

Brighton & Hove Draft City Plan Part One

May 2012

Brighton & Hove City Council's Local Development Framework



Brighton & Hove
City Council

Contents

Part One: Introduction **page no.**

Introduction and Overview	4
A profile of Brighton & Hove – context and challenges	10

Part Two: The Strategy

Vision and Objective	16
The Strategy	22

Part Three: Development and Special Area policies

DA1 – Brighton Centre and Churchill Square Area	28
DA2 – Brighton Marina, Gas Works and Black Rock Area	32
DA3 – Lewes Road Area	39
DA4 – New England Quarter and London Road Area	46
DA5 – Eastern Road and Edward Street Area	53
DA6 – Hove Station Area	60
DA7 – Toad's Hole Valley	65
DA8 – Shoreham Harbour	71
SA1 – The Seafront	76
SA2 – Central Brighton	83
SA3 – Valley Gardens	88
SA4 – Urban Fringe	92
SA5 – The South Downs	95
SA6 – Sustainable Neighbourhoods	98

Part Four – City Wide Policies

A Strong and Prosperous City

CP1 Housing Delivery	106
CP2 Sustainable Economic Development	112
CP3 Employment Land	116
CP4 Retail Provision	121
CP5 Culture and Tourism	124
CP6 Visitor Accommodation	128
CP7 Infrastructure CIL and Developer Contributions	131

A Sustainable City

CP8 Sustainable Buildings	134
CP9 Sustainable Transport	139
CP10 Biodiversity	149
CP11 Flood Risk	152

An Attractive City

CP12 Urban Design	155
CP13 Public Streets and Spaces	158
CP14 Housing Density	160

CP15 Heritage	163
CP16 Open Space	165
CP17 Sports Provision	170

Healthy and Balanced Communities

CP18 Healthy City	176
CP19 Housing Mix	178
CP20 Affordable Housing	182
CP21 Student Housing and Housing in Multiple Occupation	185
CP22 Traveller Accommodation	189

Appendix 1 Glossary of terms	192
Appendix 2 Key Diagram	200

Annexes (published separately)

Annex 1: Implementation and Monitoring
Annex 2: Infrastructure Delivery Plan
Annex 3: Housing Implementation Strategy

List of Tables

Table 1 – City Plan part 1 preparation timetable	5
Table 2 – One Planet Principles of Sustainability	23
Table 3 – Summary of Development Proposals	26
Table 4 – Housing Delivery, Supply Breakdown 2010-2030	110
Table 5 – City Plan Employment Floorspace	117
Table 6 – Estimated Retail Need	123
Table 7 – Definition of Development Size	137

List of Figures

Figure 1 Relationship of City Plan to other Strategies	6
Figure 2 – Housing Trajectory 2010 – 2030	109

List of Key Illustrations

DA1 – Brighton Centre and Churchill Square Area	28
DA2 – Brighton Marina, Gas Works and Black Rock Area	32
DA3 – Lewes Road Area	39
DA4 – New England Quarter and London Road Area	46
DA5 – Eastern Road and Edward Street Area	53
DA6 – Hove Station Area	60
DA7 – Toad's Hole Valley	65
DA8 – Shoreham Harbour	71
SA1 – The Seafront	76
SA2 – Central Brighton	83
SA3 – Valley Gardens	88
SA4 – Urban Fringe	92
SA5 – The South Downs	95
SA6 – Sustainable Neighbourhoods	98

Part 1

Introduction

Introduction & Overview

What is the City Plan?

1.1 The City Plan is the first Development Plan Document (DPD)¹ to be produced as part of a wider set of local planning policy documents known as the Brighton & Hove's Local Development Framework. Its purpose is to provide the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. It will help shape the future of the city and plays an important role in ensuring that other citywide plans and strategies achieve their objectives.

1.2 The City Plan Part 1 sets out how the council will respond to local priorities; how it will meet the social, economic and environmental challenges that face the city; and how it will work with partners to reduce inequalities. It identifies the broad locations, scale and type of development and supporting infrastructure that will take place in the city. The City Plan also responds to, and provides for, the needs of a growing population and a growing local economy and reflects the role and importance of the city in the sub region and the south east.

