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# CONSULTATION STATEMENT

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A report on consultations to date carried out by the Coldean Neighbourhood  
Planning Forum

**PUBLISHED:** 9TH SEPTEMBER 2025  
**BY:** COLDEAN NEIGHBOURHOOD PLANNING FORUM

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## 1. INTRODUCTION

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- 1.1. The Coldean Neighbourhood Planning Forum (from here on described as ‘the Forum’) have prepared a Neighbourhood Plan, for the Neighbourhood Area which had received approval from Brighton & Hove Council and the South Downs National Park Authority in December 2021.
- 1.2. This Consultation Statement sets out how the Forum has engaged with the local community whilst preparing the Coldean Neighbourhood Plan. It provides an overview of the various forms of consultations that have been undertaken by the Forum with the community. It also discusses the communication channels used by the Forum and its interaction with other groups and organisations. It broadly aims to set out what the Forum has done, how we did it, what we learnt and then what we did with what we learnt at each stage.
- 1.3. Section 3 of this document fulfills the legal obligations of The Neighbourhood Planning (General) Regulations 2012 Regulation 15(1) which requires a Consultation Statement to accompany the submission of a Plan. Regulation 12(2) of the above-mentioned Regulations confirm that a ‘Consultation Statement’ is a document which:
  - (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - (b) explains how they were consulted;
  - (c) summarises the main issues and concerns raised by the persons consulted;
  - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development Plan.
- 1.4. As set out within our Consultation Strategy (APPENDIX 1 – CONSULTATION STRATEGY) we have sought to include all parts of the community and ensure that key stakeholders have been included wherever possible. These include but are not limited to:
  - Residents, businesses and Forum members
  - Other community groups and associations active within the Neighbourhood Area
  - Farmers of agricultural land within the Neighbourhood Area
  - Statutory and non-statutory consultees including:
    - Brighton and Hove City Council
    - South Down National Park Authority
    - Stanmer Park Preservation Society
    - Natural England
    - Historic England
    - Local Highways Authority
  - Academic bodies including:

- University of Brighton
- University of Sussex
- Coldean Primary School
- Planning forums or community groups in neighbouring wards including:
  - Coldean Community Organisation
  - Rottingdean Parish Council
  - Stanmer Park Stakeholder Group

We have also sought to engage with the community via a variety of means which are discussed in turn below:

### OUTWARD COMMUNICATION

- 1.5. This was undertaken through electronically distributed “Updates” which were produced on an ad hoc basis in response to members’ concerns communicated to the committee and/or progress reports on Forum matters. A list of “Updates” by date and topic only can be found in APPENDIX 2 – EMAIL UPDATES, up until Update 35. The full Updates can be found on the [www.cnpf.co.uk](http://www.cnpf.co.uk) website.

### SOCIAL MEDIA AND WEBSITE

- 1.6. The Forum Facebook page was established in November 2022, before the November Vision meetings. To this date, it has 135 members, many of whom are Forum members, and many who have been invited to join as official members but have not yet done so. It features updates and news about the Forum and answers enquiries. The page increased the visibility of the Forum in the community as many items are shared onto the Coldean Village Facebook page (Membership 730) and the Coldean Social Facebook pages (Membership 1,800 approx).
- 1.7. The Coldean Neighbourhood Planning Forum website has been active since October 2022. The website has a number of features, including a Home page providing an introduction to the Coldean Neighbourhood Planning Forum and the Neighbourhood Area Designation, News, Events, a Contact Us form and a section on the Forum’s Consultation Strategy. The website is updated regularly, to keep the Coldean community up to date with the progress of the Plan.

### PRESS STATEMENTS

- 1.8. Two press statements were issued in response to HMO planning applications in Coldean (APPENDIX 3 – HMO PRESS STATEMENTS).

## INWARD COMMUNICATION

- 1.9. The Forum has a dedicated email address, [contact@cnpf.co.uk](mailto:contact@cnpf.co.uk), and a website contact form, <https://cnpf.co.uk/contact-us>, which is monitored daily by the Committee. The Forum aims to reply within three working days.
- A dedicated website run by the Forum. Website statistics are available.
  - Inward communication through a dedicated email and website contact form.
  - Meetings with other groups and organisations.

## REGULATION 14 CONSULTATION

- 1.10 This document sets out how consultation comments at the Regulation 14 stage have been taken into account (see Section 3 below).

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## 2. CONSULTATION ACTIVITIES UP TO REG.14 CONSULTATION

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- 2.1. The Coldean Neighbourhood Plan has been in development since late 2021 and over the past four years there has been much engagement with the local community encompassing numerous events and consultation activities.
- 2.2. This section sets out the consultation activities undertaken up until the Reg.14 Consultation in June and July 2024.

### NEIGHBOURHOOD PLAN FORUM MEETINGS (NOVEMBER 2021 & FEBRUARY 2022)

- 2.3. The first public Forum meetings were held on 22 November 2021 and 10 February 2022 at St Mary Magdalen, Church Hall, Coldean Lane, Coldean. The meetings were Chaired by the Forum's Chair, Patrick Lowe. 28 residents and Forum members attended the meeting on 22 November 2021 of whom 8 were Forum members, 8 were residents and the others were visitors. 22 residents and Forum members attended the meeting on 10 February 2022, of whom 11 were Forum members and 8 were residents. The rest were visitors.
- 2.4. The meetings took the form of an introduction to the Committee members and attendees and a general discussion on planning issues which face the Neighbourhood Area. In the 10 February 2022 meeting, a presentation was given by Planning Officers from Brighton & Hove City Council's planning policy team which discussed what Neighbourhood Planning Forums are and what they do.
- 2.5. Over the course of the meetings, residents had the opportunity to come along to discuss the Neighbourhood Plan and planning issues within the Neighbourhood Area. The residents and Forum members were given five sticky notes and a pen and were invited to write down 5 priorities for the area, graded on a scale of 1-5 with 1 being the most important and 5 being the least. Residents were then asked to place each of their sticky notes in the relevant category (1-5) on large posters attached to the wall (APPENDIX 4 – NEIGHBOURHOOD PLAN FORUM MEETING POSTERS).
- 2.6. The results of the 20 November 2021 meeting are set out below.

Priorities	1	2	3	4	5	Total
Green Open Spaces	20	8	0	0	0	28
HMOs	8	17	0	0	0	26
Vehicles	0	0	5	7	8	20
Anti-Social Behaviour	0	0	0	0	0	0
Appearance	0	0	3	8	5	16
Council Expenditure	0	0	0	0	0	0

Priorities	1	2	3	4	5	Total
Bluebell Heights	0	2	14	2	10	28
Park Road shops	0	0	0	0	0	0
Lack of families	0	0	5	8	0	13
Recycling Bins	0	1	0	3	5	9

- 2.7. The second meeting heard the presentation on Neighbourhood Planning Forums and a discussion followed on how the scope of Forums could be utilised to make a difference in Coldean. The discussion centred on HMOs and continuing planning consents for this change of use. A representative for Squires Planning Ltd, the Forum's planning consultant at that time, gave a short address.
- 2.8. Following the two Forum Meetings, the Forum was able to condense the issues raised into 5 distinct topics which are:
- Natural Environment
  - Houses in Multiple Occupation (HMO)
  - Vehicles
  - Community Assets
  - General Appearance

### COLDEAN VISION MEETINGS (NOVEMBER 2022)

- 2.9. From the results of the two previous Forum meetings, the Forum endeavored to run events to help form the Neighbourhood Plan's vision. Two Vision Meetings were held at St Mary Magdalen Church Hall, Coldean Lane, Coldean on 10 November 2022 and 11 November 2022. 13 Forum members attended the 10 November 2022 meeting; there were no visitors. 12 attended the 11 November 2022 meeting, 11 of whom were members and one was a visitor.
- 2.10. The aim of these Vision meetings was to focus on the 5 topics identified by the Forum, and gain feedback from the community as to what issues relate to these topics.
- 2.11. Members were first asked to rank each of the 5 topics from 1-5 based on their priority. The results of the 10 November 2022 meeting are set out below:

Priorities	1	2	3	4	5	Total
Natural Environment	10	1	3	0	0	14
HMOs	3	8	9	0	0	20
Vehicles	0	4	0	5	4	13
Community Assets	0	0	1	7	4	12



Priorities	1	2	3	4	5	Total
General Appearance	0	0	0	1	5	6

2.12. The results of the 11 November 2022 meeting are set out below:

Priorities	1	2	3	4	5	Total
Natural Environment	10	2	3	0	0	15
HMOs	2	10	9	0	0	21
Vehicles	0	0	0	5	4	9
Community Assets	0	0	0	5	3	8
General Appearance	0	0	0	2	5	7

2.13. Members were then asked to identify different words and phrases from their concerns, which relate to the 5 topics. The following were identified:

- Natural environment, covering green spaces and nature, for example chalk grassland, biodiversity and Coldean Woods.
- HMOs including anti-social behaviour, design and construction of new buildings, access to family homes and affordable homes and Council tenancies.
- Community assets, covering access to community spaces and public services (e.g. post office).
- General appearance, recycling bins, graffiti, covering pavements, fly-tipping, street furniture etc.

2.14. A report on the outcomes of the meetings was prepared by the Neighbourhood Planning Forum which can be found in APPENDIX 5 – REPORT ON THE OUTCOMES OF THE VISION MEETINGS.

2.15. This helped the Forum to prepare their Vision for the Neighbourhood Plan which is:

***‘To remain a residential suburb of Brighton as a family friendly community with uninterrupted connection to Stanmer Park, the Wild Park and Highfields’***

2.16. It also helped to prepare the Forum’s set of Objectives which are:

- (a) To preserve from development the existing green spaces in, and surrounding, the Neighbourhood Area.
- (b) To preserve and encourage a variety of wildlife habitats in those areas.
- (c) To encourage families to live in Coldean by reducing the number of HMOs.
- (d) To improve the appearance of Coldean and thereby increase community identity.
- (e) To work with other agencies to reduce crime and other anti-social behaviour.
- (f) To encourage retail diversity by improving the appearance of Coldean.

(g) To increase accessibility to Green Open Spaces by traffic management and improve access to green spaces.

- 2.17. Subsequently the Forum was requested by the Council, in February 2024, to add an objective addressing Anti-Social behaviors through design, which Objective was approved by the Forum at 16 April 2024 Open Meeting. See Minutes on the CNPF website. A further Objective was added as a result of the Regulation 14 Consultation, see later.

### **TRAFFIC & TRAVEL SURVEY (JUNE 2023)**

- 2.18. The following on-line survey about Traffic and Travel was completed by 49 persons in Coldean in a five week period to 30th June 2023.
- 2.19. Please see next pages for photos of Traffic and Transport Survey QR code; NB deadline on this photo of the Survey was amended. Also the pages from the Survey itself.



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## TRAFFIC AND TRAVEL SURVEY

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### ABOUT

A group of residents have formed an organisation called the Coldean Neighbourhood Planning Forum who are preparing a Neighbourhood Plan for Coldean. Once complete, this plan will be used to determine planning applications within Coldean.

