Brighton and Hove Draft City Plan – Part Two
Regulation 19 Consultation which closed on October 30th 2020.
Response by Brighton and Hove Community Land Trust

We are grateful for the opportunity to be given the chance to comment again on the Draft Plan.

We continue to have concerns with a number of aspects of the document which we feel affect the work of our organisation and we hope can be resolved either through further amendments to the Plan or through the examination process.

Brighton & Hove Community Land Trust (BHCLT) was set up in 2014 and developed throughout 2016 and 2017 through a series of community engagement workshops with grassroots community groups actively involved in land and housing issues in the city. This work was supplemented through interviews with key players within the institutional housing sector, including local councillors with roles in Housing and Brighton & Hove City Council (BHCC) Housing Officers. BHCLT in its current form emerged and was formally constituted in March 2017. It is a community benefit society and acts as an umbrella CLT for the whole city.

Our vision is to work towards providing people with affordable and environmentally sustainable places to live in Brighton. These communities will have social value based on innovative and creative joint working practices.

We work closely with Councillors and officers in the Council and we believe that we have good support within BHCC to be able to achieve this vision.

In August 2020, representatives from NUB Self-build Housing Group and BHCLT presented their petition for Community Led Housing to be prioritised over private development, and for land to be made available in affordable ways to a Brighton & Hove full special council meeting on 13 August (agenda item 32(1))

The presentation was a great success, gaining cross party support, and a near unanimous vote, to accept a Green amendment embedding *strategic support* for Community Led Housing in the city, and for land to be made available at affordable rates through initiatives like the Public Works Loans Board.

Planning policy (CPP2) must also support this vision and our work to deliver CLH schemes that are affordable in perpetuity. For instance;

I. Using the site allocation process to identify specific sites for community led housing
II. Developing an urban alternative to the rural exception site policy
III. Introducing policies for the inclusion of community led housing and self-build provision in proposals for large sites, eg Brighton General Hospital.
IV. Establishing a light touch procedure for small sites and small groups which provides flexibility for CLH schemes (space standards, density, vehicle numbers) where the community supports the scheme
V. Ensure that the design of CLH schemes meet best practice for inclusion of accessibility and health and well-being measures
VI. Working with BHCLT and CLH groups to consider other planning policy instruments that could promote long term stewardship of land by communities.

We want to work alongside the City Council to help achieve their strategic aims for the city and help deliver the community led development that the city needs. We would welcome any opportunity to discuss these matters further.

Housing need
The City Plan – Part One only seeks to deliver a proportion of the City's housing needs (less than half) and the Council is still falling significantly short of this minimum housing requirement. This increasing shortfall has been identified by the local planning authority year-on-year through their Authority Monitoring Report. Development management policies within the CPP2 need to positively and appropriately respond and drive improvements in future delivery against a wide-range of recognised and established needs.

We feel that there is a severe need for new, creative solutions to deliver new housing in the city (such as CLH) and there is a need for a new suite of planning policies that will increase the volume of windfall developments that come forward over the next ten years of the City Plan period and act as a catalyst for new development.

These comments were made by a number of respondents at the previous consultation two years ago, but no significant revision or additional allocations have been identified in the proposed submission of the CPP2. In fact, the development management policies proposed are more restrictive and onorous than current adopted policies and may further limit the development of new housing rather than enabling future development.

We therefore consider that CPP2 fails to meet the legal tests of soundness as the document has not been positively prepared to deliver a strategy that will adequately meet the future needs of the city, is not justified by the evidence base, is not effective as it will replicate the worsening issues that have arisen over the last fifteen years of Local Plan policies and is not consistent with national policy for the reasons set out above.

Specific policies:
DM1 – Housing Quality, Choice and Mix
"b) make provision for a range and mix of housing /accommodation formats subject to the character, location and context of the site, for example, ***self and custom build housing****, build for rent,* ***community led housing****, starter homes and other types of provision supported by national and local policy."*

COMMENT – This part of the policy is positive for CLH, although the wording 'make provision' is perhaps too weak. We think it should read "must include…"

"c) all residential units should meet the nationally described space standards"
COMMENT - The introduction of space standards for residential accommodation is positive and makes designing units easier and clearer. However, these space standards do not allow for the innovative 'tiny home' type of housing. It is a response to mass low quality developer type housing and therefore is too prescriptive.

Strategic Site Allocations
SSA1 Brighton General Hospital Site
The policy related to the BGH site does not include the Council's request for the land at BGH to be developed for "truly affordable housing, including options for development by the Joint Venture, **B&H Community Land Trust,** directly by the Council, or a combination." which was passed

unanimously at the Council's Committee meeting on 19th July 2018. The wording of this policy should be amended to reflect this.

H2 - Urban Fringe

We would like to suggest that ALL Council owned Urban Fringe sites should be approached as "public land for public good" and could only be developed with meaningful community engagement, biodiversity and ecology at the heart alongside 100% affordable and 0% carbon housing outcomes. With this in mind, we suggest that all development on Council owned UF should be led by BHCLT working in partnership with community stakeholders and CLH groups. This will also support the Special Council Agenda item 32(1) referred to above.