

Compiled by the Planning Policy, Projects & Heritage Team  
at Brighton & Hove City Council

# **Urban Design Framework**

## **Supplementary Planning Document**

### **Early stakeholder consultation report**

## **Appendices**

January 2019

## Contents

### Engagement with hard to reach groups

- |   |    |
|---|----|
| A. Summary of site assessments by site type                 | 2  |
| B. Transcript of Speak Out comments on site assessment tool | 10 |

### Issues & Options consultation

- |   |    |
|---|----|
| C. UDF SPD Issues & Options paper               | 11 |
| D. Transcripts of workshop responses            | 36 |
| E. Transcripts of Consultation Portal responses | 43 |
| F. Transcripts of email responses               | 50 |

## A. Summary of site assessments by site type

(in alphabetical order)

### CHURCHILL SQUARE, BRIGHTON

Site type: city centre square and bus interchange

Assessment delivered by: **Friends, Families and Travellers**

Date/Time of assessment: **Run up to Christmas 2017**



All 10 members of the Traveller community who participated in this site assessment were familiar with the area. Most visit the area regularly, using mainly to shop and/or meet friends/socialise.

#### Busy area, great for shopping

- Shops are lower than street and visibility of retail frontage is difficult;
- So busy at times, local people avoid it (Christmas);
- Not much for children and elders; and
- Crossings are far apart and no central reservation to help people cross road between buses.

#### Liked:

- Easily accessible (all buses go through it or stop nearby);
- Variety of shops and places to eat;
- Street performers & buskers; and
- Cover from the rain.

#### Improvements:

- More/Comfortable/Accessible seating for disabled people and children (not linked to food outlets);
- Clearer signage;
- Make it easier for wheelchair/mobility users to move in the area;
- More colour (flowers, decorations);
- Make it more people and child friendly;
- More places to chill out;
- More/Better/Safer crossings along Western Road;
- Space for community/ performance activities;
- Rubbish collection (planted areas);
- More parking and more shops; and
- Make it less commercial.

#### Suggested partners for implementation

- Not identified.

## CARDEN PARK, BRIGHTON

Site type: suburban park

Assessment delivered by: **Friends, Families and Travellers**

Date/Time of assessment: **Not specified**



The majority of the 9 young Irish Travellers who participated in this site assessment were familiar with the play facility located next to the Old Boat Corner Community Centre. Most having used it to play in, meet friends or wait around for dance classes to start in the centre. Four participants had never been to this place and/or knew it was there.

### Fun open area

- Lots of children in the summer time;
- Good for playing with friends and family;
- Large open space; and
- Playing with my friends and family.

### Liked:

- Community centre activities, in particular dance classes;
- Rope climbing frame.
- Play area for kids;
- Café, seating area / benches;
- Feels safe when with parents;
- Space to kick the football around.

### Improvements:

- More/Better seating;
- Grass a bit long.
- More/Better equipment (swings, climbing wall, seesaws, slides);
- Bigger sandpit.
- Football/ basketball court / area for teenagers;
- Better signs
- More lighting
- More parking;
- More direct buses;
- Pedestrian crossings on busy road.

### Suggested partners for implementation

- Not identified.

## GEORGE STREET, HOVE (Blatchington Road entrance)

Site type: shopping area (pedestrian only during daytime except on Sundays)

Assessment delivered by: **Possability People, Get Involved Group (GIG)**

Date/Time of assessment: **October-December 2017**



A total of 10 city residents ranging from ages 21 to 72 with a lived experience of disability, long-term health condition or impairment participated in the site assessment across all 4 sites assessed.

### Great pedestrianised area

- Busy during the day
- Can feel dangerous at night; and
- Gated drains are a hazard for people using walking sticks.

### Liked:

- Great transport links;
- Plenty of seating along the road;
- Lots of space to walk through when pedestrianised;
- Good range of shops;
- Sense of community;
- Friendly space, quieter than its surroundings ; and
- Most of the shops that we looked at had level or ramped access with wide open doors, which is very accessible for most people.

### Improvements:

- Provide more flat, level pavement throughout but specially on Blatchington Road approaching George Street;
- More seating and make existing seating more visible from entrance;
- Remove obstacles to movement around dropped curbs (large bins and vegetable stands) in particular at times when street is open to cars;
- Change drain covers so not a hazard for walking sticks;
- Better lighting specially at night;
- Obstacle-free paths through pavements without A-boards, bollards and street furniture such as tables and chairs, in particular when street is open to traffic;
- More on-street car parking, including blue badge spaces;
- Accessible toilets; and
- Make George Street traffic-free until 7pm (instead of 4pm);
- More events but leave space for people to move easily between stalls.

### Suggested partners for implementation

- Possability People and other charities having a presence, giving information to passers-by;
- City College or community group 'Men in Sheds' to make benches; and
- Volunteers to plant and look after flowers.



## QUEEN'S PARK, BRIGHTON (Egremont Place entrance)

Site type: city centre park

Assessment delivered by: **Possability People, Get Involved Group (GIG)**

Date/Time of assessment: **October-December 2017, 2pm on a Wednesday**



A total of 6 city residents ranging from ages 21 to 72 with a lived experience of disability, long-term health condition or impairment participated in the site assessment across all 4 sites assessed.

### Beautiful, peaceful place

#### Liked:

- Direct bus route with good access to park from bus stop near entrance;
- Fresh air in crowded city;
- Plenty of birds;
- Duck pond and tennis courts; and
- Well-kept tactile dropped kerbs in the area around gate.

#### Improvements:

- Signage from main road;
- Park information board with map to mark entrance to park and signpost events, cafe and toilet location;
- Better parking facilities;
- Widen pavement and remove residential bins on upper bus stop;
- Even out pavement around large tree (roots breaking pavement);
- Care and upkeep (toilets);
- Make it safer at night time;
- Replace white building (appears no to be in use) with seating/rest area for people walking up the hill;
- Access point for work vehicles constitutes a trip hazard and needs to be made more accessible;
- Railing along path is good but stops half way down;
- Gates that are lighter and wide enough to accommodate large wheelchair or mobility scooter;
- Path into the heart of the park is very steep and fallen leaves can make it slippery; and
- Indoor sitting area in café

#### Suggested partners for implementation

- Friends of Queens Park group;
- Hanover & Elm Grove residents;
- Local MP;
- Local businesses;
- Chamber of Commerce;
- Sussex Police; and
- Organisations concerned about drug use.

## **KNOLL PARK, HOVE (area outside café)**

Site type: suburban park

Assessment delivered by: **Hangleton & Knoll Project, Multi-Cultural Women's Group**

Date/Time of assessment: **5 October 2017, 10.30am**



A total of 14 females, including some from ethnic minorities, ranging from ages 29 to 70 participated in this site assessment. Roughly half of the respondents were not familiar with the park and/or indicated their day-to-day activities are limited because of a health problem or disability. Approximately one third of respondents resided on the edge of or near the park.

### **Traquil, valuable place with amazing potential**

#### **Liked:**

- Cleanliness;
- Potential for a community café;
- Lots of green, open space;
- Calm and quiet despite being close to residential spaces;
- Big open space surrounded by trees;
- General atmosphere;
- Grass is well maintained and no litter;
- Community managed building;
- Children's play space; and
- Café.

#### **Improvements:**

- Signage from main road and bus stop so people can see where the park/playground is located;
- Visibility of entrance (looks like private garage access to nursery);
- More/Comfortable seating;
- Equipment and maintenance raised to match standards of other parks in the city like Hove Park and Queen's Park;
- More lighting;
- More planting /flowers;
- Make it safer at night time, discouraging anti-social behaviour and drug use;
- Fix/Replace notice board and use it to advertise community activities;
- Water fountain;
- More activities;
- Introduce play equipment for young people (basketball hoops, skate park);
- Café should open more than once a week;
- Community building could be used more;
- Fix broken notice board;
- Introduce activities to attract young people, seniors and children and/or involving gardening, food growing;
- New bins;
- Provide dog bins;
- Accessible public toilets;
- Repair broken mosaic;
- Recycling bins; and
- Some people discouraged to use park because of dogs moving around freely.

#### **Suggested partners for implementation**

- Local schools;
- Local community groups; and
- Council.

## MOULSECOOMB RAILWAY STATION, BRIGHTON (Westbound platform)

Site type: Public transport facility

Assessment delivered by: **Possability People, Get Involved Group (GIG)**

Date/Time of assessment: **October-December 2017**



A total of 5 city residents ranging from ages 21 to 72 with a lived experience of disability, long-term health condition or impairment participated in the site assessment across all 4 sites assessed.

### **Good access, if you can get to it**

- Train station inaccessible to disabled people (disappointing as large college next door with a lot of users);
- Very run-down and in need of refurbishment; and
- Lots of slippery wet leaves on the way to the platform.

### **Liked:**

- Sheltered waiting area on platforms;
- Good, well-lit information and signage.
- Help point at entrance to platforms; and

### **Improvements:**

- Signage from Lewes Road and to indicate Eastbound platform is accessible (up sloped road via the bridge, away from steps);
- More parking close to station;
- Introduce pavement and resting areas along steep road linking Lewes Road bus stops and station;
- Create disabled parking area with a drop off point at the bottom of allotments allowing access into the train station on the Eastbound platform;
- Introduce wheelchair access to platform (possibly with lift);
- Paint edges of stairs up to Westbound platform;
- Improve/Update lighting up steps; and
- Put in place better arrangements in a unstaffed station in which people have to rely on the train guard for support when getting on and off the train.

### **Suggested partners for implementation**

- Possability People to suggest ways to make it more accessible; and
- Local artists providing art work to enhance the feel of community.



## SEAFRONT PROMENADE, BRIGHTON (outside i360)

Site type: Seafront public realm

Assessment delivered by: **Possability People, Get Involved Group (GIG)**

Date/Time of assessment: **October-December 2017**



A total of 6 city residents ranging from ages 21 to 72 with a lived experience of disability, long-term health condition or impairment participated in the site assessment across all 4 sites assessed.

### **Good transport links, if you have a car**

- Upper promenade can be very busy, especially with the entrance to the i360 being so close, which can be noisy/disorientating on busy road.

#### **Liked:**

- Location by the sea, fresh air;
- Underground and off street parking nearby (Regency Square);
- Many pedestrian crossing points on to the promenade which are of high quality with cones for people with visual impairments and clear pictures and sounds;
- Wide, flat walkway along upper promenade with good quality paving;
- Platform lift between upper and lower promenade;
- Lower promenade is far more accessible than before the recent development; and
- Well-designed accessible toilet in lower promenade.

#### **Improvements:**

- Better bus links (most bus stops up the hill on Western Road);
- Provide dedicated cycleway to reduce risk of bikes crossing paths with pedestrians in particular visually impaired people and those with limited mobility;
- Places to shelter;
- Introduce signage indicating location of nearest lifts and toilets in upper and lower promenades;
- Provide information about who to alert when platform lift is not working and/or how long repairs will take;
- Toilets were impossible to see and there is a 30p charge to use them;
- Ensure accessible toilet in lower promenade is open throughout the year; and
- Widen distance between bollards in lower promenade to allow ease of movement of wheelchair users.

#### **Suggested partners for implementation**

- Collaboration with local artists, food manufacturers and musicians to make the space more vibrant and aid grass roots economy.

## ST JAMES' STREET, BRIGHTON (from the bottom leading up to Wentworth Street)

Site type: High street and bus corridor

Assessment delivered by: **Brighton & Hove LGBT Switchboard's LGBTQ Disabilities Project**

Date/Time of assessment: **7 March 2018 from 16.00 to 18.00**



A total of 4 people between the ages of 23 and 57 from the local LGBTQ community who have disabilities sites carried out the assessment.

### **Cosmopolitan and has LGBTQ visibility.**

- Excluding bikes, 47 objects including signs and badly placed bollards, were identified in the way up and down the street;
- Most shops are inaccessible due to steps and/or narrow aisles;
- Bottle-necks at bus stops; and
- Different at night.

#### **Liked:**

- Variety of shops;
- Lots of thing to do; and
- People in the cafes are friendly and community-minded.

#### **Improvements:**

- Declutter pavements, in particular around bus stops;
- Ramps into shops;
- Lowered kerbs and ramps to facilitate movement across road;
- More colour;
- Less bikes blocking pavements;
- Remove graffiti; and
- Murals on boarded shops.

#### **Suggested partners for implementation**

- None identified.

## VICTORIA RECREATION GROUND, PORTSLADE

Site type: suburban park

Assessment delivered by: **Trust for Developing Communities**

Date/Time of assessment: **9 and 23 February 2018, 16.00 to 17:00**



All 14 young people who participated in this site assessment were from culturally and ethnically diverse (BME) backgrounds and live nearby. Their age ranged between 10 and 18 years old and there was an even split between male and female. Many have been born in the area.

### Part of an attractive neighbourhood

- Busy and best in good weather;
- Nice wide-open space;
- Used by all sorts of people; and
- Easy to get to.

### Liked:

- Family activities like picnics;
- Play area for younger family members;
- Somewhere near to play (informal and sports); and
- Peaceful sometimes, good for relaxing with friends.

### Improvements:

- Comfortable seating;
- Signage;
- Child safe facilities;
- More in the play area;
- Kiosk selling healthy snack / somewhere to get decent cup of tea;
- More greening and colour (flower beds, hedgerows);
- Care and upkeep (refuse collection and dustbins);
- Family-friendly environments; and
- Safer public space (without hidden corners/ places people could conceal themselves).

### Suggested partners for implementation


- Local residents.




## B. Transcript of Speak Out comments on site assessment tool

- B.1 [I have sent you] some guidelines for making information more accessible for people with learning disabilities. I hope it gives you some ideas for ways you can put together your forms. If you have any questions please don't hesitate to contact me. ...
- B.2 Thanks for sending me the [site assessment] form. I think that the questions and information need to be separated more so that the form is not so overwhelming. E.g. different pages for personal information, rating the space, identifying opportunities, the place and you. Are you planning on using the same form for everyone or having an accessible easy read version for people with learning disabilities? [Additionally, below] is a copy of an easy read equal opportunities form to give you an idea.





Please tell us a bit about you so we know we are working with all types of people.  
You do not have to answer these questions if you do not want to.  
**Circle** or write your answers.

Are you happy for us to store this information confidentially on our database? Yes ☐ No ☐





 How old are you?

Are you:  Male  Female  
Please also circle here if your gender has changed:  
(You are transgender) 

Which people are you attracted to?  
(Your sexual orientation)








 Men  Women  
 Both  None

Which ethnic group do you or your family come from?



 White  Asian  Black  Mixed Race (your parents are each from different ethnic groups)

Any other ethnic group? Which one?






Which religion describes you best?

 Christian  Buddhist  Hindu  Jewish  Muslim  Sikh  No religion

Another religion? Which one?

Do you have a disability or a long-term illness? ☒  

If you do then please circle the ones that apply to you:

 Sensory  Physical  Mental Health  Learning Disability  Illness

## C. UDF SPD Issues & Options Paper

# U r b a n D e s i g n Framework Supplementary Planning Document

Issues & Options paper

June 2018

Consultation on this document takes place between 5 July and 13 September 2018.

To respond to this consultation please visit [www.brighton-hove.gov.uk/spd](http://www.brighton-hove.gov.uk/spd)





## Contents

1. Introduction
2. Purpose of the Issues & Options paper
3. SPD Issues & Options
  - A. Priority areas for enhancement and design guidance
  - B. Accommodating taller development
  - C. Building design
  - D. Public realm design
  - E. Views and vistas
4. Appendices

## 1. Introduction

*“Good design is not just about the aesthetic improvement of environment, it is as much about improved quality of life, equality of opportunity and economic growth.”*

*The value of good design, CABE*

Good design does not just happen.

It is the result of a creative process that involves good designers and a commitment from key decision makers to achieving it.

