



**Sussex**  
Wildlife Trust

Contact: Jess Price  
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Date: 29 October 20

**By email only**  
[planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

## Brighton & Hove City Council's Development Plan April 2020 - Proposed Submission City Plan Part Two

The Sussex Wildlife Trust recognises the importance of a plan led system as opposed to a developer led process and supports Brighton & Hove City Council's (BHCC) desire to produce part 2 of their City Plan. We hope that our comments to this Regulation 19 consultation are used constructively to make certain that the plan properly plans for the natural capital needed within the city and ensures that any development is truly sustainable.

Please find attached our response within BHCC's word document response form. We have made comments in the following sections:

Section A – Your details

Section C – Representations on policies DM1 – DM46, SA7, SSA1 to SSA7

- DM22 – support
- DM32 – support
- DM37 – objection
- DM38 – objection
- DM39 – support
- DM40 – support
- DM42 – support
- Special Area SA7 – objection
- SSA1 – objection

Section D – H1 Housing Sites and Mixed Use Sites – Objection

Section E – H2 Housing Sites – Urban Fringe – Objection

We have also included an Appendix – Appendix A.

The Sussex Wildlife Trust wishes to participate in any examination hearings sessions relevant to any sections of the City Plan Part Two that we have submitted objections to. We wish to discuss our objections formally with the Inspector and respond to any additional evidence presented by other respondents.

Yours sincerely

Jess Price  
Conservation Officer  
Sussex Wildlife Trust

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## **City Plan Part Two - Proposed Submission Response Form (7 September – 30 October 2020)**

### **Please Note**

Policies in the Proposed Submission City Plan Part Two were agreed at Full Council on 23 April 2020. The Government announced amendments to the use classes in the Town and Country Planning (Use Classes) Order 1987 (as amended) on 21<sup>st</sup> July 2020 to come into effect on 1<sup>st</sup> September 2020.

The council notes that the changes to the use classes will require changes to be made in particular to Policies DM9, DM12, DM13, DM14 and DM15 of the City Plan Part Two to ensure the Plan is consistent with the changes to the Use Classes Order and effective.

It is proposed that the changes required will be dealt with through a separate focused public consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Further consideration will be given to the most appropriate time to carry out the focused consultation.

### **Section A - Your Details**

#### **Name (Required)**

Jess Price

#### **What is your address?**

Sussex Wildlife Trust, Woods Mill, Henfield, BN5 9SD

#### **What is your email address? (Required)**

Swtconservation@sussexwt.org.uk

**If you are responding on behalf of an organisation/individual, please provide the name of that organisation or individual below.**

Sussex Wildlife Trust

**Please let us know if you would like to be notified of any of the following:**

	<b>Yes</b>	<b>No</b>
The City Plan Part Two has been submitted for independent examination	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The publication of the recommendations of the Inspector who carries out independent examination of the City Plan Part Two	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The adoption of the City Plan Part Two	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Due to the process of having an Independent Examination, any information and/or responses made are not confidential. This means we need your name, or organisation name, so that the comments can be made available for the public inspection.

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Once your comments have been logged, all names, company names and associated comments submitted as part of the formal consultation process will be made available to view in due course on the BHCC website. BHCC will not share or publish postcodes or email addresses. BHCC will however have to pass on all contact details to the Planning Inspectorate (PINS). Details of the PINS privacy policy can be seen here.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810383/Privacy\\_Statement - ROW V2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810383/Privacy_Statement_-_ROW_V2.pdf)

**Please tick to reinforce that you have read this disclaimer and have read the PINS Privacy Notice**

**Please Tick (Required)**

**Yes**

**Your Representation**

Please fill in the relevant sections for your representation(s).

Section C should be completed for policies DM1 to DM46, SA7, and SSA1 to SSA7. If you want to comment on more than one of these policies, please copy and paste section C) for each policy

Sections D to G should be completed for policies H1, H2, H3 and E1. Please only fill out sections D-G) once.

Section H should be completed for supporting documents. Please only fill out section H once.

**Section C Representations on policies DM1 – DM46, SA7, SSA1 to SSA7**

**Policy Number (DM1 to SSA7)**

Please use separate sheets for each policy that you wish to comment on

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DM22

**Policy Title** e.g. Housing and Accommodation

Landscape design and trees

**1. Do you consider this policy is:** (tick as appropriate)

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not:** (tick as appropriate)

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust strongly supports policy DM22 and in particular criterion a. We are pleased to see that BHCC has incorporated our suggested wording from the regulation 18 consultation and feel that this policy now better reflects the requirements and opportunities set out in NPPF paragraph 170.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

N/A

**Policy Number** (DM1 to SSA7)

Please use separate sheets for each policy that you wish to comment on

DM32

**Policy Title** e.g. Housing and Accommodation

The Royal Pavilion Estate

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**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust is pleased to see that our suggested amendments from the regulation 18 consultation have been included in the new version of the policy. We strongly support the inclusion of the requirement to seek net gains to biodiversity within the policy and agree that this is consistent with national policy.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

N/A

**Policy Number (DM1 to SSA7)**

Please use separate sheets for each policy that you wish to comment on

DM37

**Policy Title e.g. Housing and Accommodation**

Green Infrastructure and Nature  
Conservation

**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust (SWT) supports the inclusion of policy DM37 in the City Plan Part 2 (CPP2) and recognise that the policy has been improved since the version presented in the regulation 18 consultation, in particular in relation to the requirement for net biodiversity gains.

