

City Plan Part 2: Green Group Amendment (1)

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	
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Topic – Housing, Accommodation and Community – including policies DM1 – DM10

DM6	31	At the end of paragraph 2.49	N/A	INSERT THE TEXT IN BOLD ITALICS: <i>as well as accord with sustainable buildings standards (in accordance with City Plan Part 1 Policy CP8, and City Plan Part Two Policy DM44) and achieve a net gain in biodiversity (in accordance with City Plan Part One Policy CP10 and City Plan Part Two policy DM37).</i>	Sound		
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- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

City Plan Part 2: Green Group Amendments (1 - 2)

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	
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Topic Employment and Retail – including Policies DM11 – DM17							
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DM11	46	2.96	Bullet 8	INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS: Charging points and other infrastructure to support the use of <i>low zero exhaust</i> emission vehicles (see DM36)	Sound		
DM13	53	A)	Bullets	ADD TO LIST A) Important Local Parades: • <i>Preston Drove, Preston Park</i>	Sound		

- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

City Plan Part 2: Green Group Amendments (1 - 3)

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	
Topic Design and Heritage – including policies DM18 – DM32							
DM18	64	2.148	N/A	ADD AT THE END OF 2.148 THE TEXT IN BOLD ITALICS: <i>Criteria for assessing proposals for tall buildings, including cumulative impact will be set out in the Urban Design Framework SPD.</i>	Sound		
DM23	77	2 nd paragraph	At the end of the paragraph	ADD THE TEXT IN BOLD ITALICS: <i>Subtle artificial lighting can highlight architectural features but should be low impact and avoid wider light spill.</i>	Sound		
DM23	78	2.187	At the end of the paragraph	ADD THE TEXT IN BOLD ITALICS: <i>Light pollution should be avoided in accordance with policy DM40.</i>	Sound		

- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

City Plan Part 2: Green Group Amendments (1 - 10)

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	
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Topic Traffic and Transport – including policies DM33 – DM36

DM33	98	2	b)	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>where appropriate, <i>extend</i>, improve or contribute towards the city’s <i>existing</i> network of high quality, convenient and safe cycle routes.</p>	Sound		
DM35	104	1st paragraph	N/A	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>1) Transport Statements, Transport Assessments, Construction and Environmental Management Plans and Travel Plans <i>should be provided</i> <i>are required</i> to support planning applications for all developments that are likely to generate significant amounts of movement/travel in line with the NPPF or any subsequent national or locally derived standards and guidance.</p>	Sound		

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Topic Traffic and Transport – including policies DM33 – DM36

DM35	104	Criterion 2)	N/A	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p><i>3) 2) Major developments within AQMAs should be supported by a A</i> Transport Statement or Transport Assessment (as appropriate) <i>is also required for all major developments within AQMAs</i> so that the potential impact of traffic on air quality can be adequately considered within a separate Air Quality Assessment (AQA). <i>Where</i> Transport Statements or Transport Assessments <i>are required</i> for developments elsewhere, <i>as set out in criterion (1), should consider</i> traffic impacts within AQMAs <i>should be considered</i> to inform decisions about whether an AQA is required.</p>	Sound		
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Topic Traffic and Transport – including policies DM33 – DM36

DM36	107	Criterion 1	N/A	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>1) Where a development is likely to result in overspill car parking on-street, applicants will be required to submit information, including parking surveys, to demonstrate there is sufficient car parking capacity in the immediate vicinity of the site to support the extra demand created by the new development. Where this cannot be demonstrated the council may require the development, in whole or in part, to be 'permit free'.</p>	Sound		
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Topic Traffic and Transport – including policies DM33 – DM36

DM36	107	New criterion after 2)	N/A	<p>INSERT NEW CRITERION AFTER 2) AS SHOWN BELOW IN BOLD ITALICS:</p> <p><i>Car-free residential developments will be supported and encouraged subject to consideration of relevant factors as set out in SPD14 ‘Parking Standards for New Development’ (and any subsequent revisions).</i></p>	Sound		
DM36	108	After 2.267	New paragraph	<p>INSERT THE TEXT IN BOLD ITALICS AS A NEW PARAGRAPH AFTER 2.267:</p> <p><i>Car-free residential developments where no provision is made for general parking on site will generally be supported and encouraged, however regard should be had to the considerations set out in SPD14. These include the scale and type of development, accessibility to sustainable transport modes and capacity for on-street parking in the immediate vicinity of the site and in the surrounding area.</i></p>	Sound		

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Topic Traffic and Transport – including policies DM33 – DM36

DM36	108	2.268	Whole section	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>2.268 The council will also support the provision of infrastructure to support low and ultra-low emission vehicles (ULEVs – motor vehicles that emit extremely low levels of motor vehicle emissions compared to other vehicles) and plug-in vehicles (motor vehicles that can be recharged from an external source of electricity) zero exhaust emission vehicles including, for example, electric vehicle charging points. ULEVs Zero exhaust emission vehicles are expected to make an increasingly important contribution in significantly reducing greenhouse gas emissions and assisting the UK to comply with legal obligations regarding air quality.</p>	Sound		
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Topic Traffic and Transport – including policies DM33 – DM36

DM36	108	2.269	Whole section	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>2.269 A shift to <i>ULEVs zero exhaust emission</i> vehicles offers the potential to <i>improve air quality and</i> decarbonise road transport locally, thereby making a contribution towards reducing the UK’s greenhouse emissions, whilst still enabling mobility. These benefits will be maximised if the source of the power is also part of a grid-decarbonisation programme, or generated more sustainably. <i>Plug-in and ULEV Electric vehicle charging</i> infrastructure should be considered by both commercial and residential developers, looking at provision as part of the development and forward planning for future demand. Where appropriate, developments should also include passive provision to allow conversion at a later date.</p>	Sound		
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Topic Traffic and Transport – including policies DM33 – DM36