High quality design transcends subjective issues of personal taste, style or architectural fashion. It is about creating places that are well built, work well and look good.

The Urban Design Framework Supplementary Planning Document (UDF SPD) will be used by the council to provide additional guidance to planning applicants and landowners on design policies set out in the City Plan Parts One and Two.

Fundamentally, these policies intend for good design to be seen as the norm, rather than the exception in Brighton & Hove. This demands that buildings and the spaces between buildings are designed around principles of good place making and sustainability.

Working on these principles will help deliver more successful places and need not add expense to the project, if considered early in the development process.

By setting out the processes and principles that are expected to be addressed by proposals for buildings and the spaces between them, the UDF SPD will help create sustainable places that deliver a good quality of life and prevent costly poor design.

## What is an SPD?

Paragraph 153 of the National Planning Policy Framework states that SPDs ‘should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.’

A SPD cannot make new policy or change existing policies but can help demonstrate how policy requirements, such as targets for new homes and other uses, can be successfully met.

Local communities will be consulted at different stages in the preparation of the UDF SPD to make sure that they have a chance to comment on this guidance. This helps the council identify local priorities and aspirations, as well as engage with local partnerships.

The council will consider the issues and themes raised through the consultation to help to inform the SPD. A diagram summarising the stages in the preparation of this SPD is provided in Appendix 1.

## What are the policy guidelines for the UDF SPD?

City Plan Part One Policy CP12 states that the UDF will be a city-wide document that will seek to identify and set out:

- Areas which should be largely be conserved and/or enhanced;
- Priorities for planning design guidance;
- Strategic views; and
- Area- and site-specific design principles.

It will also aim to:

- Provide clarity about areas that can accommodate taller development;

- Support public realm improvements that create pedestrian-cyclist friendly spaces that accommodate the needs of all people and achieve consistent aims and standards;
- Be informed by relevant studies, in particular the Urban Characterisation Study and Historic Character Assessment report; and
- Contribute towards the implementation of Public Spaces Public Lives, Streetscape Design Guidelines and other relevant strategies.

The preparation of the UDF SPD will look at opportunities to support constructive design discussions between applicants, designers, planning officers, councillors and communities and by outlining potentially appropriate solutions and illustrating best practice in the city and elsewhere.

Detailed information about the policy context informing the preparation of this SPD is provided in Appendix 2. A glossary is provided in Appendix 5.

## 2. Purpose of the Issues & Options paper

*“Good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people”.*

*National Planning Policy Framework, paragraph 56.*

The purpose of this ‘Issues and Options’ paper is to promote discussion and build consensus on the type and content of guidance prepared to support the delivery of Policy CP12 Urban Design and other relevant City Plan Policies.

The paper sets out some of the key design challenges and outlines options for how these could be addressed through a:

- **City Plan policies only** approach - City Plan policies provide sufficient guidance and no further guidance is needed;

- **Broad brush SPD** approach - to identify and summarise the parameters, supporting evidence and basic analysis that would be required as part of a planning application. Based primarily on information already available (e.g. via existing studies and approved planning applications); and/or
- **Detailed SPD** approach – the SPD frontloads design and masterplanning issues that could facilitate the submission of a planning application (e.g. identifies broad locations for particular land-uses, higher densities, height ranges, key landscape/access/movement links and infrastructure).

The options are not mutually exclusive. A combination of approaches could be considered as the most suitable way forward. For example, for some issues the guidance in the policy may be sufficient, but other issues may require more detailed supplementary guidance or a masterplanning approach. Consultation may also propose alternative approaches to address an issue.

This consultation paper will guide a series of discussions and workshops to gather stakeholders’ views on the identified issues and options at an early stage in the preparation of the SPD.

The outcome of this consultation will inform the preparation of a Draft UDF SPD. A city-wide consultation exercise for the Draft SPD is expected to take place Summer 2019.

## 3. SDP Issues & Options

The challenges identified have been grouped into 5 issues. For each issue this paper sets out:

- a brief summary of the current approach and what the City Plan expects from the UDF SPD; and
- the options illustrating the level of detail for the reader to choose from.



## Issue A: Priority areas for enhancement and design guidance

Brighton & Hove's population could reach nearly 290,000 by 2021<sup>1</sup>, creating challenges for meeting the city's housing and other land use needs. The city therefore needs to make the best use of its existing land resource and one way of doing this is to increase density - the degree to which land is used or occupied.

Higher densities can be a contentious issue for local communities concerned about the legacy of past mistakes in urban regeneration. However, lessons have been learnt about the ways in which good design can help to deliver more high-quality buildings and spaces while creating the critical mass to support better and more diverse local shops and services and improved social, environmental and transport infrastructure.

City Plan policies actively promote high-density, mixed-use development and view high quality design as key to delivering acceptable development in a city with high housing demand, significant spatial constraints and sensitive landscapes.

The council's [Urban Characterisation Study](#) (UCS 2009) provides a comprehensive understanding of the diversity and quality of the city's urban character and the pressures affecting it. This study identified 32 distinct neighbourhoods, in addition to the central conservation areas.

Further work is required to illustrate whether and how those neighbourhoods could satisfactorily accommodate higher densities and to identify pro-active measures that could help to secure major enhancements to their built environment and public realm.

**City Plan policies highlight the need for the UDF SPD to identify and set out:**

- areas of the city which should largely be conserved or are suitable for positive incremental or major enhancement;
- priorities for public realm improvements; and
- priorities for preparing planning briefs and guidance.

### Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

#### A1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

#### A2 Broad brush SPD

- Using a neighbourhood approach as set out in Urban Characterisation Study and Character Assessments to evaluate scale of sensitivity to change and shared urban design issues that warrant the provision of a consistent approach to development proposals.
- Identify opportunities for increasing density and priority areas for masterplanning and public realm improvements.
- Provide guidance on design principles to guide new development based on approved planning applications and DesignPLACE panel advice (see Example A2 below).

#### A3 Detailed SPD

- Through a more detailed masterplan approach identify priority areas for change and design priorities on a thematic basis (see Example A3 below).
- Provide further guidance on densities, public space potential and urban design principles.

<sup>1</sup> [Brighton & Hove City Snapshot – Summary of Statistics 2014](#)

**Example A2: Design principles for Strategic Allocation based on masterplan set out in approved planning application – [Masterplanning study submitted as part of planning application BH2016/ 02499](#) (Anston House).**

Anston House is one of a number of sites that form part of City Plan Part One's Strategic Allocation 125-163 Preston Road within Development Area 4 (New England Quarter and London Road Area).

During the pre-application stage, the applicant commissioned a masterplan to establish a clear and well-defined design response for a development that would set the tone for future development in the Preston Road and Strategic Allocation area.

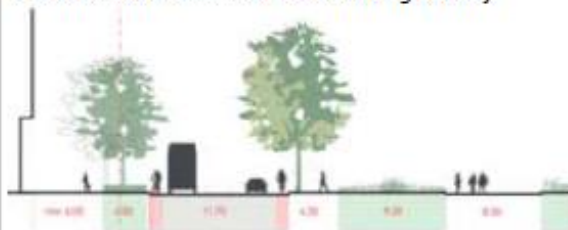
The masterplan was submitted to and received feedback from the South East Design Review Panel and forms part of the planning application approved in late 2016.

This approach to development design was actively encouraged by the Local Planning Authority.

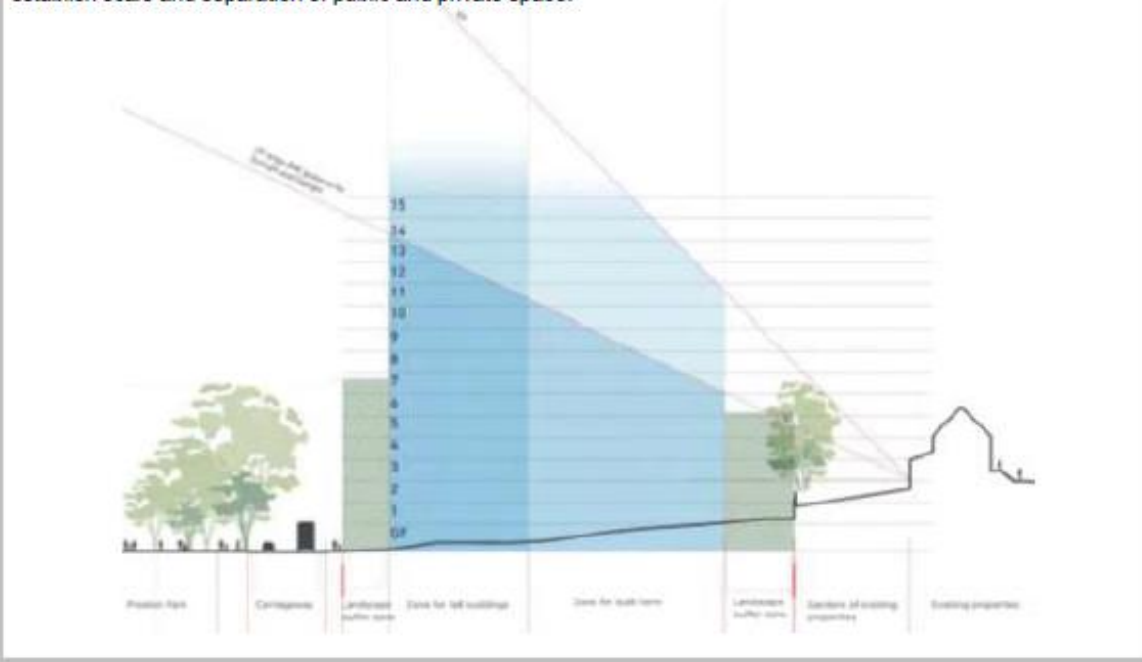
The 6 design principles identified in the masterplan are summarised below. For more information about masterplan content please refer to the Design and Access Statement (in particular parts [1](#), [2](#) and [3](#)) available in the '[Documents](#)' webpage for this application.

A broad brush UDF SPD could signpost area and/or site-based design principles and enhancement priorities established as part of approved planning applications.

**Principle 1 - Introduction of a landscaped zone along Preston Park:** the principle seeks to create a boulevard through the Introduction of a landscaped zone along Preston Road to enhance and mend the greenway.

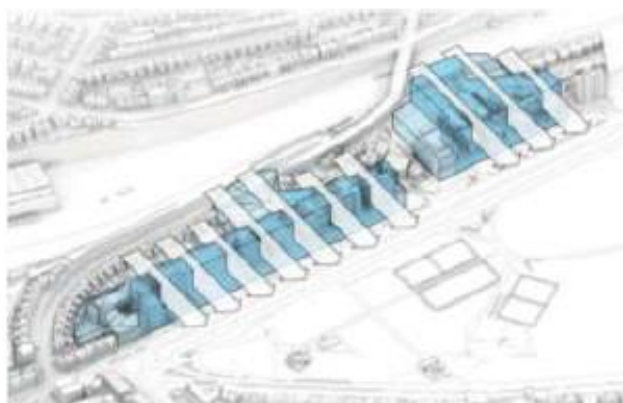


**Principle 2 - Layering from (Preston Road) front to (residential properties at the) back:** a hierarchy of defined zones establish scale and separation of public and private space.

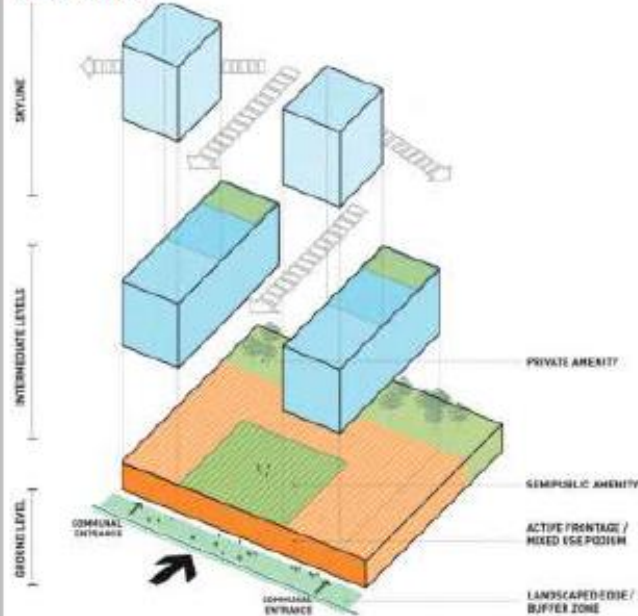




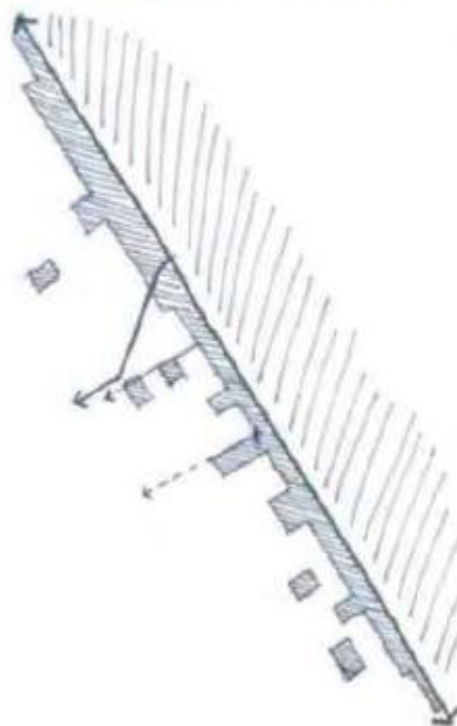
**Example A2 (continued): Design principles for Strategic Allocation based on masterplan set out in approved planning application – [Masterplanning study submitted as part of planning application BH2016/ 02499](#) (Anston House).**



**Principle 5 - Vertical layering of uses:** creates a hierarchy of privacy and defines a reduction in mass as height increases ranging from a defined continuous ground floor to broken skyline mass elements.



**Principle 6 - Introduction of courtyards and small open spaces on the west side of Preston Road:** creates opportunities for ground floor activity and amenity spaces to promote activity on site.



