

Coldean Neighbourhood Plan - Regulation 14 DRAFT July 2024 – BHCC Officer Comments

Section/Policy	Page/Paragraph	Comments	CNPF Action (Sept 2024)
Figure 1 – Map of Coldean NP area	2	It would be useful to add a key to identify the land shown in green which forms part of the development plan for land within the National Park; and the land shown in white which is the area covered by the Brighton & Hove City Council development plan The blue line to the north which shows the administrative boundary of Brighton and Hove should either be removed or identified. Identify in the key that the arrow points north	Correct Map inserted, From SDNPA
Foreword	3	Unsure about “protect what we have legally” – a NP is not legislation	Deleted ‘legally’
Table of Contents	4 - 5	Section 3.3 typo “South Downs National <u>Park</u> Authority”	Amended
Timeline	8-9	Suggest removing paragraph at the bottom of the page for the final version of the plan.	Amended and timeline updated as at Dec 2024
Section 1. Introduction, document evolution	10	Amend to “It sits alongside <u>the</u> Brighton & Hove City Plan Part Two” and make further changes as wrongly referenced throughout the document. Incorrect to state “City Plan Part One which is to be revised in 2024”. The council is beginning the process of reviewing the City Plan but CPP1 will remain part of the development plan until revised policies are adopted. Suggest removing text from para 2 which starts “as the Coldean Neighbourhood Plan”. Unsure what the last sentence of para 2 that starts “this may occur” means? Suggest deleting. Reference also needs to be made to the South Downs Local Plan as the Plan forms part of the development plan for land within the National Park.	Amended Amended Amended Amended Inserted SDNPA wordings instead

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		Final sentence incorrectly refers to there being Neighbourhood Plan for Shoreham Harbour – please delete. Para 4 first para – rephrase to say ‘alongside other documents in the Development Plan <u>Documents</u> to understand’	Deleted Amended
Planning policy context	11	Para 7 – incorrect to say the principal document in the development plan is City Plan Part Two. Parts 1 and 2 have equal weight, and the strategic framework for development is in Part 1.	Amended
Section 2. Vision & Objectives.	12	(c) reducing the number of (existing, authorised) HMOs is not something that can be done through the planning process. (e) working with other agencies is not something that can be achieved through the planning process. Cross reference to policies which achieve these objectives	Objectives had been seen by BHCC previously and this was not raised then but our members requested and approved these objectives, to the extent that Planning can assist. Re (e) we thought BHCC requested this in April 2024, see their informal comments then.
3.1 The Area	14	Para 11 – ...the northern boundary is in effect..... lower case b Para 12 – ...on the upper slopes and partly becauseno full stop needed Para 12 – countryside – all one word Para 13 – perimeter road – road needs lower case Para 14 – parkland – lower case	Amended “ “ “ “
3.3 South Downs Authority	15	Word missing from title - “South Downs National <u>Park</u> Authority” Need to include reference to the South Downs Local Plan as it forms part of the development plan for land within the National Park	Amended Inserted SDNPA wording

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3.4 Population	15 - 16	Para 23 - ...there appears to be a shortage of people in age range between 25 – 30 years, possibly indicating a decline in young couples or families. Perhaps replace with ... there appears to be fewer people between 25 – 30 years old than expected, possibly reflecting their lack of access to the housing in the area. Para 27 – Bluebell Heights development – lower case d Para 27 – Suggest removing the word tenement here and throughout the document, as it is not relevant to Coldean. Para 29 – in Para 21, it is stated that the population increase of 8% is due to an increase in the number of children in Coldean. Children are not economically active so this is also a contributory factor, as well as parents taking on a full-time caring role whilst their children are young.	Amended “ “ “
3.5 Developments	16 - 17	Para 33 – Please check this statistic and use consistent terminology (household /dwelling/ unit) 34 - Suggest this is deleted/amended - it cannot be assumed that the impact would be adverse: “It almost goes without saying that Coldean cannot sustain further developments like Varley Halls or Bluebell Heights without the Village nature adversely being affected.”	Used Household Wording retained
3.6 Future	17	Para 35 – Please justify the statement that population growth is expected to be driven by older people. In the next decade the current population will all age by 10 years and move into older age brackets. However there is no stated reason that more older people will move into Coldean from elsewhere to swell the population (i.e. no planned new retirement schemes).	People are growing older, and fewer people can afford to have children. People do not need to move into Coldean, the existing population will grow older.