1.3 The City Plan Part 1:

- Sets out a vision and objectives for the development and growth of Brighton & Hove up to 2030; identifies broad locations for development and allocates strategic sites and employment sites;
- Sets clear policies that guide decisions on planning applications;
- Indicates how the plan will be implemented and shows how progress will be monitored;
- Sets out the infrastructure requirements for the city up to 2030 and how these will be addressed.

Other Local Development Framework Documents

1.4 The policies in all the other documents forming the Brighton & Hove LDF have to be in line with the City Plan Part 1, so it is the most important part of the LDF.

- The City Plan part 2 will contain site allocations and the remaining development management policies.
- A Joint Area Action Plan (JAAP) is being developed with Adur District Council and West Sussex County Council that will set out a comprehensive, deliverable plan for the future revitalisation of Shoreham Harbour.
- Supplementary Planning Documents will provide guidance on specific areas or topics.
- Waste and Minerals Plan - the Council, working in partnership with East Sussex County Council and the South Downs National Park Authority, is preparing a Waste and Minerals Plan that will provide planning policies to guide the management of waste and production of minerals in the plan area until 2026.

¹ Development Plan Document (DPDs). DPD's are the key statutory documents within Local Development Framework's and will set out the vision, strategy and policies for the area. They are subject to Sustainability Appraisal and to a formal examination in public. The City Plan Part 1 is Brighton & Hove's Core Strategy.

- The South Downs National Park was formally designated in April 2010 and the National Park Authority brought into effect in April 2011. This is now the planning authority for the administrative area of Brighton & Hove that falls within the National Park. This area will no longer be covered by Brighton & Hove City Plan Part 1 policies but will be covered by the Core Strategy for the National Park.

Table 1 City Plan Part 1 Preparation Timetable

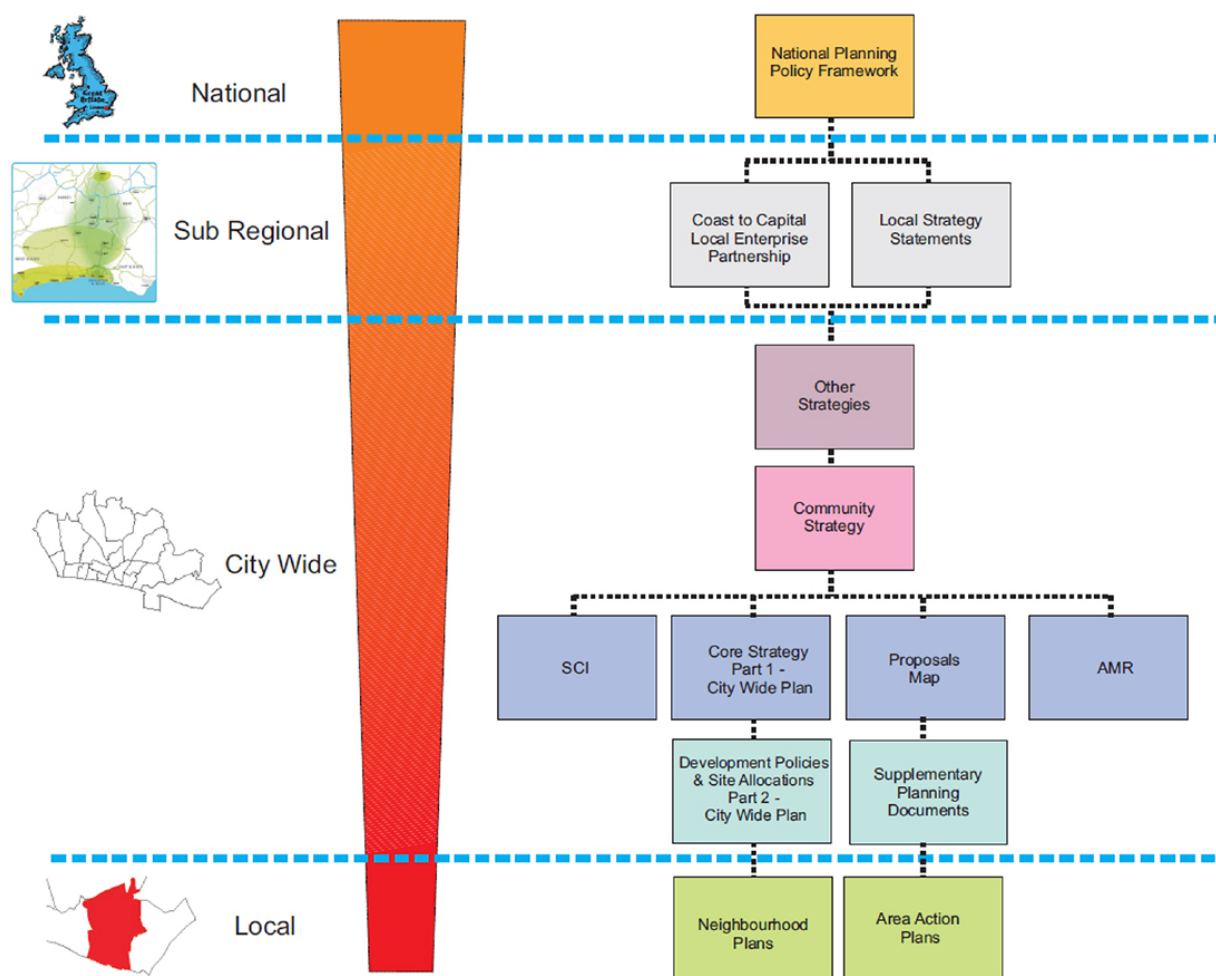
Stage	Date
Reg 18: Options Consultation	October-November 2011
Reg 18: Draft City Plan Consultation	May - July 2012
Publication of the Document	January – February 2013
Date for submission to Secretary of State	April 2013
Pre-examination meeting with Inspector	June 2013
Examination in Public (estimated)	Early September 2013
Estimated date for adoption by the council	January 2014