DM36 (Appendix 1 – Glossary of Terms)	195	Sustainable Transport Modes	Line 3	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, zero exhaust emission vehicles, car sharing and public transport.</p>	Sound		
DM36 (Appendix 1 – Glossary of Terms)	196	Add a new entry to the glossary	N/A	<p>ADD THE TEXT IN BOLD ITALICS AS A NEW TERM TO THE GLOSSARY:</p> <p>Zero exhaust emission vehicle: A vehicle with no harmful tailpipe emissions such as an electric or hydrogen-powered car.</p>	Sound		

- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

City Plan Part 2: Green Group Amendments (1 - 9)

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	
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Topic Environment and Energy – including policies DM37- DM46							
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DM37	113	Footnote 70		<p>ADD THE TEXT IN BOLD ITALICS:</p> <p><i>The “mitigation hierarchy” is set out in the Biodiversity – code of practice for Planning and Development and the British standard for Biodiversity management (BS42020) 2013. In essence it seeks avoidance of harm; then mitigation; then compensation alongside new benefits for wildlife.</i></p>	Sound		
DM37	115	2.280	After 3 rd sentence	<p>ADD THE TEXT IN BOLD ITALICS:</p> <p><i>Mitigation should be provided on site whenever possible. The LPA will only consider off-site compensation as a last resort where all on-site options have been fully explored. Avoidance, mitigation, compensatory and enhancement measures will be secured through planning conditions or planning obligations.</i></p>	Sound		

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Topic Environment and Energy – including policies DM37- DM46

DM40	124	2.306	Lines 1 - 3	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>This policy complements the AQAP by ensuring that <i>all</i> new developments <i>adhere to the NPPF guidance that developments should contribute towards national objectives for pollutants (paragraph 181 of the NPPF) including</i> in or near AQMAs or near sensitive receptors like the Royal Sussex County Hospital, assists in achieving its aim of improving air quality.</p>	Sound		
DM44	134	First Paragraph	At the beginning of the paragraph	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p><i>The council will encourage all development to improve energy efficiency and achieve greater reductions in CO2 emissions in order to contribute towards Brighton & Hove’s ambition to become a carbon neutral city by 2030.</i> The following standards of energy efficiency and energy performance will be required unless it can be demonstrated that doing so is not technically feasible and/or would make the scheme unviable:</p>	Sound		

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Topic Environment and Energy – including policies DM37- DM46

DM44	134	Final paragraph (or alternatively, add at the end of 2.344 on page 137)	Line 4	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p><i>Through preparation of the technical guidance the LPA will review and clarify what developers provide in the Energy Statement to ensure their robustness. For example, ensuring the statement will clearly set out how each element of the design will help to achieve carbon reductions.</i></p>	Sound		
DM44	137	2.344	Line 8	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>The council will consider setting up a carbon offset scheme in the future which could then be applied to the residual CO2 emissions to enable the development to achieve compliance, and to use any funds acquired through this mechanism for carbon saving projects and explore innovative retrofit options such as Energiesprong [footnote].</p>	Sound		

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Topic Environment and Energy – including policies DM37- DM46

DM44	137	New footnote	N/A	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p><i>[footnote] Energiesprong is a model developed in the Netherlands to provide state-of-the-art whole-house retrofits, initially in the social housing sector. These combine industrialised retrofit techniques, designed to obtain net zero energy consumption, with novel contractual structures for delivery and cost recovery.</i></p>	Sound		
DM44	138	2.350	At the beginning of the paragraph	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p><i>Given the council’s ambition to become a carbon neutral city by 2030, 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 across the city.</i></p>	Sound		

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Topic Environment and Energy – including policies DM37- DM46							
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DM44	138	New footnote	N/A	<p>INSERT THE TEXT IN BOLD ITALICS AS A NEW FOOTNOTE:</p> <p><i>[footnote] The Brighton & Hove Energy Study includes maps identifying opportunities for renewables and priority areas with enhanced potential for district heat networks. Nationally recognised certification for other building standards such as Passivhaus or AECB standards will be considered.</i></p>	Sound		
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- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

City Plan Part 2: Green Group Amendments (1 - 8)

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	
Section 3 Site Allocations – including policies SA7, SSA1 – SSA7, H1 – H3 and E1							
SA7	151	3.10	After 1 st sentence	ADD THE TEXT IN BOLD ITALICS: <i>Development proposals should protect and where possible enhance existing public rights of way and access in accordance with national policy and guidance [footnote]</i>	Sound		
SA7	151	Footnote	Add new footnote	ADD THE TEXT IN BOLD ITALICS: <i>[footnote] National Planning Policy Framework and Rights of Way Circular (1/09) subject to any updated policy guidance.</i>	Sound		
SSA1	152	a)	Line 2 - 3	ADD THE TEXT IN BOLD ITALICS: Achieve a high quality of design which preserves and where possible enhances the setting of the Grade II Listed Building and most significant non-designated heritage assets. A comprehensive Heritage Impact Assessment will be required;	Sound		

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Section 3 Site Allocations – including policies SA7, SSA1 – SSA7, H1 – H3 and E1

SSA1	152	c)	Line 1	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>Maintain and improve <i>upon publicly accessible the existing</i> amenity greenspace through an integrated landscape, open space and public realm network to include the provision of children’s play space and/or a multiuse sports facility;</p>	Sound		
H2	177	New criterion	N/A	<p>INSERT THE FOLLOWING TEXT IN BOLD ITALICS AS A NEW CRITERION:</p> <p><i>Provision is made for sustainable transport infrastructure improvements that provide and promote sustainable transport and improved safe pedestrian and cyclist access to and through the site to support the development.</i></p>	Sound		

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Section 3 Site Allocations – including policies SA7, SSA1 – SSA7, H1 – H3 and E1