This survey focuses on traffic and travel within Coldean and aims to provide the Coldean Neighbourhood Planning Forum with an idea of traffic and travel behaviors and patterns in Coldean. The results of the survey will help the Neighbourhood Planning Forum to understand issues associated with traffic and travel in Coldean. Your input is highly valued and can make a difference in shaping the direction of the plan.

To complete this consultation, please head over to

<https://forms.office.com/e/Ekj3rUxgcc> OR



and complete it online. Alternatively, you can complete this form and return it by post or hand to Coldean Convenience, Beatty Ave, BN1 9ED.


This consultation ends on 30<sup>th</sup> July 2012. Please ensure that your response is received before this date, responses received after this date may not be processed.

### MORE INFORMATION

You can find out more about the neighbourhood plan and the work of the Neighbourhood Forum to date at [www.cnpf.co.uk](http://www.cnpf.co.uk).

You can contact the Coldean Neighbourhood Planning Forum by emailing [cnpf@btinternet.com](mailto:cnpf@btinternet.com) or by using the form at <https://cnpf.co.uk/contact-us>

2.20. Copy of Traffic & Travel Survey Form in paper format ( 4 pages) is below;-



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### MORE INFORMATION

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## QUESTIONNAIRE

**Q1: WHAT BEST DESCRIBES YOUR HOME?**

Family Home	House in Multiple Occupation (HMO)	Official Student Accommodation	Other (Please state what)

**Q2: HOW MANY PEOPLE ARE IN YOUR HOUSEHOLD?**

1	2	3	4	5	6	7	8	9	10+

**Q3: HOW MANY BEDROOMS IN YOUR HOUSEHOLD?**

1	2	3	4	5	6	7+

**Q4: HOW MANY VEHICLES DOES YOUR HOUSEHOLD OWN?**

	Cars (including SORN)	Vans	Motorbikes / scooters / bicycles	Large Vehicles (Caravans / Motorhomes / Horseboxes / Heavy Plant)
Petrol / Diesel				
Hybrid				
Electric				

**Q5: OVER THE NEXT 5 YEARS DO YOU EXPECT THE NUMBER OF CARS, VANS ETC OWNED BY YOUR HOUSEHOLD TO INCREASE?**

Yes	No	Not Sure

**Q6: WHEN YOU REPLACE YOUR PETROL OR DIESEL POWERED VEHICLES, WILL IT BE WITH AN ELECTRIC VEHICLE?**

Yes	No	Not Sure

Q7: HOW MANY USABLE GARAGES AND OTHER OFF-ROAD PARKING SPACES DOES YOUR HOME HAVE?

Garage Spaces	Off-Road Parking Spaces

Q8: WOULD YOUR OFF-ROAD PARKING SPACES BE ABLE TO FACILITATE THE CHARGING OF AN ELECTRIC VEHICLE?

Yes	No	Not Sure

Q9: DOES YOUR HOUSEHOLD ROUTINELY PARK A VEHICLE ON THE STREET? IF YES, HOW MANY, AND DO YOU STRUGGLE TO FIND SPACE?

Yes	No

Q10: DO YOU FEEL PEOPLE ADHERE TO THE SPEED LIMITS OUTSIDE YOUR HOME?

Yes	No	Not Sure

Q11: HOW MANY MEMBERS OF YOUR HOUSEHOLD TRAVEL TO WORK (PLEASE INDICATE THE NUMBER FOR EACH)?

		Mode of transport						
		Train	Car / Van	Motorbike	Bus	Bicycle	Foot	Walk from home
Travel time	0-30 mins							
	31-60 mins							
	61-90 mins							
	91+ mins							
	120+ mins							

3

**Q12: HAS YOUR HOUSEHOLD'S AVERAGE TRAVEL TO WORK TIME CHANGED OVER THE LAST 4 YEARS?**

Decreased	No Change	Increased

**Q13: PLEASE PROVIDE ANY OTHER COMMENTS YOU MAY WISH TO. ANY OTHER ISSUES / CONCERNS RELATING TO TRAFFIC / TRAVEL IN THE VILLAGE. DO YOU FEEL THAT THE SITUATION IS IMPROVING OR GETTING WORSE?**

### STAY UP TO DATE ON THE PLAN'S PROGRESS

If you would like to be kept up to date on the progress of the Coldean Neighbourhood Plan, be informed when consultation events are held and when it reaches key stages of the process to adoption, please leave your name and email address below.

Please note that your name and email will not be linked to the responses you have provided above and be held in a separate database purely for the purposes set out above.

Name:

Email:

The Coldean Neighbourhood Planning Forum cares to ensure the security of personal data. We make sure that your information is protected from authorised access, loss of manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and relevant policies. We shall not share your data and only keep your data for the purpose it was collected for and only for as long as necessary, after which it will be deleted.

Thank you for completing the survey!





- 2.21. The Google Forms anonymised summary of 49 Survey responses, in Excel format is available on the website on this link:

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/e180f015-85da-48a6-8663-5eb9b1a4866b/Coldean%20Neighbourhood%20Planning%20Forum%20Questionnaire.pdf?ver=1750435272660>

The Traffic and Travel Consultation document derived from a summary of those responses and was released to the Forum for public consultation on 23 November 2023, please see below.

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/2023-11-23%20CNPF%20Traffic%20Management%20Plan%20Consultation.pdf?ver=1748013773423>

### **MINUTES OF OPEN FORUM MEETING INC AGREEMENT OF ASSESSMENT OF OPEN SPACES (11<sup>TH</sup> JULY 2023)**

- 2.22 Assessment of Coldean Open Spaces. Disabled Access Consultation, and Neighbourhood Improvement Plan were discussed and voted on at an Open Forum meeting on 11 July 2023. These draft documents were released on the CNPF Website in May 2023, and made available in paper format at the Coldean Library. The minutes of the Open Meeting on 11 July 2023 are available on the CNPF website.
- 2.23 From February 2023 a small working party of some Forum Committee members and the Council cartographer mapped and listed each Open space in Coldean, in conjunction with the Forum Technical Advisors at Squires Planning. Each Open space was assessed according to criteria as set out in the Assessment document, as to whether it fell into the designation of Local Green Space ('LGS'), or Local Community Space ('LCS'), or neither. The link to the Assessment Of Open Spaces document, released for Consultation on 11 May 2023 on the CNPF website is here:-.

[https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/2023-05-24\\_DRAFT%20Review%20of%20Open%20Spaces.%20Amend.docx?ver=1725227921635](https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/2023-05-24_DRAFT%20Review%20of%20Open%20Spaces.%20Amend.docx?ver=1725227921635)

- 2.24. A subgroup of Forum Committee members consulted BADGH and other relevant organisations to draft a Disabled Access Statement for the Plan. The Link to the disabled Access Consultation on the CNPF website is found here:-.

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/Disabled%20Access.docx?ver=1725227921635>



- 2.25 A subgroup of the Forum Committee consulted on and drafted a preliminary Draft Neighbourhood Improvement Plan. This was subsequently superseded by the AECOM Master Planning Framework Document described in later paragraphs. The link to the preliminary Draft Neighbourhood Improvement Plan tabled is here:-

<https://cnpf.co.uk/news/f/update-22---the-draft-coldean-neighbourhood-plan>

### **AECOM DRAFT COLDEAN DESIGN GUIDE (3<sup>RD</sup> OCTOBER 2023)**

- 2.26. The Forum was awarded a Technical Support grant in April 2023 by Groundworks to prepare a Design Guide and Code for Coldean. The Forum Committee appointed AECOM, our Technical Resource Consultants to draft the Code and they visited Coldean in May 2023 to do fieldwork, and to take photographs of typical Coldean building styles. Many of these photographs are to be found in the draft Neighbourhood Plan. The draft AECOM Coldean Design Codes document was released on the CNPF website on 3 October 2023, and paper copies made available in Coldean Library. It was also released to the Council Design Codes Officer for comments and re-released in final Form, taking into account the Comments received in February 2024. The final document is on the CNPF website. The Coldean Design Guidance and Codes document is part of draft Coldean Neighbourhood Plan, at Plan Policy DC1. Please see.

[https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/CNPF%20230310\\_Coldean%20Design%20Codes\\_Final\\_low%20res.pdf?ver=1725227921635](https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/CNPF%20230310_Coldean%20Design%20Codes_Final_low%20res.pdf?ver=1725227921635)

- 2.27. The Link to the final AECOM Coldean Design Codes document on the website is here:

[https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/CNPF%20230310\\_Coldean%20Design%20Codes\\_Final\\_low%20res.pdf?ver=1725227921635](https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/CNPF%20230310_Coldean%20Design%20Codes_Final_low%20res.pdf?ver=1725227921635)

### **HAVE YOUR SAY OPEN MEETING (21<sup>ST</sup> NOVEMBER 2023)**

- 2.28. The Minutes of the 'Have your Say' Open Forum meeting introducing Consultations on the Traffic Management plan (23 November 2023) and the HMO Consultation (23 November 2023), as well as Introducing the draft Coldean Design Codes Consultation (document previously released on the CNPF website - see above - on 3 October 2023) are on the CNPF website, in the Minutes section.
- 2.29. The Link to the Traffic Management Plan, derived from the Survey findings described above and the subgroup's analysis, dated 23rd November 2023, was open to public consultation from 23rd November 2023 to 23rd January 2024 is found here-

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/2023-11-23%20CNPF%20Traffic%20Management%20Plan%20Consul.pdf?ver=1725227921635>

- 2.30. The link to the HMO Consultation, drafted by two Forum Committee members based on the findings in the November 2022 Visions meetings, dated 23 November 2023, was opened to public consultation from 23 November 2023 to 23 January 2024 and is found here-

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/2023-11-23%20CNPF-%20HMO%20Consultation%20document.pdf?ver=1725227921635>

- 2.31 Hard copies of all 5 Consultation documents were printed out and placed in Coldean Library for public access, as from 23 November 2023 ( 3 documents) and 10 January 2024 ( 2 more documents), and advertised on Notice Boards, on the CNPF FaceBook page and on the CNPF website from 23 November 2023 to 23 January 2024. During the time of the Public Consultations CNPF website statistics showed the website had 150 visits the day after consultations were launched in January 2024. The FaceBook page had 350 visits in the 30 days to 23 January 2024 as it was circulated to Coldean Village Chat Facebook page ( at that time it had over 500 members) and to Coldean Social FaceBook page ( then over 1,500 members). NOTE all these consultation documents have been amended in the final draft Plan, to reflect feedback by consultees.

