

## **Brighton and Hove City Plan part 2 Comments on the Scoping Document**

The Regency Society wishes to comment on three of the sections of the initial scoping document, namely Housing, Design and Student Accommodation.

### **Housing**

H1 Do you support the allocation of brown-field sites to housing?

The Regency Society supports the allocation of brown-field sites to housing.

H2 Criteria for assessing urban fringe sites

Urban fringe sites should be subject to the same assessment criteria as other sites. Assessment should take into account access to open space outside of the city boundaries. Peripheral sites should be subject to similar appraisal in terms of density, mix etc.

H3 Are there sites that you would propose?

We believe that there should be a detailed assessment of 'left-over sites' that are the result of poor planning decisions in the past. Areas like Bevendean, Moulsecoomb, Coldean etc are full of small bits of useless green space that we believe should be brought forward as 'pocket schemes'.

Similarly areas of older poor quality low-density housing should be redeveloped to higher densities, for example in Bevendean and Moulsecoomb.

H4 Should site identification identify specific dwelling types and sizes?

Each proposal should be evaluated on its merits at the time when it is about to be developed.

H5 Should peripheral sites be weighted towards family housing?

Not necessarily: the aim should be, wherever possible, to produce a good mix of housing.

H6 Suggestions for ensuring good mix.

See H5

H7 Should CP2 ensure that development maximises site potential?

It is important that appropriate densities should be stipulated. We are critical of the tendency to over-develop in central areas (e.g. Circus Street) but equally critical of the use of too low a density on peripheral sites (e.g. Toads Hole Valley).

H8 Should CP2 include requirements for housing particular groups (e.g. the aged)?

Special housing aimed at people with special needs is needed, but wherever possible this should be integrated with other forms of housing

H9 Should sites be specifically required to address particular needs?

Each site should be assessed on its merits in relation to what are the priorities at any given time. The council should avoid opting for stereotypical prescriptions: many old people prefer to live in a central locations; families should not necessarily be pushed out to the periphery.

H10 Should there be provision for self-build and custom-build?

Self-build is often wasteful of land. Self-build and custom-build schemes should simply be allowed to happen as and when: no special measures are needed.

H11 Should CP2 resist the loss of housing from the existing stock (change of use?)

There is a natural migration of building types; at present the flow seems to be away from office and commercial towards housing. But some degree of control would be beneficial.

H12 Are there particular types that should protected?

Some degree of intervention would be beneficial.

H13 Should CP2 policies include a requirement for private outdoor space?

The need for private outdoor space depends entirely on housing type, density and location. There seems little point in providing large gardens that aren't used (as is evident for example in areas of Hangleton). Blocks of flats should have access to communal gardens, providing that a maintenance agreement is put in place. Brighton has some excellent historic examples of communal gardens: e.g. Lewes Crescent, Park Crescent.

H14 Should policies provide guidance on issues relating to open space?

Providing that the guidance not too prescriptive..

H15 Should CP2 stipulate minimal space standards.

Yes, certainly. All developers should be required to adopt space standards that conform with nationally agreed space standards. Special standards are needed for apartments – including provision of balconies, extra-mural storage, cycle storage, adequate refuse facilities etc. Special standards are needed to regulate HMOs.

H16 Should CP2 seek to introduce enhanced access and adaptability standards for the disabled?

In line with nationally agreed practice.

H17 Are there any new issues that you would like to introduce?

See H21.

H18, 19, 20

The popularity of HMOs simply reflects particular need. Higher education constitutes a major plank in the economy of the City and students need to be housed. Young working people also find it difficult to find and pay for self-contained housing. So the Council should encourage HMOs, though it should also take steps to regulate them, to discourage unscrupulous landlords, and to avoid the build up of concentrations of HMOs or HMO ghettos.

H21 Any other Housing Issues?