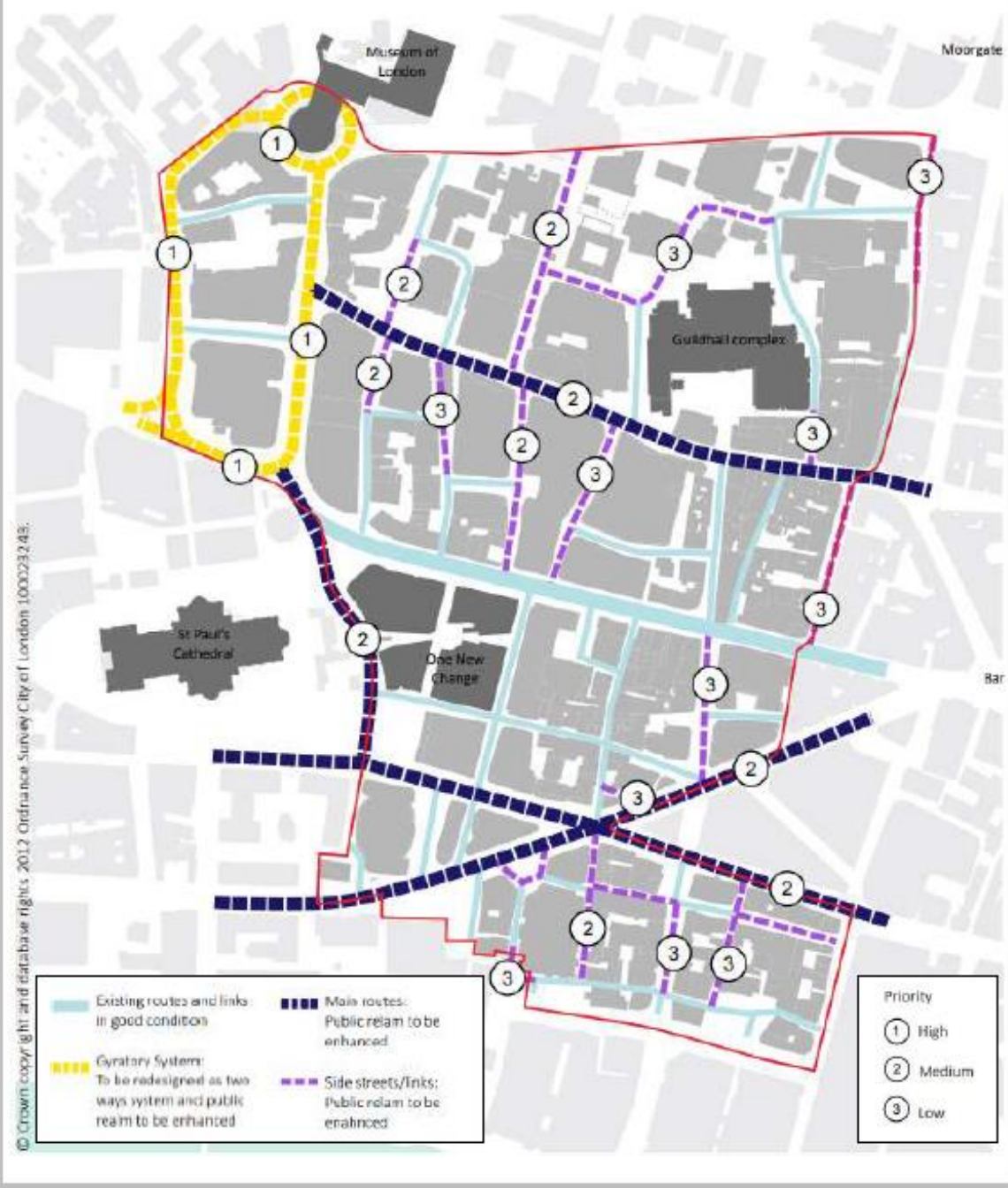


**Example A.3: Guidance identifying areas for transport and public realm enhancement and improvement - [City of London's Cheapside & Guildhall Area Enhancement Strategy](#)**

In order to deliver projects that support the objectives of its planning policies, the City of London has developed an area-based approach to enhancement strategies. The strategies deal almost exclusively with the enhancement of highways and the public realm under the City's Highway Authority or Open Spaces stewardship.

The map shown below illustrates proposed public realm enhancements for the Cheapside & Guildhall area.

A detailed UDF SPD could adopt a similar thematic approach to identify key objectives and priorities for Development Areas.



## Issue B: Accommodating taller development

City Plan Part One Policy CP14 Housing Density encourages higher densities in appropriate locations across the city. In some areas, this will include the potential to accommodate taller buildings.

Following a detailed analysis of Brighton & Hove carried out at a strategic level as part of the [Tall Buildings Study](#) (2003), area-based opportunities for taller buildings have been carefully identified. These are defined as buildings of 18 metres or more in height (approximately 6 storeys).

The areas considered suitable for taller development are generally visually recessive on the valley floors or the seafront; have limited impact on heritage settings; are well served by sustainable transport; support local commercial/shopping centres; relate to existing taller building clusters; and are in the vicinity of open space.

Many of these areas, which take the form of either nodes or corridors, fall within the City Plan's identified Development Areas. They are described in City Plan Part One Policy CP12 Urban Design (see Appendix 3).

Proposals for new tall buildings in and/or outside these areas will trigger the guidelines set out in [Supplementary Planning Guidance Note \(SPGBH\) 15 Tall Buildings](#).

Planning applicants are asked to address the assessment criteria set out in SPGBH15 via the submission of a Tall Buildings Statement (see Appendix 4).

**City Plan policies identify the need for the UDF SPD to identify and set out:**

- the boundaries of the tall building areas;
- appropriate height ranges for tall building areas; and
- strategic design criteria for new tall building development.

### Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

#### B1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

#### B2 Broad brush SPD

- Consider options to incorporate area boundaries and zones suitable, potentially suitable or not suitable for tall buildings set out in 2003 Tall Buildings Study (see Example B2 below).
- Identify height limits for each area/zone using the ranges set out in SPGBH15.
- Incorporate criteria-based approach set out in SPGBH15 for assessment of proposals inside and outside tall building areas into SPD.

#### B3 Detailed SPD

- Through a more detailed masterplan, 3D-based approach delineate, in map form, tall building area boundaries and zones.
- Provide guidance on densities, public space potential and key urban design principles to guide development (see Example B3 below).
- Explore opportunities to review criteria-based assessment set out in SPGBH15 for proposals inside and outside tall building areas.



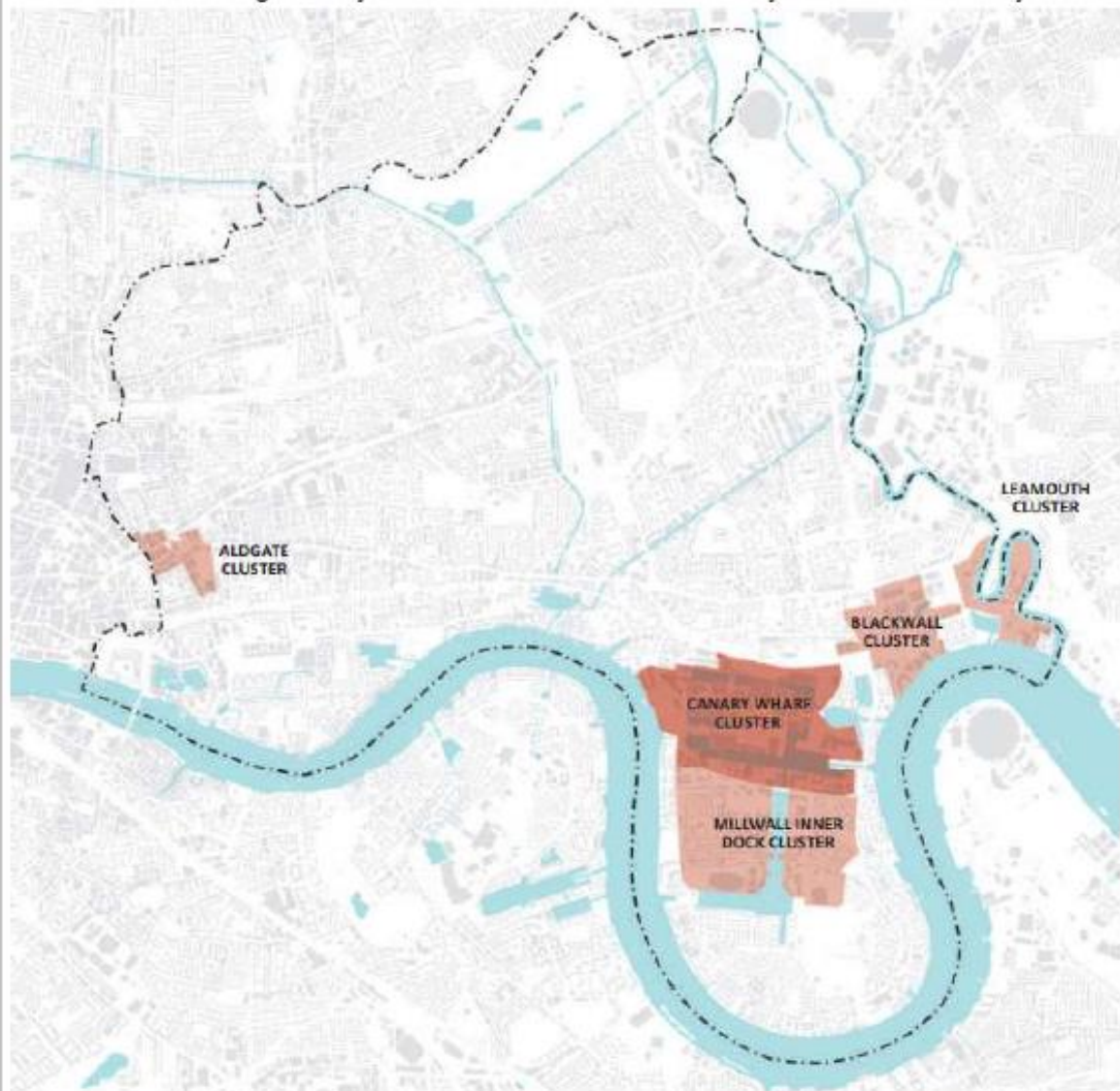
**Example B2: Draft report outlining tall building zones - [London Borough of Tower Hamlets Tall Buildings Study Draft Report](#)**

This 2017 study sets out 12 high-level design principles that any tall building proposal would need to consider anywhere in the borough; identifies 5 locations/zones where tall buildings are considered to be appropriate and provides advice on potential heights for tall buildings for each zone.

The design principles include understanding of context, response to heritage assets, approach to landmarking, tall building clusters, land uses, architectural quality, relationship to public realm, impacts on the local environment and recent tall buildings activity.

The analysis and recommended strategy emerging from this and the 2004 Brighton & Hove Tall Buildings Study are remarkably similar. Recommendations regarding zone boundaries and height ranges for each zone were not progressed into SPGBH 15 Tall Buildings.

A broad brush UDF SPD could, in the light of recent tall building activity, revisit and/or review study findings to signpost more clearly boundaries and preferred height ranges for each of the tall building areas identified in City Plan Part One Policy CP12.





**Example B3: Masterplan-based guidance setting out building heights, density, massing and urban form - [London Borough of Brent's South Kilburn SPD](#).**

This SPD identifies generic and site-specific design principles and parameters to guide future development in the South Kilburn Growth Area of the London Borough of Brent.

The guidance seeks to provide greater clarity regarding the form and quality of acceptable development, including opportunities for taller buildings in an area where the predominant building height is 4 to 8 storey. Examples of locations where greater height might be appropriate are provided. Opportunities for buildings to go slightly higher in locations such as corners, ends of vistas and frontages on principal streets are also identified.

The extract from the map below sets out indicative heights and densities across the area. The images in the next page show indicative 3D massing and heights for the area with details provided for the Queen's Park & Cullen House Site Allocation.

Building on the findings of the Brighton & Hove Tall Buildings Study, a detailed UDF SPD could contain indicative boundaries, height ranges and/or densities. It could also signpost locations and/or instances where new development could be modestly higher than prevailing building height.



### Heights and densities

	Regeneration sites		10+ Storeys
	Podium		Density 450 - 700 HRH
	1-3 Storeys		Density 750 - 900 HRH
	4-5 Storeys		Density 900 - 1200 HRH
	6-7 Storeys		Density 1200+ HRH
	8-10 Storeys		

HRH is a density benchmark that is based on workforce-to-population ratio method. For example, a health worker-to-population ratio estimates the current workforce density or supply, compared against an identified threshold density that is assumed to correspond with a health system's ability to deliver essential health services.



This aerial view shows the Queens Park area. A red circle highlights a specific site. An inset map shows the site's location within the broader Queens Park area. A north arrow is present.



## Issue C: Building design

National policy requires that planning applications for major development<sup>2</sup> and, in some instances, for development in Conservation Areas be accompanied by a Design and Access Statement. This statement should be used to explain the design principles and concepts that have been applied to the development proposed with the level of detail being proportionate to the complexity of the application.

City Plan Part One Policy CP12 and other policies seek to ensure that proposals are based upon a good understanding of site characteristics and the wider context. This means a site appraisal process is required that establishes design principles around which the scheme will be developed.

Design principles to be considered in formulating proposals for extensions and alterations to buildings and for tall buildings in the city are currently set out in [SPD12](#) and [SPGBH15](#) respectively.

These would include, for example, building layout and frontages, focal points, views in and out and main routes/connections.

This approach risks a piecemeal approach to development that fails to make the best of sites or address the needs and aspirations of local communities.

Identifying design principles and priorities for masterplanning early on in the design process is one way to provide greater clarity to everyone involved in the development and planning process, in particular when it comes to areas of the city where growth is expected.

**City Plan policies identify the need for the UDF SPD to:**

- identify area- and site-specific design principles; and
- set out priorities for planning guidance.

### Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

#### C1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

#### C2 Broad brush SPD

- Set out best practice principles for neighbourhoods that could be followed by different types of development to demonstrate that the proposal is based upon a clear appreciation of the site and its wider context (see Example C2 below).
- Identify benchmarks that could be used to assist in the assessment of proposals, including design review and/or existing design industry standards such as, for example, [Building for Life](#).

#### C3 Detailed SPD

- Work up development principles for areas and/or sites where the potential for masterplanning to raise quality and unlock development has been identified. For example, City Plan Development Areas and Strategic Allocations.
- Set out the place making principles that can be used for assessing development proposals and some principles appropriate for different scales of development, including proposals of less than 10 dwellings (see Example C3 below).

<sup>2</sup> Development involving 10 or more housing units; a site having an area of 0.5 hectares or more; the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or development carried out on a site having an area of 1 hectare or more. For a more detailed definition please see [Town and County Planning Act 1990](#).

**Example C2: Design guidance for development that includes checklist - [Wakefield District Council's Residential Design Guide SPD – Part 1: Guidance for housebuilders](#)**

This guide sets out best practice advice to help add value and design quality to residential design proposals. It outlines generic principles that collectively can have a positive impact upon neighbourhood design and contains a checklist that reminds designers of how these can be combined to help deliver a range of policy objectives.

Diagrams like the one shown below are used to illustrate how this might be achieved. For instance, designing development that encourages walking and cycling by making

streets easy to cross and pleasant to walk by using planting that provides shade, interest over the seasons, enhances biodiversity and help absorb pollutants.

Building on the findings of the Brighton & Hove's Urban Characterisation Study, a broad brush UDF SPD could identify generic design principles and signpost integrated building design best practice that can achieve multiple policy objectives for the development and the wider neighbourhood context.





### Example C3: Design guidance for regeneration area - [Wakefield District Council's City Centre Urban Design Framework SPD](#)

This SPD complements the city-wide guidance referred to in Example C2, focusing on how the Wakefield city centre can successfully accommodate new development, in particular housing. The guidance sets out 9 overarching placemaking principles to help ensure the area is developed harmoniously, maintaining a balance between the built environment and its people.

Using a high-level masterplanning approach, it also identifies design priorities for clusters of sites identified for development (see example of north of Ings Road sites below).

A detailed UDF SPD could adopt a similar approach to identify placemaking principles for the city as a whole and/or Development Areas and/or Strategic Allocations identified in City Plan Part One.

This approach has been used in the city to support the delivery of strategic sites including [Edward Street Quarter](#) and [Preston Barracks and University of Brighton](#) (see schematic masterplan on the next page).



*Lewes Road (Preston Barracks and University of Brighton - 2011): Schematic illustration of development principles.*

*Edward Street Quarter Planing Brief (2013): Schematic illustration of indicative greening strategy.*

**Key**

- Zone for public space
- Creation of a green corridor
- Prime area for green roofs and amenity space
- Links to existing green spaces and green corridor
- Priority area for soft landscaping and planting



## Issue D: Public realm design

Excellence in public realm design is about creating the right conditions to make places in the city work well.

Brighton & Hove's public highways, parks and gardens, cycle and walkways and private land that is accessible to the public provide the means for people to move quickly and safely through the city as well as providing places for socialising, sitting quietly, sightseeing, entertainment and enjoying outdoor events.

Policy CP13 Public Streets and Spaces and other City Plan policies seek to aid the evolution and enhancement of public realm in new development by, among other things, setting standards of excellence in public realm design.

The city's future attractiveness and competitiveness is partly dependent on using best practice design principles to create streets and public spaces that are functional and safe, and which enhance the quality of life for all users.

This means encouraging planning proposals to adopt a robust design

approach that shows an understanding of the role of the place, movement and other functions of the city's public realm (e.g. open space, sports provision, health, water management and habitat enhancement).