### **OPEN FORUM - 'HAVE YOUR SAY' MEETING (19TH DECEMBER 2023)**

- 2.32. This Open Forum meeting launched the Housing Needs Assessment and Development Policy public consultation, as well as the Environmental Policies public consultation, both of which ended on 23 January 2023. The MInutes of the Open Forum meeting are found on the CNPF website.
- 2.33. The AECOM draft Coldean Master Planning Framework document was also described at this 'Have your Say' Open Forum meeting, although it is not formally part of the Neighbourhood Plan, it provides background evidence.
- 2.34. By way of Background to the Master Planning Framework document, in October 2023, the Forum was granted a Technical Support grant by Groundworks to approach AECOM to review and suggest possible improvements to the two main economic hub areas of Coldean namely the Beatty Avenue shops arena, and the Park Road shops area.
- 2.35. The Link to the draft AECOM Coldean Master Planning Framework document released on 22 December 2023 on the website and in hard copy formats is found here:-

[https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/231222\\_Coldean%20Masterplan%20Framework\\_Draft\\_low%20.pdf?ver=1725227921635](https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/231222_Coldean%20Masterplan%20Framework_Draft_low%20.pdf?ver=1725227921635)

2.36. The draft Development Policies including Housing Needs Assessment was released on 5 January 2024, for Consultation also. The link is here:-

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/CNPF%20Development%20policies.pdf?ver=1725227921635>

2.37. The Link to draft Environmental Policies was released on the website on 10 January 2024 and is here:-

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/CNPF%20Environmental%20%20policies.pdf?ver=1731061739938>

#### **OPEN FORUM MEETING 23RD JANUARY 2024**

2.38. The Minutes of this Open Forum meeting are to be found on the CNPF Website.

2.39. As mentioned the CNPF website statistics showed the website had 150 visits the day after all consultations were launched in January 2024. The FaceBook page had 350 visits in the last 30 days, covering that consultation time period. Coldean was aware of the draft Neighbourhood Plan process and the Consultation documents.

#### **OPEN FORUM MEETING 16th APRIL 2024**

2.40. An Open Forum Meeting to delete Site 21a from the Open Spaces analysis took place on 16 April 2024, as requested by Brighton & Hove City Council, and to introduce a new Objective (e) / and policy (Plan Policy C1) to help to reduce Anti Social Behaviours, after an informal review of the draft February 2024 Neighbourhood Plan by the Council Planning Team. Minutes of this Open Forum meeting are to be found on the CNPF website. Open Forum Meetings after the Regulation 14 Consultation period are dealt with later within that Section.

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### 3. REGULATION 14 CONSULTATION (18th JUNE 2024-30th July 2024 midnight)

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- 3.1. This section 3 was completed after the Regulation 14 Consultation to fulfil the legal obligations of the Neighbourhood Plan Regulations 2012, which require that this Consultation Statement should contain:
- (a) details of the persons and bodies who were consulted about the proposed; Neighbourhood development plan;
  - (b) explanations as to how they were consulted;
  - (c) summaries of the main issues and concerns raised by the persons consulted;
  - (d) descriptions as to how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood development Plan.

The information is set out below.

#### WHO WAS CONSULTED?

- 3.2. Efforts were made to consult as many people or organisations who might have a stake in the Neighbourhood Area as possible, including residents of the newly occupied flats at Denman Place.
- 3.3. The following bodies were sent emails (see APPENDIX 6 – LIST OF CONSULTEES) notifying them of the Regulation 14 Consultation, including all Forum Members on the Forum Members Register on 18 June 2024. The Consultation was launched on the CNPF FaceBook page, and shared to Coldean Social FaceBook Page (then approx 1,500 members) and Coldean Village Chat FaceBook page (then approx 700 members).

#### HOW WERE THEY CONSULTED?

- 3.4. The main methods adopted to raise awareness of the Consultation are set out below:
- Three in-person launch meetings, in different locations and times in Coldean, were held on 18th June 2024, 21st June 2024 and 23rd June 2024. The launch was also publicised by an Update email to all Forum Members and Consultees, on 18 June 2024, and on the Forum FaceBook page. Coldean Residents Association also emailed their 150 contacts by email with the information, with the on-line Consultation Survey QR code for completion. Paper surveys were made available for completion. Posters on 6 Public Notice Boards in Coldean, including Coldean library, with the QR code to access the Survey were also posted. Two hard copies of the draft Plan were placed in the Library with information to the Librarian on how residents could complete the Survey. A hard copy Plan was made available to the Coldean Residents Association Committee Chair

and hard copies were also available from Coldean Convenience store on request. Stalls were run near the Beatty Avenue Shops to solicit responses to Surveys and door-knocking evenings were also run to attract attention to the Consultation, and obtain replies. The Council emailed details of the Consultation to their own database of contacts (over 800) and to BHCC councillors. The anonymised on line Regulation 14 survey results are on the Coldean Neighbourhood Planning Forum website on this link:

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/eec85189-827f-4ec2-b90a-45839ee9f7ed/CNPF%20REG%2014%20%20Survey%20Summary%20anonymised.pdf?ver=1750435272782>

The anonymised hard copy Regulation 14 survey results are also to be found on the same site and link.

- 3.5. A photograph on the Regulation 14 On-line and paper Survey follows:-



## Coldean Neighbourhood Plan Survey - Regulation 14 Community consultation

Link to Coldean Neighbourhood Plan: [LINK TO BE REVEALED ON 18th JUNE 2024]

Consultation period: 18th June - 30th July (midnight)

Thank you for taking the time to respond to this consultation, your views are important  
[brightonprintcentre@gmail.com](mailto:brightonprintcentre@gmail.com) [Switch account](#)

Not shared

\* Indicates required question

1. What is your name?\*

Your answer

\* 2. In what capacity are you making your comments?

\*

Resident of Coldean

Someone who works mainly in Coldean

Other:

3. If you are responding on behalf of an organisation, please state the reason for your involvement and the name of the organisation you represent

\*

Your answer

4. Please provide your address (street address, city, postcode)

\*

Your answer

5. Do you support the Vision Statement of the draft Plan?

In 2030 Coldean to remain a residential suburb of Brighton as a family-friendly community with uninterrupted connection to Stanmer Park, the Wild Park and High Fields.

\*

Strongly support  
Support  
Neutral  
Somewhat support  
Do not support

6. Do you have any comments or suggestions on the Vision?

Your answer

7. Do you have any comments or suggestions on the Objectives of the draft Plan?

Your answer

8. Do you have any comments or suggestions on the draft Plan Policies? Policies start with capital letters and are in green boxes in the Plan document. (When referring to a Policy/s please quote the Plan Policy number)

Your answer

9. Do you have any general comments about the draft Coldean Neighbourhood Plan? (page and/ or paragraph references would be helpful please but aren't essential)

Your answer

10. If you would like to receive updates about the Plan or then please provide your email address. We will not share this with any other organisations.

Your answer

11. Do you wish to join as a Coldean Neighbourhood Planning Forum member?  
Membership of the Forum is free.\*

Yes

No

I am a Form Member already

I need more information please

#### **What happens to your responses?**

Once views have been gathered the plan will be amended as necessary before being submitted to Brighton & Hove City Council with a summary of all representations received. These will be made public and this may include verbatim comments received. Contact details and names of private individuals will not be published publicly. Following a further consultation, the revised plan will be examined by a suitably qualified planning consultant appointed by the council.

#### **What will we do with your data?**

Your personal data will only be held by the Coldean Neighbourhood Planning Forum in relation to the making of the Neighbourhood Plan. We will not share it with any other organisations.



## MAIN ISSUES AND CONCERNS RAISED FROM THE REGULATION 14 COMMUNITY CONSULTATION & HOW THEY HAVE BEEN ADDRESSED

- 3.6. The Regulation 14 Community Consultation ended at midnight on 30 July 2024 after 6 weeks and high quality, statistically significant feedback resulted. The local publicity and Stalls had helped to improve feedback and awareness of the Neighbourhood Plan in the Coldean Neighbourhood Area, and considerably increased the number of Forum Members. Helpful comments were received from Individuals, and Statutory Consultees, and other Consultees (see list at APPENDIX 6-LIST OF CONSULTEES) by email, from the on-line survey, from paper surveys, from Open events, from telephone calls and on community FaceBook pages.
- 3.7. We had 50 on-line surveys completed, 23 paper surveys, 2 telephone calls, a FB messenger chat, and several emails and many conversations at the launch events and on Stalls. The online survey responses (on an excel spreadsheet) and the summarised paper responses are available on the link above. We received formal responses from:-
- Brighton & Hove City Council, (see in detail below)
  - South Downs National Park Authority (see in detail below)
  - Historic England - acknowledgement
  - Natural England - acknowledgement
  - Southern Water (who suggested a new Objective to be added re Water, see below)
  - Gatwick Airport Safeguarding - acknowledgement/no impact identified
  - Southern Electricity Network - acknowledgement
  - Stanmer Estate - City Parks - Tree management Plan now referenced in Plan
  - National Highways Planning Team - acknowledgement
  - Mid Sussex Council - acknowledgement
  - Sussex Ramblers and - acknowledgement
  - BADGE- acknowledgement
  - The Brighton Society - acknowledgement.
- 3.8. Results show that **94% of individual online respondents were residents of Coldean and 6% others** (i.e. working in Coldean and others). For respondents on paper surveys 91% were residents of Coldean and 9% working in Coldean.
- 3.9. 61% of online respondents were Coldean Neighbourhood Planning Forum Members (52% for paper surveys) and 39% online surveys came from Non-Members (48% for Paper surveys).



- 3.10. The Forum had over 150 Forum Members on the Members Register at the end of the Regulation 14 Consultation period.
- 3.11. This was a total of nearly 100 written responses overall, and much informal feedback.
- 3.12. There were 5 colour fully printed hard copies of the Plan in the Coldean Library and available to borrow from Coldean Convenience Store throughout the Consultation period, and there was regular loaning and returning of the draft hard copy Plan documents..

#### **Comments from Individuals**

- 3.13 Several written comments from Individual Forum Members were subsequently included into the draft Plan, including additional Comments on Disabled Access, and the Wildflower meadow, now identified and protected in the Local Green Space designation of OS41 (Coldean Lane Southside Verge near Forest Rd) at Figure 24 in the draft Plan, as well as on the pedestrian crossing being needed across Coldean Lane near Varley Park. See detailed anonymised individual comment on website, link here:

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/3ff6f570-b5c6-4d9f-bc69-a4d3ed96750e/Regulation%2014%20Consultation%20Responses%20-%20CNPF%20NP.pdf?ver=1750709008897>

#### **Comments from South Down National Park Authority, a Statutory Consultee**

- 3.14. A new Map of the Neighbourhood Area clarifying the extent of the SouthDown National Park in the Neighbourhood Area, was required by SDNPA at Figure 1 in the Plan. All additional wordings describing the SDNPA impact into the Plan were included as SDNPA had requested, in particular an addition to the Vision, where the final phrase was added 'all within the SouthDowns National Park'. The link to SDNPA's comments (6 pages) is here:

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/a3484193-bb66-46ff-9e55-982a941c57cf/Regulation%2014%20Consultation%20Responses%20-%20CNPF%20SD.pdf?ver=1750435272782>

The full text of the SDNPA Regulation 14 comments are also found overleaf in the next 6 pages.



