

Brighton Marina Neighbourhood Forum

20th June 2024

Derek Stebbing
Examiner
Intelligent Plans and Examinations (IPE) Ltd

By email to: steve.carnaby@intelligentplans.co.uk
Cc. Brighton & Hove City Council.

Dear Mr Stebbing,

RE: Brighton Marina Neighbourhood Development Plan.

Thank you for your letter of 28th May; we write to address question 4 of the Annex.

Neighbourhood Plan Forum comments on the City Council's representations at Regulation 16 Stage.

General

The Forum has been grateful for Brighton and Hove City Council's (BHCC's) comments and support throughout the Plan preparation process.

After the consultation process on the pre-submission Plan, the Forum incorporated BHCC's suggested changes where the Forum considered that they were necessary to ensure that the Plan met the basic conditions. This was in the context that the Forum has always been very clear what it did and did not want to include in its Plan.

Responses to BHCC's comments on the submitted Plan.

The Forum's comments on the most recent representation made by BHCC are set out below:

Policy BM1

Para 4 – agreed.

Last paragraph – agreed.

First bullet point – not considered necessary to ensure that the Plan meets the basic conditions.

Second bullet point – agreed

Third paragraph - not considered necessary to ensure that the Plan meets the basic conditions.

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Policy BM2

Safety paragraph – the representation largely revises the words used in the Plan. The Forum is relaxed with either version.

Attractiveness paragraph – as above.

Ante penultimate paragraph – as above.

General comments - not considered necessary to ensure that the Plan meets the basic conditions.

Policy BM3

General comments (X4) - not considered necessary to ensure that the Plan meets the basic conditions.

Policy BM4

All comments on policy- not considered necessary to ensure that the Plan meets the basic conditions.

Comments on supporting text - agreed.

Policy BM5

First three points – agreed

Proposed new sections on Biodiversity and Climate Change - not considered necessary to ensure that the Plan meets the basic conditions. In addition, the Forum has sought not to repeat or restate national legislation within the submitted Plan.

Policy BM6

The Forum has included the policy to acknowledge the special circumstances which exist at the Marina. In addition, it is not unusual for a neighbourhood plan to incorporate a policy on such uses when a similar (and more general) policy is included in an adopted Local Plan.

The Forum would like the policy to remain.

Policy BM7

Three points – all agreed.

Policy BM8

As with Policy BM6, the Forum has included the policy to acknowledge the special circumstances which exist at the Marina. In addition, it is not unusual for a neighbourhood plan to incorporate a policy on such uses when a similar (and more general) policy is included in an adopted Local Plan.

The comments in the supporting text are included to support the policy. They relate directly to the evidence base of the Plan.

The Forum would like the policy to remain.

General Comments.

The Forum notes BHCC's comments on the remainder of the Plan. However, it does not consider that any of the comments made are necessary to ensure that the Plan meets the basic conditions.

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Most of the work on the Plan was finished before the September and December 2023 updates to the NPPF. The Forum would welcome a recommendation from the examiner to update the reference to the date and the paragraph numbers of the NPPF in the document.

BHCC suggests that the Plan should include a Principal Residency Policy. This is not a matter which the Forum wanted to pursue. This acknowledges that the scope and content of any Plan is determined by the qualifying body concerned.

Summary

The Forum hopes that these comments assist the examination of the Plan. It is happy for the examiner to recommend changes either to the policies or the supporting text should this be considered necessary to ensure that the Plan meets the basic conditions.

Yours sincerely



Andrew Knight
Chair of Steering Group
Brighton Marina Neighbourhood Forum.