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		The data in the draft Neighbourhood Plan suggests that there is an under occupation of family-sized homes in Coldean due to the number of older households. These households may not downsize; and many children that have increased the population in the last decade will be moving up into secondary education or leaving home. This could affect Coldean Primary School viability, in the wider picture of falling numbers of school age children across the whole of the city.	We have moved this explanation into the text
Housing and Development Policies	18	Paragraph 38 suggest following amendments: The Brighton <u>& Hove City</u> Council Housing Needs Assessment 2015 is being updated <u>informed the City Plan Part One</u> (previously 13,000 <u>where the objectively assessed need for home to 2030 was 30,210</u> homes <u>was</u> identified as-needed). <u>The City Plan Part One has a housing target of 13,200 new homes to 2030. The 2024 Strategic Housing Market Assessment has recently been published and this will inform the City Plan Part One review of housing policies and new housing target to 2041 (Strategic Housing Market Assessment - August 2023 (brighton- hove.gov.uk)).</u> and they will seek to provide a new one during 2024 the objectively assessed housing requirement was found to be 30,120 dwellings to 2030. Their overall focus will be on providing affordable housing, refurbishing existing housing stock and providing homes for the ageing population.	Inserted instead, para 38 amended now as shown left
4.1 General Development	18 - 20	Para 37 repeated again at para 48	Leave here. In Para 48 it is elaborated

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		It would be useful to include a data set of property size of the housing stock in Coldean to assess housing need in Figure 8 alongside showing house types Para 41 - Please provide explanation for the notable changes statistic Para 43 – remove ref to tenement. More local explanation required. For example, is this due to the construction of Bluebell Heights or is that development not included? Para 44 – bedsits – typo	To discuss with BHCC. AECOM data set was not correct. We have included an analysis based on average Brighton housing stock sizes and Bedroom occupancy, as you suggested. “ Word tenement removed throughout. Bluebell Heights was not included in the figures Corrected
4.2 Housing Needs Assessment	20 - 21	Para 46 – The neighbourhood plan need only refer to the Housing Needs Assessment. The HNA introduction can include this level of detail. Concerns about the methodology of the HNA which is a background document to inform the plan. ‘...Essentially, <u>assessment of</u> housing needs in an area <u>is</u> based on a projection of numbers of residents expected in the Planning period, their ageing and demographic, <u>household formation</u>, and any special housing needs, as compared with number and types of dwellings, and the space available.’ ‘In general, this Plan does not envisage a significant ordinary resident population growth’- this statement is questioned as household formation by adult children wanting to have their own home and relationships breaking down will generate a growth in housing need in Coldean over the next ten years. This draft neighbourhood plan is not considered to acknowledge or address local housing needs satisfactorily. Appears to be a missing data set of property size within the housing stock of Coldean, which is more useful to	To discuss with BHCC To leave text in but discuss with BHCC We have updated the Plan for Housing Needs based on typical Brighton housing sizes (by bedroom number) and Bedroom occupancy as you suggested.

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		assess housing need than the tables in Figure 8 showing house types. This would make the housing need assessment methodology more robust.	
Info on previous consultation (47)	21	Para 47 Suggest removing this and putting in Statement of Consultation Para 48 repeated from para 37 remove	Consultation Statement will include this Para 48 elaborated
Future consultation via PPAs (48)	21	Paragraph 48 – either remove or amend to: The Council has recently confirmed end of 2023 that <u>will be updating its Statement of Community Involvement (which sets out the requirements for consultation on planning policy documents and with planning applications)</u> . There will be a greater focus on developers seeking to carry out large scale developments to evidence public consultation and ensure they carry out a ‘Planning Performance Agreement’.	Amended
Policy H1 – Design Guide	21	Remove this duplicated policy from this section. This is a repetition of the POLICY H1 – DESIGN GUIDE detailed in pages 46. The text in policy refers to housing policy but there is no clear connection in the text to design policy in this section of the document. Use reference to Policy H1 set out in 46 to explain the policy is about and how it will be delivered.	Removed this Policy from here, retained on Page 46 and renumber there as Policy DC1 (December 2024 draft Plan)
4.3 HMOs text (49 – 57)	21 - 22	Title: Houses in Multiple Occupation (not ‘of’) Frequent typo – ‘HMOs’ does not have an apostrophe Paragraph 49 – unclear what a ‘Class 2’ building is. If the intention is to refer to use class C2, this is incorrect. Purpose Built Student Accommodation is a <i>sui generis</i> use Paragraph 52 – City Plan not Local Plan. The City Plan does not include criteria for “licensing arrangements with landlords”, and <u>supports</u> the conversion of HMOs back into family homes.	Amended throughout Amended Text amended

