

## **Comments on the proposed development of the Outer Harbour at Brighton Marina (BH2019/00964)**

The Regency Society has considered in detail the proposed development of the outer harbour at Brighton Marina and has met on two occasions with the promoters of the scheme.

We have identified drawbacks and benefits of the scheme. These are identified below. We have concluded that, on balance, the drawbacks out-weigh the benefits. We also believe that the decision on a scheme of this size and in this location should not be made until a master plan has been prepared for the western end of the Marina and the Black Rock site.

We therefore call on the Planning Committee to refuse planning permission.

### **Drawbacks**

- The massing of the proposed buildings will have a detrimental impact on views from a number of locations, including some at a considerable distance. The views from Lewes Crescent and the neighbouring terraces will be significantly affected; this will have an unacceptable impact on the character of one of the city's most important conservation areas.
- The uniform appearance of the proposed buildings is unattractive. The proposed textures, detailing and colours are designed to change subtly as the viewer looks up the buildings, which, it is claimed, will moderate the uniform appearance. We do not believe that the changes will be sufficiently visible to achieve this aim.
- There is a risk that the central section of the "reclaimed" land, for which outline permission is being requested, will remain un-developed.
- The traffic impact assessment does not take account of the potential impact of the expected development of a 10,000 seat events venue at Black Rock. A combined masterplan is required for both the Black Rock site and the western end of the Marina, before a major development such as this can be adequately appraised.
- The proposed S.106 payments are inadequate, and their stated purposes are not sufficiently specific.

continued ...

- The developer claims that the scheme is designed to be suitably priced for local purchasers. Affordable housing requirements will be met through shared ownership. We do not believe that shared ownership will adequately meet the social housing obligations for a scheme of this scale. The developer should establish a partnership with a registered provider of social housing and designate a significant proportion of the flats for affordable rent, ideally at below 80% of market rates.
- The proposed intensive use of the site represents over-development and the spaces between the buildings will be narrow and overshadowed. Many of those living on the lower floors will enjoy little or no sunlight. The spaces outside their homes will, at times, be subject to extremely high winds.

## **Benefits**

- The scheme will provide 1,000 homes towards the city's housing development requirement. The site is identified in the City Plan as suitable for a similar number of units to that proposed in the application.
- It will provide a new and more attractive pedestrian entrance to the Marina as a whole, eventually including a section along the newly formed waterfront. This new access will not be dependent on the third and final phase being completed; it will be made available as part of phase two of the scheme, as currently submitted for full approval.
- It includes a number of public and private green spaces with planting suitable for the challenging marine environment.
- The layout of the central section (outline application at this stage) allows north-south views and walkways through the buildings, thus making the site "friendly" towards future re-development to the north. This provides a potential starting point for a "masterplan" for the west end of the Marina.
- The works will also involve improvements to the roadway which runs immediately north of the site behind the current leisure facilities. These will make the road more attractive for pedestrians and cyclists.
- The central site development (outline application) will further improve the roadway by providing "frontages" and green walls rather than the existing blank wall.

continued ...

- Most of the apartments will have one or two-bedrooms and a number will be dual aspect. There will be no penthouses.
- The developer will make improvements to the neighbouring breakwater, which will allow fishing to be continued.
- The re-constituted stone and other materials proposed should stand up well to the severe conditions likely to affect the site.

Roger Hinton

Honorary Secretary of the Regency Society.

25 July 2019