H2	177	g)	N/A	<p>DELETE THE TEXT IN g) AND REPLACE IT WITH THE TEXT AS SHOWN BELOW IN BOLD ITALICS:</p> <p>g) Opportunities are considered to achieve high standards of energy efficiency and renewable energy provision <i>Given the council's ambition to become a carbon neutral city by 2030, development will be encouraged to achieve greater reductions in CO2 emissions through the use of passive design, fabric standards, energy efficiency measures and low and zero carbon technologies, in accordance with Policy DM44.</i></p>	Sound		
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Section 3 Site Allocations – including policies SA7, SSA1 – SSA7, H1 – H3 and E1

H2	184	New paragraph after 3.76	N/A	<p>INSERT A NEW PARAGRAPH AFTER PARAGRAPH 3.76, STATING THE TEXT IN BOLD ITALICS:</p> <p><i>Development proposals on urban fringe sites will be expected to protect and where possible enhance existing public rights of way, providing for clear and legible pedestrian routes which encourage the active and continuing use of use of public areas and access. All proposals should comply with national policy and guidance on rights of way [footnote].</i></p>	Sound		
H2	184	New footnote	N/A	<p>INSERT A NEW FOOTNOTE STATING THE TEXT IN BOLD ITALICS:</p> <p><i>[footnote] National Planning Policy Framework and Rights of Way Circular (1/09) subject to any updated policy guidance.</i></p>	Sound		

- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

Addendum – Unsound Amendments

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	GG Comment

Topic – Housing, Accommodation and Community – including policies DM1 – DM10							
DM6	31	New paragraph (after 2.49)	N/A	INSERT THE TEXT IN BOLD ITALICS: <i>The local planning authority will encourage build to rent developments to use environmentally sustainable materials where possible, in accordance with policies DM37 and DM44, and CP8 Sustainable Buildings</i>	Sound	Not a soundness issue, so cross-references could be added - although these would be standard requirements for all residential development.	Sound but rephrased as suggested by Planning Team. This row is obsolete. Updated amendment is further above in this table.
DM8	37	After g)	N/A	ADD NEW CRITERION h) AFTER g) AS SHOWN IN BOLD ITALICS: <i>h) measures to promote the use of community consultation, such as an assessment of community involvement, to ascertain</i>	Unsound – not justified.	Consultation on planning applications is addressed by requirements set out in the council’s Statement of Community Involvement. It is	As this amendment was found to be unsound by the Planning Team, it has been removed.

				<i>resident concerns and potential for community use of new development spaces</i>		not considered appropriate to add to policy.	
DM8	37	2.73	Line 7	<p>ADD AT THE END OF THE PARAGRAPH THE TEXT IN BOLD ITALICS:</p> <p><i>Where applicants submit proposals for the area north of the gyratory, on the Lewes Road 'academic corridor,' applicants will be encouraged to detail the cumulative effect of new development on the built environment, given the high quantity of PBSA proposals and existing dwellings; including measures referenced in policy DM18</i></p>	<p>Unsound – not justified in policy</p> <p>A reference could be included in the supporting text to DM18 re. further tall building guidance Urban Design Framework</p>	<p>Unsound – not justified in policy</p> <p>A reference could be included in the supporting text to DM18 re. further tall building guidance Urban Design Framework</p>	<p>As this amendment was found to be unsound by the Planning Team, it has been removed. Instead, wording has been added to DM18, 2.148 as suggested by the Planning Team.</p>
DM9	40	Paragraph 3	Line 4	<p>INSERT THE TEXT IN BOLD ITALICS AFTER THE LAST SENTENCE:</p> <p>Partial loss of floorspace through change of use will be supported where it can be clearly demonstrated that the operational need of the community use requires less</p>	<p>Duplication - not necessary in policy as requirement addressed in NPPF.</p>	<p>Where the building in question is, or forms part of, a designated or non-designated heritage asset the council would require the loss of any such building (wholly or in part)</p>	<p>As this amendment was found to be unsound by the Planning Team, it has been removed.</p>

				<p>floorspace or where continuation of the existing use would otherwise be unviable and can be sustained by cross-subsidy.</p> <p><i>Where the loss of community facilities are permitted under criteria set out in 2., planning conditions should include recording the functions and features, if built form cannot be maintained.</i></p>		<p>to be recorded in accordance with Historic England guidance. The policy basis for this is set out in paragraph 199 of the NPPF. This would apply to any heritage asset to be lost, irrespective of use, so does not need to be applied to specific uses.</p> <p>The level of recording required would vary depending on the building or use; for example a pub or community facility with a historic interior would require a higher level of recording.</p>	
DM9	40	Paragraph 3 1	New line	INSERT THE TEXT AS SHOWN IN BOLD ITALICS BELOW:	Not justified.	This would represent duplication of	As this amendment was found to be not justified by the

				<p><i>To ensure protection of community facilities such as music venues, that applicants engage with the ‘agent of change’ principle, as set out in policy area DM40. Prior to any potential loss of music venues, the Local Planning Authority will require applicants to demonstrate they have enacted the principles set out in ‘agent of change.’</i></p>		<p>requirements in Policy DM40 and its supporting text.</p> <p>However, signposting to this in the supporting text of DM9 / DM10 could be appropriate. The Conservatives have put forward an amendment to this effect re DM10.</p> <p>Protection of community facilities such as music venues is addressed in adopted policy CP5 as well as DM9.</p>	<p>Planning Team, it has been removed.</p>
DM10	44	2.93	N/A	<p>Following best practice of recording details of listed buildings, such as evidenced during planning permission of the Astoria Theatre, we recommend this practice of recording historic features is also</p>	Not justified	<p>See response above to DM8.</p>	<p>As this amendment was found to be not justified by the Planning Team, it has been removed.</p>

				<p>undertaken with regard to public houses.</p> <p>THEREFORE, INSERT THE TEXT IN BOLD ITALICS AFTER THE LAST SENTENCE:</p> <p><i>Where public house uses cannot be retained in their original buildings, the LPA will attach planning conditions to record historic details of the public houses for retention by the public libraries and the Keep.</i></p>			
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- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	GG Comment