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Policy H2 – Houses of Multiple Occupancy (HMO)	22 - 23	Heading - Houses in [not of] Multiple Occupancy tion Criteria relating to design, amenity, refuse storage and transport are covered by the relevant City Plan policies. Criterion (e) merely signposts to DM7 (but not to Policy CP21). It is unclear what this policy would add.	Amended Checked Policy wording with PMR, our professional adviser and they recommend to retain that Policy (Now H! in December 2024 Plan). Their detailed reasons can be supplied if needed.
Text supporting policy H3 (58 - 60)	23 then 25	Paragraph 59-60 appears to be setting the principle of acceptability of new development only within the built-up area boundary as shown on the adopted Brighton & Hove adopted policy (red dashed line). However, this is not included in the policy text of either H1 or H3. Whilst this approach reflects Strategic Policy SD25 in relation to settlements within the National Park it should be noted that the intention not to allow development outside the 'settlement boundary' could be in conflict with the City Plan Part Two which allocates two housing sites (Policy H2) which are within the urban fringe within the City Plan area. If any changes are needed to the built-up area boundary this will be considered through the city plan review, a statutory process involving public consultation and examination by an independent inspector.	New wording from SDNPA inserted instead Noted Noted
Adopted policies map for B&H East area	24	Figure 11 should be amended to read: Figure 11 Settlement Area Map for Brighton & Hove, including Adopted Policies Map for Brighton & Hove extract which includes the Coldean Area. It should clearly delineate the Coldean Area otherwise it's unclear how it relates to Plan. Also amend reference in paragraph 50 for consistency. Suggest having a clearer map rather than a copy from the City Plan policies map – which shows designations in the key not relevant to Coldean.	Amended Where in para 50? Simpler map obtained from PMR, with larger index. It should be clearer now in Dec 2024 draft Plan.

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		Clarification is needed as to whether the Neighbourhood Plan is proposing to define a settlement boundary around Coldean. The council's built-up area boundary is not a settlement boundary. If this is being proposed it should be justified and reflect the housing site allocations in the City Plan Part Two.	No we are not proposing this. In Coldean the topography of the Area dictates where building is possible.
Policy H3 – New Developments within Settlement Boundary	25	A number of these criteria duplicate the intentions of the following City Plan policies: • CP12 Urban Design • CP13 Public Streets and Spaces • CP15 Heritage • DM18 High Quality Design and Places • DM20 Protection of Amenity • DM22 Landscape Design and Trees Unclear what these criteria add to existing City Plan policies, other than criterion (a) requiring a Community Engagement Plan, but it is unclear what this would include, and further detail is not provided elsewhere in the Plan. Caselaw suggests while community engagement is encouraged, the lack of it cannot be used as a reason for refusal so this may need to be in supporting text rather than policy.	Having checked these with PMR our advisers, we have retained these policies, now renumbered as Policy H2.
4.5 Homes for older people	26	Change 4.5 to read 4.4 and in table of contents Wording needs to be set out like a policy (as per rest of the plan) Suggest setting out para 65 as the policy; as currently it's not clear that it is one.	Amended As agreed with Forum Committee, this is stated but not as a Policy.

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		Paragraph 64 – City Plan Part Two Policy DM4 Housing and Accommodation for Older Persons sets out the overarching policy for housing and accommodation for Older Persons based on a city-wide assessment of need. The identified estimated needs for Coldean set out in Paragraph 64 (an additional 3 care home beds or 5 by 2037) due to the expected increase in the older would inform the application of Policy DM4 within the Coldean Area. Amend Paragraph 65: This Plan therefore <u>The adopted City Plan Part Two policy DM1 Housing Quality, Choice and Mix</u> sets targets for new housing to meet national standards for accessibility and adaptability, ensuring that 10% of affordable homes and 5% of market homes on sites with 10+ dwellings are suitable for mobility or wheelchair standard units (Category M4(3)).	Noted Inserted
5.1 Open Spaces - Introduction	28	Open spaces need listing in the policy. Para 69 – unclear on this “Local Community Space” doesn’t appear to be an actual designation. Is this the same as an Asset of Community Value (ACV)? Process for listing is different. Para 71 – this paragraph refers to an assessment process to evaluate open spaces and NPPF criteria. It is unclear which open spaces this assessment process is referring to. Is this referring to the assessment for the LGS or the Local Community Spaces?	Amended This is the listing as advised/categorized by former advisers Squires Planning, and agreed by the Forum in July 2022, presumably we can use it? Amended to confirm it’s the LGS process.
5.2 Spaces Categorisation Summary – local green spaces and local communities spaces	29	This definitions on page 29 may be better placed in the glossary. Local Community Spaces – Not clear what a ‘Local Community Space’ is? Has the Forum created the designation and assessment process for “Local Community Space” as this doesn’t appear to be an actual designation. Is this the same as an Asset of Community Value (ACV)?	Prefer to leave here. This is what happened during our consultations. Per Squires Planning; LCS is a proper designation. WE have not assessed Assets of Community Value in this Plan.