Ref	Comment	SDNPA Recommendation to Coldean Neighbourhood Forum
	part of the Development Plans for Brighton & Hove and the SDNP.	<u>Neighbourhood Area is within two Local Planning Authority areas, covered by Brighton and Hove City Council (BHCC) and the South Downs National Park Authority (SDNPA) for the part in the South Downs National Park (SDNP). Once made the Neighbourhood Plan will form part of the Development Plans for Brighton &amp; Hove and the South Downs National Park. It sits alongside Brighton City Plan Part Two (and other documents such as City Plan Part One which is to be revised in 2024) and the South Downs Local Plan (adopted in 2019 and currently in the early stages of review), and is to be used to guide development and determine planning applications within the Plan Area. The Neighbourhood Plan will be used by BHCC and the SDNPA as appropriate to make decisions about planning applications.</u> The Coldean Neighbourhood Plan ('the Plan') has been prepared in accordance with the Town & Country Planning Act 1990 (TCPA), the Planning & Compulsory Purchase Act 2004, (CPPA) the Localism Act 2011 (2011) and the Neighbourhood Planning Regulations (NPR) 2012."
Paragraph 2, page 10	The Neighbourhood Area was also designated by SDNPA for the area within the SDNP.	We request the following amendment: "...as formally designated by Brighton and Hove City Council ('BHCC' or 'the Council') <u>and the South Downs National Park Authority ('SDNPA')</u> in December 2021."
Paragraph 3, page 10	The NDP will form part of the Development Plan for the SDNP. Therefore, it would be useful to also link to planning documents relating to the SDNP as well as within the Brighton & Hove City Council local planning authority area.	Suggest adding the following: (second last sentence) "Details of all <del>the other</del> neighbourhood plans in the Brighton & Hove <u>City Council planning authority</u> area can be found online..." (Add to end of paragraph) " <u>Details of neighbourhood plans and planning policy in the South Downs National Park can be found online at <a href="https://www.southdowns.gov.uk/planning-policy/">https://www.southdowns.gov.uk/planning-policy/</a></u> "

2

The full text of the SDNPA Regulation 14 comments : page 1 above and page 2 below.

#### SDNPA response to the Coldean Pre-Submission Neighbourhood Development Plan (NDP)

Requested new wording is underlined and deleted wording is ~~struck through~~.

Ref	Comment	SDNPA Recommendation to Coldean Neighbourhood Forum
General Comments	<p>We acknowledge the hard work already undertaken and the gathering of evidence to support the approach taken in the NDP. A substantive part of the Neighbourhood Area is inside the South Downs National Park (SDNP). There could be greater emphasis on the relationship between the settlement of Coldean and the surrounding areas of the SDNP within the Neighbourhood Area.</p> <p>For planning purposes, the document needs to make clear the NDP when made, will form part of the Development Plan for Brighton and Hove inside the built-up area and the SDNP, outside the settlement planning boundary of Coldean. Therefore, the NDP covers two local planning authority areas. Namely inside the SDNP part of the Neighbourhood Area, the local planning authority is the South Downs National Park Authority (SDNPA). In the Neighbourhood Area outside the SDNP, the local planning authority is Brighton and Hove City Council (BHCC).</p>	<p>We acknowledge the hard work already undertaken and congratulate the Neighbourhood Forum on reaching this point in the process.</p> <p>A substantive part of the Neighbourhood Area is inside the South Downs National Park (SDNP). There could be greater emphasis on the relationship between the SDNP and the settlement of Coldean.</p> <p>The document needs to make explicitly clear; 1) the NDP will be part of the Development Plans for Brighton &amp; Hove <u>and</u> the SDNP; 2) the NDP covers two local planning authority areas. Namely South Downs National Park Authority (SDNPA) is the local planning authority for those parts of the Neighbourhood Area within the SDNP. Brighton and Hove City Council (BHCC) are the local planning authority for the Neighbourhood Area outside the SDNP.</p> <p>Below are suggestions where policies or supporting text be amended for clarity and/or to protect the special qualities of the SDNP.</p>
Figure 1, page 2	The map would be clearer if the SDNP boundary and the built-up area boundary for Coldean were shown and if the map had a key.	For clarity we request that the SDNP boundary and the Coldean built-up area boundary is shown on the map and includes a key.
Paragraph 1, page 10	The opening paragraph needs to reflect the Neighbourhood Area covers two local planning authority areas. The NDP will form	We request the following amendment: "The document provides one part of the development plan for the Coldean Neighbourhood Area to 2030. <u>The Coldean</u>

1

Ref	Comment	SDNPA Recommendation to Coldean Neighbourhood Forum
Paragraph 6, page 11	Similarly to the above, need to add link for the planning documents that apply within the SDNP part of the Neighbourhood Area.	We request the following addition: (after last sentence) " <u>The current documents for the Development Plan in the SDNP can be found on the South Downs National Park Authority (SDNPA) website at <a href="https://www.southdowns.gov.uk/planning-policy/">https://www.southdowns.gov.uk/planning-policy/</a></u> "
Paragraph 7, page 11	Add to the paragraph to make clear there is a separate Development Plan for the SDNP part of the Neighbourhood Area.	(second sentence) "The Development Plans for the <del>Plan</del> Neighbourhood area comprise a number of documents, the principal ones being the Brighton City Plan Part Two <u>and the South Downs Local Plan</u> which sets out the strategic and other planning policies intended to guide development until 2030/2033 <u>respectively</u> ."
Vision and Objectives, page 12	The SDNP is connected, and in proximity, to the settlement of Coldean. The Vision mentions Stanmer Park and Wild Park. Both these areas are inside the SDNP. There is an opportunity for the Vision and the Objectives to reflect the existing connection to the SDNP. The Objectives could be amended to include reference to the SDNP. Many of the green spaces and habitats referred to, are within the SDNP part of the Neighbourhood Area.	Consider rewording the Vision and Objectives to reflect the existing connection to the SDNP. The Objectives could be amended to reflect those improvements, for example to existing green spaces, will include areas within the SDNP.
Paragraph 19, page 15	The South Downs National Park Authority has a legal purpose to "conserve and enhance" the natural beauty, wildlife and cultural heritage of the South Downs National Park. Suggest amending the paragraph for clarity.	We request that the existing paragraph is deleted and is replaced with the following: " <u>The South Downs National Park Authority (SDNPA) has two purposes, the first of which is to "conserve and enhance" the natural beauty, wildlife and cultural heritage of the South Downs National Park</u> "
Paragraph 20, page 15	For clarity suggest amending the paragraph to clearly reflect the role of the SDNPA. The use of the word setting is important as this is consistent with the text used in paragraph 182 of the National Planning Policy Framework (NPPF) in relation to National Parks.	We request the following changes: <ul style="list-style-type: none"> <li>(second sentence) "...to ensure the conservation and enhancement of the <u>natural beauty, wildlife and cultural heritage of the National Park</u> and its vicinity <u>setting</u>."</li> <li>Delete the last sentence.</li> </ul>

3

Ref	Comment	SDNPA Recommendation to Coldean Neighbourhood Forum
Paragraph 59, page 25	For clarity regarding development within the SDNP part of the Neighbourhood Area suggest amending this paragraph. The South Downs Local Plan provides for exceptions for new buildings within the open countryside, i.e. outside settlements. These are limited exceptions although they do exist and therefore the statement in the second sentence is incorrect. The reference to main Development policy in the existing fourth sentence needs to be clarified; to make clear this is regarding the settlement of Coldean rather than all the Neighbourhood Area.	We request the paragraph is amended as follows: "We attach the Map of the Settlement Area for Brighton & Hove with an inset for the Coldean Area. <del>No planning permissions can be obtained for any new buildings outside the settlement area.</del> We do not expect the Council to amend the <del>Settlement</del> <u>planning boundary</u> (note to author – or other appropriate term used by BHCC) <del>area</del> during the Neighbourhood Plan period. The main Development policy for the <u>settlement of Coldean</u> area is to demolish and rebuild, or refurbish and improve, existing dwellings and housing stock."
Paragraph 74, page 28	It appears there are open spaces being referred to within the SDNP. Therefore, the paragraph needs to be amended to include reference to the South Downs Local Plan.	Amend the paragraph to reference the South Downs Local Plan as the Development Plan for any open spaces being referred to in the SDNP part of the Neighbourhood Area.
Local Green Space maps pages 31-34; Policy LGS1, page 35	For the Local Green Space (LGS) maps make clear which sites are within the SDNP. Three of the Local Green Space referred to, OS1, OS2, OS25 are within the SDNP. The South Downs Local Plan applies to these three LGS. This needs to be reflected in the policy wording. As National Policy the NPPF is a material consideration in any planning decision using this policy. For those areas within the Brighton & Hove City Council local planning authority boundary, i.e. settlement of Coldean, all the appropriate Development Plan policies will apply to a planning decision using LGS1. Therefore, specific reference to the NPPF and policy DM38 is unnecessary. Removing these references is clearer for the application of policy LGS1 to the three LGS within the SDNP.	1) Make clear which LGS are inside the SDNP and 2) Remove the references in the policy LGS1 to the NPPF and City Plan Part One DM38 to clarify how it is applied to those LGS in the SDNP.
Policy LCS1, page 36	This policy needs clarifying for ease of use. A map showing the Local Community Spaces (LCS) sites would be helpful. It is unclear which sites are inside the SDNP.	For the purposes of clarity: 1) Add a map showing the LCS sites, including identifying those within the SDNP.