The [Public Space Public Life Study](#) identifies a hierarchy of routes that could make the experience of moving through the city more continuous and consistent. The [Streetscape Design Guidelines](#) sets out standards of design and installation specifications for street furniture and surface materials.

**City Plan policies identify the need for the UDF SPD to:**

- ensure that public realm improvements create pedestrian-cyclist friendly spaces that accommodate needs of all people;
- achieve consistent aims and standards in public realm design and delivery;
- identify area- and site-specific design principles; and
- set out priority for planning guidance.

### Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

#### D1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

#### D2 Broad brush SPD

- Identify opportunities to better integrate land use, water management, green network, health and transport policy objectives into public realm in order to deliver a simpler and less cluttered appearance with high quality materials and low maintenance requirements (see Example C2 Edward Street Quarter greening strategy in page 16).
- Set out urban design best practice principles and standards and provide guidance for priority areas for public realm improvements that respond to the needs of the local community, including businesses and visitors.

#### D3 Detailed SPD

- Through a more detailed masterplan approach identify placemaking principles and minimum standards that will be used for assessing public realm proposals as well as management and maintenance issues to ensure that long-term quality is achieved (see Example D3 below).



### Example D3: Public realm guidance identifying design principles according to street and/or space type - [Southampton's Streets and Spaces Framework](#)

This framework provides strategic guidance for the city's network of streets and spaces. The map extract below represents a hierarchy of the network that includes primary roads and public spaces (level 1) and remaining public spaces and streets (level 2).

It identifies 12 key integrated design principles that can be applied to the different elements within the network and sets out aspirations for Level 1 routes. Below is a summary of aspirations for the Green Mile, a primary route into Southampton.



04. The Green Mile — From the Central Parks via Queensway to Queens Park.

The framework also contains a checklist to help assess streets and spaces enhancements. See extract below.

Building on the Brighton & Hove's Public Spaces, Public Lives strategy, Streetscape Design Guidelines and recent public realm improvements, a detailed UDF SPD could set out indicative design principles for different types of public realm areas across the city and/or in Development Areas and/or Strategic Allocations identified in City Plan Part One.

#### GREEN MILE

##### KEY ASPIRATIONS

- To make a major contribution to the greening of the city; a key aspiration of the CCAP
- To increase the opportunity for reducing surface water run-off by the minimising of hard surfacing
- To increase street tree planting to improve the city's micro-climate
- To implement a major sustainable urban drainage scheme

### Performance Checklist for streets + spaces enhancements (extract)

#### DESIGN + APPEARANCE

6. Does the street or space respond to local distinctiveness and context?
7. Is the street or space defined by a well-structured building layout?
8. Does parking add to or detract from the street scene?
9. Does the street or space integrate with existing roads, streets, paths and/or the surrounding development?
10. Do buildings, street and spaces take priority over the roads and parking so that highways do not dominate?

#### ENVIRONMENT

11. Does the "place fit the space"?
12. Does the place positively exploit the existing buildings, landscape and topography?
13. Is the street or space overlooked and does it feel safe, both night and day?
14. Is there shelter from the wind, weather and noise?
15. Has the street or space been designed to reduce its environmental impact?

## Issue E: Views and vistas

Views play an important role in shaping people's appreciation and understanding of the city. The existence of particular views adds to peoples' enjoyment of places and particular views can become cherished because of their distinctiveness with important buildings and landscapes.

Due to the topography of Brighton & Hove long views from elevated points are common and a number of these will have city-wide implications. A number of strategic views from specific points within Brighton & Hove have been identified in the [Tall Buildings](#) and [Urban Characterisation](#) Studies.

These are generally distant views from elevated locations, mostly on the periphery of the built-up area, and include some panoramic views.

In determining the strategic views the key factors are: the degree to which the view illustrates the relationship between

the built up city and the Downs and/or the sea; the prominence of key ridge lines; the extent to which the view reveals the typical pattern of past development; and the presence of any notable landmarks or heritage assets.

These views will be particularly relevant in assessing the merits of proposals for taller buildings or for larger scale developments in elevated locations.

The Local Planning Authority (LPA) will require applicants to highlight those views that are relevant to their application and to demonstrate that the relevant views would be protected or enhanced by their proposals in accordance with policy CP12 Urban Design.

**City Plan policies identify the need for the UDF SPD to:**

- **identify and set out strategic views.**

### Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

#### E1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

#### E2 Broad brush SPD

- Highlight important views identified in the Tall Buildings Study, Urban Characterisation Study, Conservation Area Character Statements, area-based Supplementary Planning Documents and planning briefs and approved planning applications. (see Example E2 below).

#### E3 Detailed SPD

- Through a more detailed masterplan approach outline strategic and key local views and their sensitivity to change to ensure a consistent approach to the visual assessment of new development in the city (see Example E2 below).



**Example E2: Guidance that identifies views of local significance as part of a broader assessment framework - [London Borough of Wandsworth Local Plan SPD Local Views](#)**

This guidance sets out 6 Local Views that are considered to have the greatest borough-wide importance. These complement the set of strategic views identified in the London View Management Framework, Wandsworth Local Plan and Conservation Area Appraisals and Management Strategies. It focuses on views upstream and downstream from bridges over the River Thames and of Heritage assets identifying viewpoints and setting out how the council will assess the

impact of new development on river frontages, established longer distance landmarks and specific heritage assets within the borough.

A broad brush UDF SPD could signpost views identified in the relevant studies, documents and approved planning applications.

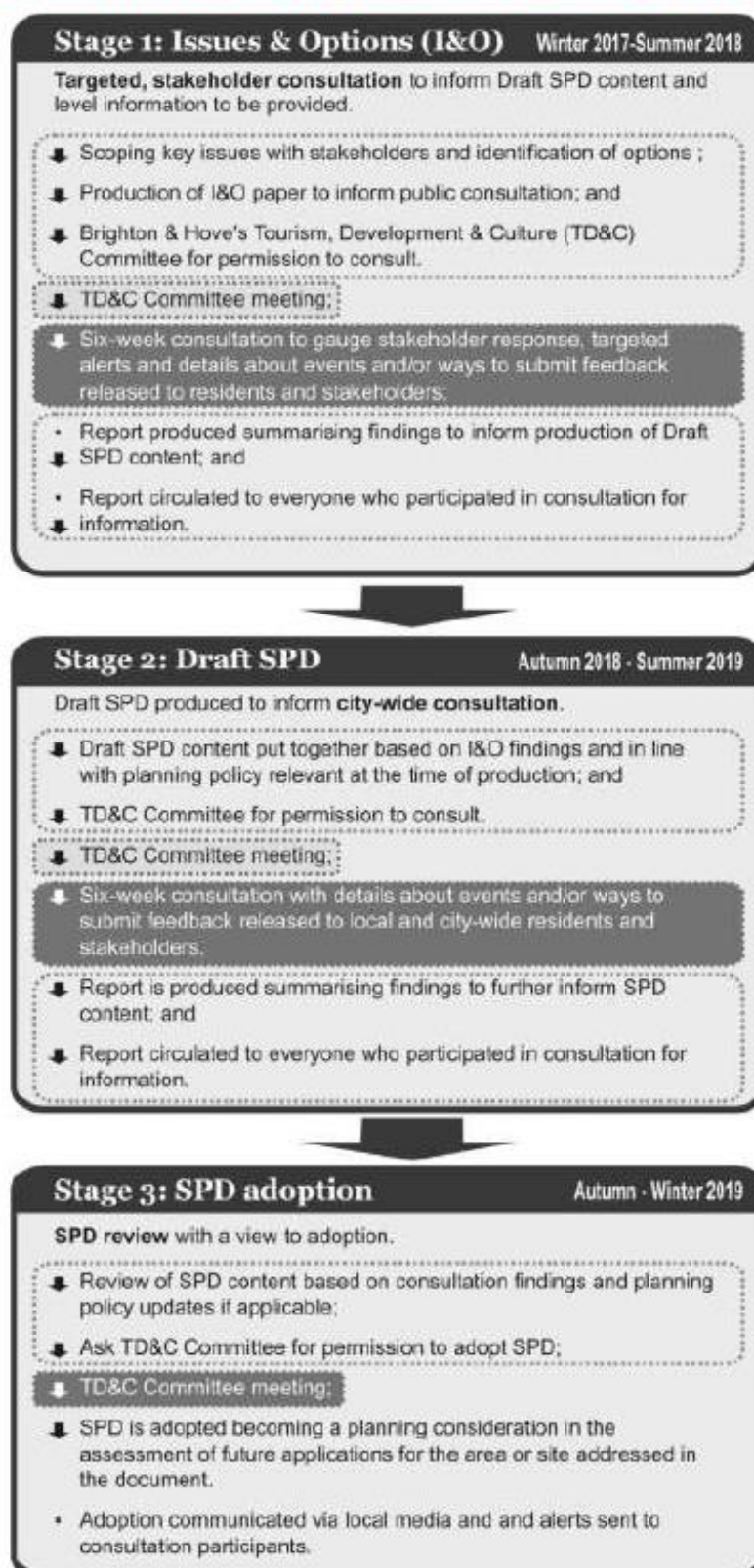
A detailed UDF SPD could also help to identify indicative local views.



View 5: From Queenstown Road to Battersea Power Station (above) and viewing point (below)



## Appendix 1 - Stages in the preparation of the UDF SPD





## Appendix 2 – Design policy context

The UDF SPD will demonstrate how the requirements of national and local planning policy can be met with the aim of producing consistently high quality design outcomes. Proposals that follow this guidance could be more likely to move through the planning process quickly and successfully. The following provides an overview of the key policies as they relate to design.

### National Planning Policy

The [Planning Act 2008](#) (section 183) requires local authorities to have regard to the desirability of achieving good design. This SPD contributes to meeting the duty placed on local authorities by the Act.

The [National Planning Policy Framework \(NPPF\)](#) and its accompanying [Technical Guidance](#) recognise the importance and value of good design as an essential component of sustainable development. [These documents are currently under review](#) with proposals for 'Policy 12 Achieving well-design places' to support a proactive, contextual approach to the creation of high-quality buildings and places that respond to the aspirations of local communities.

### Local Planning Policy

#### [Brighton & Hove City Plan Part One](#) (adopted in 2016)

**CP12 Urban Design** is the key and overarching policy regarding development design along with **CP13 Streets and Open Spaces** that focuses on the spaces between buildings. Additionally, the UDF is referenced in a number of policies across the Plan including SS1 Presumption in Favour of Sustainable Development, Development Areas Brighton Marina, Gas Works and Black Rock Area, DA3 Lewes Road, DA5 Eastern Road and Edward Street, DA6 Hove Station Area, CP1 Housing Delivery, CP5 Culture and Tourism, CP8 Sustainable Buildings and CP14 Housing Density and CP15 Heritage.

#### [Brighton & Hove Local Plan](#) (adopted in 2005)

There are a number of retained Local Plan policies that deal with design issues. Most form part of Chapter 3 and cover a range of issues such as, for example, QD27 Protection of Amenity, QD14 Extensions and alterations and QD14 Landscape design. These policies will be replaced through [Brighton & Hove City Plan Part Two](#) which the council is currently preparing. The UDF is expected to provide supplementary guidance on some of these issues.

#### [Supplementary Planning Documents \(SPD\)](#) and [Guidance \(SPG\)](#)

The Adopted City Plan and retained Local Plan Policies are supported by a range of detailed guidance on how these will be implemented. If adopted, the UDF SPD will form part of this set of planning documents.



## Appendix 3 – Tall Building areas

Below is a transcript of the 12 tall building areas identified in City Plan Part One Policy CP12 Urban Design.

4.146 Given the city's physical and environmental constraints there is a need to increase density on existing brownfield land in a positive and sustainable manner. Taller buildings (in the context of the city's prevailing built form) offer one potential way of achieving this in appropriate locations. This policy seeks to ensure that such proposals are directed towards those broad areas where such potential has been identified. The areas are described in greater detail as follows:

- Brighton Marina – is a node (place where activity and routes are concentrated) limited to the boundaries formed by the eastern and western breakwaters and the undercliff walk to the north.
- Brighton Station / New England area – is a node situated to the east of Brighton Station, to the north of Trafalgar Street and along New England Street.
- Central Seafront – is a node comprising a small area to the east of Sussex Heights that includes Churchill Square, the Brighton Centre and the Odeon Cinema complex.
- Eastern Road / Edward Street – is a linear corridor broadly stretching from William Street in the west to Bristol Gate in the east and which focuses on the opportunities around existing tall buildings, particularly those at the County Hospital.
- Hove Station area – is a node situated on both sides of the rail corridor, extending westward to include the existing group of tall residential buildings to the north of Clarendon Road, together with the adjoining industrial areas.
- Lewes Road corridor – is a linear area centred on the University of Brighton's Moulsecoomb campus and the former Preston Barracks site.
- London Road / Preston Road corridor – is a linear area focused around existing 'mid rise' tall buildings that front the western edges of Preston Park, Surrenden Field and Withdean Park.
- Western Seafront / Kingsway – is a linear corridor along the stretch of Kingsway that directly overlooks Hove's Western Lawns as far west as Wish Road.
- Shoreham Harbour – is a node focused on the eastern-most area of the harbour within the Brighton & Hove City boundary, including both the docksides and the commercial area immediately north of Wellington Road.

## Appendix 4 – Tall Building Statement assessment criteria

All planning applications involving tall buildings in the city must be accompanied by a Tall Building Statement. Below is a summary of the assessment criteria that should be addressed by applicants as part of the Statement.

<b>Planning principles:</b>	<ul style="list-style-type: none"> <li>▪ Sustainability</li> <li>▪ Land use mix</li> <li>▪ Infrastructure</li> <li>▪ Transport</li> </ul>	<b>Wider context:</b>	<ul style="list-style-type: none"> <li>▪ Visual Impact</li> <li>▪ Siting of buildings</li> <li>▪ Conservation</li> </ul>
<b>Detailed design considerations:</b>	<ul style="list-style-type: none"> <li>▪ Alignment</li> <li>▪ Massing Scale</li> <li>▪ Form Urban Pattern</li> <li>▪ Streetscape</li> <li>▪ Public Realm</li> </ul>	<ul style="list-style-type: none"> <li>▪ Public Access</li> <li>▪ Accessibility</li> <li>▪ Open Space</li> <li>▪ Climatic Impact</li> </ul>	<ul style="list-style-type: none"> <li>▪ Neighbourliness</li> <li>▪ Technology</li> <li>▪ Materials</li> <li>▪ Maintenance</li> </ul>

## Appendix 5 - Glossary

**Accessible** refers to a destination that is easy to get to or the feeling of belonging or ability to occupy a space or place.

**Accessibility** applies to a building and/or space that is easy for disabled people to enter and move through.

**Adaptability** is the ability of the form and pattern of development to adapt over time to a city's and neighbourhood's changing social, technological and economic conditions.

**Building envelope** is the skin of the building. It consists of the external walls, doors, windows, roof and lowest floor of the building.

**Built environment** refers to everything that is for humans, by humans, and to be used for human activity (versus natural environment). Examples would include cities, buildings, urban spaces, walkways, roads and parks.

**Character** is a recognisable feature and/or set of features that help identify a city or neighbourhood to its residents or visitors. This can include, for example, historic buildings, buildings with a distinct architecture, public art and public spaces. It can also refer to a development pattern created by a regular grid of streets and blocks reinforced by buildings that form a continuous street frontage.

**Convivial spaces** are open spaces where unplanned social interaction can occur. Examples may include (but are not limited to), urban plazas, courtyards, expanded building entrances, trail staging areas, park seating areas, pocket parks, etc.

**Corridors** (see tall building corridors).

**Density** refers to the number of units and/or people living in a given area. Typically measured in number of dwelling units per hectare or acre.

**Design code** approach whereby land owners establish the key components of the design of new developments up front and, through legal requirement, then require abidance by any developers subsequently wanting to build in the area covered by the code.