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		Open spaces do already have protection under CPP1 policy CP16.	Noted
Open Spaces ID and categorisation	30	Categorisation Table of Open Spaces - This information should be part of the evidence base rather than in the main text of the plan. Just have a final table in the plan of Local Green Open Space and Local Community Space rather than those that did not meet the criteria. OS4 should be removed from the list of sites assessed as Local Green Spaces in figure 14 as this is an urban fringe site, already designated in the City Plan.	It is also in the evidence base. We have reconfigured the same table/figure. Removed OS4 as LGS in the newer simplified table in the December 2024 Plan.
Summary of open spaces analysis grid (fig 14)	30	Recommend putting this in evidence rather than main plan.	Figure 14 table made clearer in December 2024 Plan
Maps local green spaces	31 - 34	Consider amending map scale to help identify site locations and better consider their wider context, Include street names. Add key to identify areas of shading and any delineations shown on the maps.	Street names included where possible. Maps originally produced by BHCC Cartographer
Policy LGS1 – Local Green Space Designations	35	Policy should clearly set out the names of the LGS in the policy rather than just listing numbers. Put para number for NPPF in footnote – not in the policy text as this is likely to become out of date very quickly.	Amended In final Plan, there will be a footnote.
5.4 Local Community Spaces	36	Para 80 – change the word ‘chamfered’ - as unclear language for most people	Word deleted
Policy LCS1 – Local Community Spaces	36 - 37	1 st bullet point and 7 th bullet point both refer to “Green Open Space” Should this be “Local Green Space”? Ensure consistency of wording.	Amended to Local Green Space

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		10th bullet point refers to Coldean Pharmacy. A pharmacy is classed as an E use class within the Use Class Order and can therefore change to any other use within the E use class without the need for planning permission. Suggest deleting. As previously highlighted to the forum before reg 14 consultation, the final bullet point includes OS4 Site 21a. This conflicts with CPP2 policy H2 which allocates this site for development. The site has been allocated in CPP2 which is already adopted. To meet the basic conditions at examination the NP must be in general conformity with the City Plan. Recommend that this site is deleted from the NP. Final paragraph refers to open spaces to be retained until evidence shows they are no longer needed. However, policy LCS1 also includes sites which are not green and open spaces, such as a pharmacy and doctors. In addition, there is no explanation in the supporting text which sets out the type of evidence that would be required to demonstrate the sites are not needed. This needs setting out to support implementation of the policy. Any loss of open space would also need to meet the policy requirements in CPP1 policy CP16 Open Space. If justified to retain local community spaces, have landowners been contacted re proposed allocation of these sites/uses? Evidence of this would be required at examination. If justified to retain local community spaces, then please provide inset Maps in the plan otherwise no one is aware of their boundaries. 11	Deleted Pharmacy from list Site 21a deleted from list Amended to use wording supplied by SDNPA So far we have not sought landowner consent Have requested help to create this new map of Local Community Spaces. As at December 2024 we do not have such a map.