Relationship to other Strategies

1.5 The City Plan Part 1 has been informed the aims of the city's Sustainable Community Strategy, other citywide plans and strategies and national planning policy and feedback from consultation. Figure 1 shows the relationship to these documents. Policies in the City Plan are in conformity with the National Planning Policy Framework and apply it at the local level.

1.6 The Localism Act sets out the government's intention to revoke regional spatial strategies. It is acknowledged that any move to revoke existing regional strategies is subject to the outcome of the consultation on the related environmental assessments that ended 20 January 2012. Whilst the South East Plan) remains part of the list of documents which local authorities must have regard to when preparing their development plans the government has indicated that subject to the assessment process they expect the orders revoking the existing Regional Plans to take effect Spring 2012. Therefore although it is considered that the draft City Plan remains in conformity with the South East Plan it is not referred to explicitly within the City Plan.

Figure 1 Relationship of the City Plan to other Strategies



Links to neighbouring areas

1.7 Brighton & Hove provides jobs, entertainment, shops and leisure, health and education facilities for people living in neighbouring areas. The city is a regionally significant visitor economy and a transport hub. Brighton & Hove's Travel to Work Area (TTWA), stretches north through Burgess Hill and towards Haywards Heath and Crawley, east to Newhaven and Lewes and west as far as Shoreham and to a lesser extent Worthing. In 2001, census data shows that the city had a relatively self-contained labour market with 75% of the workforce living within the City's boundaries in 2001. The major commuting flows into the City were from Lewes District (representing 7% of the City's workforce), Adur (5%), Mid Sussex (3%) and Worthing (3%). In 2001, 7% of the City's resident working population commuted to London for work.

1.8 Brighton and Hove forms part of a Sussex Coast housing market which includes Lewes District as well as Coastal West Sussex. A key feature of the housing market dynamic in Brighton & Hove particularly is movement of households from London to Brighton with movement of over 4000 people per annum, many of whom continue to commute to the capital supported by the strength of the rail links. This reflects the City's strategic accessibility.