**Design principles** are a set of values to be expressed in the built environment that designers should consider when designing buildings and the spaces between them.

**Ecosystem services** refer to the function of existing natural systems that provide supportive functions to built infrastructure. Examples may include streets that are designed with greater water permeability than standard streets to capture and slowly release stormwater into the ground via vegetation and/or porous pavement.

**Form and massing** refers to a building's size, shape and configuration.

**Ground-floor oriented development** refers to buildings with views from and/or that have direct access from the street to individual units at the ground floor.

**Landmarks** are urban features with distinctive spatial features and by virtue of their colours, shape or value have the potential to help people to orientate or find their way in the environment.

**Land use mix** involves a range of complementary land uses that are located together in a balanced mix, including residential development, shops, employment community and recreation facilities and parks and open space.

**Legibility** is a clear and simple development pattern within a city and neighbourhood that enables residents and visitors to understand how an area is organised and to make their way around. This type of development pattern is generally delivered through a grid or modified grid network of streets that allows for easy navigation and provides a block pattern that creates increased connectivity, which also encourages alternative transport modes to the car. In turn, the block pattern sets the parameters for the type of built form that can be achieved.

**Linear area** is one that pertains to or resembles a line or corridor. Examples in Brighton & Hove are the areas along Lewes Road, Edward Street and the Seafront.

**Masterplan** is a detailed document that sets out guidelines for long-term development of an area or site over a specified period of time. They typically refer to large sections of land that are proposed to facilitate limited subdivision with development occurring primarily through the planning process.

**Mobility** refers to design and infrastructure that supports active (pedestrian and cyclist) modes of transportation as well as vehicle movement.

**Nodes** (see tall building notes).

**Placemaking** is a creative, collaborative process that includes design, development, renewal or regeneration of our urban or rural built environments. The outcome should be sustainable, well-designed places and homes which meet people's needs by harnessing the distinct characteristics and strengths of each place to improve the overall quality of life for people.

**Public realm** is defined as any publicly owned streets, pathways, right of ways, parks, or publicly accessible spaces and any public and civic building and facility.

**Ridge line** is that along the highest points of a mountain ridge, an area of higher ground separating two adjacent valleys, streams or watersheds.

**Roof treatment** refers to exposed roof areas that offer a significant opportunity for overlook from floors above and below. These include mechanical systems, lifts and other appurtenances that should be integrated into the form and architecture of the building. Careful attention should be paid to the design and screening of these to ensure neighbouring buildings are not affected by noise pollution.

**Scale** is the relationship between elements of a building or the building and its surrounding context.



**Siting / Site layout** refers to the location/placement of buildings relative to one another, as well as their setbacks from the site's boundaries and spaces between buildings.

**Tall building corridors** refer to areas along transportation routes that are classified in the Brighton & Hove Tall Buildings Study as potentially suitable for accommodating taller development.

**Tall building nodes** refer to areas classified in the Brighton & Hove Tall Buildings Study as potentially suitable for intense assemblies of taller development.

**Topography** is the physical appearance and features of an area of land, especially the shape of its surface.

**Townscape** refers to the general view, appearance and character of an urban scene/landscape.

**Urban design** is the process of shaping the setting of buildings and public realm for cities, towns and villages. This process is considered key to making places where people will want to live and which will nurture economic activity.

**Valley floor** is the broad, flat bottom of a valley.

**Views and vistas** refer to a unique distant view, viewscape or view corridor along a road, through an opening or high point.

## D. Transcripts of workshop responses

### Issue A - Priority areas for enhancement and design guidance

#### Table consensus: combination of A2 + A3

Role of nature (green infrastructure) in densification of development? = threat to environment /social quality of life.

Taller buildings (=up) versus loss of open space/public realm (=put) dilemma.

Characterisation: city divided into 6,7 Character Areas.

Noise issues.

Is there a minimum size for the high density living space?

If it is high density where are the cars parked? Lots of public transport/cycling walking routes.

Age friendly design accessible to all.

Health Impact Assessment of the density. Impact on health services + education.

High-level classification of the city zones? E.g. Seafront, City Centre, Neighbourhoods, Urban Fringe.

Strategy & Local views.

Need for new issue in UDF: integration of green infrastructure/nature-based solutions.

Traffic impact on buildings? Air quality, vehicle noise, road safety.

Need political will. Public realm/street tree planting PRIORITY.

Sound noise complaints / Urban sound planning (EU project).

Set maximum density thresholds? for different zones.

Encourages HMOs in DAs?

Social housing high density issues? Retrofit solutions. Incorporate crime + ASB.

Areas that allow + encourage involvement of residents + business in service provisions + providers. Work with + enhance service delivery.

A2 Broad brush appears to be the best as offers way of achieving consistency without being prescriptive.

Encouraging joint responsibility of public realm areas. Provide examples of successful planning applications that have achieved good neighbourhood partnerships.

Invite proposals which invite interventions to impose + maintain urban realm.

Pressing need for public realm vision for city + then to character neighbourhoods.

To include regard to other relevant policies + strategies in decision-making processes.

Agree strategic views to be protected should be identified otherwise a lot of work for us + developers each time.

Area with poor public realm use all options some broad brush, some detail.

Priority areas - 'DA' development areas (as defined in City Plan) + areas identified for change.

Suburban areas: need to use more efficiently; say will allow higher density if in character; show good examples e.g. encourage backhand.

Suggest we need a detailed SPD: allows flexibility but need certainty + political buy-in.

Include need to engage with local community. If we don't go into some detail - end up being led by the developer - need to get key principles down.

Divide area into smaller 'character' areas.

Agree - tall building part very useful - where, how esp. storeys gives developer certainty.

The Seafront: our 'shop window', generates income.

### Issue B - Accommodating taller development

#### Table consensus: B3 but not as prescriptive as the Kilburn example

Constraints Plan needed immediately.

3D map of city needed immediately.

3D modelling visual, spatial representation + assessment (to be able to see the heights).
Minimum densities necessary but maximum densities can already be controlled + restricted.
Failure to detail significantly can waste officer + developer resources.
Maximise tall building opportunities.
Identify key buildings for protected view only e.g. Royal Pavilion, St Bart's Church, etc.
Town houses in Kensington + Chelsea are the densest in the country.
Don't want to be too restrictive and tie architects hands.
London has approved 500 buildings over 20 storeys.
Greater detail to assist planners + developers.
Other signature buildings.
Does taller building actually result on higher density (re: housing shortage example).
Table conversation tended towards detailed when overlap with other issues, but broad brush when not crossing over.
Visual impact constraints map for accommodating taller buildings.
Detail to defend against aggressive developers.
Protect views to the sea and the Downs.
Assessment of what impact on Conservation Areas tall buildings could be done as detail.
Gridlocks - broad v detail. Need flexibility.
Need protected views from key points in the city. Protected views of cherished buildings, churches, Royal Pavilion. Need to plan for strategic views of the future.
Need to meet our housing needs. 12,800 shortfall.
Use GIS + Vivacity - spatially to support SPD.
Link with issue E: views and vistas (Preston Barracks example 'poking through' vista).
Cluster or not taller buildings.
Is there financial support to i.e. a really detailed SPD + can easily become out of date.
Lack of detail + guidance leads to wasted money.
Critical we guide heights in context.
Maximise sustainability + quality together.
Identify landmark site of quality.
5-6 storey townhouse such as our Regency buildings can provide significant density.
Tall buildings competition world class.
Detail helps developers have a clear steer + they prefer clear guidelines.
Look at how San Francisco has achieved tall buildings in the Downtown area and low rise in the outer city.
Part of SPD frameworks is to look at 3D modelling to mark in views etc.
Multiple constraints can be very restrictive.
City-wide view assessment from Downs + the sea.
Detailed to make less experienced architects more aware of assessment parameters.
Helpful for SPD to map constraints e.g. views + vistas
Needs to set out constraints early on so they are known for the start.
Framework can indicate constraints such as densities and views, amenity impacts. Indicate whether high-density can be achieved by tall or lower closely packed.
Need detailed guidance so that case officers + developers know where tall buildings can go within DA area 2 QD4 Local Plan offered more guidance. Need to assess where tall buildings go.
Detailed. Future proofing? Retrofit options with tall buildings limited.
Energy efficiency issues with taller buildings if not double aspect. So detailed required.
Health + wellbeing - tall buildings?



## Issue C - Building design

### Table consensus: Combination of C2 and C3

Not really a comment on the SPD, but before it is adopted how are we going to provide guidance to developers, particularly on larger development sites.

Avoid over reliance on pastiche.

Consider all types of building design - sometimes something 'out of character' within an area can add to the area - the view currently seems to be that anything different will detract from enhancing Regency architecture.

Needs flexibility to avoid stifling innovation/evolution in urban design trends over the next 15 years.

Developers ask for certainty.

Context of an area - don't just focus on design of the 'bricks + mortar'.

Need more specific guidance than City Plan.

More scope for innovative architecture - detailed SPD would help identify suitable areas.

Larger development sites need specific guidance to be proactive rather than reactive in dealing with applications.

Specific guidance for each DA area - resource implications? Broad brush for rest of the city.

Broad brush checklists can allow innovation or local/non-strategic sites (e.g. infill). Not enough detail is City Plan at the moment.

Detailed SPDs and requirements on major sites can unlock other benefits across the city (e.g. District Energy networks) - without these, building level solutions may restrict future neighbouring development.

Mix + match C2/C3 as different sized development sites need different approaches. Example: coastal areas of Brittany (France).

Places in city centres to just 'be'.

## Issue D - Public realm design

### Table consensus: Combination of D2 and D3

Design out' urban realm approaches that aren't helpful.

Accessibility is not just about disability - its' about 'signposting' by good design.

Instinctive' navigation - public realm is about subliminal understanding of spaces + their connectivity.

Shared spaces and level roads/pavements etc. promote ambiguity, improve safety and reduce 'funnelling' of people through an area.

Surfacing!

Urban design to discourage anti-social behaviour.

Think holistically about small areas of public realm and how it fits into the wider urban grain.

Mixed approach - detailed guidance for city-centre areas with high level of visitors. General principle for suburban areas.

Places in city centres to just 'be'.

Need to create holistic view of public realm rather than piecemeal approach to development.

### Table consensus: D3 with flexibility

Underground waste services. Many EU cities already have this. We should do an underground service survey to understand where services may present a challenge and where the opportunities are.

Could there be a design 'checklist' to help achieve consistency?

Could guidance encourage applicants to work with communities on 'look and feel' of the space?

Link to neighbourhood council's policy? In terms of consultation - get ownership of the plan by the community.

Space for cycling: council has adapted space for cycling objectives + should be more prominent in developments.

Public art: need improved strategy for delivery of public art as part of developments.

Access to water & public water drinking fountains could be built into public realm.

Natural shading & ways to address extreme heat.

Can developers evidence the materials they are using area re-used & locally sources where possible? Can the streetscape tell a story?

Ensure public realm guidance does not include high maintenance costs.

Broad brush guidance with advice on what could be included - not too prescriptive?

Transport input - public realm issue.

Detailed but need flexibility for developers if can't achieve certain standards.

Need to allow compromise/negotiation.

Access & consideration to ease of access particularly for disabled should be priority in terms of flow & use of materials and street furniture.

Will detailed plan work? Ghel produced document for the city, but how much was it incorporated into the planning system.

Neighbourhood Plan. Think of the character of different neighbourhoods - what they need. Problems faced in terms of air pollution, flooding issues, green spaces to decide broad brush SPD.

SUDS: rain gardens + permeable surfaces.

Street Art/Graffiti: promotion of street art in some locations - design to reduce canvas in others.

Car free/ low car neighbourhoods: restrict rat runs and movement of cars.

Detailed SPD may stifle creativity & innovative design.

How do the different options encourage community participation and collaboration?

Consider how public realm improvement unlocks wider economic growth/regen.

Consider ongoing maintenance costs to developer council.

Urban sound planning. Soundscape of the city.

Different frameworks for different 'types' of public realm e.g. residential, communal/park green, commercial.

There should be use of locally sourced materials supporting local circular economy. Circularity of materials should be key part of design i.e. Amvo Bank Pavilion, Amsterdam.

Leave room within policy for creative and new approaches - don't be too prescriptive.

Underground services are often a big constraint within or adjacent to development sites but many developers don't survey these until post planning. Services surveys should be done at pre-app stage so urban realm can be confidently + appropriately planned + designed.

Public realm that can signpost to key visitor destinations e.g. Lanes, North Laine, George Street, Boundary Road.

Public realm that designs out crime e.g. dark spaces, overgrown trees.

Allow spaces for Guerrilla gardening close to communities.

Ensure that tree planting does not become a hazard for buggies i.e. roots making pavement uneven.

Should incorporate 'play' equipment into urban realm (can be informal).

Should design in cycle parking and map out deficient areas.

Should give clear guidance on durability of materials + plants in urban realm, particularly given the coastal environment.

Protected and important trees should be identified in the SPD.

Public realm should have clear guidance for pathway/cycle path widths - could consult transport-officers and refer to existing guidance such as TFL?

Shared surfaces/streets should be clearly defined and SPD should provide guidance on their design.

## Issue A - Priority areas for enhancement and design guidance

### Table consensus: combination of A2 + A3

Plan ahead - think of area where we want the density to start - make good practice work.  
Don't get bogged down in too much detail. Allow for movement as the city grows.  
A3 Need a comprehensive approach to all uses e.g. approach to licensing.  
Need to separate areas requiring masterplanning - public realm input - these are linked to A2.  
Treasure Conservation Areas + enhance - they are investment in future economy.  
Perhaps a 'hybrid' of A2 + A3. Some areas may need more detailed planning?  
Consolidation of design is important so as not to create defined ghettos.  
Assurance about sustainability + facilities at planning stage.  
Improve: walking, cycling routes, public transport.  
Protect urban greenspace - 'no' /minimal building on Greenfield sites.  
Relationship with Conservation Area Management Plans? + Neighbourhood Plans? This needs to be defined i.e. hierarchy.  
Ensuring infrastructure doctors' surgeries, schools, etc. is in place, especially if density of population is the driver.  
Integrated transport services.  
What will the duration of the SPD be - I will need to evolve + reflect change in the city.  
Reduce motorised traffic/pollution.  
Increase density in city centre - high rise.  
Combination of A2 + A3 is required to address issue A. The grain will need to be assessed before development is proposed.  
Address look + feel so as to produce an instantly recognisable city look; distinct and reflective of the city's unique character.

## Issue B - Accommodating taller development

### Table consensus: B3

SPD to address very tall buildings + definitions? Relevant definition.  
Detailed assessment required.  
Revisit strategic views. Maintain sea & Downs vistas + glimpses.  
Revisit ideas of 'heights as tall. Look at density as I&O issue.  
Existing SPG broad brush. As much detail as possible in UDF.  
Kilburn example too different in practice terms + to enforce not the right way forward.  
Look at views from public spaces.  
Community spaces are vital for large sites and areas of higher density + taller development.  
Shading etc. issues for wildlife case studies reviewing tall buildings and need for them.  
Also issues re conglomeration/cluster of tall buildings once we allow one then they will all happen/gather.  
Identify design guidance for spaces + public realm around taller and denser development.  
High density can deliver many units. Not always the highest buildings which are the densest.

## Issue C - Building design

### Table consensus: Combination of C2 and C3

Broad brush approach for smaller developments.  
Need realistic design montages etc. From developers often misleading.  
Depends on size of development.  
Hybrid of broad brush + detailed for some areas.  
Overlap with Heritage? Conservation Areas...



