

Response to Another London Road postcards sent to Environment Cabinet Member in October – November 2009-11-24

Around 200 pre-formatted postcards provided by the Another London Road campaign have been sent to the council by individuals. The council thanks the individuals concerned and the ALR campaign for their keen interest in the future of London Road. The council is pleased to have made a number of changes to the document in line with the concerns (which had already been expressed during the advertised six week consultation period). A response to all the points raised on the postcard is provided below, explaining where and why changes have or have not been made.

Let Us Breathe! Local people who contributed to our consultation also felt the SPD did not address the traffic problem, and much of it was couched in terms of demolition and rebuilding rather than incremental improvements to existing structures, which are clearly preferred by local people.

Incremental improvements are preferable to regeneration through redevelopment in terms of immediate benefit to the local community and building on what is good rather than replacing

The traffic & transport situation has been very poorly addressed with some contradictions and confusion – it is key to the infrastructure of the whole area and should be given top priority

Response: The council has recently re-established the transport sub group of the city's Local Strategic Partnership in order to examine strategic citywide transport issues in greater detail. The London Road area sits within the major road corridor to and from the city centre and is inevitably subject to relatively high volumes of through traffic. The masterplan does not make specific proposals regarding traffic flows and routing through London Road as these factors are bound up with wider strategic road network. Any future changes to the city's wider transport strategy will need to be closely examined with regard to their impact on the London Road area and the need to meet the SPD's objectives of improving the environment of the area. In the meantime, the masterplan sets out a variety of measures to upgrade and improve the local environment and economy, assuming that existing traffic flows will continue in the short term but may change in the future. The need to improve air quality is an issue that is specifically addressed in the masterplan document, which includes guidance on the layout and siting of any new development in order to reduce residential exposure to air pollution and improve wind flow adjacent to the road. This is one particular way in which opportunities for some new development can help provide benefits for the wider area. Other benefits of new development would be to provide new and improved areas of public realm and new employment floorspace.

The retention of existing buildings, particularly those that contribute positively to the area's character is another important aspect of the SPD and additional

text had been added to the document to reinforce this point, in response to the representations received during the consultation period.

Save Ransoms! There was no recognition that many of the frontages above the shops are unique and valued by local people. Of particular concern was the proposal to demolish buildings around the bottom of Ann Street to create a square, which would mean that the much-loved Ransoms would go!

Ann Street Square proposal – create a range of usable, functional open spaces keeping Ransoms in place.

Response: The masterplan recognises and highlights a number of important frontages above shops which are of architectural interest or otherwise contribute positively to the character of the area. It seeks to retain such frontages wherever possible (as well as establishing a design code to improve the frontages at ground floor level of all shops in the area). As a result of representations received, the council's response to the consultation recommends that these buildings be included on an updated local list of important buildings, in order that they are afforded greater protection in future planning decisions.

The proposal around the bottom of Ann Street to create a public square received support from a significant number of respondents. The purpose of including the proposal in the masterplan was to stimulate debate on the various potential benefits that could accrue from providing a public open space immediately next to the main shopping area, opening up long views to The Level from St Bartholomew's Church, and strengthening the east-west through route (when completed) between Brighton Station, through The Level and on to the Lewes Road/Elm Grove/Hanover area.

The masterplan recognises that the demolition inherent in the proposal would indeed result in the loss of a number of properties (including the premises occupied by Ransoms) and that were such a scheme to be pursued, the existing occupiers would need to be consulted and successfully relocated in the area. Whilst the proposal received a fair amount of comments, both pro and anti, any such scheme is unlikely to come forward for a variety of technical and financial reasons. In recognition of this and to help move the project forward in line with the support it has received in principle, two additional scenarios have been added to the revised masterplan, which are less ambitious in scope but which could be more viable.

The first of these (which is the most feasible and viable) would not involve any demolition but provide for an improved public realm, including pedestrian priority or a form of shared surface, at the western end of Ann Street. This would be complemented by changes to the road surfaces across London Road and onto Oxford Street and other appropriate measures (including the use of paving materials) to link with The Level and beyond. This would help to reinforce the aforementioned east-west link for pedestrians, although would not provide for the same quality or amount of public open space at the bottom

of Ann Street, or the visual linkages to The Level provided by the more ambitious original proposal.

The second new option would seek public open space on the southern corner of Oxford Street in the event that the building currently occupied by Boots and Somerfield was proposed for redevelopment.

Don't let Tesco in through the back door! The original SPD left plenty of room for a Tesco-style development in London Road, and while Tesco appears to have retreated slightly from its original proposals, it still owns a large amount of property in the area and may just be biding its time.