However, SWT is very concerned about the addition of ‘unless allocated for development in the City Plan’ in part C of the policy and objects to this.

NPPF paragraph 171 states that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. Additionally, NPPF paragraph 174 is clear that plans should safeguard components of local wildlife-rich habitats including locally designated sites of importance for biodiversity. Further to this, National Planning Practice Guidance states:

*‘National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.’* (Paragraph: 013 Reference ID: 8-013-20190721)

We do not believe this policy is compliant with national policy as it does not safeguard the Local Wildlife Sites and Local Nature Reserve that are also allocated for housing in policies H1 and H2.

SWT does not believe that the exclusion of allocated locally designated sites within the requirements under part C of the policy is consistent with the rest of policy DM37. Namely that all development provides net gains to biodiversity, or policy H2(d) which requires that ‘development will mitigate any adverse impacts on designated sites’. It is also not compliant with part 5d of policy SA4 Urban Fringe from the City Plan Part 1 which states that development should only be permitted on the urban fringe if ‘any adverse impacts of development are minimised and appropriately mitigated and/or compensated for’.

One of the aims of the UFAS as stated in the Invitation to Tender was to provide a more detailed landscape and ecology assessment of the Study Areas to assist in determining: ‘Whether the mitigation identified is likely to be sufficient and/or feasible; whether

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additional or alternative site specific mitigation is likely to be required; and/or whether mitigation is not likely to overcome the adverse impacts identified.'

As it stands, the first line of part C of policy DM37 only provides confusion as it contradicts so many other policies in the development plan. Removing this line will not prevent development on allocated sites that are also locally designated sites. However, it will make clear that applicants must demonstrate that any adverse impacts on the designated site are avoided through good design with residual impacts mitigated for in line with the mitigation hierarchy. This is already what is required by policy H2.

By removing this line, it allows BHCC to refuse an application which has clearly disregarded adverse impact. It would create consistency with the rest of the plan.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

In order to make this policy both compliant with the NPPF and internally consistent with the rest of policy DM37 and policy H2 '*Unless allocated for development in the City Plan*' should be deleted from part C. Locally Protected Sites.

**5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)**

	Tick
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in the hearing session(s)	<input checked="" type="checkbox"/>

**6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.**

The Sussex Wildlife Trust wishes to attend the examination hearings so that we can discuss our objections formally with the Inspector and respond to any additional evidence presented by other respondents.

**Policy Number (DM1 to SSA7)**

Please use separate sheets for each policy that you wish to comment on

DM38

**Policy Title e.g. Housing and Accommodation**

Local Green Space

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**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust (SWT) supports the inclusion of policy DM38 and the allocation of Hollingbury Park, Three Cornered Copse, Ladies’ Mile and Benfield Valley as Local Green Spaces (LGS). We also acknowledge that the policy has been strengthened since the regulation 18 consultation to better reflect the requirements of Chapter 8 of the NPPF.

The Local Green Space Topic paper explains that these four sites were identified as suitable for LGS designation in the 2014 Urban Fringe Assessment (UFA). Further to this, other sites were considered, but only if put forward by organisations/local residents during the local plan consultations in 2016 and 2018. We now believe that Whitehawk Hill should be designated as a LGS and that the policy is not sound without this.

Whitehawk Hill LNR meets the criteria set out in paragraph 100 of the NPPF and highlighted in paragraphs 2.290 and 2.293 of the proposed submission plan (please see our submission to question 3 for policy H2). Like the four suggested LGS, Whitehawk Hill is clearly also a ‘green wedge’ into the urban area. The council also clearly has no objection to designating Local Nature Reserves (LNR) where evidence justifies this, as LGS as both Ladies’ Mile and Hollingbury Park are LNRs.

The council acknowledges in the topic paper (paragraph 4.2) that LGS designation implies a greater level of protection than general open spaces policy. In particular, that LGS designations should be capable of enduring in the long term (beyond the end of the plan period). SWT is very concerned that the allocation of a development site on Whitehawk Hill LNR (policy H2) will open the gates to further development as the council continue to fail to meet the unachievable housing targets required by the NPPF standard method. Whilst SWT does not believe any development should occur on the LNR, if the H2 allocation does go forward, it is paramount that there is not a shift to the continuous

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'nibbling away' of the LNR. SWT feel strongly that a LGS designation would allow the site to be protected in the long term for the benefit of both biodiversity and local residents.

