </ul>	<p>In response to representation (South Downs National Park Authority)</p>

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<p>urban design framework will be prepared to set out areas which should generally be preserved, areas of the city suitable for local incremental enhancement/ area-wide enhancement and identify areas which have potential for taller developments.</p>	<p><b>Minor Supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• reference to Planning Briefs instead of design guidance and clarification on protection and enhancement of views;</li> <li>• more detail on the extent of the Kingsway/Western Seafront and Shoreham Harbour tall building areas;</li> <li>• a new paragraph giving more background detail on the tall building areas and clarifying that boundaries will be defined in the Urban Design Framework;</li> <li>• clarification that the Tall Buildings SPG will be superseded by the Urban Design Framework;</li> <li>• reference to the importance of planted green space</li> </ul>	<p>In response to representations</p> <p>In response to representations</p>
<p><b>CP13 Public Streets and Spaces</b> A framework to comprehensively improve the quality, legibility and accessibility of the city's public urban realm. Proposals will be expected to achieve consistent aims and standards and make an appropriate contribution to achieving these requirements.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• reducing signage (as well as street) clutter;</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• editorial.</li> </ul>	<p>In response to representations</p>
<p><b>CP14 Housing Density</b> Outlines the criteria for assessing higher density residential developments and, in order to make the full and effective use of land available, sets a minimum density of 50 dph (dwellings per hectare) city wide</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• refer to minimum density requirements.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• refer to minimum density requirements.</li> </ul>	<p>In response to representations</p>

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and 100 dph within Development Areas DA1 – DA6 and DA8.		
<p><b>CP15 Heritage</b>            Preserve and enhance the historic built environment and archaeological assets and their settings, giving greatest weight to national designations. Review the Conservation Strategy to provide a framework for future conservation area management proposals/conservation area designations.</p>	<p><b>Minor policy text amendments:</b></p> <ul style="list-style-type: none"> <li>• add promotion of the city’s heritage to the overall aim;</li> <li>• add references to settings of heritage assets and the need for positive action of heritage at risk;</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Additional reference made to public consultation on the review of the Conservation Strategy to inform local priorities;</li> <li>• amplification of policy change on promotion of heritage; additional explanation regarding undesignated heritage assets; and reference made to historic character informing planning briefs, SPDs and the UDF;</li> <li>• amplify that part of the policy that refers to ensuring local distinctiveness in historic areas.</li> </ul>	<p>In response to representations.</p>
<p><b>CP16 Open Space</b>            Safeguard, enhance and promote access to the city’s green and open spaces and beaches and promote active living. Local open space standards are set out and development will be expected to contribute to the provision of and improve the quality, quantity and accessibility of public open space. Overall approach is to retain open</p>	<p><b>Main policy text amendment:</b></p> <ul style="list-style-type: none"> <li>• Added reference to the importance of the beach as an open space asset.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• amended to provide greater clarity over the Accessibility Standards;</li> <li>• reflect the latest population projections and housing trajectory;</li> </ul>	<p>In response to representations.</p> <p>In response to representations</p> <p>Updated information</p>

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<p>space. Approach to development in terms of acceptable losses of open space is detailed as 'exceptions' criteria in policy.</p>	<ul style="list-style-type: none"> <li>• amendments to make clear that new development should seek to provide open space.</li> </ul>	<p>clarity</p>
<p><b>CP17 Sports Provision</b> Safeguard, enhance and promote access to the city's sports and recreation facilities. Local sports and recreation standards will be set out and development will be expected to contribute to the provision of and improve the quality, quantity and accessibility of sport and recreation facilities. Support the delivery of proposed sporting facilities to reflect the city's regional status.</p>	<p><b>Main policy text amendment:</b></p> <ul style="list-style-type: none"> <li>• Amend Policy and para 4.172 to remove reference to Black Rock (Brighton International Arena)</li> <li>• Table in policy re additional space required by 2030, Para 4.173 and respective footnote amended to reflect the latest population projections and housing trajectory.</li> </ul> <p><b>Minor supporting text amendments:</b></p> <ul style="list-style-type: none"> <li>• Para 4.173 amended to update reference to the London 2012 Olympic Games and Paralympics and, remove reference to Nivea Sun Yellowwave Beach Sports Centre as a pre-games training venue (uptake uncertainty).</li> <li>• Para 4.179 amended to include reference to area near Falmer acting as an existing sports</li> </ul>	<ul style="list-style-type: none"> <li>• Update in line with current situation ie there is no longer an ability to deliver the BIA. To ensure the site is used to best effect it is considered appropriate to ensure there is flexibility in potential uses. References to leisure and recreation are retained elsewhere in the plan (eg DA2 and SA1)</li> <li>• To update in line with latest population figures and findings of the Housing Requirements Study (Update of 2011 HRS Study)</li> <li>• To ensure the supporting text is up to date and appropriate for a plan that will cover a period up to 2030.</li> <li>• To reflect the representation from University of Sussex</li> </ul>