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Section 6. Anti-social behaviours	38	Policy not implementable and should be deleted as previously discussed. Management plans – bullet point could be reworded to require ‘management plans by condition when planning permission is granted for an HMO’ or similar. Neighbourhood Police Inspectors would not be consulted on these planning applications. Designing out crime officers not consulted on all applications. Tenancy agreements are also out of the scope of a planning application decision. Supporting text paragraph 86 – unnecessary to refer to officer’s names in detail	We thought BHCC previously requested this policy be added? IN April 2024. Can we discuss please.? We have amended the bullet points in December 2024 Plan. Names deleted
Policy C1 – reducing anti-social behaviour	39	Policy reference to adherence to the UK Government’s Anti-Social Behaviour Action Plan is not appropriate for a neighbourhood plan and should be deleted. Policy C1 could be renamed: <u>‘Designing out Crime or Promoting a Safer Community’</u> and be amended to read: <u>Development should incorporate appropriate design measures in the layout and landscaping of new developments, streets and public spaces to reduce opportunities for crime and support community safety’</u> Suggest adding a new supporting text paragraph: National Planning policy encourages the creation of safe and accessible places so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Well-designed, clear and legible pedestrian and cyclist routes and high-quality public spaces and buildings which encourage natural surveillance will be supported. The police are a statutory consultee for all planning applications, with plans scrutinised by a Designing Out Crime Officer (DOCO) who can make recommendations.	Noted Amended /inserted This text has been inserted.

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		addressed through the planning process such as pedestrian crossing points , wheelchair access to pavements, the removal of a height restriction barrier and provision of disabled driver/blue badge holder bays on-street e.g. Park Road or on private land (Bluebell Heights). Where new issues emerge as a result of development, these may be able to be addressed through the planning process, but not existing problems. 114 – rogue para number	Noted Number amended
7.3 Further traffic management issues	42	7.3 - this section is primarily about decarbonisation. Suggest heading reflects this e.g Sustainable and active transport and travel opportunities Para 119 – definition of genomic hub required Para 120 – green lanes are not defined in the glossary.	Heading changed Word genomic deleted Now defined in Glossary
7.4 Cycling Routes	42	This section should refer to the council's priorities for cycling and walking as set out in the council's Local Cycling & Walking Infrastructure Plan [LCWIP], and any routes will be expected to reflect these priorities. Para 121 – add wheeling Para 122 is repeated in Policy T7.	Noted and LCWIP mentioned Added Para 122 Deleted
7.5 Buses	43	This section does not indicate the implications for development, nor identify how development could address community concerns. The section could acknowledge the council's Bus Service Improvement Plan [BSIP]. 14 Issue 8 is not in section 7.6 Policies? This should refer to para 98 in section 7.1.	BSIP acknowledged Amended

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7.6 Policies (124 – 125)	43		Above
Policy T1 Increasing Sustainable Transport	43	Unclear what policy adds to Policy CP9 regarding Sustainable Transport and the general approach taken in the NPPF in support of sustainable transport. Policy heading would benefit from adding the word accessible. See comment on T5 below. Policy wording is ambiguous/unclear, particularly in terms of what is meant by ‘attractiveness’ (in design/visual terms of making it more useable?). Suggested wording could include ‘Development should include proposals appropriate to its scale and location which enhance the attractiveness of walking, wheeling, cycling, and public transport within Coldean. Specific proposals such as improved accessibility for disabled people, will also be supported.’	Noted Accessible added to heading Wording amended “
Policy T2 Through Traffic	43	The need and/or focus/wording of this policy and what it is seeking to achieve should be reviewed. This is because it is difficult to justify a policy related to through/external traffic, as existing or new development will either be a trip origin or destination within the local area.	Amended with PMR
Policy T3 Residential Streets	43 -44	All of these measures can be implemented by the Council without the need for a planning application, so the policy is unnecessary. a) Refer to comment on through traffic above b) Home Zone is not defined in the glossary. c) It would be difficult to secure this temporary use through the planning process in association with a development, but the design of a development and its public realm could facilitate this type of activity.	Amended with PMR

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Policy T4 Car Parking	44	The policy heading is Car parking, but there is also reference to cycle parking. Suggest heading is changed to Parking. It is very unlikely that a development proposal would be required to alter parking controls for a particular existing land use. The first part of this policy should therefore be reworded. It is unclear whether off-street parking means a car park or parking that is part of a development. The latter would be considered against BHCC standards within policy DM36.	Heading changed It does mean the latter, to check with PMR
Policy T5 Accessibility for all	44	Policy could be removed if T1 is expanded to reference accessibility, or remove the specific reference to accessibility in T1 as it is covered here.	T5 retained, now renumbered as T4 in December 2024 Plan
Policy T6 Accessible Developments	44	Add wheeling to wording. Policy wording is incomplete.	Added Original wording added in December 2024 Plan
Policy T7 Provision of Cycle / Walkways	44	This policy wording repeats para 122. Unclear what this adds to existing City Plan Policy. Priorities for cycling and walking are set out in the council's Local Cycling & Walking Infrastructure Plan [LCWIP], and any routes will be expected to reflect these priorities. https://www.brighton-hove.gov.uk/lcwip The LCWIP includes references to Coldean and Coldean Lane. Suggest replacing walkway with pavement or footway. The integrity of Coldean is not defined. How would this be assessed?	Para 122 deleted Referred to LCWIP in para now. To check with PMR Walkway replaced with pavement New wordings clarify integrity, in December 2024 Plan