As it stands we do not believe the exclusion of Whitehawk Hill as a LGS is justified as it is not clear what evidence was used in the 2014 UFA to identify potential sites. The topic paper (section 6.11) states that the UFA involved a comprehensive assessment of all sites within the city's urban fringe, however the Schedule of Sites in Appendix 3 and the site proformas in Appendix 4 of the UFA do not mention the LGS designation. The main UFA text states that four sites have been identified, but not why they were selected or why others were ruled out. Not protecting the LNR from further development is also not consistent with paragraph 174 of the NPPF.

BHCCs own documentation demonstrates that they acknowledge the LNR contains one of Europe's rarest and most spectacular habitats – ancient chalk grassland and Whitehawk Camp – one of Britain's most significant earthwork structures. This indicates both richness to wildlife and local significance.

[https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/downloads/cityparks/management\\_plans/Whitehawk\\_Hill\\_booklet\\_final.pdf](https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/downloads/cityparks/management_plans/Whitehawk_Hill_booklet_final.pdf).

There is clear local interest in the site, demonstrated by the activities of the Friends of Whitehawk Hill (FoWH) who are working with the council's Park Rangers to actively manage the LNR and improve it for wildlife and people. As the FoWH demonstrate in their own submission to this consultation – Whitehawk Hill has been celebrated, enjoyed and written about by a wide variety of local people for two hundred years.

The whole of Whitehawk Hill LNR should be designated as a Local Green Space under DM38. Its glaring omission makes policy DM38 unsound.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

As demonstrated by our objection to policy H2, SWT believes that the allocation of 'Land at and adjoining Brighton Race Course' is not sound and should be deleted from the plan. Additionally, the entirety of Whitehawk Hill LNR should be included in the list of Local Green Spaces.

However, even if the Inspector does not delete the allocation in H2, we still believe that the remainder of the LNR should be designated as a Local Green Space, as has been done for Benfield Valley.

**5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)**

	Tick
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>

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Yes, I wish to participate in the hearing session(s)	<input checked="" type="checkbox"/>
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**6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.**

The Sussex Wildlife Trust wishes to attend the examination hearings so that we can discuss our objections formally with the Inspector and respond to any additional evidence presented by other respondents.
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**Policy Number (DM1 to SSA7)**

Please use separate sheets for each policy that you wish to comment on

DM39
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**Policy Title e.g. Housing and Accommodation**

Development on the Seafont
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**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust strongly supports this policy and in particular the recognition of the MCZ.
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**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

N/A

**Policy Number (DM1 to SSA7)**

Please use separate sheets for each policy that you wish to comment on

DM40

**Policy Title e.g. Housing and Accommodation**

Protection of the Environment and Health – pollution and nuisance

**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust is pleased to see that our suggested amendments from the regulation 18 consultation have been included in the new version of the policy. We strongly support this policy.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

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N/A

**Policy Number (DM1 to SSA7)**

Please use separate sheets for each policy that you wish to comment on

DM42

**Policy Title e.g. Housing and Accommodation**

Protecting the water environment

**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust is pleased to see that our suggested amendments from the regulation 18 consultation have been included in the new version of the policy. We strongly support policy.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

N/A

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**Policy Number (DM1 to SSA7)**

Please use separate sheets for each policy that you wish to comment on

Special Area SA7

**Policy Title e.g. Housing and Accommodation**

Benfield Valley

**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust (SWT) supports the inclusion of a special area policy for Benfield Valley and in particular the acknowledgement that this site needs to be protected and enhanced as an important green wedge, a valued Local Wildlife Site (LWS) and a Local Green Space (LGS). This desire to protect Benfield Valley is clearly consistent with the requirements of NPPF paragraph 170 and particularly, the need to establish coherent ecological networks that are more resilient to current and future pressures.

However, SWT maintains its objection to allowing residential development within the LWS and the allocation of housing for this site under policy H2. We do not believe that this is justified or compliant with national policy.

NPPF paragraph 174 is clear that plans should safeguard components of local wildlife-rich habitats including locally designated sites of importance for biodiversity. Further to this, National Planning Practice Guidance states: *'National planning policy expects plans to identify and map these sites, and to include policies that not only secure their*

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*protection from harm or loss but also help to enhance them and their connection to wider ecological networks.'* (Paragraph: 013 Reference ID: 8-013-20190721).

We understand that BHCC has received pressure from various site promoters to allow large scale development on the site. However, BHCC own the freehold of the site and therefore the council does have a large say in whether development occurs.

SWT greatly respects the professional opinion of the County Ecologist as set out in Appendix 2 of the topic paper. However, we disagree with both her and the council that the requirement for housing on the urban fringe established in the City Plan Part 1 (CPP1) means that it is not possible to avoid development within this LWS.

