



Representations to Waste and Minerals Local Plan

Objection to designation of cold yard adjacent to Sackville Trading estate, Hove for potential waste management purposes

Reason:

The proposal would undermine the potential for comprehensive redevelopment of the area to the north of Hove station and railway tracks, which is shown as Development Area 6 (DA6) in the emerging City Plan.

The site designated for waste management purposes forms a contiguous site with the site known as Sackville Trading Estate and together extends to some 9 acres (3.6 ha). This, we believe, is the largest brownfield site remaining in Brighton, which, if redeveloped comprehensively, would make a very substantial contribution to the city's housing and employment needs.

The designation for waste management does not reflect the increase in housing need in the City, which has steadily risen since the start of the preparations of the city plan. At the latest estimate the demand now stands at some 30,000¹, whilst land identified for housing purposes at the latest estimate and after an extensive search on the urban fringe now stands at some 13,000 units.

The city plan indicates min densities for development areas of 100 dwellings per hectare (dph)². It also suggests that there are examples of high density Victorian developments in Brighton which rise to 200 dph. Assuming that this area was developed comprehensively in a high density urban mode it is estimated that some 360-720 dwellings could be generated on this site alone. If mixed development this might be more at the lower end. Clearly the bigger the site the greater will be the potential for generating a good urban landscape with a high number of dwellings and other units. We believe that forgoing this opportunity for the sake of a hypothetical and potential waste management use ignores the rising housing need in the city and unnecessarily blights the area.

In conclusion we believe that the waste and minerals plan does not adequately reflect the dramatically increased housing needs that have occurred since the City Plan has gone through its examination in public and subsequent successive modifications. The designation of the coal yard site for waste management purposes dramatically reduces the potential for comprehensive redevelopment of the north western part of the Development Area 6 and therefore unreasonably reduces the potential for new housing to be built in the City.

¹ The 2013 first draft of the City Plan suggested a need of some 15,800 (para 4.3 of the consultation version) and has risen for every projection since then to now some 30,000. The equivalent change in housing supply has gone from 11,300 (para 4.4 of the consultation version) to just over 13,000.

² Policy CP14, 6.p 189



Bearing in mind that the Minerals and Waste management plan concedes that the sites identified might not be needed³ and that the local authority might grant permission for other uses on such sites⁴ we request that the designation for waste management purposes is removed so as not to hinder much needed development in the area.

The Society still supports the need for a district heating network in this development area, but believes that this is more likely to happen if large comprehensive development is permitted.

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³ *It should be noted that the size of the shortfalls are not great and in reality only a few new strategic sites are required, para 3.6 of the deposit version of the Waste and Minerals Local Plan*

⁴ **3.29** *There may be a small number of instances where, after careful consideration, a local planning authority grants planning permission for uses other than waste management on a safeguarded site. In these cases, on the implementation of the planning permission, in the circumstances that all or part of the safeguarded site is no longer available for waste management activities and is not required to ensure the provision of existing waste management, that site will no longer be considered to be safeguarded*