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7.7 BHCC transport policies	45	Policy T8 is not a policy merely a list of BHCC plan policies. Suggest this is deleted as it is unnecessary to have a policy that lists the BHCC City Plan policies which are supported, as they would be applied to all planning applications by BHCC. Suggest this list could therefore just be included as text. Links to the source City Plan documents would be helpful to the reader.	This is now a list of BHCC Transport Policies endorsed, not our own Plan Policy in the December 2024 Plan Include as list in text, not Policy, with links.
8.1 Coldean design guide and code	46	This document provides valuable insights into the characteristics of the built environment of and guidance for the Coldean area. It focuses almost exclusively on the character of single-dwelling typologies, failing to address the characteristics of flatted/apartment and retail typologies in the area. It would also be useful if the document provided more insight on how the area is likely to accommodate change, including from potential pressures from, for example, densification in the form of flatted development, conversion of houses into flats, and/or back garden development.	For AECOM to amend. The Design Code is meant to cover larger developments and flats
Policy H1 Design Guide	46	There is no reference to the city-wide design guide, SPD 17 Urban Design Framework, which covers most of the issues set out in the Coldean Design Guide. The supporting text to this policy does not effectively explain what the policy is about and how it will be implemented. Notably how good design will help to deliver the vision set out in the NP, including meeting housing needs.	For AECOM to include comment.

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9.1 Environmental Policies Overview	48 - 49	Paragraph 133 - remove reference here to Green belt land and elsewhere in the section as not relevant to Brighton & Hove. Paragraph 133 refers to the government's "Environment Green Paper". What is this? Is this referring to the Environment Act? Paragraph 136 refers to the Coldean Nature Recovery Strategy. May want to clarify the difference between the Coldean Nature Recovery Strategy and the Sussex Nature Recovery Strategy that is being prepared, being led by East Sussex County Council for East Sussex and Brighton & Hove and state how (if) the Coldean Nature Recovery Strategy will feed into that. Paragraph 138 refers to restoration of chalk grassland including Site 21a North of Varley Halls. This site is allocated for development under CPP2 policy H2. Delete reference to site. Paragraph 140 also refers to protection of site 21a as green space. Delete. Paragraph 140 refers to "Spaces of Community Value". Should this be "Local Community Spaces" to reflect earlier policy wording? Ensure consistency of wording.	Ref deleted Amended to say Environment Act Agreed Distinguished in amended text. Site Ref deleted Site Ref deleted Local Community Spaces used throughout
9.2 South Downs Way Ahead Nature Improvement Area	49 - 50	Paragraph 141 refers to the South Downs Way Ahead NIA. This is designated within CPP1 policy CP10. This should therefore be referred to within this paragraph. ¹⁸ Paragraph 145 refers to strengthening arguments against development at site 21a. Delete due to conflict with CPP2 policy H2 which allocates site 21a for development.	The link shown refers to that Policy (SDNPA also commented) Refs deleted

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		Paragraph 147 suggest amend as follows: “Site 21a (Land North of Varley Halls) had been <u>was</u> identified as having housing potential for a high- density scheme - approx. 50 dwellings. <u>It is allocated in City Plan Part 2 policy H2 for an indicative 12 dwellings.</u> Last section of paragraph 147 refers to “failure of council to spend any S106 monies”. This statement is not appropriate for a Neighbourhood Plan.	Amended Comment deleted
9.3 The NPPF	50	Not sure why this section is needed. Suggest deleting. Section 13 Protecting Green Belt Land is not of relevance to Coldean Neighbourhood Plan as Brighton & Hove does not include any designated Green Belt. Information is out of date as the Department of Levelling up Housing and Communities no longer exists and has been replaced by MHCLG. Changes in NPPF can be frequent, and specific references are best avoided due to risk of becoming out of date.	Para 148 and Heading 9.3 deleted. “
Policy E1 Settlement Containment	50	As worded this policy: ‘...within this area of countryside...’ is unclear. Which area of the countryside is being referred to? If this relates to land within the National Park, the policy will need to be in conformity with the South Downs Local Plan and City Plan Policy SA5. In relation to the urban fringe land between the built-up area boundary and the A27 within the Neighbourhood Plan Area, Policy E1 needs to acknowledge City Plan Part 1 Policy SA4 Urban Fringe and outstanding site allocation in City Plan Part 2 Policy H2. As currently written may not fully comply with SA4 and H2. E1a) Unclear how the ‘undeveloped feel’ of the land can be retained with development coming forward. Query reference in E1c) only to ‘landscape setting of the settlement’, not to protecting landscape (or countryside) for its own value.	SDNPA and Southern Water had agreed with this policy and have retained it in the December 2024 Plan “