4

Ref	Comment	SDNPA Recommendation to Coldean Neighbourhood Forum
	In general, text in the document that refers to LCS needs to be clearer and consistent regarding their purpose and the effect of being included in the NDP. The LCS have been identified as being important to the local community and by being in the NDP it is contended they will be given some weight in planning decisions within the Neighbourhood Area.	2) Where referring to LCS within the text of the NDP ensure there is consistency regarding their purpose and the effect in planning decisions of being included.
Paragraph 133, page 48	"Environment and green spaces" are stated as a top priority for the NDP. The statement in this paragraph reiterates the opportunity that exists for the Vision and Objectives to make clear the importance of the existing connections to the SDNP.	The reference to the importance of the "environment and green spaces" reiterates the opportunity for the Vision and Objectives to make clear the importance of existing connections to the SDNP.
Paragraph 141, page 49	The correct web address is given to the South Downs Way Ahead Nature improvement Area although the link is broken, and the webpage cannot be found.	Repair the link to the South Downs Way Ahead Nature Improvement Area.
9.2 South Downs Way Ahead Nature Improvement Area, page 49	It needs to be clarified that the Nature Improvement Area project has completed having been active between 2012 and 2015. It also needs to be clarified that the NIA was in the SDNP and therefore outside the boundaries of sites 21a and 21c.	Add wording in appropriate part of this section to clarify 1) the NIA was inside the SDNP and therefore outside the boundaries of sites 21a and 21c and 2) the NIA was an active project between 2012 and 2015.
Policy EI Settlement Containment	EI may contradict the requirements of similar policy regarding settlement coalescence within the South Downs Local Plan (SD4(3) Landscape Character). It is suggested the Neighbourhood Forum seek further advice from SDNPA planning policy officers on the conformity of this policy.	Suggest the Neighbourhood Forum seek further advice from SDNPA Planning Policy, via contact post the consultation, on the conformity of this policy with the South Downs Local Plan.
9.5 Ancient Chalk Downlands paragraph 153, page 53	This paragraph appears to be missing further wording after the semi-colon.	Clarify whether further wording should be included following the semi-colon.
11. Glossary & Acronyms, page	National Park, clarify the definition using the wording for the two statutory purposes and the duty.	Delete current wording and replace with the following:

5

Ref	Comment	SDNPA Recommendation to Coldean Neighbourhood Forum
		<p><u>"The Government has provided two statutory purposes for National Parks in England. The National Parks &amp; Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up &amp; Regeneration Act (LURA) 2023, requires all relevant bodies – including Brighton &amp; Hove City Council (BHCC) – to seek to further the purposes.</u></p> <p><u>The Government also places a corresponding social and economic duty upon National Park Authorities themselves – to be considered when delivering the two purposes.</u></p> <p><u>Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</u></p> <p><u>Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</u></p> <p><u>Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of the purposes."</u></p>

6

**All suggestions made by SDNPA were adopted or implemented in the Neighbourhood Plan**

### **Southern Water, a Statutory Consultee**

3.15. Southern Water suggested a new Water Objective and subsidiary amendments to Plan policies regarding Water and drainage and amendments to the Design Guidance and Codes as a result. We discussed these at an Open Forum Meeting on 19 November 2024 and the Forum agreed a further Open meeting be held on 10 December 2024 to agree or disagree the inclusion of a new Water Objective and or/ each resulting Policy /policy amendment or Design Guidance & Codes amendment. The link to Southern Water's comments, which are on the website, is here:

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/6d5fe08a-20ad-4bf7-8edc-1d5f6a720292/Regulation%2014%20Consultation%20Responses%20-%20CNPF%20So.pdf?ver=1750435272782>

3.16 The link to the Minutes of the 19 November 2024 Open Forum Meeting raising these changes to the draft Plan can be found on the CNPF Website.

3.17 On 10 December 2024 the next Open Forum meeting voted on and unanimously agreed the inclusion of a new Water Objective (h) in the Plan, with follow-on amendments to the draft Plan and final Coldean Design Guidance and Codes. AECOM has updated the Final Design Codes and Guide accordingly and that can be found on the CNPF website under the Final Documents tab.

3.18 The 10 December 2024 Open Forum Meeting Minutes can be found on the CNPF website.

### **Brighton & Hove City Council, a Statutory Consultee**

3.19 Extensive comments were received from BHCC, endorsed formally by BHCC Councillors, on the June 2024 draft plan. Most comments, were easily dealt with, and there were some suggested new wordings or corrections which were all changed in the draft Plan. Please see the link to the BHCC comments pages with the CNPF handling response/extra column on the CNPF website at the following link:

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/7ec893ed-169a-4934-a200-b9b30f6ee6f0/CNPF%20Coldean%20NP%20Reg%2014%20BHCC%20comments%20final%20wit.pdf?ver=1757450590369>

3.20 The BHCC comments are also set out below in full, showing CNPF actions in the final column.

Section/Policy	Page/Paragraph	Comments	CNPF Action ( Sept 2024)
Figure 1 – Map of Coldean NP area	2	<p>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 &amp; Hove City Council development plan</p> <p>The blue line to the north which shows the administrative boundary of Brighton and Hove should either be removed or identified.</p> <p>Identify in the key that the arrow points north</p>	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	<p>Amend to "It sits alongside <u>the Brighton &amp; Hove</u> City Plan Part Two" and make further changes as wrongly referenced throughout the document.</p> <p>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.</p> <p>Suggest removing text from para 2 which starts "as the Coldean Neighbourhood Plan".</p> <p>Unsure what the last sentence of para 2 that starts "this may occur" means? Suggest deleting.</p> <p>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.</p>	<p>Amended</p> <p>Amended</p> <p>Amended</p> <p>Amended</p> <p>Inserted SDNPA wordings instead</p> <p>Removed</p> <p>Removed</p> <p>See SDNPA comments included at their request</p>
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Section/Policy	Page/Paragraph	Comments	CNPF Action
		<p>Final sentence incorrectly refers to there being Neighbourhood Plan for Shoreham Harbour – please delete.</p> <p>Para 4 first para – rephrase to say ‘alongside other <del>documents in the</del> Development Plan <u>Documents</u> to understand’</p>	<p>Deleted</p> <p>Amended</p>
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	<p>(c) reducing the number of (existing, authorised) HMOs is not something that can be done through the planning process.</p> <p>(e) working with other agencies is not something that can be achieved through the planning process.</p> <p>Cross reference to policies which achieve these objectives</p>	<p>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.</p>

3.1 The Area	14	<p>Para 11 – ...the northern boundary is in effect..... lower case b</p> <p>Para 12 – ...on the upper slopes and partly because..... no full stop needed</p> <p>Para 12 – countryside – all one word</p> <p>Para 13 – perimeter road – road needs lower case</p> <p>Para 14 – parkland – lower case</p>	<p>Amended</p> <p>“</p> <p>“</p> <p>“</p> <p>“</p>
3.3 South Downs Authority	15	<p>Word missing from title - “South Downs National <u>Park</u> Authority”</p> <p>Need to include reference to the South Downs Local Plan as it forms part of the development plan for land within the National Park</p>	<p>Amended</p> <p>Inserted SDNPA wording</p>

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3.4 Population	15 - 16	<p>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.</p> <p>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.</p> <p>Para 27 – Bluebell Heights development – lower case d</p> <p>Para 27 – Suggest removing the word tenement here and throughout the document, as it is not relevant to Coldean.</p> <p>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.</p>	<p>Amended</p> <p>“</p> <p>“</p> <p>“</p> <p>“</p> <p>“</p> <p>“</p> <p>“</p>
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3.5 Developments	16 - 17	<p>Para 33 – Please check this statistic and use consistent terminology (household /dwelling/ unit)</p> <p>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.”</p>	<p>Used Household</p> <p>Wording retained</p>
3.6 Future	17	<p>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).</p>	<p>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.</p>

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		<p>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.</p>	<p>We have moved this explanation into the text</p>

Housing and Development Policies	18	<p>Paragraph 38 suggest following amendments:</p> <p>The Brighton <u>&amp; Hove City</u> Council Housing Needs Assessment 2015 is <del>being updated</del> <u>informed the City Plan Part One</u> (<del>previously 13,000</del> <u>where the objectively assessed need for home to 2030 was 30,210</u> homes <del>was identified as needed</del>). <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</u> (<u>Strategic Housing Market Assessment - August 2023 (brighton-hove.gov.uk)</u>). <del>and they will seek to provide a new one during 2024</del> 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.</p>	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

Section/Policy	Page/Paragraph	Comments	CNPF Action
		<p>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</p> <p>Para 41 - Please provide explanation for the notable changes statistic</p> <p>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?</p> <p>Para 44 – bedsits – typo</p>	<p>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.</p> <p>“</p> <p>Word tenement removed throughout. Bluebell Heights was not included in the figures</p> <p>Corrected</p>

<p>4.2 Housing Needs Assessment</p>	<p>20 - 21</p>	<p>Para 46 – The neighbourhood plan need only refer to the Housing Needs Assessment. The HNA introduction can include this level of detail.</p> <p>Concerns about the methodology of the HNA which is a background document to inform the plan.</p> <p>‘...Essentially, <u>assessment of housing</u> 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.’</p> <p>‘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.</p> <p>This draft neighbourhood plan is not considered to acknowledge or address local housing needs satisfactorily. Appears to be a missing data set of</p>	<p>Discussed with BHCC</p> <p>To leave text in but discuss with BHCC See calculation below this table.</p> <p>We have updated the Plan for Housing Needs based on typical Brighton housing sizes (by bedroom number) and Bedroom occupancy as BHCC suggested.</p>
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		property size within the housing stock of Coldean, which is more useful to	
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Section/Policy	Page/Paragraph	Comments	CNPF Action
		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 include this  Para 48 elaborated instead
Future consultation via PPAs (48)	21	Paragraph 48 – either remove or amend to: The Council has <del>recently confirmed end of 2023) that</del> <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	Removed this Policy from here, retained on Page 46 and renumber there as Policy DC1 ( December 2024 draft Plan)

		out in 46 to explain the policy is about and how it will be delivered.	
4.3 HMOs text (49 – 57)	21 - 22	<p>Title: Houses in Multiple Occupation (not 'of') Frequent typo – 'HMOs' does not have an apostrophe</p> <p>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</p> <p>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.</p>	<p>Amended throughout</p> <p>Amended</p> <p>Text amended</p>

Section/Policy	Page/Paragraph	Comments	CNPF Action
Policy H2 – Houses of Multiple Occupancy (HMO)	22 - 23	<p>Heading - Houses <u>in</u> [not of] Multiple Occupancy <u>tion</u></p> <p>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.</p>	<p>Amended</p> <p>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.</p>

Text supporting policy H3 (58 - 60)	23 then 25	<p>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 &amp; Hove adopted policy (red dashed line). However, this is not included in the policy text of either H1 or H3.</p> <p>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.</p> <p>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.</p>	<p>New wording from SDNPA inserted instead</p> <p>Noted</p> <p>Noted</p>
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Adopted policies map for B&H East area	24	<p>Figure 11 should be amended to read: Figure 11 <del>Settlement Area Map for Brighton &amp; Hove, including</del> Adopted Policies Map for Brighton &amp; Hove extract which includes the Coldean Area. It should clearly delineate the Coldean Area otherwise it's unclear how it relates to Plan.</p> <p>Also amend reference in paragraph 50 for consistency.</p> <p>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.</p>	<p>Amended</p> <p>Where in para 50?</p> <p>Simpler map obtained from PMR, with larger index. It should be clearer now in Dec 2024 draft Plan.</p>
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Section/Policy	Page/Paragraph	Comments	CNPF Action
		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.