1.9 Brighton & Hove is also a member of the Coast to Capital Local Enterprise Partnership which sees international trade activity as the core economic driver that determines the functional economic area, which is reliant on Gatwick Airport. Recognised as one of the south east's key growth areas, the Gatwick diamond is linked to Brighton and Hove, as well as the West Sussex coast. The inclusion of Croydon in the LEP establishes a link to the London economy, and an opportunity for increased business growth and the potential for collaboration between Coast to Capital and those in London.

1.10 The preparation of the City Plan has had regard to the duty to cooperate and the council will continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters.

Annexes

1.11 The City Plan Part 1 is accompanied by 3 annexes:

Annexe 1 - Implementation and Monitoring – sets out the key monitoring indicators and targets and identifies how the City Plan will be implemented. Published separately as Annex 1 to the City Plan part 1. The Annual Monitoring Report (AMR) is the key evaluation tool to monitor performance and will be revised to take into account new policies contained within this plan.

Annex 2- Infrastructure Delivery Plan - details the physical, social and environmental infrastructure that will be required to implement the proposals set out in the City Plan. Published separately as Annex 2 to the City Plan part 1.

Annex 3 - Housing Implementation Strategy – describes the approach to managing the delivery of housing over the plan period and sets out how a five year supply of housing will be maintained to meet the planned housing target. Published separately as Annex 3 to the City Plan part 1.

Supporting Documents

1.12 The City Plan part 1 is also accompanied by a number of supporting documents:

Sustainability Appraisal – which looks at and assesses the social, economic and environmental impacts of the City Plan part 1. Published as a separate document.

Supporting Evidence Document - identifies and summarises the key findings from all the background studies and strategies that have informed the preparation of the City Plan. Published as a separate document.

Consultation Statement – provides full information on how organisations and groups have been consulted throughout the preparation process of the City Plan part 1. Published as a separate document.

Appropriate Assessment - an assessment under the provisions of the Habitats Regulations to ensure the City Plan itself does not lead to any adverse effect on any European or international wildlife site. Published as a separate document.²

Equalities and Health Impact Assessment - assesses the potential health and equalities outcomes of the City Plan. This assessment will be updated for the submission.

Development Plan Documents Being Revised

² The Brighton & Hove City Council includes the Castle Hill Special Area of Conservation, and a number of other European or Ramsar wildlife sites are located in the wider area, The City Plan has been assessed under the provisions of the Habitats regulations to ensure that it will not have an adverse effect on any European or Ramsar wildlife site and this assessment has been recorded. The City Plan does not support any project proposal where it cannot be demonstrated that the development would not have an adverse effect on the integrity of any European or Ramsar site. Any subsequent plan following this City Plan will similarly adhere to the requirements of the Habitat Regulations.

Proposals Map

The adoption of the City Plan part 1 will lead to changes to the proposals (2005) through new allocations, changes to boundaries and deleted allocations. Changes to the proposals map are set out in a proposals map booklet.

A Glossary of terms is included at Appendix 2.

A profile of Brighton & Hove – context and challenges

1.13 Brighton & Hove is a tightly constrained, compact city situated between the South Downs National Park and the sea with a population of 258,800³. With a limited legacy of derelict or vacant sites these ‘natural boundaries’ define and limit the outward expansion of the city⁴. The built up area is roughly half of the city’s geographical area (8,267 ha).

1.14 Brighton & Hove is an attractive city of distinct urban and suburban neighbourhoods generally of low to medium rise, with some taller buildings in the city centre. Within the centre of the city, residential densities of between 60-200 dwellings per hectare are commonplace. Despite the recent downturn in the housing market, relatively high house prices⁵, particularly for smaller properties, have put home ownership beyond the reach of many households.

1.15 The natural environment within and surrounding the city is of remarkable quality. One sixth of the city’s area is covered by a nature conservation designation and the city is home to a great variety of common and rare animal and plant species. The extensive chalk downlands, much of which fall within the South Downs National Park boundaries, are essential to the health of the city, in terms of its water supply (aquifer), biodiversity, and opportunities for leisure and recreation. The city’s network of parks and open spaces plays an essential role for the city as a whole hosting community and cultural events as well as being places of relaxation and recreation for both residents and visitors to the city. There has been significant progress in sports-related regeneration and investment in sports facilities in schools and colleges.