Topic Employment and Retail – including Policies DM11 – DM17							
DM12	51	Table 3	N/A	Move Station Road/Boundary Road from 'District Centre,' to 'Town Centre,' Move High Street, Rottingdean from a 'Local Centre,' to a 'District Centre,' Add Preston Road, Brighton and George Street, Hove to 'Local Centres,'	Unsound – not justified	Not justified – retail hierarchy established through adopted Policy CP4. Change to hierarchy would require updated Retail Study to be undertaken as part of a review of CPP1	As this amendment was found to be unsound by the Planning Team, it has been removed.
DM13	53	A)	Bullets	ADD TO LIST a) Important Local Parades: <ul style="list-style-type: none"> • Saltdean Vale, Saltdean; • Hangleton Way, Hangleton; • Burwash Rd, Hangleton; • Graham Avenue, Mile Oak; • South Street, Portslade; • Mill Rise, Westdene; • Wilmington Parade, 	Unsound – not justified apart from Preston Drove, Preston Park	Not justified - not consistent with the approach taken in the assessment of suitability for inclusion as local centre. Does not meet identified criteria.	Not sound, apart from Preston Drove, Preston Park. Therefore, removed all areas from the list apart from Preston Drove, Preston Park.

				<p><i>Hollingbury;</i></p> <ul style="list-style-type: none"> <i>Carden Avenue/County Oak, Hollingbury;</i> <i>Carden Avenue (Adj Carden Crescent), Patcham;</i> <i>Preston Drive, Preston Park.</i> 		<p>Parades not listed as Important Local Parades are still protected by through Part B of policy DM13</p>	<p>This row is obsolete. See updated amendment further above in the table.</p>
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- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

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Topic Design and Heritage – including policies DM18 – DM32

DM26	84	2	After j)	<p>ADD:</p> <p><i>k) the quality and impact of artificial light expected from retail premises, in accordance with guidelines set out in policy area DM40</i></p>	<p>Sound. Light pollution is covered by DM40 but suggest that DM23 would be more appropriate policy to cover this specific point.</p> <p>The choice of internal lighting in shop units are not controlled by planning applications.</p>	<p>At end of second paragraph of policy CP23 add “<u>Subtle artificial lighting can highlight architectural features but should be low impact and avoid wider light spill</u>”.</p> <p>Add sentence at end of paragraph 2.187 to say “<u>Light pollution should be avoided in accordance with policy DM40</u>”.</p>	<p>Sound but rephrased & moved to DM23 as suggested by the Planning Team. This row is obsolete. Updated amendment is further above in this table.</p>
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- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

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Topic Traffic and Transport – including policies DM33 – DM36

DM33	98	2	b)	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>where appropriate possible, link to,-improve or otherwise contribute towards the extension of the city’s existing network of high quality, convenient and safe cycle routes; in order that residents are afforded easy access to the network;</p>	Partially sound.	<p>Suggested re – wording “where appropriate, extend, improve or contribute towards the city’s existing network of high quality, convenient and safe cycle routes”.</p> <p>Latter part can be added to supporting text as it is explanatory</p>	Partially sound. Reworded as suggested by the Planning Team to make this amendment sound. This row is obsolete. Updated amendment is further above in this table.
DM35	104	Point 2)	N/A	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p>	Unsound – not effective	Not considered appropriate to require all	Unsound. Updated as suggested by the

				<p><i>Major All developments within AQMAs should be supported by a Transport Statement or Transport Assessment (as appropriate) so that the potential impact of traffic on air quality can be adequately considered within a separate Air Quality Assessment (AQA). Transport Statements or Transport Assessments for developments elsewhere should consider traffic impacts within AQMAs to inform decisions about whether an AQA is required.</i></p>		<p>developments to provide this analysis due to the very minor or nil traffic impact resulting from many minor applications (e.g. residential extensions)</p>	<p>Planning & Transport Teams to make the amendment sound. This row is obsolete. Updated amendment is further above in this table.</p>
DM36	107	1	4	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>Provision of parking, including ‘blue badge’ holder and cycle parking, in new developments should follow the standards in SPD14 ‘Parking Standards for New Development’ (and any subsequent revisions) as set out in Appendix 2, <i>except where developments are in or adjacent to an AQMA in which case they are required to be ‘car-free’ (with the exception of blue-badge parking), and follow a menu of transport</i></p>	<p>Unsound – not effective.</p>	<p>It would not be appropriate to require all types of development to be car-free. The thrust of this amendment with regard to residential development is addressed in DM40 – see para. 2.307.</p> <p>The precise</p>	<p>As this amendment was found to be unsound by the Planning Team, it has been removed.</p>

				<i>plan options including the provision of good pedestrian connectivity and cycle parking.</i> In addition:		boundaries of AQMAs (e.g. to the kerbs of roads) would result in difficulties in defining 'adjacent'	
DM36	107	Points 1 & 2	N/A	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>1) Where a development is likely to result in overspill car parking on-street, applicants will be required to submit information, including parking surveys, to demonstrate there is sufficient car parking capacity in the immediate vicinity of the site to support the extra demand created by the new development. Where this cannot be demonstrated the council may require the development, in whole or in part, to be 'permit free'.</p> <p>2) New developments will be supported where they are substantially 'car-free'; where parking is included it should include infrastructure to support the use of zero-emission vehicles, including electric vehicle charging</p>	Partially sound.	<p>Part 1 amendment considered sound.</p> <p>Part 2 considered unsound as not effective due to the difficult in defining 'substantially' Suggest revising with a new criterion in Policy DM 36 "Car-free residential developments will be supported subject to consideration of relevant factors as set out in SPD14 'Parking Standards for New Development' (and</p>	Partially sound. A new criterion has been added to the main policy text and a new paragraph has been added after 2.267 as suggested by the Planning & Transport Teams to make the amendment sound. This row is obsolete. Updated amendment is further above in this table.