The CPP1 Inspector's Report (February 2016) clearly states that the CPP1 does not allocate urban fringe sites and that decisions on whether individual sites should be developed, will be made through the process of preparation of the City Plan Part 2 (CPP2).

Table 3 of the Housing Provision Topic Paper demonstrates that the updated assessment of housing delivery, including site allocations in the CPP2, shows potential to deliver 14,875 net dwellings. This is a surplus of 1,665 dwellings against the city plan target.

Removing the housing allocations in policy H1 and H2 that are in Local Wildlife Sites or Local Nature Reserves and do not currently have any planning permission would reduce this delivery number by 237 (as set out in our response to question 3 for policy H2).

This would still leave a surplus of supply of 1428 dwellings. CPP1 policy CP1 does set out the proposed distribution of new housing in part B, but caveats this with 'new housing will be delivered broadly in line with the following distribution'. We do believe that the number of dwellings being delivered in the urban fringe could be reduced with the CPP2 still being compliant with the requirements of the CPP1.

Specifically for Benfield Valley we disagree that retaining wildlife corridors and buffers around the development will be sufficient to reduce negative impacts of introducing housing within the designated site. In 2017, Yorkshire Wildlife Trust investigated the relationship between housing proximity and frequency of damage and disturbance on their nature reserves:

[https://connectingfornature.files.wordpress.com/2017/11/inpractice97\\_sep2017\\_rylattgarsiderobin.pdf](https://connectingfornature.files.wordpress.com/2017/11/inpractice97_sep2017_rylattgarsiderobin.pdf)

The study found that 'Each of the five types of damage identified generally occurs more frequently the closer the reserve is to a settlement.' Whilst this is not surprising, it was also found that all but one type of damage and disturbance decreased between reserves within 100m of a settlement and reserves between 101m and 500m from a settlement. The decrease was seen again for reserves over 501m away. The study recommended that 'the first step in the planning process should be to locate new housing developments at least 100m from reserves, and ideally more than 500m away.

Further to this we note that Natural England supported policy SA7 during the regulation 18 consultation on the grounds that it recognises the value of Benfield Valley LWS as

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natural capital stock and a green infrastructure asset. This is as the LWS stands and whilst better management of the site would be very welcome, this is not required for the site to act as a natural capital asset or a valued component of the wider ecological network.

SWT does not believe it is consistent with the requirements of the NPPF, and in particular the need to allocate land with the least environmental or amenity value and safeguard locally designated sites, to develop on Benfield Valley Local Wildlife Site. We also do not think the allocation is justified given the council's evidence base and the surplus in housing delivery being proposed.

Apart from the above, we note the comment in section 2.4 of the Benfield Valley Topic Paper that *'The development of the Sainsbury's Superstore at the southern end of the valley in the early 1990s was linked to restrictive covenants which sought to protect the rest of valley for outdoor recreation.'* This is not mentioned again and it is unclear what impact this has on the proposal to allow some residential development.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

SWT requests that the second paragraph of policy SA7, which relates to residential development, be deleted from the plan.

Policy SA7 should reiterate that residential development is not appropriate on Benfield Valley Local Wildlife Site and the boundary of the Local Green Space should be extended to cover the whole of Benfield Valley.

**5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)**

	Tick
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in the hearing session(s)	<input checked="" type="checkbox"/>

**6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.**

The Sussex Wildlife Trust wishes to attend the examination hearings so that we can discuss our objections formally with the Inspector and respond to any additional evidence presented by other respondents.

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Please use separate sheets for each policy that you wish to comment on

SSA1

**Policy Title** e.g. Housing and Accommodation

Brighton General Hospital Site

**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Meets the Duty to Co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

Whilst we support the development of this brownfield site, Sussex Wildlife Trust is concerned that the policy wording in part h is not sufficient to ensure the protection of the swift colony on site. Whilst this policy requires provisions to safeguard the policy, it does not require that these provisions are provided in advance of any development.

The current hospital buildings are home to Brighton's largest colony of Swifts (15 nests in 2018 and 19 nests in 2019) – an amber listed species, which in Great Britain nests only under the eaves of roofs of buildings or in Swift nest boxes. Swifts return to the same nesting location year on year and therefore it is the continuity of nest availability at this site that is key to maintaining the population.

Any proposal that requires the destruction or disturbance of the existing nests, must be required to provide successful alternative nesting opportunities before there is any disturbance i.e. the alternative nest sites should be installed and proven to be successful before any development commences. Without this requirement, there can be no guarantee that the proposals will be successful in safeguarding the colony.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

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SWT requests that part h is amended to read as follows:

h) The development should contribute towards Biodiversity Action Plan objectives and provide biodiversity net gains, green infrastructure and wider landscaping enhancements through creative landscaping solutions and provide alternative nest sites to safeguard the swift colony, these nests should be installed and proven to be successful before any development commences.