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	<p>hub</p> <ul style="list-style-type: none"> <li>• Para 4.179 amended to make clear the reference to maintenance programmes for sports pavilions relates only to city council premises.</li> <li>• Para 4.180 amendment to include reference to One Planet approach</li> </ul>	<p>(92/15).</p> <ul style="list-style-type: none"> <li>• Improving clarity</li> <li>• Text added in response to comments made on behalf of Cook and Pecla – to include references to OPL to all DAs Enplan</li> </ul>
<p><b>CP18 Healthy City</b> Ensures developments, programmes and strategies are tested to ensure that they reduce adverse impacts on health, maximise positive impact on health and promote health, safety and active living for all age groups. Safeguards allotments and encourage joint working with health providers.</p>	<p><b>Minor supporting text changes only</b></p> <ul style="list-style-type: none"> <li>• Include in paragraph 4.185 intention that HIA best practice guidance or Planning advice note will be prepared to assist developers undertaking HIA;</li> <li>• HIA's should pay special regard to sensitive communities that the HEQIA has identified as having a potential for adverse impacts;</li> <li>• Reference to Partnership working with NHS Brighton and Hove and other health care trusts and providers in the identifications of health care service provision requirements.</li> </ul>	<p>Recommendations of HEQIA</p>
<p><b>CP19 Housing Mix</b> Sets out approach to securing a mix of housing types, sizes and tenures in the city. Details demographic evidence to indicate</p>	<p><b>Main Policy text changes:</b></p> <ul style="list-style-type: none"> <li>• Minor changes to formatting of policy.</li> </ul>	<ul style="list-style-type: none"> <li>• Clearer presentation and improve effectiveness of the policy.</li> </ul>

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likely balance of housing types and sizes required over the plan period based upon planned levels of housing delivery.	<b>Minor supporting text changes:</b> <ul style="list-style-type: none"> <li>• Updates within supporting text re. demographic data, housing stock data etc</li> <li>• Clearer statement within supporting text re. need for family sized housing.</li> </ul>	<ul style="list-style-type: none"> <li>• Findings of up to date study.</li> <li>• Response to representations.</li> </ul>
<b>CP20 Affordable Housing</b> Sets out approach to secure new affordable housing development in the city. Sliding scale of affordable housing requirements is set out reflecting the updated Affordable Housing Viability Study. Targets to secure 40% affordable housing on sites of 15+ units; 30% on sites of between 10 and 14 units and 20% financial contribution equivalent on sites of between 5 to 9 units.	<b>Main Policy text changes:</b> <ul style="list-style-type: none"> <li>• Clarification of 'net' dwellings in criteria a) to c)</li> <li>• Amendment to policy text introducing criteria for flexibility.</li> <li>• Removal of last part of policy which details 'exceptional circumstances' for providing commuted sums on larger sites as an alternative to onsite provision. Put this in supporting text instead.</li> </ul> <b>Minor supporting text changes:</b> <ul style="list-style-type: none"> <li>• Update affordability data in supporting text.</li> <li>• Update housing needs position in supporting text</li> </ul>	<ul style="list-style-type: none"> <li>• Improve effectiveness of policy.</li> <li>• Improve effectiveness of policy. Update in line with current context.</li> </ul>
<b>CP21 Student Housing and Houses in Multiple Occupation</b> Identifies specific sites for purpose built student housing and sets out criteria to assess other proposals for student housing that may come forward. Sets out approach to controlling numbers of houses in multiple occupation in those areas of the city where there is a high concentration of student lets.	<b>Minor policy text changes:</b> <ul style="list-style-type: none"> <li>• Amend part of policy to clarify support required from an existing educational institution; change reference from 'residences' to 'dwellings';</li> </ul> <b>Minor supporting text changes:</b> <ul style="list-style-type: none"> <li>• clarify proposed controls over use as student accommodation;</li> <li>• amended to accurately reflect status of City College site;</li> </ul>	In response to representations Improve clarity of policy

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<p><b>CP22 Traveller Accommodation</b>  Indicates pitch requirements to 2016 and site assessment criteria to guide site selection. Acknowledges that needs assessment will need to be reviewed to cover plan period to 2030 and sites will need to be identified to meet updated needs.</p>	<ul style="list-style-type: none"> <li>• editorial changes</li> </ul> <p><b>Main Policy text changes:</b></p> <ul style="list-style-type: none"> <li>• Number of permanent pitches required in to 2019 amended from 16 to 18 and 'early review of policy may be required' added to policy.</li> </ul> <p><b>Main supporting text changes:</b></p> <ul style="list-style-type: none"> <li>• Indicating short term projected requirements to 2019, reference to site search exercise and identification of sites with potential to meet need.</li> </ul>	<p>To align more closely with national policy guidance – Planning for Traveller Sites.</p>