

**REGENCY SOCIETY COMMENTS ON
PROPOSED SUBMISSION BRIGHTON AND HOVE CITY PLAN PART TWO**

The Regency Society has reviewed the proposed submission City Plan Part Two and would comment as follows:

We welcome the improvements which have been made in the document and the progress which has been made in implementing some of its policies, but not all the changes have been for the better and not all of our previous comments have been addressed. Policies alone are not sufficient: Council needs to act on them. We have indicated where we consider action is required, including the preparation of additional documents.

The City Plan Part Two has been a long time in gestation and is in danger of being overtaken by events. There has been an accelerated take-up of electric bicycles and electric scooters are now legal on the public highway. The extension of exemption from planning permission of conversions from retail to residential can be expected to have the same detrimental effect on the quality of the resulting housing as the exemption for office to residential conversions. Allowing blocks of flats to be extended without planning permission by up to two storeys could be very damaging, even though conservation areas are excluded.

This is a pre-Covid 19 document and we have commented on it as such. Although it is too soon to be able to comment with full hindsight on the effect it is already evident that some pre-existing trends have been accelerated. It is of course still unclear what the speed and extent of reversion to the status quo ante will be.

The increased emphasis on active travel, now at the expense of public transport as well as of private cars, is exemplified by the rapid production and implementation of the Interim Covid-19 Response Local Cycling and Walking Infrastructure Plan.

C19 has accelerated the trend towards on-line purchasing and supermarket home deliveries, increasing the number of delivery vans and reducing the potential for creating fully traffic-free areas. The effect has been to accelerate the decline of high street retail outlets and halt the growth of supermarkets and shopping centres while boosting local shopping.

Home working, with or without occasional hot-desking, was already growing before C19, which has seen an exponential growth of on-line meetings. The bounce-back in use of existing office space and demand for new can be expected to be slow and low. The knock-on effects on travel, retail and catering are as yet unpredictable.

It is unclear whether day and longer stay tourism will in the long run benefit from the fall-out of C19 as people staycation.

The folly of replacing the Brighton Centre at Black Rock had already been recognised before the outbreak of C19. Whether a 10,000 seater venue will still be required and what the future holds for Churchill Square are open questions.

We have commented, by exception, on the following sections (clause numbers in brackets are those of the Draft City Plan Part Two). To query or respond to any of our comments please contact the society's secretary, Roger Hinton: honsec@regencysociety.org

Housing, Accommodation and Community

DM1 Housing Quality, Choice and Mix

Employment and Retail

DM11 New Business Floorspace

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

DM14 Commercial and Leisure Uses at Brighton Marina

DM15 Commercial and Leisure Uses on the Seafront

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

Design and Heritage

DM18 High Quality Design and Places

DM19 Maximising Development Potential

DM26 Conservation Areas

DM27 Listed Buildings

DM28 Locally Listed Heritage Assets

DM29 Setting of Heritage Assets

DM30 Registered Parks and Gardens

Transport and Travel

DM33 Safe, Sustainable and Active Travel

DM34 Transport Interchanges

DM35 Travel Plans and Transport Assessments

Environment and Energy

DM39 Development on the Seafront

DM44 Energy Efficiency and Renewables

Special Area Policy, Strategic Site Allocations, Housing and Mixed Use Sites and other Site Allocations

SSA1 Brighton General Hospital Site

SSA5 Madeira Terrace and Madeira Drive

HOUSING, ACCOMMODATION and COMMUNITY

DM1 Housing Quality, Choice and Mix

2.13 The term “where relevant” in relation to the provision of outdoor amenity space requires clarification, possibly by indicating where such requirements are not relevant.

EMPLOYMENT and RETAIL

DM11 New Business Floorspace

We particularly welcome the emphasis on flexibility.

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

The baseline for calculating allowable percentages for change of use should include previously converted premises.

The provision that within the Lanes and North Laine areas the change of use should not result in a group of three or more adjoining units being in non-A1 is particularly welcome.

We would encourage the residential use of the upper floors and rear areas of shops not least to secure the viability of the premises, provided it does not compromise the viability of the shop. Fire engineering can ensure fire safety where simple compliance with approved documents is not practical.

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

The baseline for calculating allowable percentages for change of use should include previously converted premises.

DM14 Commercial and Leisure Uses at Brighton Marina

The opportunities presented by the short remaining leases on some commercial and leisure premises and the abandonment of plans for a 10,000 seat venue at Black Rock are not taken into account by this policy. Any development at the Marina should be in the context of a masterplan for it and Black Rock.

DM15 Commercial and Leisure Uses on the Seafront

There is no specific mention of the importance of Madeira Drive as a venue for events, of the need for infrastructure to support them and of the potential of Madeira Terrace as a grandstand.