<p>Policy H3 – New Developments within Settlement Boundary</p>	<p>25</p>	<p>A number of these criteria duplicate the intentions of the following City Plan policies:</p> <ul style="list-style-type: none"> <li>· CP12 Urban Design</li> <li>· CP13 Public Streets and Spaces</li> <li>· CP15 Heritage</li> <li>· DM18 High Quality Design and Places</li> <li>· DM20 Protection of Amenity</li> <li>· DM22 Landscape Design and Trees</li> </ul> <p>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.</p>	<p>Having checked these with PMR our advisers, we have retained these policies, now renumbered as Policy H2.</p> <p>“</p>
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4.5 Homes for older people	26	<p>Change 4.5 to read 4.4 and in table of contents</p> <p>Wording needs to be set out like a policy (as per rest of the plan)</p> <p>Suggest setting out para 65 as the policy; as currently it's not clear that it is one.</p>	<p>Amended</p> <p>As agreed with Forum Committee, this is stated but not as a Policy.</p>
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Section/Policy	Page/Paragraph	Comments	CNPF Action
		<p>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.</p> <p>Amend Paragraph 65: <del>This Plan therefore</del> <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)).</p>	<p>Noted</p> <p>Inserted</p>



5.1 Open Spaces - Introduction	28	<p>Open spaces need listing in the policy.</p> <p>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.</p> <p>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?</p>	<p>Amended</p> <p>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?</p> <p>Amended to confirm it’s the LGS process.</p>
5.2 Spaces Categorisation Summary – local green spaces and local communities spaces	29	<p>This definitions on page 29 may be better placed in the glossary.</p> <p>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)?</p>	<p>Prefer to leave here. This is what happened during our consultations.</p> <p>Per Squires Planning; LCS is a proper designation. WE have not assessed Assets of Community Value in this Plan.</p>

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		Open spaces do already have protection under CPP1 policy CP16.	Noted
Open Spaces ID and categorisation	30	<p>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.</p> <p>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.</p>	<p>It is also in the evidence base. We have reconfigured the same table/figure.</p> <p>Removed OS4 as LGS in the newer simplified table in the December 2024 Plan.</p>
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	<p>Policy should clearly set out the names of the LGS in the policy rather than just listing numbers.</p> <p>Put para number for NPPF in footnote – not in the policy text as this is likely to become out of date very quickly.</p>	<p>Amended</p> <p>In final Plan, there will be a footnote.</p>
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 <sup>st</sup> bullet point and 7 <sup>th</sup> 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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		<p>10<sup>th</sup> 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.</p> <p>Suggest deleting.</p> <p>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.</p> <p>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</p>	<p>Deleted Pharmacy from list</p> <p>Site 21a deleted from list</p> <p>Amended to use wording supplied by SDNPA</p>
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		<p>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.</p> <p>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.</p> <p>If justified to retain local community spaces, then please provide inset Maps in the plan otherwise no one is aware of their boundaries.</p>	<p>So far we have not sought landowner consent</p> <p>Have requested help to create this new map of Local Community Spaces. As at December 2024 we do not have such a map.</p>
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<p>Section 6. Anti-social behaviours</p>	<p>38</p>	<p>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.</p> <p>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.</p> <p>Supporting text paragraph 86 – unnecessary to refer to officer’s names in detail</p>	<p>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.</p> <p>Names deleted</p>
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<p>Policy C1 – reducing anti-social behaviour</p>	<p>39</p>	<p>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.</p> <p>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></p> <p>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</p>	<p>Noted</p> <p>Amended /inserted</p> <p>This text has been inserted.</p>
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		Officer (DOCO) who can make recommendations.	
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Policy C2 – contributions to crime prevention	39	Policy not necessary and should be deleted. Security/safety issues with site layouts etc. would be addressed in comments from Designing Out Crime Officers, but more general crime issues are addressed by the police. Financial contributions would not be sought from individual planning applications for the wider community to implement measures to combat crime.	Policy C2 (June 2024 Plan) deleted  Noted
Section 7. Traffic and Travel	40 - 45	The relevance of Figures 24, 25 and 26 to this section is unclear.	These are just fill in photographs. Of busy junctions in Coldean.
7.1 Traffic Management Review and Plan	40	This section highlights the outcomes of the Forum's survey in 2023. Locality guidance on transport in Neighbourhood Plans <a href="https://neighbourhoodplanning.org/toolkits-and-guidance/transport-matters-can-neighbourhood-plan-address/">https://neighbourhoodplanning.org/toolkits-and-guidance/transport-matters-can-neighbourhood-plan-address/</a> outlines what transport issues Plans can address through planning policies, and those which fall outside of its scope and must therefore be addressed in other ways.	Noted; we have amended some traffic policies with PMR in the December 2024 draft Plan.



Issues 1 - 11	40 - 41	<p>The list contains a number of issues that are existing and/or would not be able to be addressed through the planning process such as speeding traffic, overgrown vegetation, abandoned vehicles, bus routes, and parking enforcement. Although para 90 suggests that the Plan policies will address them, it would be helpful if it explained how it expects them to be delivered e.g. development/CIL/ BHCC. A number of the highlighted measures could be considered through requests to council teams e.g. the Safer, Better Streets programme, for example.</p> <p>The format layout of Paragraph and issue numbers is confusing. Suggest the issues are addressed within one numbered paragraph.</p>	<p>To discuss with Committee. We have not as yet been to communicate with the Safer, Better Streets programme</p> <p>These issues were analysed from the Traffic Survey responses</p>
7.2 Disability Access Assessment	41 - 42	This section includes a number of locations where infrastructure is considered to be required. A number of these existing issues cannot be	Noted

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		<p>addressed through the planning process such as pedestrian crossing points</p> <p>, 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).</p> <p>Where new issues emerge as a result of development, these may be able to be addressed through the planning process, but not existing problems.</p> <p>114 – rogue para number</p>	<p>Noted</p> <p>Number amended</p>
7.3 Further traffic management issues	42	<p>7.3 - this section is primarily about decarbonisation. Suggest heading reflects this e.g Sustainable and active transport and travel opportunities</p> <p>Para 119 – definition of genomic hub required</p> <p>Para 120 – green lanes are not defined in the glossary.</p>	<p>Heading changed</p> <p>Word genomic deleted</p> <p>Now defined in Glossary</p>

7.4 Cycling Routes	42	<p>This section should refer to the council's priorities for cycling and walking as set out in the council's Local Cycling &amp; Walking Infrastructure Plan [LCWIP], and any routes will be expected to reflect these priorities.</p> <p>Para 121 – add wheeling</p> <p>Para 122 is repeated in Policy T7.</p>	<p>Noted and LCWIP mentioned</p> <p>Added</p> <p>Para 122 Deleted</p>
7.5 Buses	43	<p>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].</p> <p>Issue 8 is not in section 7.6 Policies? This should refer to para 98 in section 7.1.</p>	<p>BSIP acknowledged</p> <p>Amended</p>

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7.6 Policies (124 – 125)	43		See above

Policy T1 Increasing Sustainable Transport	43	<p>Unclear what policy adds to Policy CP9 regarding Sustainable Transport and the general approach taken in the NPPF in support of sustainable transport.</p> <p>Policy heading would benefit from adding the word accessible. See comment on T5 below.</p> <p>Policy wording is ambiguous/unclear, particularly in terms of what is meant by 'attractiveness' (in design/visual terms of making it more useable?).</p> <p>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.'</p>	<p>Noted</p> <p>Accessible added to heading</p> <p>Wording amended</p> <p>"</p>
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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	<p>All of these measures can be implemented by the Council without the need for a planning application, so the policy is unnecessary.</p> <p>a) Refer to comment on through traffic above</p> <p>b) Home Zone is not defined in the glossary.</p> <p>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.</p>	Amended with PMR

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Policy T4 Car Parking	44	<p>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.</p> <p>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.</p>	<p>Heading changed</p> <p>It does mean the latter, to check with PMR</p>
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	<p>Add wheeling to wording.</p> <p>Policy wording is incomplete.</p>	<p>Added</p> <p>Original wording added in December 2024 Plan</p>

Policy T7 Provision of Cycle / Walkways	44	<p>This policy wording repeats para 122.</p> <p>Unclear what this adds to existing City Plan Policy.</p> <p>Priorities for cycling and walking are set out in the council's Local Cycling &amp; Walking Infrastructure Plan [LCWIP], and any routes will be expected to reflect these priorities.  <a href="https://www.brighton-hove.gov.uk/lcwip">https://www.brighton-hove.gov.uk/lcwip</a> The LCWIP includes references to Coldean and Coldean Lane.</p> <p>Suggest replacing walkway with pavement or footway.</p> <p>The integrity of Coldean is not defined. How would this be assessed?</p>	<p>Para 122 deleted</p> <p>Referred to LCWIP in para now.</p> <p>To check with PMR</p> <p>Walkway replaced with pavement</p> <p>New wordings clarify integrity, in December 2024 Plan</p>
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7.7 BHCC transport policies	45	<p>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.</p> <p>Suggest this list could therefore just be included as text. Links to the source City Plan documents would be helpful to the reader.</p>	<p>This is now a list of BHCC Transport Policies endorsed, not our own Plan Policy in the December 2024 Plan</p> <p>Include as list in text, not Policy, with links.</p>
8.1 Coldean design guide and code	46	<p>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</p>	<p>For AECOM to amend. The Design Code is meant to cover larger developments and flats</p>



		into flats, and/or back garden development.	
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.

<p>9.1 Environmental Policies Overview</p> <p>Page 65 of 97</p>	<p>48 - 49</p>	<p>Paragraph 133 - remove reference here to Green belt land and elsewhere in the section as not relevant to Brighton &amp; Hove.</p> <p>Paragraph 133 refers to the government's "Environment Green Paper". What is this? Is this referring to the Environment Act?</p> <p>Paragraph 136 refers to the Coldean Nature Recovery Strategy.</p> <p>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 &amp; Hove and state how (if) the Coldean Nature Recovery Strategy will feed into that.</p> <p>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.</p> <p>Paragraph 140 also refers to protection of site 21a as green space. Delete.</p>	<p>Ref deleted</p> <p>Amended to say Environment Act</p> <p>Agreed</p> <p>Distinguished in amended text.</p> <p>Site Ref deleted</p> <p>Site Ref deleted</p> <p>Local Community Spaces used throughout</p>
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		Paragraph 140 refers to “Spaces of Community Value”. Should this be “Local Community Spaces” to reflect earlier policy wording? Ensure consistency of wording.	
9.2 South Downs Way Ahead Nature Improvement Area	49 - 50	<p>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.</p> <p>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.</p>	<p>The link shown refers to that Policy (SDNPA also commented)</p> <p>Refs deleted</p>

		<p>Paragraph 147 suggest amend as follows: “Site 21a (Land North of Varley Halls) <del>had been</del> <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></p> <p>Last section of paragraph 147 refers to “failure of council to spend any S106 monies”. This statement is not appropriate for a Neighbourhood Plan.</p>	<p>Amended</p> <p>Comment deleted</p>
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9.3 The NPPF	50	<p>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 &amp; Hove does not include any designated Green Belt.</p> <p>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.</p>	<p>Para 148 and Heading 9.3 deleted.</p> <p>“</p>
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Policy E1 Settlement Containment	50	<p>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.</p> <p>E1a) Unclear how the ‘undeveloped feel’ of the land can be retained with development coming forward.</p> <p>Query reference in E1c) only to ‘landscape setting of the settlement’, not to protecting landscape (or countryside) for its own value.</p>	<p>SDNPA and Southern Water had agreed with this policy and have retained it in the December 2024 Plan</p> <p>“</p>
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Policy E2 Protecting Valued Views	51	<p>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.</p> <p>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.</p>	<p>Some wordings amended or defined by our advisers PMR who originally drafted these policy wordings for Coldean.</p> <p>“</p>
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Policy E3 Protection of Green Spaces	51	<p>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.</p> <p>Also, this policy could undermine the open space protection policy by implying community benefits could outweigh loss of the green space.</p> <p>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?</p>	<p>It refers to both LGS and LCS, as now clarified in the text of the Dec 2024 Plan.</p> <p>Checked with PMR; wording retained ‘as is’</p> <p>“</p>
Policy E4 Protecting Allotments	51	<p>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.</p>	<p>Checked with our advisors PMR ; they advised to keep Policy E4 ‘as is’</p>

