

Sent by email to: planningpolicy@brighton-hove.gov.uk

05/05/2022

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the main modifications to the Brighton and Hove City Plan Part 2

Thank you for consulting the Home Builders Federation (HBF) on the main modifications to the City Plan Part 2. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

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The HBF support the modifications proposed to DM36.

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Modification is not necessary for the soundness of the local plan and could create uncertainty in decision making contrary to clarity required by paragraph 16 of the NPPF.

The HBF do not consider the proposed amendment to the supporting text at paragraph 2.282 on page 115 of the City Plan Part 2 to be required for the soundness of the local plan and as such it is unnecessary. Whilst Sussex Local Nature Partnership has an ambition to achieve a 20% target for biodiversity net gain from all development the inclusion of this statement is irrelevant to the soundness of the local plan or what is actually required of development under the Environment Act 2021. The paragraph whilst merely stating a future ambition could create uncertainty amongst decision makers as to what development is actually required to deliver. We would therefore recommend that this modification is not taken forward.

Yours faithfully



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