**5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)**

	Tick
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in the hearing session(s)	<input checked="" type="checkbox"/>

**6. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.**

The Sussex Wildlife Trust wishes to attend the examination hearings so that we can discuss our objections formally with the Inspector and respond to any additional evidence presented by other respondents.

**Section D H1 Housing Sites and Mixed Use Sites**

**Please only fill this section out once**

**Which site(s) does your representation refer to? (Tick all that apply to your submission)**

- ALL SITES**
- Former St Aubyn's School, 76 High Street, Rottingdean
- Land between Marine Drive and rear of 2-18 The Cliff, Brighton
- 25 Ditchling Rise / rear of 57-63 Beaconsfield Road, Brighton
- 60-62 & 65 Gladstone Place, Brighton
- 76-79 & 80 Buckingham Road, Brighton
- 87 Preston Road, Brighton
- Eastergate Road Garages, Moulsecoomb, Brighton,
- Land between Manchester Street/Charles Street, Brighton
- Preston Park Hotel, 216 Preston Road, Brighton
- George Cooper House, 20-22 Oxford Street, Brighton
- Old Ship Hotel (garage), 31-38 Kings Road Brighton
- Saunders Glassworks, Sussex Place, Brighton
- 2-16 Coombe Road, Brighton
- Outpatients Department, Royal Sussex County Hospital
- Whitehawk Clinic, Whitehawk Road, Brighton
- Buckley Close garages, Hangleton
- Former playground, Swanborough Drive, Whitehawk
- Former Hollingbury Library
- 29-31 New Church Road, Hove
- 189 Kingsway, Hove
- Kings House, Grand Avenue, Hove
- Victoria Road Former Housing Office (adj Portslade Town Hall), Victoria Rd, Portslade
- Land at the corner of Fox Way and Foredown Rd, Portslade
- Smokey Industrial Estate, Corner Church Road, Lincoln Rd & Gladstone Rd Portslade
- Land south of Lincoln Street Cottages, Lincoln Street, Brighton
- Hove Sorting Office, 88 Denmark Villas, Hove
- Former Belgrave Centre & ICES, Clarendon Pl, Portslade (Site SP2 in JAAP Policy CA3)
- Wellington House (Site SP3 in JAPP Policy CA3)
- City College, Pelham Tower (and car-park), Pelham Street
- 71 - 76 Church Street, Brighton
- Post Office site, 62 North Road, Brighton
- 27-31 Church Street (corner with Portland Street)
- Former Dairy Crest Site, 35-39 The Droveaway, Hove
- Kingsway/Basin Road North (site AB4 in JAAP policy CA2)
- Prestwich House (Site SP1 in JAAP policy CA3)

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- Regency House, North Street, Portslade (Site SP4 in JAAP policy CA3)
- Former Flexer Sacks, Wellington Road, Portslade (Site SP5 in JAAP policy CA3)
- Church Road/Wellington Road/ St Peter's Road (site SP6 in JAAP policy CA3)
- Station Road site, Portslade (Site SP7 in JAAP policy CA3)

**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Meets the Duty to Co-Operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust (SWT) objects to the allocation of the Land between Marine Drive and rear of 2-18 The Cliff, Brighton because this site is designated as a Local Wildlife Site (LWS).

The NPPF is clear in paragraph 174 that plans should safeguard components of local wildlife-rich habitats including the hierarchy of designated sites of importance for biodiversity. Further to this, the Planning Practice Guidance states: '*National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.*' (Paragraph: 013 Reference ID: 8-013-20190721).

The value of the site for biodiversity does not appear to have been considered in the SHLAA or draft versions of the plan. The Sustainability Appraisal (SA) site assessment notes that the site was recently designated as a LWS but does not acknowledge that the site was recommended as a LWS in both 2013 and 2017.

The SA site assessment also states that the amount of development proposed on the site has been reduced from 16 to 10 to reflect the LWS designation. However, as no evidence is provided to explain how the reduction was decided, this appears somewhat arbitrary.

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The Local Wildlife Site Review states that the site contains rough coastal grassland, including priority habitat chalk grassland, which is unusual within the City. The site also supports a significant population of common lizard.

This site is a core component of the city's ecological network and a natural capital asset that should be safeguarded as per the NPPF. As set out in our answers to question 3 for policy SA7 and policy H2, we believe this site can be removed from the plan without materially impacting on housing delivery.

Table 3 of the Housing Provision Topic Paper demonstrates that the updated assessment of housing delivery, including site allocations in the CPP2, shows potential to deliver 14,875 net dwellings. This is a surplus of 1,665 dwellings against the city plan target. Removing the housing allocations in policy H1 and H2 that are in Local Wildlife Sites or Local Nature Reserves and do not currently have any planning permission would reduce this delivery number by 237. This would still leave a surplus of supply of 1428 dwellings.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

Remove Land between Marine Drive and rear of 2-18 The Cliff, Brighton from policy H1 and protect it as a Local Wildlife Site.