Policy E2 Protecting Valued Views	51	The policy lacks the clarity needed to enable implementation. CPP1 Policy CP12 Urban Design, SPD17 Urban Design Framework and the Urban Characterisation Study identify key ‘strategic’ and ‘local’ views to aid the assessment of design proposals, in particular tall buildings. Strategic views are generally distant views from elevated locations, including some from the SDNP, and local views are used for wayfinding and as route markers. What are ‘valued’ views and how do they differ from the ‘strategic’ and ‘local’ views established in? How have ‘publicly valued’ views been established and evidenced? Where are they located? What types of proposals would this policy apply to? These will need to be described in the policy and set out in on policies map or appendix to the plan.	Some wordings amended or defined by our advisers PMR who originally drafted these policy wordings for Coldean. “
Policy E3 Protection of Green Spaces	51	Policy refers to “<i>green spaces identified...</i>” Is this referring to the Local Green Spaces and Local Community Spaces identified in the Plan? Needs clarification whether this policy only refers to those designated/identified in the plan or also includes other green/open spaces. Also, this policy could undermine the open space protection policy by implying community benefits could outweigh loss of the green space. Slightly unclear what is required by policy – does it mean that loss of green space would be acceptable if replacement green space (with equivalent benefit?) or an alternative facility is provided? What is an ‘alternative facility’ to green space?	It refers to both LGS and LCS, as now clarified in the text of the Dec 2024 Plan. Check with PMR; wording retained ‘as is’ “
Policy E4 Protecting Allotments	51	Policy E4 as currently written is not in conformity with Policy CP16 Open Spaces in the adopted CPP1 as legal protection is afforded to statutory allotment sites applies to Coldean Lane and Charlton Allotments these allotments are well used with a waiting list.	Checked with our advisers PMR ; they advised to keep Policy E4 ‘as is’

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Policy E5 Adapting to climate change	51 - 52	This policy largely duplicates the requirements set out in City Plan Part One policy CP8 Sustainable Buildings and City Plan Part Two Policies DM43 Sustainable Drainage and DM44 Energy Efficiency and Renewables which require accordance with Future Homes Standard and Future Building Standards set out in Part L as a minimum and opportunities for new development to achieve greater reductions in CO2 emissions through the use of passive design, fabric standards, energy efficiency measures and low and zero carbon technologies will be encouraged in housing allocations in the urban fringe.	We wish to leave this in please
Policy E6 BNG	52	Policy may be better renamed “Biodiversity” as not all of the requirements relate to BNG. Point (a) “Endemic species” generally refers to species found only in a limited, restricted or defined area of habitat, with no other traces in other parts of the world. Unlikely that this is applicable locally. Suggest deleting and rewording to something more meaningful locally, such as “protected, priority or notable species”. Some of the policy requirements appear more like aspirations or projects than policy requirements and it is unlikely these will be directly applicable to development (e.g. point (b) and point (c)). Point (c) - CPP2 DM37 already requires the control and eradication of invasive non-native species. May be unnecessary repetition. Point (e) would be useful to set out the types of measures expected (e.g. biodiverse SuDS?). Point (f) is now secured through legislation so unnecessary. 21	Renamed Amended Leave in. Leave in. Mentioned SUDS, Southern Water have suggested amended wordings at E6 (e) re Water Objective unanimously agreed by the Forum at the December 2024 Open Meeting. added at (n) on Policy H2, now in December 2024 Plan. (f) Deleted; instead added new Policy element (n) in updated Policy H2 , see December 2024 Plan. As suggested by Southern Water and unanimously agreed by the Forum in its December 2024 Open meeting.
9.4 Biodiversity findings	53	Unsure how this fits with the Plan as does not appear to be supporting text to a policy/objective etc.	Leave in, as evidence, and study of interest to Coldeaners.
9.5 Ancient Chalk Downlands	53	Unsure how this fits with the Plan as does not appear to be supporting text to a policy/objective etc. This paragraph appears as though it should have some text following it. Is something missing?	It follows on from Policy E 5 (e) and E6 (d)