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

We are glad to see that common sense has prevailed and the proposal to replace the Brighton Centre at Black Rock has been abandoned. We consider that Black Rock should be reserved for leisure and recreational use as the eastern termination of the beach and not become the site of a hotel. We do consider the Marina to be a suitable place for a new hotel.

DESIGN and HERITAGE.

DM18 High Quality Design and Places

We welcome the inclusion of the principles of a circular economy in an integrated approach to design.

The spaces around a development can be as important as those within it and should have first call on CIL and S106 funding, for public realm improvements including repaving and street trees.

2.147 (2.139) We welcome the production of detailed guidance to developers (and for Planning Committee members) in the Urban Design Framework Supplementary Planning Document, which should be adopted by the time the City Plan Part Two is adopted.

DM19 Maximising Development Potential

There is potential for the original target of 13,200 new housing units by 2030 to be exceeded by over 1,600 units. This is in part the result of current major developments exceeding their original targets, leading often to over-development with excessively tall buildings with inadequate open space between them. This produces overlooking, possible wind tunnels, restricted sun light and generally unattractive public spaces. Proposed housing schemes which would exceed the City Plan minimum by more than 50% should not normally be approved.

DM26 Conservation Areas

2.204 (2.195-196) There is still no commitment to preparing character statements and management plans, relying instead on the applicants' own assessments. Character statements and management plans should be prepared for all conservation areas that are without them.

2.205 (2.196) There is still no statement that poor condition due to neglect is not legitimate grounds for the demolition of a building which makes a positive contribution to a conservation area.

2.208 This additional clause on contemporary and innovative design is welcomed.

DM27 Listed Buildings

The policies, or at least the supporting text, should still be explicit that less interventive but still economically viable use is preferable to a more commercially viable but more heavily interventive use.

(2.204) The omission of this clause is regrettable given the low quality of so many Heritage Statements.

2.220 (2.211) No Supplementary Planning Document giving further detailed policy guidance on alterations to listed buildings appears to be in preparation.

The Council should not register Planning and Listed Building Consent applications submitted with insufficient information, including inadequate heritage statements.

DM28 Locally Listed Heritage Assets

2.222 (2.213) The Local List of Heritage Assets has not been reviewed since it was issued in 2015.

DM29 Setting of Heritage Assets

2.219 (2.277) The additional statement that “This policy does not therefore preclude a bold architectural approach where appropriate.” is cautiously welcomed.

DM30 Registered Parks and Gardens

The Council should review further parks and gardens for registration and take the lead in the production and implementation of management plans for registered parks and gardens.

TRAVEL and TRANSPORT

DM33 Safe, Sustainable and Active Travel

The Local Transport Plan urgently needs to be supported by the Local Walking and Cycling Infrastructure Plan.

DM34 Transport Interchanges

2.255 The benefit to the local communities and reduction in other car journeys along the route of a frequent bus service from a park and ride into the city centre should be a material consideration in assessing its economic viability.

2.256 Rectifying the lack of dedicated coach parking for tour buses and facilities for their drivers should be a high priority for a city so heavily dependent on tourism. The impending development of Black Rock, restoration of Madeira Terrace and environmental enhancements to Madeira Drive increase the priority, making it an essential element of the proposed Eastern Seafront Masterplan.

The Pool Valley coach station is a disgrace to a city with any pride in itself: its replacement should be of the highest priority.

DM35 Travel Plans and Transport Assessments

2.261 The economic viability of additional public transport to developments in inaccessible locations should be a material consideration for their density of development.

ENVIRONMENT and ENERGY

DM39 Development on the Seafront

The restored arches of Madeira Terrace should be used to minimise development on the actual beach, facilitated by the minimisation of traffic on Madeira Drive.

DM44 Energy Efficiency and Renewables

Implementation of this policy should take into account the whole life energy consumption of existing buildings on circular economy principles, including the embodied energy of the existing fabric and the theoretically unlimited life of a historic building, against the energy cost of demolition and disposal, new raw materials, manufacturing and transporting components to site and constructing new buildings of limited life.

STRATEGIC SITE ALLOCATIONS

SSA1 Brighton General Hospital Site

We have supported the designation as a conservation area of the site formerly occupied by the Brighton Workhouse and wish to see it progressed as a priority.

SSA5 Madeira Terrace and Madeira Drive

We consider overnight accommodation of any kind within the terrace to be inappropriate, not contributing significantly to an active frontage and likely to impose undue pressure on the infrastructure.

We still consider that basic visitor facilities on the beach should be kept to a minimum and excepting lifeguards should preferably be accommodated within the terrace. Minimising traffic on the drive would facilitate this.

The improvement or removal of the coach parking on Madeira Drive should be an integral part of the project.

3.47 (3.36) Reopening all the closed staircases between Marine Parade and Madeira Drive is both feasible and essential, not just an option to be considered, and should be prioritised.