**5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)**

	Tick
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in the hearing session(s)	<input checked="" type="checkbox"/>

If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

The Sussex Wildlife Trust wishes to attend the examination hearings so that we can discuss our objections formally with the Inspector and respond to any additional evidence presented by other respondents.

**Section E H2 Housing Sites – Urban Fringe**

**Please only fill this section out once**

**Which urban fringe site(s) does your representation refer to? (Tick all that apply to your submission)**

- ALL SITES**
- Land at Oakdene, Southwick Hill / Land West of Mile Oak Road, Portslade
- Benfield Valley
- Land at and adjoining Horsdean Recreation Ground, Patcham
- Land at Ladies Mile, Carden Avenue
- Land to north east of Coldean Lane
- Land north of Varley Halls, Coldean Lane
- Land at and adjoining Brighton Race Course
- Land at South Downs Riding School & Reservoir Site
- Land north of Warren Road (Ingleside Stables)
- Land at Ovingdean Hall Farm & Land at Bulstrode / Ovingdean Farm
- Land adjacent to Ovingdean and Falmer Road, Ovingdean
- Land at former nursery, Saltdean
- Cluster at Coombe Farm and Saltdean Boarding Kennels, Westfield Avenue North, Saltdean
- Land west of Falmer Avenue, Saltdean

**1. Do you consider this policy is: (tick as appropriate)**

	Yes	No
Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Meets the Duty to Co-Operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**2. If you consider the policy to be unsound is it because it is not: (tick as appropriate)**

	Tick
Positively Prepared	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

**3. If you consider the policy is not legally compliant or is unsound, please give details in the box below. Please be as precise as possible. If you support the policy and feel it is sound and/or legally compliant, please also use the box below to set out your comments.**

The Sussex Wildlife Trust (SWT) objects to this policy and does not believe it is consistent with national policy or justified.

8 of the 16 site allocations in Table 8 are designated as Local Wildlife Sites (LWS) and one is designated as a Local Nature Reserve (LNR) as follows:

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- Land at Oakdene, Southwick/Land west of Mile Oak Road - BH22 Oakdene Southwick Hill LWS
- Land off Overdown Rise, Mile Oak - BH02 Mile Oak Fields LWS
- Benfield Valley - BH09 Benfield Valley LWS
- Land at and adjoining Horsdean Recreation Ground - BH101 Patcham Court Field LWS
- Land to north east of Coldean Lane - BH87 Land at Coldean Lane LWS
- Land north of Varley Halls, Coldean Lane - BH87 Land at Coldean Lane LWS
- Land at and adjoining Brighton Race Course - Whitehawk Hill Local Nature Reserve
- Land north of Warren Road (Ingleside Stables) - BH86 Bevendean Horse Paddocks LWS
- Land adjacent to Ovingdean and Falmer Road, Ovingdean - BH78 Meadowvale LWS

The NPPF is clear that the planning system should establish coherent ecological networks that are more resilient to current and future pressures (paragraph 170) and that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 171). Further to this, paragraph 174 is clear that plans should safeguard components of local wildlife-rich habitats including locally designated sites of importance for biodiversity. This is reiterated in the Planning Practice Guidance which states:

*'National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.'* (Paragraph: 013 Reference ID: 8-013-20190721)

As it stands, SWT does not believe that policy H2 is consistent with this policy. Whilst H2 says that development must mitigate any adverse impacts and provide biodiversity net gains, SWT has not seen any evidence to demonstrate that adverse impacts of development on these sites can be effectively mitigated or that net gains can actually be provided. Whilst all these LWS would benefit from ongoing management, allowing development of part of them is not an essential or reasonable way to achieve that. More fundamentally, these sites are a finite resource and the allocations simply make the valuable areas of habitat smaller. This is not a sustainable approach and does not align with the council's need to protect and enhance the City's ecological network. Once built on, these core sites are gone forever.

SWT also does not feel that the need for some of these allocations is justified. The total number of dwellings allocated for these 9 sites is 639. Three of the sites - Land off Overdown Rise, Land to north east of Coldean Lane and Land adjacent to Ovingdean and Falmer Road – already have planning permission, so SWT accepts that the principle of development has been set for these sites. Removing the allocations for the other 6 designated sites would only reduce the yield on the urban fringe by 227 dwellings. Also removing Cliff Road Paddock from policy H1 would reduce the number of dwellings being planned in the CPP2 by 237.

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Table 3 of the Housing Provision Topic Paper demonstrates that the updated assessment of housing delivery, including site allocations in the CPP2, shows potential to deliver 14,875 net dwellings. This is a surplus of 1,665 dwellings against the city plan target. Removing the housing allocations in policy H1 and H2 that are in Local Wildlife Sites or Local Nature Reserves and do not currently have any planning permission would reduce this delivery number to 14,638, still with a surplus of 1,428.