Policy E5 Adapting to climate change	51 - 52	<p>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.</p>	<p>We wish to leave this in place</p>
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Policy E6 BNG	52	<p>Policy may be better renamed “Biodiversity” as not all of the requirements relate to BNG.</p> <p>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”.</p> <p>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)).</p> <p>Point (c) - CPP2 DM37 already requires the control and eradication of invasive non-native species. May be unnecessary repetition.</p> <p>Point (e) would be useful to set out the types of measures expected (e.g. biodiverse SuDS?).</p> <p>Point (f) is now secured through legislation so unnecessary.</p>	<p>Renamed</p> <p>Amended</p> <p>Leave in.</p> <p>Leave in.</p> <p>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.</p> <p>(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.</p>
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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)
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	<p>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.</p> <p>Affordable Housing: suggest NPPF definition is used. City Plan Part 1 - heading has no narrative</p> <p>Conditions – suggest reword: “Conditions associated with a planning permit <del>that restrict, manage, or guide the execution of a development.</del> <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></p> <p>Environment Agency: suggest this is checked with their definition online.</p>	<p>Deleted these 3 definition from Glossary, which was reviewed and amended</p> <p>Inserted</p> <p>Definition deleted</p> <p>Considerably updated this whole section. In December 2024 Plan</p>
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<p>Page 75 of 97</p>	<p>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.</p> <p>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></p> <p>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</p> <p>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></p>	<p>All rewordings suggested for Glossary have been inserted instead. Mention of A27 included .</p> <p>Inserted instead</p> <p>Wheeling inserted</p> <p>Heading bolded, new definition inserted</p> <p>Definition inserted instead</p> <p>Leave in</p> <p>Bolded</p>
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		<p>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>'</p> <p>However, neither of the above terms are specifically referred to in the Plan's policies or narrative and could therefore possibly be deleted.</p> <p>TPOs – heading is not bolded.</p>	
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		<p>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.</p>	Described
		<p>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></p>	<p>New definition used instead</p> <p>Amended</p>
		<p>CIL – <del>An annual</del> levy charged by the Local Planning Authority <u>on certain types of new development</u></p>	New definition used instead.
		<p>GDPO: <del>Government-established rules the Town and Country (General Permitted Development)(England) Order 2015 (as amended) regulations</del> providing approval for specific, minor development projects <u>or change of use. are known as planning permission regulations</u></p>	Deleted

		Public Open Space – suggest deleting as already have “Open Space”	
Links to evidence documents	60	<p>All appendices seem to link back to the main neighbourhood plan page and can’t be accessed through the hyperlinks provided.</p> <p>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.</p>	<p>Will arrange separate page links</p> <p>Noted</p>

<b>General Comments</b>		<p>References to Brighton Council need to be amended to say Brighton &amp; Hove City Council</p> <p>References to Brighton City Plan Part One throughout need to be changed to read Brighton &amp; Hove City Plan Part One. Similarly, if referring to Brighton City Plan Part Two.</p> <p>References to NPPF paras will be out of date very quickly. Recommend footnoting references so they are not part of the policy text.</p>	<p>All should now say Brighton &amp; Hove City Council</p> <p>We have checked references again, should be correct now.</p> <p>To go in footnotes.</p>
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NOTE : As can be seen above Substantive comments were raised by BHCC on improving:-

- 1) **the Housing Needs Assessment** by taking into account the numbers of bedrooms in the area and bedroom occupancy rates. Our Consultant provided the following ONS bedroom data, (from ONS data for Brighton & Hove in 2021)

1 bedroom- 29,944 dwellings

2 bedroom -37,846 “

3 bedrooms - 31,679 “

4 + bedrooms 21,933 “

Bedroom occupancy Ratings +2 or more 29,532 dwellings

+1 37,088 dwellings

0 49,366 dwellings

- -1 4,910 dwellings

- -2 or less 506 dwellings.

These statistics show that there are few unoccupied bedrooms in the Brighton & Hove area, probably owing to a large student and transient population visiting the City. Coldean households are similarly fully occupied. These percentages have now been summarised and mentioned in the Plan itself. The new BHCC Draft Housing Strategy in November 2024 was useful to put Housing Needs in Brighton & Hove into the frame/context, with 130, 840 households in the Brighton & Hove City area (1,046 households in Coldean as at 2021, excluding the 242 households occupied in Bluebell Heights thereafter). A prorata of the previous new housing target for Brighton of 13,200, **would indicate that the Coldean area would need to build 105 new households** (a figure already far exceeded by the Bluebell Heights Dev), in the Plan period. The Coldean Area has therefore already recently accommodated more than its proper share of new housing, and at the expense of Ancient chalk downlands, and with no added infrastructure such as drains or additional water supply, or shops/doctors etc). The overall housing assessment needs have not therefore been changed within the draft Plan, although the Plan period may be extended to 2041, and will be subject to further review..

- 2) **HMOs policy.** The majority of the Reg. 14 Consultation Survey respondents agreed with the draft HMOs Policy in the Plan (Plan Policy H1). Our professional adviser PMR Architecture has also commented we should stay with the existing draft Policy H1 . Although the Council had queried that draft Policy, with many HMOs in Coldean, we wish the Council to tighten up on its approvals for HMOs in Coldean, by requiring those households to adopt Coldean Design Guidance & Codes policy (Plan Policy DC 1), and as detailed in draft Policy H1, to have sufficient car parking and other facilities included in the HMOs development or extension application, and to ensure they do not breach existing BHCC policies regarding concentrations of HMOs in one location or street within Coldean.
- 3) The **Settlement area.** We were asked to improve the map at Figure 11 (Now Figure 13), which has been done. The Council argues that this is **the built-up area**. We argue, as does our professional adviser PMR Architecture, that this is the same as the Settlement area in Coldean because of the topography. It is impractical and expensive to build on



the steep slopes typically found above the existing built-up area. No specific comments were received on this Plan Policy during the Regulation 14 Consultation.

### **MOCK HEALTHCHECK OF UPDATED PLAN BY INDEPENDENT EXAMINER**

- 3.21 After amendments and alterations arising from the Regulation 14 Community Consultation had been discussed and agreed in a working group the updated draft Neighbourhood Plan, v16, dated December 2024 was prepared. This was sent to Locality for Review in December 2024. Locality identified a Mock Independent Examiner for the Health Check. A Technical Support Grant, applied for and granted in August 2024 was received for this. Feedback from the Mock independent Examiner, Laura Collins Bsc MA MRTTP at Intelligent Plans and Examinations in Bristol, was received in January 2025 and has been input, before submitting the Draft Plan (v20) back to the Council for the next steps which should be a Regulation 16 Consultation and the formal Independent Examiner Review. All Forum Committee Minutes, AGM Minutes and the Constitution amendments made are available, listed chronologically in APPENDICES 7,8,9.

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## CONSULTATION PROCESS SINCE DECEMBER 2021- IN SUMMARY

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3.22 During the period since the Coldean Neighbourhood Planning Forum was approved, and up to date, there have been 3 AGMs, 2 Vision and Objectives meetings and 9 Forum Open meetings, with 35 emailed Updates to Forum members, and Consultees. A regularly maintained dedicated website and Facebook page had also been set up. There have been numerous surveys, subgroup meetings, Forum committee meetings, consultations, consultation launch meetings, hard copies of documents made available for review in the Coldean Library and in the local shops, informal discussions and indeed formal discussions with other parties for example the Council Planning Team and South Down National Planning Authority. Also our constituency MP Sian Berry as well as our elected Ward Councillors have been involved. Details are set out in this Consultation Statement, and the evidence and this Consultation Statement are all on the Coldean Neighbourhood Planning Forum Website . There have been conversations or emails including consultations with technical support teams at AECOM, Locality and indeed Groundworks who provided grants. The Government Neighbourhood Planning website answered ad hoc questions.

**3.23 It has been noticeable that the neighbourhood planning process has brought together various organisations and stakeholders in Coldean who have been helping and supporting the formation of the Plan; these are mentioned in the Plan.**

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## APPENDIX 1 – CONSULTATION STRATEGY

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This is shown in full on the [www.cnpf.co.uk](http://www.cnpf.co.uk) website.

The link is here:-

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/Consultation%20Strategy.pdf?ver=1725227921814>

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## APPENDIX 2 – EMAIL UPDATES TO FORUM MEMBERS

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### UPDATE NUMBER/DATE

**All Updates are available in full on the CNPF website**

- |    |                  |   |
|----|------------------|---|
| 1  | 24 December 2021 | Forum obtains full approval   |
| 2  | 1 March 2022     | Next steps from Open Forum Meeting 10 February 2022<br>Minutes from meeting attached  |
| 3  | 18 April 2022    | News of planning applications for HMO's and update on Coldean Woods   |
| 4  | 26 May 2022      | Neighbourhood Plan Vision of Coldean, Council Tax and HMO's and update on Coldean Woods Ancient Grass Downland                |
| 5  | 18 August 2022   | Refused application for HMO conversion and reminder for SGM 1 September 2022  |
| 6  | 20 October 2022  | Upcoming Vision of Coldean meetings, AGM 8 December 2022, Consultation Strategy and Planning Notes                            |
| 7  | 31 October 2022  | Facebook page and website, HMO update and upcoming Vision of Coldean meeting 10 November                                      |
| 8  | 17 December 2022 | Topics to be covered in Neighbourhood plan and request for community input  |
| 9  | 18 January 2023  | News on Forum Consultation Statement and discussion of AGM 8 December 2022  |
| 10 | 12 February 2023 | Progress Report flowchart and Committee request for community assistance  |
| 11 | 6 April 2023     | Grant for technical , BBC Wild Isles and Traffic Management Plan  |
| 12 | 19 April 2023    | Technical support funding, Housing Needs Assessment, Design Codes, Traffic and Travel Survey and draft Vision and Objectives. |