The popularity of AirBnB is on the increase. It offers affordable accommodation to tourists and brings more of them into the city. But it also threatens the more conventional types of accommodation – hotels and guest houses. It needs to be regulated (as it is increasingly in other countries for example in Berlin) to ensure it meets appropriate standards, for example for health and safety.

Energy Efficiency / renewable energy etc: there seems to no mention in CP2 of the need to build energy efficient homes, or indeed the need to improve the efficiency of existing homes. Likewise with renewable energy, should CP2 not address the alternative forms of renewable energy and draw up guidelines on the installation of solar panels?

General comments on housing:

In drawing up the Draft City Plan the Council was under pressure from government to adopt ambitious house-building targets. The plan thus included the aim to complete 13,200 new homes during the 15 years leading up to 2030 (880 per year)

The problem with this target is that, on the one hand, it is simply not sufficient to meet the combined demand for new homes and for replacement of redundant stock, while on the other, it is unachievable in terms of current rates of housing completion and currently available land resources. Furthermore, the Council's hands are tied because it has only a limited proactive role as a housing developer: its main role is reactive - it depends on the willingness of land-owners to make land available of private developers to invest.

In order for a City to thrive and prosper it is essential that it is free to develop and grow. However, Brighton occupies a circumscribed territory between the Downs and the Channel. Much of its future growth can only be achieved through densification - either by building on left-over pockets of land or by replacing redundant stock.

The Regency Society believes that, in order to achieve this ambitious target, it is a matter of urgency that the Council revises its its policies on density and tall buildings.

Large areas of Brighton were developed during the 20th C. at unsustainably low densities - one thinks of areas like Moulsecoomb, Hangleton and Westdene where net residential densities rarely exceed 30 dwellings per hectare, where huge areas of landed were wasted in creating extensive high-maintenance grass verges and purposeless green spaces and in providing overly generous private gardens that are often ignored. The problem with low density housing is not simply that it consumes more land: it also requires more infrastructure, it requires more maintenance and servicing and is less energy efficient, and within certain limits, is less socially cohesive.

On the other hand, it is interesting to remind ourselves that Brighton has a unique history of interesting high-density urban housing. The great marine estates like Brunswick Town and Kemp Town were early examples of high-rise (6 storeys) and high density developer housing driven by the demand for seafront locations. The rows of small terraced houses of Islingword were built initially on a tight grid of streets to a density of about 95 houses per hectare. Today many of those houses have been sub-divided so that the current density is probably more like 150 dwellings per hectare. And yet many Islingword homes enjoy the use of small gardens and enjoy reasonable access to on-street parking. Brighton can also boast Victorian suburbs such as the Stanford Estate where substantial terraced houses with front and back gardens achieve densities of 50 dwellings per hectare. And Brighton also has elegant apartment blocks built between the wars, built often to a height of seven storeys to densities of around 200 dwellings per hectare.

The Regency Society proposes the following:

- That the Council undertakes a comprehensive quantitative study of unused and under-used land, as well as a study of existing housing that is suitable for redevelopment at higher densities.
- That the council revisits its 'Tall Buildings Policy' , both with a view to re-defining the different categories of tall buildings and reviewing the zoning policy.
- That the Council re-examines its policy on development density with a view to defining optimal densities with clear minima as well as maxima. This should include an absolute minimum density of 50 dwellings per hectare on peripheral sites (rising to 75-100 dwellings per hectare where the mix includes a high proportion of small dwellings)

The Society is concerned that the Council operates with measures of density that are too crude and simplistic. This has been evident in the past in the way that it has handled such schemes as King Alfred, Circus Street etc. A given dwelling density (dwellings per hectare) can cover a range of bed-space densities that reflect different dwelling size and room count (i.e. number of theoretical

bed-spaces). It is also necessary to ensure that developers build to nationally accepted space standards – there are concerns that much of the lower-end developed housing is built to lower space standards than those achieved in local authority housing fifty year ago.