1.16 Brighton & Hove is a regional cultural ‘city by the sea’ famous for its vibrant, cosmopolitan lifestyle with a strong commitment to the arts and thriving creative industries and digital media sector which attracts tourism and new businesses. The city’s cultural heritage encompasses the internationally renowned and iconic Royal Pavilion, regionally recognised museum collections, historic parks and gardens but also established cultural activities such as the Brighton Festival, exhibitions and community based arts and cultural events. The city is known internationally for its extensive Regency and Victorian architecture and has around 3,400 listed buildings. The city is also a major European business conference and tourist destination which attracts around 8million visitors per year and in 2009, visitors to the city were thought to have spent £732m. The 11km of seafront is the ‘shopfront’ of the city acting as a focus for entertainment, recreation and leisure activities. Substantial public and private investment has transformed the seafront between the two Piers. Phased renewal of the coastal defences between the Marina and the city boundary at Saltdean has been undertaken over the past 15 years, and is part of an ongoing programme of coastal defence maintenance in response to erosion and climate change.

1.17 The city is a regional centre for shopping and employment within the south east and a sub-regional centre for health services. The economy has performed strongly over the past

³ Mid year estimate for 2010.

⁴ Over the period 2004/5 – 2009/10, 100% of residential development and 100% of new employment floorspace were on brownfield land.

⁵ House prices tripled in the ten year period 1997 – 2007, Brighton & Hove Strategic Housing Market Assessment 2008. In 2011 Housing prices were 36 per cent above the national average, State of the City 2011.

decade, with, until the recession, falls in unemployment⁶ and rises in average earnings⁷. In 2008, the local economy was estimated to be worth £4.2 billion⁸. With the onset of global recession in autumn 2008 it is ever more important that the city builds upon its resilience and protects and provides for good quality jobs in the city. The city has a strong service sector economy, with public services, education, health and financial and business services being rich sources of local employment. Brighton & Hove is home to the biggest creative industries and digital media cluster in the south east outside London, currently providing over 10% of employment in the economy. The city is known as a profitable place for business with a strong entrepreneurial culture and a large proportion of residents working in higher grade professional occupations and the population as a whole is well-educated compared with the South East and national averages.

1.18 The city has a well-defined network of shopping centres, including Brighton Regional Centre and contains a significantly greater number of shops than other cities of similar size, with a strong reputation for specialist and independent traders. The two growing universities within the city host around 34,000 students⁹ and with high graduate/ post-graduate retention they make a major contribution to the economic, social and cultural life of the city.

1.19 However, set against this success, the city is a net exporter of commuters; around 25,000 workers travel in to Brighton & Hove for work and around 28,000 people who live in the city travel outside Brighton & Hove for work¹⁰. This has implications for sustainable travel and also for the ability of local people to find local employment. There is also evidence that the city is developing a 'dual economy', with a high proportion of highly skilled jobs in knowledge-based occupations, supported by a growing number of lower paid workers in lower skilled, support services including care work and many of the hospitality and retail trades. There is a limited legacy of manufacturing industry in the city and, as a consequence, very few brownfield sites available for redevelopment.

1.20 The city is also a regional transport hub, with the A23/M23 linking it to London/M25 and the A27 providing major east-west links. Car ownership in the city is the lowest in the South East region and one of lowest nationally and bus patronage and cycling and pedestrian movements in and out of the city centre have continued to increase since 2000. The city's rail network includes 8 stations over three lines, linking east, west and north with Brighton Station having the highest daily passenger volume of all stations along the south coast between Kent and Hampshire. Shoreham Harbour on the western side of the city is a regionally significant port and offers a significant opportunity for future regeneration and growth. The city is served well by air links with two airports; Shoreham and Gatwick, within easy reach. Ferry services operate to Dieppe from nearby Newhaven.

1.21 The city has an unusual age distribution with a bulge of residents aged 20-44 years and relatively high numbers of residents aged 85 years or more.¹¹ This reflects the nature of Brighton as a destination for young people, the presence of two universities and the many English Language schools within the centre of the city. A high proportion of young working

⁶ Falls from 7.5% in February 2000 to 5.8% in June 2008 but an increase to 7.6% in June 2011, ONS.