No Update number allocated

1	May 2023	Letter from Sir David Attenborough
13	29 May 2023	Update on Forum Applications
14 a.	12 June 2023	Open Forum Meeting Agenda
14b.	14 July 2023	Proposals agreed at meeting
15	23 July 2023	Bluebell Heights Travel Plan
16	12 August 2023	Bluebell Heights
17	16 September 2023	Bluebell Heights Update
18	2 November 2023	Update and invitation to Forum Event 21 November 2023
19	24 November 2023	Have Your Say meeting 23 November 2023, New Consultation documents
20	17 December 2023	Council Planning Update and reminder of Open Meeting and AGM 19 December 2023
21	22 December 2023	Report of meetings held 19 December 2023
22	29 February 2024	Draft Neighbourhood Action Plan has informal checks with Council
23	1 April 2024	Agenda Open Forum Meeting 16 April 2024
24	8 November 2024	Draft Neighbourhood Plan outlining commitment to Biodiversity Net Gain in new developments
25	8 November 2024	Committee announce Launch Party for Regulation 14 Consultation on 18 June 2004
26	8 November 2024	Regulation 14 Community Consultation Closes 30 July 2024 with strongly positive responses to the Vision
27	8 November 2024	Meeting with Sian Berry MP
28	8 November 2024	The Forum Committee report on progress arising from Regulation 14 Consultation
29	8 November 2024	Notice of Open Forum Meeting 19 November 2024

- |     |                  |  |
|-----|------------------|--|
| 30  | 14 January 2025  | New Water Objective Approval Plan and AGM                    |
| 31  | 25 February 2025 | Update 31 Mock Independent Examination of Work Plan underway |
| 32  | 27 February 2025 | Coldean Update and Improvements                              |
| 33  | 3 May 2025       | Mock Independent Examiner Feedback on the Draft Plan         |
| 34  | 5 May 2025       | Successful Meeting With Council Leader Bella Sankey          |
| 35. | 29 June 2025.    | Many new documents uploaded to the CNPF website.             |

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## APPENDIX 3 – HMO PRESS STATEMENTS

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### BRIGHTON AND HOVE NEWS

**23<sup>rd</sup> April 2022**

Coldean Neighbourhood Planning Forum has undertaken consultations with the community and identified the loss of family homes and their conversion to HMOs (houses in multiple occupation) as an issue of concern locally.

It has affected local school places in recent years.

We have carried out local research after we heard claims that mainly business people or tenants other than students were living in the HMOs.

We found this from our research to be untrue. Nearly all the HMOs in Coldean are taken up by students.

We have also noted at the recent council planning meeting that another claim was made that there were more HMOs in Hanover than Coldean which was again untrue.

We were very disappointed that the council approved the application for an HMO in Talbot Crescent despite there being strong local opposition.

Owing to a very large and ongoing building programme by Sussex University and Brighton University, HMOs are unlikely to continue to be in demand, with plentiful good-quality on-campus accommodation increasingly available.

This seems therefore a good point at which to refuse further planning applications for HMOs – not least with many HMOs in Coldean empty and unrented.

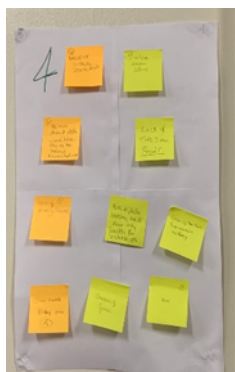
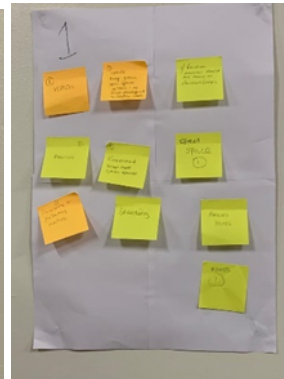
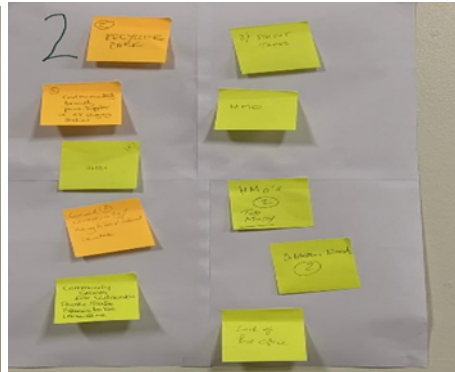
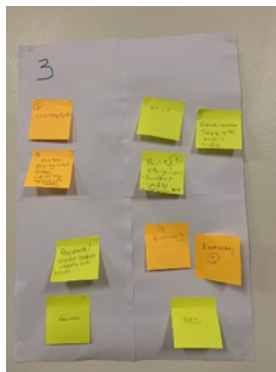
The Coldean Neighbourhood Planning Forum would like to ask: “When will the council realise that we have enough student accommodation and HMOs in the city for students and change its planning policies accordingly?”

Patrick Lowe is the chairman of the Coldean Neighbourhood Planning Forum.

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## APPENDIX 4 – NEIGHBOURHOOD PLAN FORUM MEETING POSTERS

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## APPENDIX 5 – REPORT ON THE OUTCOMES OF THE VISION MEETINGS

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Please see link to this document on the website here:-

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/92338927-30ab-4368-a16c-c1729295156f/CNPF%20Outcome%20of%20the%20%20Visions%20Meetings%20Nov%202022..pdf?ver=1750883208506>

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## APPENDIX 6 – Reg 14 LIST OF CONSULTEES

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### ORGANISATION

- 1 Brighton & Hove Chamber of Commerce
- 2 VisitBrighton
- 3 Sussex Chamber of Commerce
- 4 SAFE
- 5 Brighton Society
- 6 Bluebird Society for the Disabled
- 7 Older People's Council
- 8 Ramblers East Sussex Countryside Officer
- 9 Amaze
- 10 Community Works
- 11 Brighton and Hove Speak Out
- 12 Ditch the Label
- 13 Gscene Magazine
- 14 rYico (Rwandan youth information community organisation)
- 15 The Carers Centre for Brighton and Hove
- 16 Badge Brighton & Hove
- 17 Possability People
- 18 Brighton & Hove Green Spaces Forum (Includes Coldean Woods Trust)
- 19 Brighton Area Buswatch
- 20 Sussex Ornithological Society
- 21 Sussex Gardens Trust
- 22 The Gardens Trust
- 23 Sussex Local Nature Partnership
- 24 Biosphere programme
- 25 Royal Society for the Protection of Birds
- 26 Network Rail
- 27 Stanmer Preservation Society
- 28 Sussex Wildlife Trust
- 29 CPRE B&H
- 30 Hove Station Neighbourhood Forum
- 31 Rottingdean Parish Council

- 32 Sussex Police Community Safety
- 33 Historic England
- 34 Mid Sussex DC
- 35 South East Local Enterprise Partnership
- 36 South Downs Society
- 37 Highways England
- 38 Network Rail
- 39 Sussex Police
- 40 East Sussex County Council
- 41 Office of Rail Regulation
- 42 English Heritage - SE Region
- 43 Sussex Partnership NHS Trust
- 44 Policy Planning Team Lewes District Council
- 45 Sport England
- 46 Brighton & Hove City Council
- 47 South Downs National Park Authority
- 48 Sussex Police
- 49 Sussex Community NHS
- 50 Fire Brigade
- 51 Natural England
- 52 Civil Aviation Authority
- 53 Environment Agency
- 54 Coast 2 Capital LEP
- 55 National Grid
- 56 The Big Six (Energy Suppliers)
- 57 Southern Water
- 58 Vodafone and O2
- 59 Scottish & Southern Energy
- 60 Southern Gas Networks
- 61 National Grid (c/o Avison Young)
- 62 BT openreach
- 63 Southern Water
- 64 Mobile Operators Association
- 65 EE Telecom

- 66 Scotia Gas Networks, Plant Protection Team
- 67 Development Services SWS Ltd, Atkins Ltd,
- 68 EDF Energy
- 70 Sussex University Community Liaison Team
- 71 Sussex University Students' Union
- 72 Brighton University Community Liaison Team
- 73 Brighton University Students' Union
- 74 Coldean Allotment Rep(Peter Beck). Brighton and Hove Allotment Society
- 75 Brighton & Lewes Beekeepers
- 76 Coldean Residents' Association
- 77 Coldean Community Organisation
- 78 Brighton Permaculture Trust
- 79 Friends of Coldean Woods
- 80 The Aquifer Partnership
- 81 Coldean Independents
- 82 Tobias J Sheard (BHCC Councillor)
- 83 Mitchie Alexander (BHCC Councillor)

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## **APPENDIX 7 - LIST OF FORUM COMMITTEE MEETINGS IN CHRONOLOGICAL ORDER**

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**CNPF Committee Meetings. All minutes can be found in full on the CNPF website.  
[www.cnpf.co.uk](http://www.cnpf.co.uk)**

### **2021**

30 July 2021  
9 August 2021  
20 September 2021  
8 November 2021  
12 November 2021  
13 December 2021

### **2022**

10 January 2022  
7 February 2022  
14 March 2022  
11 April 2022  
9 May 2022  
13 June 2022  
11 July 2022  
8 August 2022  
1 September 2022  
3 October 2022  
9 November 2022  
6 December 2022

### **2023**

16 January 2023  
7 February 2023  
7 March 2023  
19 April 2023  
26 April 2023  
8 June 2023  
6 July 2023

31 July 2023  
8 August 2023  
12 September 2023  
30 October 2023  
16 November 2023  
18 December 2023

## **2024**

9 January 2024  
2 February 2024  
22 February 2024  
29 March 2024  
21 May 2024  
9 July 2024  
7 August 2024  
18 November 2024  
9 December 2024

## **2025**

30 January 2025  
27 March 2025  
10 April 2025  
12 May 2025  
3 June 2025  
24 July 2025

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## **APPENDIX 8 - ANNUAL GENERAL MEETINGS (8th December 2022, 19th December 2023. 10 December 2024)**

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### **2022**

8 December 2022 - All AGM Minutes are available in full on the CNPF website

### **2023**

19 December 2023 - All AGM Minutes are available in full on the CNPF website

### **2024**

10 December 2024 - All AGM Minutes are available in full on the CNPF website

## APPENDIX 9 - FORUM CONSTITUTION, Amendments (September 2022, December 2022, December 2023)

### **Constitution**

#### **2021**

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/Signed%20Constitution%20of%20CNPF-1.pdf?ver=1725227921484>

#### **2022**

##### **September 2022 Amendment to Constitution**

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/September%202022%20Amednment%20to%20Constitution.pdf?ver=1725227921484>

#### **2023**

See also amendments in 2023 AGM minutes

[https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/2023-12-19%20\\_%20Draft%20CNPF%20%20AGM%20Minutes-%20amended.pdf?ver=1731061739869](https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/2023-12-19%20_%20Draft%20CNPF%20%20AGM%20Minutes-%20amended.pdf?ver=1731061739869)



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## APPENDIX 10 - PREVIOUS COLDEAN BIOLOGICAL SURVEY (January 2020)

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Biological survey and assessment of land at Varley Park, Coldean Lane by Graeme Lyons

<https://img1.wsimg.com/blobby/go/9c8b4f40-7ba4-447e-938e-a549eb6dbdb4/downloads/Biological%20survey%20and%20assessment%20of%20land%20at%20Va.pdf?ver=1725227921635>