The CPP1 Inspector's Report (February 2016) clearly states that the CPP1 does not allocate urban fringe sites and that decisions on whether individual sites should be developed, will be made through the process of preparation of the City Plan Part 2 (CPP2). Further to this, whilst CPP1 policy CP1 does set out the proposed distribution of new housing in part B, it caveats this with 'new housing will be delivered broadly in line with the following distribution'.

SWT believes that the number of dwellings being delivered in the urban fringe could be reduced with the CPP2 still being compliant with the requirements of the CPP1. We also believe this strikes the right balance between the environmental and social pillars of the planning system, acknowledging that the natural capital that a coherent ecological network provides is an environmental and social benefit.

Land at and adjoining Brighton Race Course

Whilst we object to the allocation of housing on Local Wildlife Sites, we want to make clear to the Inspector that SWT's strongest objection is to 30 dwellings on Whitehawk Hill Local Nature Reserve (site name 'land at and adjoining Brighton Race Course'). This LNR is an exceptional site for wildlife and an extremely valuable community resource.

Detailed ecological evidence has been submitted in the Friends of Whitehawk Hill (FoWH) and we commend this information to the Inspector as an accurate representation of the ecological importance of the site. In particular, the detailed analysis from national and local experts which demonstrates that the conclusions of the Urban Fringe Assessment 2014 (UFA) and Urban Fringe Assessment Summary 2015 (UFAS) should be considered out of date and unreliable. A summary of the most recent FoWH ecological evidence is appended to this submission (Appendix A).

Under 'Evidential Requirements', the Procedure Guide for Local Plan Examinations (The Planning Inspectorate June 2019 (5th Edition)) states that '*Evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older*'. SWT strongly feels that BHCC case for allocating on this LNR has been 'overtaken by events'.

The LNR has significant ecological importance that is recognised by BHCC, for example their acknowledgement that the LNR contains one of Europe's rarest and most spectacular habitats – ancient chalk grassland: [https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/downloads/cityparks/management\\_plans/Whitehawk\\_Hill\\_booklet\\_final.pdf](https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/downloads/cityparks/management_plans/Whitehawk_Hill_booklet_final.pdf). Further to this, temporary grazing signage was put up on site in 2019 by BHCC describing Whitehawk Hill as 'one of the best wildlife

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sites in Sussex'. It is self-evident that the site is of high biodiversity value and should be safeguarded as required by the NPPF (170, 171 and 174).

We note that Whitehawk Hill is not allocated as a LWS. However, this should not be taken as a reflection of its ecological value. It is apparent in the Introduction to the Brighton and Hove Local Wildlife Site Review that the process of identifying and designating LWS in the city has been a long and convoluted process, which still has not resulted in a comprehensive suite of sites. Whitehawk Hill LNR has never been assessed for designation as a LWS. However, if put forward, SWT believes it would clearly meet both the Brighton and Hove and Sussex LWS criteria.

The allocation of this site and the requirements under policy H2 indicates that BHCC believe that any adverse impacts on the site from development can be mitigated for and further to this, that net gains to biodiversity can be delivered. SWT strongly disagrees with this position and believes that BHCC have both underestimated the high value of the site and the likely impacts of development.

The council's evidence disregards the ancient gorse scrub as a valuable ecological feature and undervalues the importance and integrity of the mosaic of habitats acting together as a viable unit. The Lawton Review in 2010 was clear that the urgent need to recover nature required ecological networks that are 'bigger, better, more and joined up'. This principle has been taken forward in the Government's emerging Environment Act and the requirement for a Nature Recovery Network. Whitehawk Hill LNR is a linear 'finger' coming down from the South Downs National Park and into the city. The level of development around the LNR already makes it vulnerable to urbanising impacts, indeed as a core area, this site needs further buffering, not impingement at the narrowest point.

The LNR is already in active management by BHCC rangers with committed, on the ground support by the Friends of Whitehawk Hill. BHCC claim that development on the LNR will result in enhancements to the remainder of the site, but it is clear that enhancements are already happening, despite the council's limited investment in their own LNR. This is a LNR that is working, that is valued by the local community and has a positive future. Allowing development on this site will undermine all this, undermine the community's enthusiasm and threaten the future of the whole LNR.

SWT feel strongly that both the physical damage to the integrity of the LNR and emotional damage to the local community outweighs the minor contribution that 30 dwellings will have on the council's housing delivery. As we have stated previously, this site could be removed and still leave the council delivering a surplus of homes against the requirement in the CPP1.

We acknowledge that the housing targets committed to in the CPP1 does not meet the OAN of the city which is considerably higher. Indeed, including the changes to the standard method which the Government has recently consulted on (<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>) would, according to Lichfields analysis (<https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/#section16>), raise the OAN to 1,520 per year. This is an astronomical figure which could never be conceivably accommodated within the city. Even with radical

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planning changes, the city will always be constrained by geography (the sea and the SDNP) and therefore the pressure to develop on every patch within the city boundary will continue to grow.