				points.		<p><i>any subsequent revisions)</i> Add new paragraph after existing 2.267 – <i>“Car-free residential developments where no provision is made for general parking on site will generally be supported, however regard should be had to the considerations set out in SPD14. These include the scale and type of development, accessibility to sustainable transport modes and capacity for on-street parking in the immediate vicinity of the site and in the surrounding area”</i></p>	
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DM36	108	2.268	Whole section	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>2.268 The council will also support the provision of infrastructure to support <i>low and ultra low emission vehicles (ULEVs – motor vehicles that emit extremely low levels of motor vehicle emissions compared to other vehicles) and plug-in vehicles (motor vehicles that can be recharged from an external source of electricity)</i> <i>zero exhaust emission vehicles including</i>, for example, electric vehicle charging points. <i>ULEVs zero exhaust emission vehicles</i> are expected to make an increasingly important contribution in reducing greenhouse gas emissions and assisting the UK to comply with legal obligations regarding air quality.</p>	Sound.	<p>The infrastructure required to support zero exhaust vehicles is understood to be the same as for ULEVs so in effect there is no change to the policy requirements.</p> <p>Suggest also adding ‘significantly’ before ‘reducing greenhouse gas emissions’</p>	<p>Sound but updated as suggested by the Planning Team. This row is obsolete. Updated amendment is further above in this table.</p>
DM36	108	2.269	Whole section	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>2.269 A shift to <i>ULEVs zero exhaust emission</i> <i>vehicles</i> offers the potential to <i>improve air quality</i></p>	Sound.	<p>Suggest also removing ‘Plug-in and’</p>	<p>Sound but updated as suggested by the Planning Team. This row is obsolete. Updated</p>

				<p>and decarbonise road transport locally, thereby making a contribution towards reducing the UK’s greenhouse emissions. These benefits will be maximised if the source of the power is also part of a grid-decarbonisation programme, or generated sustainably. Plug-in and <i>ULEV Electric vehicle charging</i> infrastructure should be considered by both commercial and residential developers, looking at provision as part of the development and forward planning for future demand. Where appropriate, developments should also include passive provision to allow conversion at a later date.</p>			<p>amendment is further above in this table.</p>
DM36 (Appendix 1 – Glossary of Terms)	195	Sustainable Transport Modes	Line 3	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, <i>low and ultra-low emission vehicles zero exhaust emission vehicles</i>, car sharing and public transport.</p>	Unsound	<p>Implies that low and ultra low emission vehicles do not have a overall low impact on the environment</p>	<p>Unsound. Updated as suggested by the Planning Team to make the amendment sound. This row is obsolete. Updated amendment is further above in this table.</p>

- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	

Topic Environment and Energy – including policies DM37- DM46							
DM37	110	Paragr. 1	N/A	<p>INSERT THE TEXT IN BOLD ITALICS AT THE END OF THE PARAGRAPH:</p> <p><i>The LPA will attach planning conditions for site-specific nature improvements and enhancement, requiring applicants to submit site-specific nature enhancements; and the LPA will proactively discourage offsite mitigation.</i></p>	Part Unsound – suggest some supporting text	<p>The use of the proposed wording is not consistent with the established mitigation hierarchy reflected in the last paragraph of the policy and referred to in the supporting text at 2.280.</p> <p>The overarching aims of ecological work used to inform the planning process are to minimise harm and to maximise benefits for biodiversity resulting from development. There is an established ‘mitigation hierarchy’ set out in the Biodiversity code of practice for Planning and Development. This is explained in BS42020:2013 as: <i>which seeks as a preference to avoid impacts then to mitigate unavoidable impacts, and, as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and</i></p>	<p>As this amendment was found to be unsound by the Planning Team, it has been removed. Instead, wording has been added to the supporting text, paragraph 2.280 & respective footnote created as suggested by the Planning</p>

					<p><i>mitigation measures.</i></p> <p>With respect to compensation it states: <i>The extent of compensatory measures, whether on the development site, off site or a combination of both, should take full account of the extent and quality of the asset being lost or degraded, and the risks associated with the creation of new habitats or the restoration of new ones. Wherever possible, compensatory measures should be timed so that biodiversity losses do not occur until compensatory measures are in place and likely to establish successfully.</i></p> <p>Suggest add after 3rd sentence of paragraph 2.280:</p> <p><u>Mitigation should be provided on site whenever possible. The LPA will only consider off-site compensation as a last resort where all on-site options have been fully explored. Avoidance, mitigation, compensatory and enhancement measures will be</u></p>	<p>Team. This row is obsolete. Updated amendment is further above in this table.</p>
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						<p><u>secured through planning conditions or planning obligations.</u></p> <p>Please note: the text of footnote 70 is missing in error: re-insert: <u>The “mitigation hierarchy” is set out in the Biodiversity – code of practice for Planning and Development and the British standard for Biodiversity management (BS42020) 2013. In essence it seeks avoidance of harm; then mitigation; then compensation alongside new benefits for wildlife.</u></p>	
DM37	112	C. Locally protected sites	Line 1	<p>DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p><i>Unless allocated for development in the City Plan,</i> development proposal that will result in an adverse effect on the integrity of any local site which cannot be either avoided or adequately</p>	Unsound	<p>Not positive planning; contrary to NPPF and adopted City Plan Part One, Policy SA4.</p> <p>Policy SA4 Urban Fringe states that: ‘Development within the urban fringe will not be permitted except where: a) a site has been allocated for development in a development plan.’</p> <p>The Urban Fringe 2014 and Further Assessments 2015 provide evidence of</p>	As this amendment was found to be unsound by the Planning Team, it has been removed.

				mitigated will not be permitted, unless:		the suitability of urban fringe sites for housing and in relation to those sites that are within or adjacent to locally protected sites (LNRs, LWS) the 2015 Further Assessments indicate that appropriate and robust mitigation and enhancement measures can be achieved.	
DM37	115	2.280	Lines 11 - 13	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>This includes a need to undertake a full life cycle analyses of developments including <i>embedded carbon footprint, taking into consideration</i> the impact of construction and materials over the long-term).</p>	Unsound	<p>Not effective/ justified - introducing a new policy requirement through the supporting text which has not been subject to earlier consultation or assessment. This would be a matter for the review of CPP1.</p> <p>It is accepted that the existing reference to full life cycle analyses in the supporting text is not clear, it does not reflect wording in the British Code of Practice/ BS and is a matter that is usually addresses in policies relating to reducing carbon emissions (ie Policy CP8).</p> <p>Elements of reducing embodied carbon footprint of development are covered by adopted CPP1</p>	As this amendment was found to be unsound by the Planning Team, it has been removed.