Use design professionals from Brighton + Hove for masterplanning etc.
Materials for buildings. Robust/Good quality appropriate.
Resist plastic where possible in building materials especially external.
Too prescriptive = limited like span/scope of SPD.
Longevity of building life proposed.
Sensitive sites: how the hell do you define them? Not just Listed or Conservation Area.
How useful are the aged Character Studies + 32 neighbourhoods - change?
With regards to the examples shown - Anston House - the visuals are mainly deceptive - it would be important to stop this.
Public art where not suitable (like murals)
Balcony treatments - whether overhanging pavements or within site boundary or even discreetly internal - size (useful!)
Hybrid of broad brush SPD + detailed for specific areas to preserve look, heritage or economic development opportunity.
More detail that can be provided that reflects local interest.

#### Issue D - Public realm design

##### Table consensus: No consensus

Collaborative working with local businesses and consideration of 'meanwhile' uses.
Sunlight to public spaces very important e.g. Edward Street.
Work up + adopt policies + strategies for public realm. Needs vision.
Replacement of street trees that need to come down.
UDF document to bring together tie in with all studies. Making this easier all in one place.
Initial vision no retrofitting. Looking outside Brighton & Hove to get great ideas.
Proactive regarding public realm quality, maintenance + standard of design.
Don't want too prescriptive but clear criteria.
City Parks - consideration of long term management of new public realm created.
Temporary public realm improvements and meanwhile uses.

##### Table consensus: D2

Street noise intolerable. Vehicles, especially buses.
If to help developers . The city is too diverse for a simple broad brush approach. Our city development such as highways need to lead by example.
Good design & its effects on health & wellbeing of the space users.
Safe & secure.
Good cycle parking facilities.
Pavements not wide enough in city centre.
Some of our street lights are fine old structures which are mainly not listed but should be upgraded sensitively.
More attractive design - linked to art.
Kept clear.
Accessible for all.
De-cluttered.
Minimum acoustic standards for buildings - walls that absorb sound + not reflect it within buildings.
Avoid poorly laid pavements.
Dark Skies' minimise light pollution through light fittings.
Cutter on pavements - difficult to navigate through.
Un-necessary 'poles' e.g. lamp studs + parking notices never combined. Should be

rationalised to use 1 for several purposes.

Link UDF to Developer Contribution SPD to help guide how S106/future CIL monies are spent.

Broad brush: set out principles for how places will be used; public realm schemes will be too detailed if 'detailed SPD' option.

Broad brush to include general requirements for different spaces but not be too specific as this will depend on type, scale + size of development coming forward.

Graffiti + tagging could be countered by planting climbers and other plants close to walls. Even if it takes up 6-8" of pavement.

Can detailed advice/guidance be offered on an aspirational basis? Perhaps ranking, say ideal paving materials.

Too many poles on/near pavements + uneven pavements.

Ensure developers required to fund management and maintenance of public realm they deliver.

Broad brush important to ensure wider continuity in public realm but need to allow developers flexibility to ensure treatment suits type and size of space.

Seating - can't seat on them!

Bus shelter seats in the Old Steine good (old fashioned seating). New bus shelters do not provide proper seating or shelter. Signage at bus shelters on the wrong side and seats face the wrong way.

Detailed stifles imagination - needs to be flexible.

Detailed majors only?

Broad brush city-wide.

Public spaces outside private spaces often not as well maintained. Ex: Churchill Square.

## Issue E - Views and vistas

### T3 - Sujeet Sharma

#### Consensus: No consensus

Detailed SPD E3. Consider the Brent example in B3 as detailed building heights for areas with existing approvals.

E3: What are the strategic local views? Are they the ones in the Urban Characterisation Study?

E3: Protect views from the topes of hills into Bevendean + Whitehawk.

E3: Create local points/designs at the end of a long street. PS: Not a protected view?

E3: Consider views into St Peter's Church from Circus St as an example in A3.

Is the Urban Characterisation Study 2009 still a valid reference? i.e. what's changed since i360?

Strategic to detail (1) Good urban scale study of views in + out of the site;. (2) reasoned arguments/thoughts on how the proposals respect/respond/enhance these in positive ways; (3) Detailed analysis of options + how they positively affect character + nature of views.

Replacement of views ... particularly masterplan sites. Don't necessarily preserve fixed views unless they are very, very high value. Instead accept replacement that are equivalent or better.

How do you decide which single angle perspectives should be protected. This is impacted by personal experience.

The views and vistas are constantly changing. Detailed SPD could close conversations. Each development needs its own conversation.

Focus on action rather than an issue is key.

In there an in between E2+E3?

Difficult to pin down views as we don't just work with one vantage point.

Road infrastructure has caused a lot of views to change.

How much to we embrace change or insist on preservation? How far reaching visionary can we be i.e. does the SPD predicate one way or another?

Gentlemen's agreement 1920 - not to building within 200 yds of hilltops all around Brighton - Councillors & developers agreed which protected Downs & views (example Bevendean).

Save rare species from extinction flora + fauna - urban fringe - 5/6 of the only rare chalk grassland habitat in Sussex (around this area) and Kent (another 1/6 in Scandinavia) - no other fauna + flora.

Designing in family homes & having designated student blocks all along Lewes Road to free up family homes for rent (not for additional students).

Can we have a discussion group on email to highlight and to develop points?

Where are long term locals in the discussions & consultations? They could point to past good practice & what did not work (from experience?)

## **E. Transcripts of Consultation Portal responses**

Should be governed by what people in the city want to see

Masterplans required for major developments.

There should only be further development where there is already development. Increasing density is preferable to new build

The City is most likely to thrive and deliver to the widest population by leading urban design proposals, rather than purely reacting to them, which a Detailed SPD offers.

The SPD should seek to protect and enhance the green infrastructure network of the city, that spans neighbourhoods and is vital to maintain and enhance the city's liveability, air quality and ability to adapt to climate change.

The Society believes that priority should be given to those areas which have already been highlighted as in need of improvement: examples include the proposals by the Gehl report in 2007, which includes corridors from the down to the sea both in Brighton and Hove and treatment of related conservation areas. We also believe that existing conservation areas should have investment strategies - with funding coming from developer contributions as and when appropriate. Major sites should be given detailed masterplan treatment which should include surrounding public realm. This work should be firmly focussed on implementation.

Brighton & Hove has 34 Conservation Areas, over 1300 Listed Buildings and a unique landscape setting and topography within the area between the hills and valleys of the South Downs as they fall towards a long seafront which extends from Shoreham Harbour in the west to the chalk cliffs of Rottingdean and Saltdean to the east. These Heritage assets and the unique physical characteristics of the city's landscape setting are vitally important when it comes to determining the way in which new buildings are related to the city's historical patterns of development and the value and scale of its surrounding landscape and seascape. Detailed studies to ensure this relationship is preserved and enhanced are vital requirements of an Urban Design Framework.

Make it more obvious that the issue here is about higher density development. There is a risk to actively consider to environmental quality through the densification of development, hence to implement the stated objective to "to identify pro-active measures that could help to secure major enhancements to their built environment and public realm" there is a need for soft landscape/vegetation to be integrated through its creative use in public realm areas and on buildings themselves to deliver public environmental benefits and retain/increase the functionality of Green Infrastructure.

Any guidance needs to be followed by the BHCC Highways Department and other departments such as Cityclean. If these departments continue to ignore existing guidance on street enhancement and street design there is no point in producing more.

Opportunity for taller developments to make a real statement and be an example of the best design - will help continue marking out the city as individual and different.



Taller development only where there is already dense and tall development

---

Time and energy will be saved by identifying the areas where tall buildings may be located and a broad brush allows flexibility to meet changing design and construction developments which may make tall buildings suitable in the future, where currently they are deemed less so.

---

In a city like Brighton and Hove - where tall buildings are a rarity - special care is needed in accommodating them. This includes their impact on wind. I am not convinced that recent proposals (e.g. the University of Brighton's Moulsecomb development) pay sufficient attention to the visual and other impacts. Much recent development (e.g. the New England Quarter) deteriorates very quickly and becomes stained and an eyesore. The impacts of large developments on water management need to be taken into account more seriously.

---

We believe a more relaxed approach to higher buildings in the city within the defined nodes would be of benefit. Where several high building are feasible these should be 3D modelled with an aim to create an interesting and varied skyline.

---

Make sure tall buildings don't block views of the seas (particularly hotels on the seafront), which is important for mental wellbeing.

---

Taller development on City centre brownfield sites must take preference over urban development on green field sites.

---

One of the problems developers have had in formulating acceptable proposals for new buildings within the Tall Building zones has been the lack of proper guidance on the constraints on design and height in relation to important considerations such as the relationship to local and citywide topography, the existing pattern and scale of the surrounding area and the importance of views, particularly those from Heritage assets - which include listed buildings and parks, and Conservation Areas. Each Tall Building zone has its own constraints - the relationship to hills and valleys, the desirability of keeping tall buildings below the tops of hills and skylines from important viewpoints and key heritage assets and Conservation Areas throughout the city. The scale and character of neighbouring buildings and streets are vitally important considerations which up to now have never been formally set out in relation to any of the Tall Building zones. The result has been 'open sesame' for developers to come to their own conclusions as to what they - not the public interest - regard as appropriate. Circus Street, Preston Barracks, Anston House, the first (withdrawn) Sackville Tower applications and more recently, the Legal and General 18-storey tower block on New England Street, are all examples of the failure of the Tall Buildings Policy to set out the necessary planning constraints in terms of landscape and Heritage considerations. And finally, we would emphasise yet again that high density does not have to mean high buildings. High densities can be and are achieved by low-rise buildings. Here in Brighton the most densely populated neighbourhood in the City is the area between Western Road and Lansdowne Road in Hove bounded by York Road to the east and Lansdowne Street to the west. At 315 persons per hectare this area is also the most densely populated area in the South East outside London. (B&H City Snapshot Summary of Statistics 2014). We would suggest that a high density, low rise approach based on this development model would be a far more appropriate and sympathetic solution to Brighton's housing problems than are tall buildings.

---

It is vital to enable residents to have the opportunity of contact with local nature, including those living in taller buildings, hence there is a need for inclusion of vegetation such as green roofs and balcony planters, and other wildlife measures to be installed too such as bird boxes.

---

Tall buildings and structures are an increasing threat to the setting of conservation areas and heritage assets. Examples being the i360 tower and the party hotel on the site of the former ice rink in Queen's Square which now dominates the listed churchyard of the listed St Nicholas Church. The local guidance must ensure these heritage assets are better protected.

---

Good opportunity to involve residents in 'place making' to create spaces that are usable and attractive

---

We feel that the current SPD12 provides clear guidance of what is acceptable and what is not. This principle should be retained subject to masterplanning of large developments.

---

Planning need to be more flexible to allow development of buildings with potential to provide additional accommodation. New build would therefore not be required

---

We are concerned that the multitude of policies with increasing demands put on developer contributions including the imminent CIL will reduce the quality of design to a bare minimum. This is an issue that the Council has not addressed. We cite as evidence the attitude by the authority to the design of 1-3 Ellen Street, with its varied materials and imaginative 3D greening up proposals. There is a need to recognise that good design costs money.

---

Place stairs at the entrance to tall buildings, not just lifts - so that stairs become the default form of access

---

Sustainable buildings using solar power and water harvesting should be mandatory.

---

We have previously noted that Brighton & Hove has 34 Conservation Areas, and over 1300 Listed Buildings. Certainly within all the areas containing these heritage assets - which constitute the majority of the city's central areas and wards - and other areas where the landscape setting is important, it is vital to ensure that planning guidelines are set which are designed to preserve and enhance our city and its landscape setting, and do not affect those areas in a way which causes harm to those heritage and landscape assets. Each neighbourhood has its own particular design constraints in terms of scale and height, pattern of development, architectural language, use of materials, relationship to the topography etc. In Conservation Areas, many of these constraints are set out in the local Conservation Area Character Statements against which design proposals can be measured. However these Character Statements need to be updated in several Conservation Areas, and where this is so it should be specifically recognised and highlighted in the UDF SPD. The recent Character Statements for the Old Town and Queen's Park set an excellent standard to which all other Character Statements should aspire. Developments outside Conservation Areas are hardly less important because almost every area within the City, borders or overlooks one of the 34 Conservation Areas. Constraints on the heights, scale and character of those developments which could have a detrimental effect on those Conservation

---

Regarding building layout, the Wakefield DC example given of SPD guidance for housebuilders shows good incorporation of environmental GI elements "this is what is needed for the BHCC UDF too .

---

Provision for long-term maintenance should be included at the design stage

---

WHY are the council closed no the facility at Stanmer park and taking down the greenhouses? What a wonderful facility this is for a council to have. To let it go is a disgrace. Where will the plants come from now to keep the parks and gardens looking beautiful. Look at the sea front between the marina and Saltdean, it is a disgrace. No planting, weeds, rubbish not cleared. What impression does this give visitors, it's shocking. Public spaces and seafront/ clifftop walks should be maintained. Re open Stanmer Park and manage it correctly please

---

There is much more to do to make B&H a city in which people can travel easily without fear of physical threat or harm from pollution. To move forward to a healthier, safer city in which to travel a strong guide must be given.

---

Welcome commitment to improving integrated water management through a landscape-led approach.

---

It would be helpful to identify areas of public realm that need to be improved. From there a list of improvements could be produced that could serve as a menu for appropriate developer contributions. A good start are the proposals in the Gehl report (Public Life - Public Space) and in addition the long list of projects in the LTP - this could generate synergies with the development process in the City.

---

"making spaces age friendly" drop pavements, benches etc. covers all ages not just older small children people with walking limitations or heavy bags etc. "neighbourhoods with communal spaces and greening areas" people really value these and m improves perception of community safety "Consideration of street furniture and temporary things such as publicity A frames and smoking areas which are placed on the flattest smoothest part of the pavement . Older residents find this limits their feeling of "safe footed" walking and increases likelihood of tripping and falling. "glad to see cycle pedestrian friendly spaces " we do need some integrated parking to allow for ability access i.e. not just blue badges but also those with other temporary or circumstantial limitations, elderly people, small

children, delivery collections and drop off. Ensure all developments around parks have views onto the parks perhaps take advice from FCL/community safety re children's play areas a balance between the simple pleasure many get of watching children play, child safety surveillance keeping an eye on your kids, with safeguarding issues. Views of key sites e.g. pavilion whenever possible – Greening the urban environment it costs to manage the trees but the mental health and anti-pollution benefits are good. May need to consider less allergenic types for those who suffer hay fever. Communal urban gardens promoted as a key marketing point esp for tall new accommodations, or at the end of streets. Green cycle/walkways between estates, buildings, retail areas will need good lighting though for safety. Improvements to walking and cycling must be given high priority to reduce pollution from motor vehicles and ensure healthy user friendly routes. Priority given to public transport e.g. Bus lanes.

---

The city's record in creating better public spaces is not good. Its parks are not being properly maintained, its street furniture, particularly on the seafront is badly maintained, its buildings and neighbourhoods are increasingly covered in scruffy and ugly graffiti, its streets are over-run with cars and traffic. Why not close more streets and return them to the people as suggested by Prof. Stefan Lehmann of Portsmouth University in his inspiring talk to the Vision 2030 event in July this year? East Street and New Road are about the only examples – and even then the streets are not fully closed to traffic. It is not good enough for a city which claims to be committed to being a One Planet City. Recent planning approvals show that the quality of public space is not regarded as important. Look at Circus Street, where the public spaces between the tall buildings will be totally overshadowed and receive no sunlight. Look at Preston Barracks where the public spaces are just the left-over spaces between tall buildings, again mostly overshadowed and receiving little sunlight during the day. Look at Anston House, where there tall buildings will overshadow the Rose Garden in late summer, autumn and early spring, all times when people will want to sit out on sunny days. Look at the First Base site in Edward Street - the public spaces will be in shadow most of the day even in summer. Little sunlight will shine there. Look at Moshimo in Bartholomew Square - the ineptly called 'skylight restaurant' will overshadow much of the already unattractive square most of the day. Look at Pavilion Gardens which are now deemed so dangerous after dark, that they may have to be closed to the public and become a gated, fenced off area. We don't see much commitment to making public spaces in our city attractive in current Council Policy.

