

**Brighton & Hove City Council
Proposed Modifications to the Submitted City Plan Part One
Electronic Response Form**

Consultation Period: Tuesday 4th November until midnight on Tuesday 16th December 2014

The City Council is publishing for consultation post Submission proposed modifications to the City Plan Part One.

The City Plan Part One was submitted to Government in July 2013 and is currently under examination by an independent Planning Inspector appointed by the Government to consider the 'soundness' of the Plan. The Inspector held a series of hearing sessions in October 2013. In response to the Inspector's Initial Conclusions Letter the City Council is now proposing a number of changes or 'main modifications' to the submitted City Plan Part One to address her concerns.

We are only able to accept representations on these proposed modifications. Further guidance on completing this form can be downloaded at www.brighton-hove.gov.uk/planning/local-development-framework/consultation

This form has two parts: Part A – Personal Details
 Part B – Your Representation(s).

Representations should only relate to the Proposed Modifications and not other parts of the City Plan.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

	1. Your Details	2. Agent Details (if applicable)
Title	Ms	
Forename	Penny	
Surname	Hudd	
Job Title	Trustee	
Organisation	CPRE Sussex	
Address	Brownings Farm	
	Blackboys	
	Uckfield	
Postcode	TN22 5HG	
Email Address	info@cpresussex.org.uk	
Telephone No.	01825 890975	
Mobile No.		

Data Protection Notice: Personal data given on this form will be used by BHCC (and its agents) in connection with statutory functions. It will not be used for any other purpose.

Part B: Your Representation

Please answer the questions below and clearly explain your comments in the relevant sections. Use one form per representation / comment. You may use as many additional sheets as necessary.

(Please note that the text boxes below expand as you type)

Q1a. To which Proposed Modification does your comment relate? (Please enter one modification number)

Modification Number PM045

Q1b. To which policy / section of the plan does your comment relate?

Policy / Section DA7

Q2. Do you wish to support or object to this Proposed Modification? (Please tick one box)

Support ☐
Object ☒

Q3a. Do you consider this Proposed Modification Legally Compliant? (Please tick one box)

Yes ☒
No ☐

Q3b. Please use this space to explain your answer above. (Please be as precise as possible and refer to any supporting / background document as you see necessary).

Q3c. Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of the proposed modifications. (Please be as precise as possible).

Q4a. Do you consider this Proposed Modification is Sound? (Please tick one box)

Yes ☒ No ☐

Q4b. If you consider that the proposed modification is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.

Please select	Test of Soundness
<input type="checkbox"/>	It is <u>not positively prepared</u> in that it is not prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
<input type="checkbox"/>	It is <u>not justified</u> in that it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.
<input type="checkbox"/>	It is <u>not effective</u> in that it is not deliverable over its period and based on effective joint working on cross boundary strategic priorities.
<input type="checkbox"/>	It is not <u>consistent with national policy</u> .

Q4c. Please use this space to explain your answer to Q4a above (Please be as precise as possible).

CPRE Sussex believes that the proposed development of Toads Hole Valley, as promoted by Policy DA7, will only be acceptable if the resulting development would create an exemplary suburb that would:

- complement the unique landscape of the site and its surroundings
- safeguard strategic views of the South Downs and the sea.
- create a well-balanced mixed-use sustainable garden suburb following TCPA Garden City Principles
- conserve and enhance the biodiversity of the valley
- bring benefits for the neighbouring communities in Goldstone Valley, Hangleton and Nevill
- mitigate the impact of traffic and traffic noise on the neighbouring areas
- ensure the costs of maintaining the public areas of the valley and serving it with public transport are met by the development

Accordingly, CPRE Sussex objects to the the Proposed Modifications to Policy DA7, which we consider would weaken the Policy's requirements e.g. the proposal to replace "Ensure that" and "is of an" in clause 2 with the weaker "will aim to be an"; the addition of "seeks to" in clause 3; and the replacement of "To secure" with "provide the opportunity to benefit" in clause 4.

We consider that these Proposed Modifications would weaken the Policy's ability to deliver the exemplary suburb that this extremely sensitive site demands.

Q4d. If you consider the Proposed Modification unsound, please set out what change(s) you consider necessary to make it sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of the Proposed Modification. Please be as precise as possible.

Q5. The Sustainability Appraisal has been updated where appropriate to reflect the proposed modifications. Do you have any comments on this document?

Q6. Do you have any further comments to make?

If you have any further queries please contact us on 01273 292505 or via email ldf@brighton-hove.gov.uk .

Thank you for taking the time to complete your representation(s).