						<p>Policy CP8 bullet points f)... reuses existing buildings; i) uses materials that are sustainable and have low embodied carbon; k) minimises waste and facilitates recycling, composting and re-use.</p> <p>Further consideration would need to be given to this issue in the CPP1 review as we would need to consider whether all developments would be covered by a requirement (The new London Plan only requires larger referable applications) and the assessment would need to follow a nationally recognised Whole Life-Cycle Carbon Assessment methodology and there would need to be clarification of the council's expectations re actions we would expect to be taken to reduce life-cycle carbon emissions.</p>	
DM40	124	2.306	Lines 1 - 3	INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:	Sound - suggest some re-wording.	<p>Suggest for clarity:</p> <p>This policy complements the AQAP by ensuring that all new developments in or near adhere</p>	Is sound but reworded as suggested by the Planning

				<p>This policy complements the AQAP by ensuring that all new developments <i>in or near</i> <i>adhere to the NPPF guidance that developments should contribute towards national objectives for pollutants (para 181 of the NPPF) including</i> AQMAs or near sensitive receptors like the RSCH, assists in achieving its aim of improving air quality.</p>		<p><i>to the NPPF guidance that developments should contribute towards national objectives for pollutants (para 181 of the NPPF) including in or near</i> AQMAs or near sensitive receptors like the RSCH, assists in achieving its aim of improving air quality.</p>	<p>Team. This row is obsolete. Updated amendment is further above in this table.</p>
DM44	134	Paragraph 1	Point 1	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>All development including conversions and change of use of existing buildings to achieve at least 19% improvement on the carbon emission targets set by Part L unless superseded by national policy or legislation; <i>should</i></p>	<p>Sound – Suggest for clarity the wording change should be included within part 3 and suggest alternative wording?</p>	<p>3. <u>Given the council’s ambition to become a carbon neutral city by 2030, opportunities for new development</u> 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 <u>encouraged across the city and in particular,</u> in the following areas:…’</p>	<p>Is sound but reworded as suggested by the Planning Team. This row is obsolete. Updated amendment is further above in this table.</p>

				<i>recognise the council's target of carbon-neutral by 2030, and that opportunities for development to achieve greater reductions than 19% in CO2 will be actively encouraged, including measures in point 2 and 3 below;</i>			
DM44	134	Point 3	Lines 1 - 4	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>Opportunities for new development to achieve greater reductions in CO2 emissions through the use of passive design, fabric standards, energy efficiency measures, <i>working with existing or developing renewable energy infrastructure for and</i> low and zero carbon technologies,</p>	Not clear/duplication.	<p>Would advise that specific examples, which are easily superseded by future technological or regulatory developments are not included in the policy.</p> <p>The matters of district heating and alternative standards are covered in the supporting text to adopted CPP1 policy CP8 Sustainable Buildings at paragraphs: 4.83 – 4.84 and footnote 199.</p> <p>Suggest for consistency that the first sentence of supporting text at 2.350 could be amended to</p>	Reworded as suggested by the Planning Team. This row is obsolete. Updated amendment is further above in this table.

				<p><i>such as district heat, passivhaus, energiewerke (in accordance with policy DM45), opportunities,</i> will be encouraged in the following areas:</p>		<p>include wording shown in red to the left and that a similar footnote is included in CPP2:</p> <p>2.350 <u>Given the council’s ambition to become a carbon neutral city by 2030, 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 across the city.</u> There are certain locations within the city that offer greater potential for the installation of low and zero carbon technologies (LZCs). In these locations developers are encouraged to assess the potential to deliver higher CO2 savings through greater passive design, fabric and energy efficiency measures and LZC technologies [insert new footnote1]. These areas are identified as ‘Low Carbon Opportunity Zones’:</p> <p>1 insert new footnote: <u>The</u></p>	
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					<p><u>Brighton & Hove Energy Study includes maps identifying opportunities for renewables and priority areas with enhanced potential for district heat networks. Nationally recognised certification for other building standards such as Passivhaus or AECB standards will be considered.</u></p> <p>It is understood that Energiesprong in the UK is currently working with the social housing sector in order to create sufficient volume to develop the first solutions in the UK. A housing company finances an Energiesprong retrofit (or new build) by combining savings on energy cost from tenants and on repairs and maintenance. The issues with this approach have been considered by GLA https://carbonneutralcities.org/wp-content/uploads/2018/05/1-London-Energiesprong-Transferability-Assessment.pdf</p> <p>Therefore, suggest reference</p>	
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						would be better included with proposed amendment to 2.344 (see below).	
DM44	134	Final paragraph (or alternatively, add at the end of 2.344 on page 137)	Line 4	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p><i>The council will progress a Carbon Neutral Supplementary Planning Document to expand on a range of actions developers can consider/incorporate into development plans, to reduce their carbon impact (covering building materials, design and orientation, natural ventilation, landscaping and off-setting). This may include the requirement of a carbon statement to be submitted as part of the Development Management process.</i></p>	Covered by the requirement in the policy for applicants to submit Energy Statements. Further guidance will be provided in technical guidance or in the UDF SPD.	<p>SPDs cannot take a stricter approach than policy or introduce new policy. Given the fast pace of change in this area preparing technical guidance may more appropriate.</p> <p>Both adopted Policy CP8 and DM44 (see paragraphs 2.357-2.359) indicate that technical guidance will be produced to clarify what is required of Energy Statements.</p> <p>The Energy Statements that are required of applicants at present should demonstrate how the development will achieve the 19% CO2 reduction through improvements in building fabric, design and energy systems, plus things like type of lighting, cycle parking, reduced car parking. So essentially, Energy Statements should already be doing the job of telling us about carbon</p>	Reworded following a discussion with the Planning Team. This row is obsolete. Updated amendment is further above in this table.