⁷ Average full-time pay increasing from £410.50 per week in 2002 to £480.00 per week in 2008 and continue to increase, in December 2010 £522.60 (The State of the City Report 2011).

⁸ Sustainable Community Strategy, update 2009.

⁹ 2008/09, estimated to be closer to 40,000 in 2011, State of the City report 2011

¹⁰ Brighton & Hove Strategic Housing Market Assessment 2008, Census 2001 Special Workplace Statistics.

¹¹ 22 per cent (55,000) of the population are estimated to be aged 19 or under, 65 per cent (165,100) are estimated to be aged between 20 and 64 years. The population aged 90 years or more is expected to increase from 2,400 to 3,400 people, an increase of 42 per cent, over the next decade, State of the City 2011.

age adults provides the city with many advantages in terms of its potential labour pool. However, this population profile also has implications for a range of issues such as a sense of local community, potential for crime and disorder, the need for sustainable employment opportunities and the need to provide for a mix of housing units and tenures.

1.22 Brighton & Hove is a diverse city of neighbourhoods and communities. The proportion of our population who are from Black and minority ethnic backgrounds is increasing. In the 2001 census, 12 per cent of our residents were recorded as not being from White British backgrounds; in the 2007 census the proportion had increased to 16 per cent. It's estimated that at least 14 per cent (35,000) of Brighton & Hove's adult residents are lesbian, gay, bisexual or trans. Whilst the trans population is thought to be small, trans people face particularly acute issues. Nine per cent of adult residents (15,600) are thought to have a physical disability of some kind. Two per cent (5,033) are estimated to have a learning disability. 19 per cent of adults (28,000 people) aged 15-64 are estimated to have a common mental disorder such as anxiety or depression¹².

Challenges

1.23 In setting out the vision for the city to 2030, there are a number of key issues that the City Plan Part 1 needs to address. These include:

- A growing population. The city's population is expected to grow by 15.1% to 296,951 by 2030. This represents growth in the population of around 39,000 people over the 20 years to 2030 if current trends continue¹³.
- With the onset of a global recession in autumn 2008, the city must protect and provide for good quality jobs.
- The city has an unusual age distribution with a bulge of residents aged 20-44 years and relatively high numbers of residents aged 85 years or more¹⁴.
- The working age population is projected to increase by 12, 650 over the next 10 years. If these projections prove accurate, the city may need to find work for an additional 6,000 residents by 2014 just to keep the employment rate at the current level of 71.1%.
- Access to suitable and affordable housing¹⁵ remains difficult for many households. Affordability of housing has serious implications for the recruitment and retention of staff and has also resulted in a high number of concealed households¹⁶.
- The city also has a lack of affordable business premises and workspace.
- The city's unemployment rate remains higher than the South East average¹⁷. Despite the very high proportion of the city's adult residents who have higher level qualifications, GCSE attainment within the city's schools, whilst improving, is well below the national average.¹⁸

¹² State of the City 2011

¹³ Brighton & Hove City Council Housing Requirements Study, June 2011

¹⁴ State of the City Report 2011

¹⁵ The 2005 Housing Needs Survey identified a net annual affordable housing shortfall of 1,200.

¹⁶ Adults living within another household because they cannot afford to enter the housing market (e.g. young adults living with parents).

¹⁷ Unemployment at September 2010 was 6.8% compared to the regional rate of 5.5%, State of the City Report 2011.

¹⁸ In 2010, 49% of pupils at local authority schools gained 5 or more GCSEs at A*-C; the national average was 55%.