---

I note that the "Public Life, Public Space" document refers to a "complete bicycle network" (it would be better to refer to a cycle network) and that "a coherent pedestrian and cycle network is vital to the legibility and overall quality of the City". We of course strongly agree with those statements. We support moves to "Copenhaganise". However it appears that the "Public Life, Public Space" document was published in 2007 which is a long time ago. Similarly the Streetscape Guidelines which you reference are out of date. The Streetscape Guidelines document refers to the "Brighton and Hove Cycle Track Design Guidance" which it states is available from the Transport Planning Team, however we have not seen a link to the document on this site. In order to bring about a coherent approach to cycling in City Plan Part 2 and this UDF, more resources need to be urgently brought forward to act on Government's guidance to produce a Local Cycling and Walking Infrastructure Plan in a timely manner and to provide a proper cycling strategy which becomes embedded in local planning documents. Transport and cycling provision is a rapidly changing area and we need references to up to date, evidence based documents with high quality standards for infrastructure. Shared space and shared surfaces are concepts which need re-evaluation in the light of fast-growing numbers of cyclists and the preferences of people walking or cycling. Shared space is not an adequate solution in many instances where in fact a segregation of modes is necessary for the comfort of all involved, taking road space or parking space where necessary. Also, a freight strategy needs to be developed to limit access by large vehicles to areas of the City where people walk and cycle (or are trying to cycle). Writing the LCWIP (which the DfT has clearly stated is pivotal in the funding process) was unacceptably delayed in this local authority and we are not seeing signs that adequate resources have been brought to bear for its successful and early completion.

---



Of the 5 Issues [resented, this is probably the key area to incorporate GI objectives in to, along the lines of those suggested in the broad brush SPD approach – however in this there is a need to also include functional environmental benefits as an objective here too. Such a need for explicit mention of GI objectives here should particularly emphasise climate change resilience and adaptation, as well as other elements of CPP2 DM policies 37 and 22). The Southampton Green Mile example given illustrates understanding of a specific GI agenda there.

---

The BHCC Highways Department and those departments operating in consultation with it such as Cityclean must be made to follow the guidance which already exists. This has not been evident in recent years. The proliferation of pointless street signs and other street clutter, the wide spread use of tarmac to replace flag stones in conservation areas and the placing of unsightly ill maintained communal bins in front of grade one listed churches are examples of the failure of these department s to follow guidance in even the most limited way.

---

It does not take a plan to identify the needs of the city. See ab l –™ve. Planting, rubbish removal and maintenance needed.

---

Please protect Greenbelt and brown belt. Build only on existing building sites, build upwards and outwards and re open closes empty buildings. Planning department need to be more efficient and move applications through quickly. They are currently slow and inefficient. Please do not allow any new build on greenfield or brownfield sites, or national park Please re open the wonderful facility at Stanmer Park and maintain our public spaces.

---

Being a hilly place, there are many strategic views you need to take account of, including views into the city from the S Downs.

---

– neighbourhoods with communal spaces and greening areas – people really value these and m improves perception of community safety. Re plans for more tall buildings such as hotels, do not built tall hotels along the sea front as they block the sea view for many residents - very valued and has mental wellbeing benefits - so many can see the sea not just the building residents/hotel stayers Mental health benefits of green/sea views. Ensure views of the Downs wherever possible. Ensure all developments around parks have views onto the parks perhaps take advice from FCL/community safety re children’s play areas a balance between the simple pleasure many get of watching children play, child safety surveillance keeping an eye on your kids, with safeguarding issues. Views of key sites e.g. pavilion whenever possible

---

B& H is fortunate to be between the Down and the Sea. High priority must be given to protect and ensure views of the Sea and downs are not spoilt by development particularly on the Urban Fringe and green spaces in the city. The Public Rights of Way network must be kept open and easy to use and improved. Particular note should be taken of the B&H Rights of Way Improvement Plan.

---

Preservation of important views is vitally important. We have emphasised this and the importance of protecting the existing topography and landscape in the earlier responses in this survey. We are very concerned that conglomerations of tall buildings will disguise the lines of the landscape, intrude upon and project high up above existing horizons and skylines formed by the surrounding landscape. We are concerned too that conglomerations of tall buildings along the seafront could eventually create a wall of buildings between the city and the sea, particularly when viewed from high points on the outskirts of the city and from the South Downs. Very few planning applications show adequately what the visual effects of tall buildings will be, sometimes because they don't show long views at all, or if they do, the quality of the image is so poor as to be meaningless. The recent application for the 18-storey tower on New England Street, while not itself in a Conservation Area, does show how visibly prominent the tower of this proposal will be from a great many viewpoints within the ring of Conservation Areas which surround the site, but there are no distant views shown from higher points around the city or from the South Downs. The proposal for the 15-storey tower on Lyons Close in Hove will, together with the 8-storey Hyde Housing building nearing completion Newtown Road nearby, block off the last remaining view of the sea from Hove Park. The tall buildings at the Marina have effectively blocked off the views of the chalk cliff to the east which used to be clearly visible from Hove seafront. Almost every tall building proposal is blocking important views and causing harm to our landscapes and seascapes because they

are not being adequately controlled. More controls have to be imposed to regulate this process.

---

Note that encouraging links (including visual connections) between the city, downs and sea is a key objective of our Biosphere programme .

---

All public views from within conservation areas are particularly important but some might be identified as being of special importance.

---

Would like to see designers involve communities more in shaping new developments

---

We are broadly in favour of any advance planning that encompasses learning from previous design and development in the city and involves the diverse communities of the city in the framework.

---

Speculative development of urban fringe greenfield sites should not be allowed whilst brownfield sites lie undeveloped. Current/proposed Urban development on greenfield sites at Ovingdean, and Saltdean: Falmer Avenue and Coombe Farm are undemocratic, opposed by local elected Councillors and local residents. Sustainability and reduction of pollution must be given high priority in the UDF SDF

---

The Brighton Society is very aware that because the Council cannot demonstrate a 5-year housing supply, the NPPF instructs Councils "that in order to refuse planning permission, the Council would need to demonstrate that in planning terms any adverse impacts of the proposal would significantly and demonstrably outweigh any benefits and in each case the harms need to be weighed against the benefits. "We are very aware that because the Council cannot demonstrate a 5-year housing supply, the NPPF instructs Councils "that in order to refuse planning permission, the Council would need to demonstrate that in planning terms any adverse impacts of the proposal would significantly and demonstrably outweigh any benefits and in each case the harms need to be weighed against the benefits. "We are very concerned that many of the matters which we have referred to in our responses to the earlier questions, such as good design, heritage assets, protection of landscape and topography, preservation of views etc., are at risk as a result of undue emphasis on the NPPF criteria set out above. Our understanding is that the NPPF is a material consideration in determining the outcome of planning applications; but matters such as Heritage and Design etc. are also material considerations. It seems to us that the balance between these two material considerations must be redressed in favour of Heritage and Design. Otherwise the historic character and the quality of our urban realm, our streets, our open spaces and our new buildings will be prejudiced - forever. There is an old quote from a leading town planner in the 1960s which is worth reminding ourselves of: the role of good planning is to prevent the likelihood of irreversible mistakes.

---

Vision As with the draft proposals for the City Plan Part 2 we feel that the UDF SPD has missed an opportunity to outline and support a clear and forward looking vision for the future design of the urban realm within the city of Brighton and Hove. Set against the context of the aims and aspirations embodied within City Plan Part 1 there appears little to help developers and their design teams address the real needs of the City in years to come. As such it is very difficult to offer constructive and helpful advice upon a document that we feel is fundamentally flawed in its structure, as to do so could be interpreted as support for that structure. If the UD's purpose is to guide proposals on acceptable standards of good urban design, we question first the selection, and limitation, of these 5 criteria and would note that CP12 already notes a list of criteria that are broader and more relevant. However, even they appear to miss perhaps a key driver to any city-wide urban design strategy being one of movement patterns, how they exist and how or why they are being proposed to improve. From this, and coupled with a clear understanding of urban grain, development potential of the city, plus demographic, social and economic studies of the area in question, appropriate and meaningful proposals can be generated that contribute to a wider vision for the urban framework. So, we would suggest the five criteria listed are reviewed, broadened and linked back to connect more clearly with the aspirations and policies stated within CPP1. Examples for City Plan only / Broad Brush SPD / Detailed SPD levels As noted above we feel that save 1 example noted for Anston House to support A2, all other examples appear either poor in conveying their intention and in the detail of information, or seem inappropriate to the urban context of Brighton. We would note the

UDF might be better to refer to an excellent resource document, often quoted by CABE, entitled The Urban Design Compendium, Vols 1 & 2, published by The Housing Corporation and English Partnerships in 2007 this contains many precedent studies that illustrate the fundamental principles of good urban design. (Page 12 of Vol 1 of that document sets these out very clearly, page 2 of Vol 2 notes Brunswick Town, Hove as a good example of urban design from the Regency era and page 9 a process map leading from policy setting to leaving a positive legacy.) Conclusion Given our comments above and the degree of problems we can see within the Issues and Options Paper, we would suggest that the whole document is reviewed and this could be done with a body such as PAF working alongside the Council. We believe that PAF has offered this help with perhaps DSE facilitating the initial workshop. We believe that this could be a positive way forward.

---

My main comment is that the scope of the UDF SPD needs to be broadened to allow an integrated approach to be taken in the built environment to properly include soft landscape / natural environment / Green Infrastructure elements. The 5 issues identified in the SPD fail to adequately or explicitly include this agenda currently, hence I suggest that this becomes an additional 6th issue (and is much better integrated in to the current topics as possible/relevant). Regarding an expanded scope, in the Introduction and Purpose sections there is a need for explicit mention of CPP1 CP13 Public Streets and Spaces also, in addition to CP12, in order to take such a more integrated approach - since this includes a policy objective to incorporate street trees and biodiversity wherever possible. There is then also a link to make with the present proposed CPP2 policies also, in addition to DM18, including: DM37 Green Infrastructure and Nature Conservation - the key CPP2 policy for GI DM22 Landscape Design and Trees this has a strong focus on GI including a proposed requirement for GI Plans to be produced for developments; in order to produce useful and informed GI Plans there is a clear need for guidance to developers (and planners) which should be provided through the UDF SPD (given that BHCC lacks plans for a dedicated GI Strategy). SPD 11 Nature Conservation & Development - links to make to this also (+ Glossary "GI needs to be included and defined here (in addition to ecosystem services)

---

I think that enforcement is crucial. Our City needs to be protected from developer exploitation in the strongest way possible.

---

Much of the harm done in recent years to conservation areas and heritage assets has either resulted from a lack of planning policy enforcement or because the harm has been caused by a BHCC department exercising powers not subject to planning policy. Departments such as Highways and Cityclean especially (though not exclusively) must have managers who are prepared to read guidance on urban design (both local and national) and be willing to act in accordance with it.

---

Incidentally, I and the RNIB Solicitor did an inspection of the central streets of Brighton and Hove with regards to the clutter. We took many photographs of the culprits. The RNIB was inclined to sue, having got nowhere with the Council. In fact it didn't pursue a legal action, because of its shaky financial situation and the risks of costs against it, should it not be successful. Brighton and Hove City Council is very litigious. However, the law has strengthened with respect to obstruction of the public highway so the RNIB might think again should its finances improve.

---

However, we all hope that the Council will take the question of obstructions in the public realm seriously and will come up with a policy that will meet the approval of all reasonable people.

---

I want to mention something which ... is something that has been driving me mad for a long time: you probably know that on the northern edge of the enclosed gardens in Palmeira Square, there is a very attractive wall which separates the pavement on the northern side of the square from an area behind it which abuts on to the buildings. You might have noticed that on that wall are five (I think) very attractive black iron lamp holders, similar to those that one can see on the embankment to London. For many years, these lamp holders held light bulbs (surprise, surprise!) which worked. They did last an enormous number of years before failing but when they failed, they were not replaced. The last one lasted at least five years. I have tried several times to get the Council to replace the bulbs. How many Council staff does it take

---



to replace a light bulb? (Answer: a great number, it seems). This has never been done. I have tried several routes into the Council and the most helpful people seem to be the planning department however I am not sure this is a planning matter. It's a maintenance matter.

Why is this important? Because it's very silly to have an asset which is not being used. These lamps are very functional as well as being decorative - they are a great use to me because I can steer my way by their light. Not so much by the light they shed but by their beacon aspect. The northern side of Palmeira Square is rather dark and there are obstructions (not pointless obstructions) such as taxi and bus shelters, benches and rubbish bins which are mostly dark and I just cannot see after dark. There was an issue, false in my view, about the difficulties in seeing who was responsible for the lamps. At one time, Hove was a District within East Sussex County Council and they were responsible for street lighting in the town. Then Hove became part of Brighton and Hove unitary authority and responsibility for street lighting was transferred to that authority. I have been told many times that it is impossible to reallocate responsibility from ESCC to BHCC with regards to the wiring to the lamps and for the replacement of the bulbs within the lamps. It's a ridiculous situation and one which must be solved because the whole matter is bringing the Council into disrepute. I know most people in the area find this situation annoying but they think nothing can be done about it because of the perceived implacability of the Council. This saga reminds me of *Cloche merle*.

---

## **F. Transcripts of email responses**

---

I am secretary of the Round Hill Society and have been documenting our street lights. Sadly they are losing their heritage value every time the top of a swan neck is cut off to replace the existing lantern with a nasty unsuitable fitting. As a conservation area I had hoped that heritage features would be protected, but it seems not. With LED units coming across the city I fear cheapness will outweigh quality. Perhaps some authorities care more and have found ways to upgrade existing lanterns?

Can we at least try to find a better solution?

To start perhaps one of the cut off lanterns can be found and examined by experts to see if upgrading the lantern might be possible.

If you have no time or budget I will undertake finding experts if you can get a lantern from your lighting agents.

---

Shared Space Roads To Be Halted In the UK - You might be interested in this breaking news about Shared Spaces.

I will be in touch with you later about Monday's event which was very useful. I found everyone there very welcoming. I'll talk to Chris Pugh another time about the audio arrangements.

I don't know if the subject of shared spaces was raised on Monday. Is it a planning matter? I should think so!

Please make sure that the information I have sent below is injected into the top areas of the Council's Planning Department or whatever it is called these days.

---

A discussion took place around the potential flexibility on the number of storeys when bringing tall buildings forward for housing, in certain areas of the City, and how the guidance will operate in this respect.

Ed spoke about the public's perception of high rise buildings and the development of Anston House was given as an example. It was agreed that a good high rise model was needed to change the public's view of high rise developments.

---

I attended the workshop on behalf of BTA and we are invited to make any comments before 13th September

---

---

It was a good workshop, well presented and the facilitators at each discussion table enabled a good dialogue

The document is, we think, a good start as an advisory document. It does provoke some useful questions by giving examples from other places that could be applied in our setting and as such is welcomed and supported by the Brunswick Town Association

Obviously there are aspects like environmental issues, greenery, aesthetics of building etc that must be an integral part of all city and urban design programmes for the future

One big question is will ALL council departments sign up if this is only a strategy and not the policy of council? And we cannot stress strongly enough the need for the principles espoused to be adopted as Policy. Otherwise we will continue with one department undermining the good work of another

We assume that this will need to be read and agreed in conjunction with the City Plan as one needs to inform the other

We feel that the statement on public realms and conservation are NOT strong enough, eg rubbish policy and required actions

We have some expressed concern regarding, can you have one approach fits all for a city like Brighton/Hove. Too rigid and developers have no ability to be creative, too flexible and it is abused

As an example it is noted that appx 3 tall building potential development includes western front of Kingsway overlooking Hove lawns as far as Wish Road. Equally we felt that the 3rd detailed option should be agreed in all cases

The workshop and the document are welcomed and this is a positive good step forward for further dialogue.

---

Issue A: Priority areas for enhancement and design guidance identified above?