						<p>reductions and therefore a separate carbon statement is not required.</p> <p>Through preparation of the technical guidance we can review and clarify what we ask developers to provide in the Energy Statement to ensure their robustness. For example ensuring the statement clearly sets out how each element of the design will help to achieve carbon reductions.</p> <p>Some of the issues referred to: covering building materials, design and orientation, natural ventilation, landscaping will be covered in the UDF SPD.</p>	
DM44	134	Point 3	After c)	<p>INSERT NEW AREA d) AFTER c) AS SHOWN IN BOLD ITALICS BELOW:</p> <p><i>d) to cover all areas identified in CPP2, so that all areas of the plan are considered 'low carbon opportunity zones'</i></p>		<p>See suggested amendment to part 3 of policy DM44 above.</p>	<p>As this amendment was found to be unsound by the Planning Team, it has been removed.</p>

DM44	137	2.344	Line 8	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>The council will consider setting up a carbon offset scheme in the future which could then be applied to the residual CO2 emissions to enable the development to achieve compliance, <i>and to use any funds acquired through this mechanism for carbon saving projects.</i></p>	sound	<p>Suggest add to end of proposed sentence ‘...<u>and explore innovative retrofit options such as Energiesprong</u>’ [insert new footnote to explain]</p> <p>[New footnote: <u>Energiesprong is a model developed in the Netherlands to provide state-of-the-art whole-house retrofits, initially in the social housing sector. These combine industrialised retrofit techniques, designed to obtain net zero energy consumption, with novel contractual structures for delivery and cost recovery.</u>]</p>	<p>Is sound but reworded as suggested by the Planning Team. This row is obsolete. Updated amendment is further above in this table.</p>
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- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation

Policy Number	Page Number	Paragraph number	Part of policy or Line(s)	Amendment proposed (revised text)	Evaluation*	Reason**	GG Comment

Section 3 Site Allocations – including policies SA7, SSA1 – SSA7, H1 – H3 and E1							
SA7	149	First bullet point on page 149	Lines 1 - 4	<p>INSERT THE TEXT IN BOLD ITALICS:</p> <p>Improved public access through the site and to the wider natural environment through the provision and improvements of safe pedestrian and cyclist access, including the north/south linear footpath/cycleway on the eastern side of Benfield Valley and existing rights of ways; <i>and that the LPA upholds the DEFRA Guidance on Rights of Way, (paragraph 7.11) and that planning permission does not entitle developers to obstruct a public right of way.</i></p>	Unnecessary - Not appropriate to include this in policy as duplicates NPPF/Circular 1/09. Suggest adding new sentence to supporting text to cover this point referencing the national policy guidance.	<p>Insert new sentence after first sentence of Para 3.10 stating: <i>“Development proposals should protect and where possible enhance existing public rights of way and access in accordance with national policy and guidance <footnote>”.</i></p> <p>Insert new footnote stating: <i>“National Planning Policy Framework and Rights of Way Circular (1/09) subject to any</i></p>	Removed and instead new sentence added to paragraph 3.10 & as well as a respective footnote, as suggested by the Planning Team.

						<i>updated policy guidance.”</i>	
SSA1	152	a)	Line 2 - 3	<p>DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS: (suggested)</p> <p>Achieve a high quality of design which preserves and where possible enhances the setting of the Grade II Listed Building <i>and non-designated heritage assets</i>. A comprehensive Heritage Impact Assessment will be required;</p>	Unsound as proposed	<p>Not justified to remove in entirety given the significance of the site is considered to lie to a large degree in the group value of the site as a surviving complex of Victorian workhouse buildings, each with their own specific function and including the ancillary structures that supported the principal buildings.</p> <p>Suggest ‘...<u>most significant non designated heritage assets...</u>’</p>	Unsound. Updated as suggested by the Planning Team to make the amendment sound. This row is obsolete. Updated amendment is further above in this table.
SSA1	152	c)	Line 1	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p><i>Maintain and improve the</i></p>	Unsound as proposed	Unclear wording – suggest ‘maintain and improve <u>upon...</u> <u>publicly accessible...</u>	Unsound. Updated as suggested by the Planning Team to make the

				<p>existing Develop public amenity greenspace through an integrated landscape, open space and public realm network to include the provision of children’s playspace and/or a multiuse sports facility;</p>			<p>amendment sound. This row is obsolete. Updated amendment is further above in this table.</p>
SSA1	152	Second bullet	N/A	<p>INSERT THE TEXT IN BOLD ITALICS & DELETE THE STRUCK THROUGH TEXT IN BOLD ITALICS:</p> <p>a minimum of 200 300 residential units (Use class C3); and</p>	unsound	<p>Not justified.</p> <p>The proposed indicative site capacity is a minimum figure. Having reviewed the evidence and arguments put forward in the representations, the Council is not persuaded that a higher housing number should be indicated without making detailed investigations in terms of impact on landscape, historic environment and open space. The</p>	<p>As this amendment was found to be unsound by the Planning Team, it has been removed.</p>

						indicative site capacity in the Plan takes account of the number of buildings with heritage significance on the site which the policy seeks to retain; their conversion potential, and space requirement for up to 12,000 sq m of health and care facility on site.	
H2	177	Before a)	N/A	<p>INSERT NEW CRITERION a) AND RENAME THE FOLLOWING POINTS (e.g. b becomes c etc.):</p> <p>a) Genuinely affordable homes</p>	Unsound	<p>Not Justified, Effective or Consistent with national policy and Not consistent with CPP1.</p> <p>A requirement for 100% affordable housing is not consistent with Policy CP20 in the adopted CPP1 or with the NPPF. The NPPF requires that planning policies are</p>	As this amendment was found to be unsound by the Planning Team, it has been removed.