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9.6 BHCC Carbon Neutral 2030 Plan and Tree Planting	53	Unsure how this fits with the Plan as does not appear to be supporting text to a policy/objective etc. The juxtaposition with the unfinished section beforehand is unfortunate as tree planting will neither preserve nor protect chalk downland habitat but destroy it.	We have left this in for completeness. Noted
Section 11 Glossary and Acronyms	56 - 60	Only include in Glossary terms which are used in the NP / are relevant to Coldean. For example the terms AONB, Greenbelt and Article 4 Direction are not relevant to Coldean. Affordable Housing: suggest NPPF definition is used. City Plan Part 1 - heading has no narrative Conditions – suggest reword: “Conditions associated with a planning permit that restrict, manage, or guide the execution of a development. <u>are applied to a planning permission to limit or regulate the development approved – e.g. by limiting hours of opening, approving plans, or requiring the submission of information.</u>” Environment Agency: suggest this is checked with their definition online.	Deleted these 3 definitions from Glossary Inserted Definition deleted Considerably updated this whole section. In December 2024 Plan

		Highways Agency – has been renamed to National Highways. Add '<u>which includes the A27.</u>' at end of definition. However, this organisation is not mentioned elsewhere in the Plan, so could be deleted. Local Transport Plan – suggest definition is reworded to '<u>A Local Transport Plan [LTP] is a statutory document that sets out a local authority's priorities for transport and how these relate to, and help deliver, the objectives of other national, regional and local plans and strategies. It includes a long- term strategy and short-term (up to 5 years) delivery plan to deliver a safe, accessible, sustainable and resilient transport network. The LTP enables local authorities to bid for and receive government funding.</u>' Sustainable travel - Cycling, walking <u>and wheeling</u> is now a preferred term to describe forms of active travel, recognising wheelchair and mobility scooter users Transport Assessment – heading is not separate/bolded. Suggest definition is altered to '<u>Transport Assessments are part of the planning process and assess and mitigate the negative transport impacts of development in order to promote sustainable development. They are required for all developments which generate significant amounts of movements.</u>' Travel Plans – suggest definition is altered to '<u>Travel Plans are long-term management strategies for integrating proposals for sustainable travel into the planning process. They are based on evidence of the anticipated transport impacts of development and set measures to promote and encourage sustainable travel (such as promoting walking and cycling).</u>' However, neither of the above terms are specifically referred to in the Plan's policies or narrative and could therefore possibly be deleted. TPOs – heading is not bolded.	All rewordings suggested for Glossary have been inserted instead. Mention of A27 included . Inserted instead Wheeling inserted Heading bolded, new definition inserted Definition inserted instead Leave in Bolded
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		Ancient Chalk Downland – rather than saying that site 21a is classified as this, it would be more useful if this definition actually described what Ancient Chalk Grassland is. Change of Use – “from one use class to another, <u>however some use classes benefit from permitted development rights, allowing them to change from one use class to another without the need for a planning application, as set out in the Town and Country Planning (General Permitted Development) Order 2015 as amended. Under the Local Government Act 2000</u> CIL – An annual levy charged by the Local Planning Authority <u>on certain types of new development</u> GDPO: Government-established rules <u>the Town and Country (General Permitted Development)(England) Order 2015 (as amended) regulations</u> providing approval for specific, minor development projects <u>or change of use.</u> are known as planning permission regulations Public Open Space – suggest deleting as already have “Open Space”	Described New definition used instead Amended New definition used instead. Deleted
Links to evidence documents	60	All appendices seem to link back to the main neighbourhood plan page and can't be accessed through the hyperlinks provided. Appendix 5 contains the Masterplanning Framework which includes suggested changes to the public highway/public realm in some locations, including the removal of bus stops. Further comments would be made on such proposals at the appropriate time, when future engagement is undertaken.	Will arrange separate page links Noted
General Comments		References to Brighton Council need to be amended to say Brighton & Hove City Council References to Brighton City Plan Part One throughout need to be changed to read Brighton & Hove City Plan Part One. Similarly, if referring to Brighton City Plan Part Two. References to NPPF paras will be out of date very quickly. Recommend footnoting references so they are not part of the policy text.	All should now say Brighton & Hove City Council We have checked references again, should be correct now. To go in footnotes.