Brighton & Hove has 34 Conservation Areas, over 1300 Listed Buildings and a unique landscape setting and topography within the area between the hills and valleys of the South Downs as they fall towards a long seafront which extends from Shoreham Harbour in the west to the chalk cliffs of Rottingdean and Saltdean to the east.

These Heritage assets and the unique physical characteristics of the city's landscape setting are vitally important when it comes to determining the way in which new buildings are related to the city's historical patterns of development and the value and scale of its surrounding landscape and seascape.

Detailed studies to ensure this relationship is preserved and enhanced are vital requirements of an Urban Design Framework.

Issue B: Accommodating taller development

One of the problems developers have had in formulating acceptable proposals for new buildings within the Tall Building zones has been the lack of proper guidance on the constraints on design and height in relation to important considerations such as the relationship to local and citywide topography, the existing pattern and scale of the surrounding area and the importance of views, particularly those from Heritage assets - which include listed buildings and parks, and Conservation Areas. Each Tall Building zone has its own constraints - the relationship to hills and valleys, the desirability of keeping tall buildings below the tops of hills and skylines from important viewpoints and key heritage assets and Conservation Areas throughout the city.

The scale and character of neighbouring buildings and streets are vitally important considerations which up to now have never been formally set out in relation to any of the Tall Building zones. The result has been 'open sesame' for developers to come to their own conclusions as to what they - not the public interest - regard as appropriate. Circus Street, Preston Barracks, Anston House, the first (withdrawn) Sackville Tower applications and more recently, the Legal and General 18-storey tower block on New England Street, are all examples of the failure of the Tall Buildings Policy to set out the necessary planning constraints in terms of landscape and Heritage considerations.

And finally, we would emphasise yet again that high density does not have to mean high

---

---

buildings. High densities can be and are achieved by low-rise buildings. Here in Brighton the most densely populated neighbourhood in the City is the area between Western Road and Lansdowne Road in Hove bounded by York Road to the east and Lansdowne Street to the west. At 315 persons per hectare this area is also the most densely populated area in the South East outside London. (B&H City Snapshot Summary of Statistics 2014).

We would suggest that a high density, low rise approach based on this development model would be a far more appropriate and sympathetic solution to Brighton's housing problems than are tall buildings.

#### Issue C: Building Design

We have previously noted that Brighton & Hove has 34 Conservation Areas, and over 1300 Listed Buildings. Certainly within all the areas containing these heritage assets - which constitute the majority of the city's central areas and wards – and other areas where the landscape setting is important, it is vital to ensure that planning guidelines are set which are designed to preserve and enhance our city and its landscape setting, and do not affect those areas in a way which causes harm to those heritage and landscape assets.

Each neighbourhood has its own particular design constraints in terms of scale and height, pattern of development, architectural language, use of materials, relationship to the topography etc. In Conservation Areas, many of these constraints are set out in the local Conservation Area Character Statements against which design proposals can be measured.

However these Character Statements need to be updated in several Conservation Areas, and where this is so it should be specifically recognised and highlighted in the UDF SPD.

The recent Character Statements for the Old Town and Queen's Park set an excellent standard to which all other Character Statements should aspire. Developments outside Conservation Areas are hardly less important because almost every area within the City, borders or overlooks one of the 34 Conservation Areas. Constraints on the heights, scale and character of those developments which could have a detrimental effect on those Conservation Areas, will need to be included in the SPD to take account of this.

#### Issue D: Public Realm design

The city's record in creating better public spaces is not good. Its parks are not being properly maintained, its street furniture, particularly on the seafront is badly maintained, its buildings and neighbourhoods are increasingly covered in scruffy and ugly graffiti, and its streets are over-run with cars and traffic. Why not close more streets and return them to the people as suggested by Prof. Stefan Lehmann of Portsmouth University in his inspiring talk to the Vision 2030 event in July this year? East Street and New Road are about the only examples – and even then the streets are not fully closed to traffic. It is not good enough for a city which claims to be committed to being a One Planet City.

Recent planning approvals show that the quality of public space is not currently regarded as important. Look at Circus Street, where the public spaces between the tall buildings will be totally overshadowed and receive hardly any sunlight. Look at Preston Barracks where the public spaces are just the left-over spaces between tall buildings, again mostly overshadowed and receiving little sunlight during the day. Look at Anston House, where there tall buildings will overshadow the Rose Garden in late summer, autumn and early spring, all times when people will want to sit out

on sunny days. Look at the First Base site in Edward Street - the public spaces will be in shadow most of the day even in summer. Little sunlight will shine into there. Look at Moshimo in Bartholomew Square - the ineptly called 'skylight restaurant' will overshadow much of the already unattractive square most of the day. Look at Pavilion Gardens which are now deemed so dangerous after dark, that they may have to be closed to the public and become a gated, fenced off area.

We don't see much commitment to making public spaces in our city attractive in current Council Policy.

---



---

#### Issue E: Views and Vistas

Preservation of important views is vitally important. We have emphasised this and the importance of protecting the existing topography and landscape in the earlier responses in this survey. We are very concerned that conglomerations of tall buildings will disguise the lines of the landscape, and intrude upon and project high up above existing horizons and skylines formed by the surrounding landscape.

We are concerned too that conglomeration of tall buildings along the seafront could eventually create a wall of buildings between the city and the sea, particularly when viewed from high points on the outskirts of the city and from the South Downs.

Very few planning applications show adequately what the visual effects of tall buildings will be, sometimes because they don't show long views at all, or if they do, the quality of the image is so poor as to be meaningless.

The recent application for the 18-storey tower on New England Street, while not itself in a Conservation Area, does show how visibly prominent the tower of this proposal will be from a great many viewpoints within the ring of Conservation Areas which surround the site, but there are no distant views shown from higher points around the city or from the South Downs.

The proposal for the 15-storey tower on Lyons Close in Hove will, together with the 8-storey Hyde Housing building nearing completion Newtown Road nearby, block off the last remaining view of the sea from Hove Park.

The tall buildings at the Marina have effectively blocked off the views of the chalk cliff to the east which used to be clearly visible from Hove seafront.

Almost every tall building proposal is blocking important views and causing harm to our landscapes and seascapes because they are not being adequately controlled. More controls have to be imposed to regulate this process.

#### Additional comments

The Brighton Society is very aware that because the Council cannot demonstrate a 5-year housing supply, the NPPF instructs Councils "that in order to refuse planning permission, the Council would need to demonstrate that in planning terms any adverse impacts of the proposal would significantly and demonstrably outweigh any benefits and in each case the harms need to be weighed against the benefits."

We are very concerned that many of the matters which we have referred to in our responses to the earlier questions, such as good design, heritage assets, protection of landscape and topography, preservation of views etc., are "at risk" as a result of undue emphasis on the NPPF criteria set out above.

Our understanding is that the NPPF is a material consideration in determining the outcome of planning applications; but matters such as Heritage and Design etc. are also material considerations.

It seems to us that the balance between these two material considerations must be redressed in favour of Heritage and Design. Otherwise the historic character and the quality of our urban realm, our streets, our open spaces and our new buildings will be prejudiced - forever.

There is an old quote from a leading town planner in the 1960s which is worth reminding ourselves of: "the role of good planning is to prevent the likelihood of irreversible mistakes".

Do you consider the Urban Design Framework Supplementary Planning Document (UDF SPD) to have any equalities implications, positive or negative? If so, please provide further details.

No - there are enough visual, environmental and amenity issues and problems that the Urban Design Frameworks should be addressing, without introducing potentially controversial equalities, social and welfare issues into the discussion.

These should be addressed by other Council policies.

---

The Brighton & Hove Planning Agents Forum (PAF) has considered the proposed Urban Design

Framework SPD Issues and Options paper and has the following comments to offer.

---

#### 1.0 Vision

---

1.1 As with the draft proposals for the City Plan Part 2 we feel that the UDF SPD has missed an opportunity to outline and support a clear and forward looking vision for the future design of the urban realm within the city of Brighton and Hove. Set against the context of the aims and aspirations embodied within City Plan Part 1 there appears little to help developers and their design teams address the real needs of the City in years to come.

1.2 As such it is very difficult to offer constructive and helpful advice upon a document that we feel is fundamentally flawed in its structure, as to do so could be interpreted as support for that structure.

1.3 Nonetheless, we have included what we hope are seen as constructive comments for a potential way forward and trust this advice is taken up by BHCC.

## 2.0 SPD Issues and Options

2.1 The paper starts by noting 5 topics against which it is to offer advice on Urban Design issues, these are noted as being referred to within CPP1, CP12. That policy states: “4.145 The purpose of this policy is to provide a statutory basis for the proposed Urban Design Framework and to enable as much certainty and clarity as possible about where the city will broadly accommodate any taller development. The Urban Design Framework will set out priorities for preparing planning briefs and supplementary planning documents for development areas and other areas requiring positive enhancement. It will include identification of the key strategic views into, out of and within the city which require protection or which may benefit from development that would enhance them.”

And under 4.147 and 4.148: “Further detail on the boundaries of the tall building areas and guidance on appropriate height ranges will be provided in the Urban Design Framework.”

“All applications that fall within the definition of a tall building will be required to be accompanied by a Tall Building Statement, as currently set out in the adopted Tall Buildings Supplementary Planning Guidance (SPG 15), which will be superseded by the Urban Design Framework.”

The above text makes no mention of the subjects covered by points A, C or D and immediately sets up contradiction and inconsistency between the two documents. However, none of the 5 points A to E cover the need to set out the priorities for preparing planning briefs but reads more as a collection of examples of how one might choose to substantiate one’s proposals set against the 5 selected criteria.

2.2 If the UDF’s purpose is to guide proposals on acceptable standards of good urban design, we question first the selection, and limitation, of these 5 criteria and would note that CP12 already notes a list of criteria that are broader and more relevant. However, even they appear to miss perhaps a key driver to any city-wide urban design strategy being one of movement patterns, how they exist and how or why they are being proposed to improve. From this, and coupled with a clear understanding of urban grain, development potential of the city, plus demographic, social and economic studies of the area in question, appropriate and meaningful proposals can be generated that contribute to a wider vision for the urban framework.

2.3 So, we would suggest the five criteria listed are reviewed, broadened and linked back to connect more clearly with the aspirations and policies stated within CPP1.

## 3.0 Examples – for City Plan only / Broad Brush SPD / Detailed SPD levels

3.1 As noted above we feel that save 1 example noted for Anston House to support A2, all other examples appear either poor in conveying their intention and in the detail of information, or seem inappropriate to the urban context of Brighton.

3.2 We would note the UDF might be better to refer to an excellent resource document, often quoted by CABE, entitled The Urban Design Compendium, Vols 1 & 2, published by The Housing Corporation and English Partnerships in 2007 this contains many precedent studies that illustrate the fundamental principles of good urban design. (Page 12 of Vol 1 of that document sets these out very clearly, page 2 of Vol 2 notes Brunswick Town, Hove as a good example of urban design from the Regency era and page 9 a process map leading from policy setting to leaving a positive legacy.)

---

#### 4.0 Conclusion

4.1 Given our comments above and the degree of problems we can see within the Issues and Options Paper, PAF would welcome the opportunity to help the Council in reviewing the composition of the document and assist in its potential re-structuring. We'd therefore like to propose a workshop between PAF, the Council, potentially facilitated by Design South East, with a mutually agreed agenda prior to the event, in order to develop the emerging UDF.

---

[There] are a couple of comments that are relevant for UDF in relation to GI and SUDs that you may want to look at in the CP2 feedback I submitted. See attached.

I really wanted to highlight the importance of the role of our public realm design in terms of support public health objectives – which I hope was picked up in the workshop I attended earlier this year too.

#### DM33 Safe, Sustainable and Active Travel

##### 1) 2) Cyclists:

- To reduce disruption to cycling flow along routes, new development will support continuity of cycling track through good design and appropriate use of signage, where relevant. 'Difficult engineering solutions should be addressed early on to avoid gaps being left. The design should aim to minimise maintenance requirements and costs, and take account of who is responsible for that. Ensure the design of the route enables it to be used effectively in the dark and in poor weather'.

([https://www.sustrans.org.uk/sites/default/files/file\\_content\\_type/sustrans\\_handbook\\_for\\_cycle-friendly\\_design\\_11\\_04\\_14.pdf](https://www.sustrans.org.uk/sites/default/files/file_content_type/sustrans_handbook_for_cycle-friendly_design_11_04_14.pdf));

##### 2) 3) Public Transport Users:

- "d) protect and, where appropriate, enhance existing and proposed public transport routes, services and facilities incl. signs and bus stops".

#### DM37 Green Infrastructure and Nature Conservation

3) 2.268) Green Infrastructure is a multi-functional and connected network of predominantly green spaces, water and other environmental features in urban and rural areas that delivers a wide range of environmental, social, economic benefits and quality of life benefits. It can help strengthen climate change resilience, health and well-being of communities, economic vibrancy, social cohesion, and, provide habitats and wildlife corridors as well as urban cooling.

4) The most effective approach to embedding GI into CP2 would be through the development of a Green Infrastructure Plan for the city. Would/should use this opportunity to set out our intention for having this in the pipeline. It will also support delivery of UDF.

#### DM43 Sustainable Urban Drainage

5) The design and layout of all new buildings, and the development of car parking and hard standing, will be required to incorporate appropriate Sustainable Urban Drainage Systems (SUDS) capable of ensuring that there is a reduction in the level of surface water leaving the site unless it can be

demonstrated not to be reasonably practicable.

SUDS should be sensitively located and designed to ensure that the quality of local water is not adversely affected; and should promote improved biodiversity, an enhanced landscape/townscape and good quality spaces that improve public amenities in the area.

6) 2.322 The choice of appropriate sustainable drainage measures for a site/development should be informed by specific catchment and ground characteristics, and will require the early consideration of a wide range of issues relating to the management, long term adoption and maintenance of SUDS. When determining the suitability of SUDS, vulnerability and the



---

importance of local ecological resources, such as water quality and biodiversity should be considered. See also policies DM42 Protecting the Water Environment and DM40 Protection of Environment and Health – Pollution and Nuisance and DM37 Green Infrastructure and Nature Conservation. The use of SUDS will be required as part of all development proposals other than in exceptional circumstances where it can be demonstrated that there is no appropriate SUDS solution which is reasonably practicable.

It is important that design and accessibility is factored into the planning of any SUDs. The choice of design and type of SUD is essential to ensure they function successfully both in terms of surface water management 'and' in terms of their social function. If suitability of systems 'type' is not properly considered there is a danger that surface water flooding can be exacerbated. SUDs should be designed to support and encourage greater public accessibility of spaces than was possible before. Creative and innovative design of SUDs can also help to open up areas that were otherwise inaccessible and support improvements in public realm and in health and well-being of local residents and communities.

#### DM45 Community Energy

2.264 Developers of medium scale and major development schemes are encouraged to actively seek community energy partners to deliver low carbon energy solutions which are 'led by' or 'meet the needs' of communities through full community ownership and control of a low carbon energy solution or project and that can add social value in accordance to the council social value framework. This policy is particularly relevant where viability issues restrict the applicants' ability to maximise the potential for low and zero carbon energy as part of their scheme.

---

I know this is probably not something you may have considered in the UDF work but public breastfeeding and how spaces for this can be incorporated into urban design could be of great added value into any work focusing on public health in the core elements of the UDF and how streetscape is designed to support better use of space.

Let me know if you are interested in bringing in Sally into any future workshops or consultations on relevant elements of the UDF development process

---

Thank you for inviting Highways England to the Urban Design Framework SPD workshop.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

Having reviewed the subject matter for the workshop, Highways England will not be attending as it will not affect the safe and efficient operation of the Strategic Road Network.

---

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A23 and A27.

Having examined above consultation, we note that the questionnaire is aimed at those living, working and studying in Brighton and Hove, and therefore Highways England does not have any comments.

---