						<p>deliverable and that site allocations and affordable housing policies take account of viability considerations. The national planning practice guidance (PPG) specifically states that <i>“Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”</i></p> <p>Many of the urban fringe sites are not owned by the council so will not come forward unless development</p>	
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						<p>is viable for landowners and developers. A requirement for 100% AH would therefore be unsound for several reasons - Not justified (in terms of evidence), Not effective (i.e deliverable) and Not consistent with the NPPF.</p> <p>In addition, the proposed wording is unclear – “genuinely affordable” would need to be more clearly defined (see for example Policy DM6).</p>	
H2	177	New criterion after d) and before e)	N/A	<p>INSERT NEW CRITERION AFTER d) and BEFORE e) AND RENAME THE FOLLOWING CRITERIA ACCORDINGLY:</p> <p><i>Retain public rights of way</i></p>	<p>Unnecessary - Not appropriate to include this in policy as it duplicates NPPF/Circular 1/09. Suggest</p>	<p>Insert new paragraph after 3.76 stating: <i>“Development proposals on urban fringe sites will be expected to protect</i></p>	<p>Removed and new paragraph inserted instead, as well as respective footnote as suggested by</p>

				<p><i>containing clear and legible pedestrian routes which encourage the active and continual use of public areas in compliance with paragraph 69 of the NPPF and 7.11 of the DEFRA guidance on rights of way.</i></p>	<p>adding new sentence to supporting text to cover this point referencing the national policy guidance.</p>	<p><i>and where possible enhance existing public rights of way, providing for clear and legible pedestrian routes which encourage the active and continuing use of use of public areas and access. All proposals should comply with national policy and guidance on rights of way <footnote>”.</i></p> <p>Insert new footnote stating: “<i>National Planning Policy Framework and Rights of Way Circular (1/09) subject to any updated policy guidance.</i>”</p>	<p>the Planning Team.</p>
H2	177	e)	At the end of e)	<p>INSERT THE FOLLOWING TEXT IN BOLD ITALICS AT THE END OF e):</p>	<p>Agree a policy reference to sustainable modes of</p>	<p>Add further criterion to policy stating: <u>“Provision is made for sustainable</u></p>	<p>Removed and new criterion added instead, as suggested</p>

				<p>e) Improved linkages and access to the South Downs National Park and surrounding areas are secured where feasible; <i>Use of private vehicles will be kept to a minimum and sustainable modes of transport are designed into proposals.</i></p>	<p>transport would be useful. Suggest this should tie in with similar wording included in the SSA policies. Policy also needs to conform with CP9 and adopted parking standards.</p>	<p><u>transport infrastructure improvements that provide and promote sustainable transport and improved safe pedestrian and cyclist access to and through the site to support the development.</u>”</p>	<p>by the Planning Team.</p>
H2	177	g)	N/A	<p>DELETE THE EXISTING TEXT IN g) AND REPLACE IT WITH THE TEXT AS SHOWN BELOW IN BOLD ITALICS:</p> <p>g) <i>Opportunities are considered to achieve high standards of energy efficiency and renewable energy provision in accordance with Policy DM44. The highest standards of energy efficiency and carbon neutral energy such as BREEAM Outstanding and</i></p>	<p>Unsound</p>	<p>Not consistent with adopted CPP1. BREEAM outstanding goes beyond the standards set for new build residential in CPP1 Policy CP8 for residential new build.</p> <p>Suggest:</p> <p>g) <i><u>Given the council’s ambition to become a carbon neutral city</u></i></p>	<p>Rephrased as suggested by the Planning Team to make this amendment sound. This row is obsolete. Updated amendment is further above in this table.</p>

				<i>Passivhaus provision will be pursued, helping to mitigate or adapt to climate change and reduce greenhouse gas emissions, in accordance with policy DM44.</i>		<u><i>by 2030, development will be encouraged to achieve greater reductions in CO2 emissions through the use of passive design, fabric standards, energy efficiency measures and low and zero carbon technologies in accordance with Opportunities are considered to achieve high standards of energy efficiency and renewable energy provision in accordance with Policy DM44.</i></u>	
H2	177	After “plots will be encouraged”	N/A	INSERT THE TEXT IN BOLD ITALICS AFTER “plots will be encouraged” <i>Development should be intensified at many large</i>	Unsound (for those sites not already allocated)	Not effective as we have no evidence that some of the sites listed are available or deliverable.	As this amendment was found to be unsound by the Planning Team, it has

				<p><i>brownfield sites including: above M&S on Western Rd and over the storage area; above the NCP car park between King Place and Church St. The reconfiguration of land at the corner of Spring Gardens and Church Street, the sorting office and at the BHCC car park at Theobald House could glean more brownfield housing sites.</i></p>		<p>The land at the corner of Spring Gardens & Church St and the North St Sorting Office are already allocated as mixed use sites in Policy H1.</p> <p>None of the other suggested sites has been promoted to us or identified through the SHLAA. Therefore we have no evidence that they are available or deliverable at this stage, so to allocate them would not be Effective in terms of the soundness test.</p> <p>There are several policies in CPP1 and CPP2 which support and encourage more effective use of</p>	<p>been removed.</p>
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						brownfield sites including CP1, CP14 and DM19. Therefore proposals for redevelopment/intensification of the suggested sites could potentially come forward in future as windfall development.	
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- Evaluation including Soundness, Legal, Financial implications ** Reason – explanatory text to officer evaluation