Response: The ownership of individual shop units is not an issue for planning control. With regard to new retail development, the planning policy framework against which any proposals for a superstore would be assessed is set out in national policy guidance, the council's Local Plan and the 'emerging' Local Development Framework (the LDF). A retail impact assessment is a fundamental requirement of any retail proposal in excess of 2,500 sq m. Such assessments measure the potential effects of the proposal on existing shops and shopping centres in the surrounding area, including whether or not they would cause economic harm. As an identified town centre in the Local Plan and the LDF, London Road is one of the areas in the city that will remain a focus for new retail development.

To specifically exclude superstore proposals from such centres would conflict with national, regional and local planning policy in that it would help encourage proposals in environmentally unsustainable out of centre locations. It is widely recognised that in many instances out of centre proposals could cause harm by diverting trade away from established centres such as London Road. The masterplan focuses on seeking a wide mix of shop types and sizes and a range of development types in London Road town centre.

There is *no* proposal for a new superstore within the document. Should any development proposal be made within the masterplan area, it would be considered within the context of the wider objectives of the SPD: whether it was assisting with the provision of a wide mix of shop types and sizes; providing for an improved public realm; improved access to London Road by a variety of transport modes including walking; and improving the overall environment and air quality, vibrancy and safety of the London Road town centre. It would also, as referenced above, require a retail impact assessment if over 2,500 sq m to assess its effects including whether it was causing economic harm.

The lack of site-specific earmarking for retail development is a concern particularly in view of Tesco's earlier plans for the Circus Parade area

Response: The land use section of the masterplan includes a number of sites that provide opportunities for new retail development, normally as part of mixed use redevelopment schemes in order to contribute to the vitality,

economy and safety of the area. These sites include the Open Market; Vantage Point, Boot/Somerfield (where capacity also exists for a taller building and provision of new public realm), City College/Pelham Street Quarter. The masterplan also focuses on upgrading the environment of the wider area in order to attract more investment into the existing shops in the area.

There are no definitions of ‘quality’ and ‘poor quality’ buildings – historic architecture should be protected and highlighted – New England House and Vantage Point to be refurbished not replaced

Response: Prior to adoption of the masterplan, a glossary of terms is to be added in response to some of the representation received during the consultation period. This will include a definition of ‘quality’ and ‘poor quality’ buildings in response to the above concern of the ALR group. In the context of a building, ‘quality’ normally refers to issues around its integral design and appearance. The masterplan identifies and seeks to retain such buildings and improve their appearance and condition where appropriate. These are normally historic buildings that contribute positively to the appearance and character of the area. By way of contrast, the masterplan also refers to “poor quality” buildings, where redevelopment could provide a variety of net benefits to the area and realise important objectives of the masterplan. Such buildings include the Boots/Somerfield building, where appropriate redevelopment that brought forward improvements to the townscape and appearance of the area would be supported in principle. The refurbishment of New England House is supported in the document, as is the alternative of demolition and its replacement with a more modern facility if it retained the important cluster of small businesses and provided improvements to the townscape and the wider environment. The demolition of Vantage Point would also be supported in principle if it helped to deliver new employment floorspace in the area in line with the objectives of the council’s Local Development Framework. There is a considerable shortage of modern office floorspace in the city and the London Road/New England Quarter has been identified in the LDF as the area to bring forward a net gain of 20,000 sq m of new employment floorspace. The Vantage Point site is likely to play an important role in this respect.

Open Market – improve without destroying the open market feel

Response: The need for a new, improved and economically successful Open Market is a long standing aspiration of the council and there is a scheme in the pipeline involving a partnership with the traders and Hyde Housing. The masterplan supports the redevelopment of the Open Market and seeks improved linkages between London Road and the Level as part of this. A new Open Market would be expected to provide a net improvement over the existing facility to users and traders alike.

Old Co-op building to house a complementary department store or creative industry including, for example, an art gallery

Response: The building is owned by the Co-op, which for business reasons has ceased trading in department stores throughout the country. The London Road store has an established retail use and could be used as a department store at any time without a planning application being necessary, if an interested operator was to buy or lease the premises. This has not happened for a variety of reasons due to wider changes in the nature of retailing, as well as other factors around the site that apparently make the operation of a department store an unattractive business proposition. The council is not in a position to ensure the future use of the building as a department store, although would in principle support any proposal for a new department store operator moving in to the premises, which would be compatible with London Road's planning policy status as a town centre. An art gallery within the building would most probably receive council support in principle, but it would be inappropriate for the masterplan to allocate such a use in a key area of prime retail frontage, unless it was clear that the landowner supported such a scheme and funding was likely. The masterplan seeks the retention of the building as a preferred option. Ultimately the council seeks the long term viability of the site with a retail use that will benefit and help regenerate the London Road town centre.