It is clear that these 30 proposed dwellings makes no real contribution to this delivery gap. But allowing development on the LNR will set a precedent which will open this site up for discussion every time the city plan is reviewed. SWT is extremely concerned that we will see a nibbling away of the LNR every 5 years until there is nothing left. This is a cumulative impact that is simply not worth the harm it will cause, given the tiny gain this site currently provides to housing delivery.

Whitehawk Hill LNR is a site of high biodiversity value that should be cherished by the council as a core component of their ecological network. It is completely illogical to allocate this site for the development of such a small number of homes. This will have no real impact on housing delivery, but will irreversibly damage ecology, natural capital and community spirit. The allocation should be removed from the plan as unsound.

Please note that as a nature conservation charity SWT has focused its objection on ecological matters and the importance of the site for biodiversity. However, we are aware that the LNR also has high landscape, archaeological, historical and community importance as demonstrated by the FoWH submission.

**4. Please set out the change(s) you consider necessary to make the policy legally compliant and sound in respect of any legal compliance or soundness matters you have identified in Q3 above. Please be as precise as possible.**

Remove the following sites from policy H2 and safeguard them as Local Wildlife Sites:

- Land at Oakdene, Southwick Hill / Land West of Mile Oak Road, Portslade
- Benfield Valley
- Land at and adjoining Horsdean Recreation Ground, Patcham
- Land north of Varley Halls, Coldean Lane
- Land north of Warren Road (Ingleside Stables)

Delete the 'Land at and adjoining Brighton Race Course' from policy H2 and safeguard the site as a statutorily designated Local Nature Reserve.

**5. If your representation is seeking a change to the Plan, do you consider it necessary to participate at the hearing session(s)? (Tick as appropriate)**

	Tick
No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes, I wish to participate in the hearing session(s)	<input checked="" type="checkbox"/>

If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

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The Sussex Wildlife Trust wishes to attend the examination hearings so that we can discuss our objections formally with the Inspector and respond to any additional evidence presented by other respondents.

**Representations must be made between Monday 7<sup>th</sup> September and 23:59 on Friday 30<sup>th</sup> October 2020.**

**The completed Word Form can be emailed to [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk) or posted to:** Proposed Submission CPP2, Policy Projects and Heritage Team, Brighton & Hove City Council, First Floor Hove Town Hall, Norton Road, BN3 3BQ.

**Appendix A**

**Whitehawk Hill Local Nature Reserve  
Summary of Biological Recording 2019-20**



**Breeding Bird Survey**, spring 2019, Richard Bickers

Covered the allocation site and immediately adjoining areas. Recorded 15 probable breeding species, including BoCC4 red listed linnet and song thrush and amber listed dunnock, as well as greenfinch and lesser whitethroat. Of particular note was the population of linnet, which recording indicated were breeding in the gorse scrub, centred on a location close to the boundary of the allocation, but recorded more widely in the area.

**Entomological Survey**, May 2019, Peter Hodge

Covered the allocation site and immediately adjoining areas. Focused on beetles, bugs and flies. Recorded 89 species. PH noted *“To record 65 species of beetles by sweeping vegetation with a net in an area of chalk grassland 200 x 50 metres in just 3 hours in my opinion indicates an extremely rich site. Its importance in terms of conservation value is enhanced by the presence of several highly notable species.”* Included eight notable species, including Nationally and Locally Scarce species, including the click beetle *Prosternon tessellatum*, which was recorded in good numbers and is characteristic of acid grassland and heathland, including Lullington Heath, and represents a possible relic of a chalk heath fauna related to the presence of gorse and related species in this area.

**Entomological Survey**, July 2019, Mike Edwards

Covered the allocation site and adjoining areas. Focused on aculeate hymenoptera. Recorded 41 species in sub-optimal conditions. This included six Nationally Scarce species and three s41 Species of Principal Importance. Of particular note were records of the brown banded carder bee *Bombus Humilis*, a Priority /s41 Species. ME commented that the records indicated the presence of several nests across the site, which form part of the wider metapopulation of this species in the Brighton area.

**Butterfly Transect**, April – September 2020, Richard Bickers

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Included areas adjoining the allocation. Recorded a total of 25 species, including the Priority/s41 species small heath, small blue, dingy skipper and wall. The scarce migrant long tailed blue was also recorded, Whitehawk Hill being arguably the best site in the country for this species (<https://www.theguardian.com/environment/2020/sep/29/butterflywatch-the-long-tailed-blue-visitor-or-native-species>). Brown hairstreak, a further Priority/s41 species was recorded in habitat similar to that within the allocation (blackthorn/wild plum scrub) during 2020. A further eight species were recorded during transect surveys carried out by Paul Gorringe BHCC ranger, in the last decade, including the Priority/s41 species grizzled skipper.