The Society urges the council to develop the necessary tools to define and discuss density in a meaningful way and draw up acceptable minimal space standards for homes. Such space standards should include, for apartments, the provision of storage, balconies & etc. development densities should be quantified in terms of floor area ratio (FAR) (i.e. the ratio of building area to site area), building footprint (i.e. the ratio of ground covered to site area), building height, and in the case of residential development, dwelling density (dwellings per hectare), notional bed-space density (theoretical bed-spaces per hectare) and internal space standards.

## **Design**

We welcome the recent setting up of an external ‘Design Panel’ which will hopefully address the problems that arise from the diminishing number of in-house Council staff with appropriate design qualifications and experience. We urge council officers and elected members to take the recommendations of the panel seriously. We hope that this will help to raise the standard of architecture and design in the city (9.1).

The Regency Society also welcomes the Council's intention to prepare an Urban Design Framework for the city in the near future. In addition to developing and defining the city's overall vision for place making and design standards, it is understood that this will evaluate the importance of strategic views, including the impact of tall buildings.

Whilst we applaud the emphasis on ‘Place Making’ (9.2, 9.5), we are concerned about how this will translate into action. We wonder how good place making can be encouraged by policy statements (D1). We urge the Council to use arrangements such as S106 agreements or the Community Infrastructure Levy to oblige developers to improve public spaces in the vicinity of their schemes. We also urge the Council to consider to adopt key place-making principles when they draw up revised proposals for Valley Gardens.

We have been very disappointed by the quality of the Council’s recent Design Briefs (e.g. that for Edwards St. / Amex site). We urge the Council to seek to attain a higher standard of design and place making in the preparation of such briefs, to consult more thoroughly with local amenity societies and, if necessary, to employ suitably qualified consultants. Similarly we are aware that recent HE guidance recommends that Character Studies and Management Plans should be in place for Conservation Areas. The RS would welcome a commitment that the Council will prepare studies for the CAs without these: Queen's Park, College and management plans for those CAs under development pressure, including Old Town.

## **Student accommodation**

SH1: Should the City Plan Part 2 seek to establish a target for the amount of student housing need to be met through purpose built student accommodation?

No. Forecasting student numbers is not a precise science. Students’ preferences can change. Decisions about the provision of purpose built accommodation should be left to the market, in other words to the establishments which attract the students and to private developers.

SH2: Should the City Plan Part Two seek to allocate additional sites for purpose built student accommodation?

No. The Plan should encourage the institutions which attract students to provide housing for them on their own sites where this is possible. Sites elsewhere will be identified by the market. The role of the planners is to appraise the suitability of such sites when proposed and to establish policies to prevent excessive studentification of particular areas.

SH3: Are there any locations/sites that could be considered for purpose built student housing development?

We welcome the plans for additional student housing on the Falmer and Moulescoomb campuses. Further sites are best identified by the universities and private developers.

SH4: Should City Plan Part Two seek a more dispersed approach to suitable locations for purpose built student accommodation around the city?

Students are people and will benefit from living alongside other groups of people, as opposed to living in student ghettos. There is a good case for providing some accommodation on campuses, for example to house first year students. It is not appropriate to allow students to take over other residential areas, forcing out existing residents. This suggests that the answer to this question is “yes, provided there are strong controls to prevent studentification”.

SH5: What barriers are there to locating purpose built student accommodation outside the Lewes Road academic corridor and how could these be overcome?

The main barrier is the reasonable concern of existing residents that their area will become a student ghetto, hence the need for strong controls over the number of new student housing development in specific areas.

SH6: How can the cumulative impacts of purpose built student accommodation developments best be assessed and mitigated?

The need for controls mentioned above suggests that some sort of quantitative limits are needed, as have been established already for HMOs. Consideration should be given to establishing an acceptable proportion of student places in relatively small, clearly defined neighbourhoods, possibly as specific as individual streets or small groups of streets.

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