- A number of the city's areas have been identified as facing high levels of disadvantage. 12 per cent of the city's local areas¹⁹ are in the ten per cent most deprived in England. Two of the city's 164 local areas are in the most deprived one per cent of areas in England; one in East Brighton & one in Queen's Park.
- There are marked differences in physical and mental health and life expectancy between the most deprived and most affluent neighbourhoods in the city. Reducing the gap between deprived neighbourhoods and the rest of the city is a priority.
- Whilst community safety is improving in the city, many people still fear being victims of crime.
- There is a national trend towards increased car use. Accompanied by the anticipated future development in the city this will lead to worsening congestion and air quality by 2030 without a number of positive measures to mitigate this.
- Transport is the main cause of poor air quality in certain parts of the city. In 2008 an extended Air Quality Management Area was designated covering a significant area of the centre of the city.
- There is a significant pressure for school places in the city at both primary and secondary level due to increased numbers of children entering the education system annually since 2000.
- The city's two universities are growing and the impacts of further growth and expansion will need to be addressed.
- The city faces competition from home and abroad as a tourist destination in both the leisure and business tourism market.
- Brighton & Hove's ecological footprint has recently been calculated as 5.14 global hectares (gha) per person. This eco footprint is not sustainable and the city needs to shift towards a more resource efficient future. The Sustainable Community Strategy sets a challenging target reduction to 2.5 gha per person by 2020; and to 1.25 gha per person by 2050.
- There is an urgent need to move to a low carbon economy and city. The Climate Change Act sets out the government's target to reduce carbon emissions to 80% of the 1990 levels by 2050, The Sustainable Community Strategy sets a challenging target to reduce the city's carbon emissions by 42% by 2020 and by 80% by 2050 from the 2005 baseline of 5.7 tonnes per person.
- There is a need to secure the sustainable management of water resources and meet the objectives of the Water Framework Directive. The city is within a 'highly water stressed' region with above regional average per capita water consumption
- There is a need to improve groundwater status. The city's groundwater system provides 100 per cent of the city's water supply and its current overall quality or status is "poor".
- Planning will need to anticipate sea level rises of 6mm a year in the South East and ensure that the city is resilient to the predicted impacts of climate change such as warmer, wetter winters, hotter, drier summers, sea level rise and more frequent extreme weather events.
- Available evidence suggests a continuing loss of species and habitats.
- Over 40 per cent of Brighton & Hove including the ancient woodland²⁰ at Stanmer Park is included within the boundary of the South Downs National Park.

¹⁹ According to the 2010 Indices of Deprivation.

²⁰ An area which has had continuous woodland cover since at least 1600 AD.

- As the density of the city increases, demand and use of parks and open space has escalated. In the more central areas of the city, access to open space is limited. Despite good progress made in recent years, sports and recreation facilities are as yet inadequate for a city of its size and regional importance.

Part 2

The Strategy

Part 2 – The Strategy

Vision and Objectives

The vision for Brighton & Hove in 2030

2.1 The vision sets out what kind of city Brighton & Hove should strive to be by 2030. In order to achieve this vision and address the issues identified in Part 1, the City Plan sets out a number of strategic objectives. The aim is to achieve these objectives through the spatial strategy, the policies set out in the City Plan and through the direct actions of the city council and its partners.

Working closely with all sections and areas of the local community the aim is to achieve the following:

A Strong and Prosperous City

2.2 By 2030, Brighton & Hove will have a resilient local economy with sufficient jobs at all levels. Local residents will have the skills to enable them to progress through the labour market and earn incomes to help them live successfully within the city. New housing will be provided, of different types and tenures and in suitable locations to match a range of requirements and lifetime needs.

- Brighton & Hove will play a full role in the economic growth and development of the south east region,
- The economic performance of the city will continue to improve and the city's long-term unemployment rate will have fallen with an increase in employment rates.
- Sustainable economic growth will be achieved by ensuring a range of suitable employment sites and premises; supporting the city's key and growing employment sectors with a well trained and suitably skilled local workforce and by securing training and support for local entrepreneurs and start-up businesses.
- Significant new development will be directed to areas of the city with good sustainable transport links and to those areas in need of regeneration and renewal.
- New housing will be delivered to help meet housing demand and need. This will help achieve more sustainable communities with a range of housing types and tenures, including family homes and homes to match lifetime needs.
- To be England's favourite 'Creative City' through an expanded base and support for the arts and creative industries across the city, drawing on the local workforce, and a thriving creative and cultural quarter in the city centre.
- To be one of Europe's best meeting destinations and the city's tourism industry will have grown significantly but sustainably into a year-round profitable business.

Strategic Objectives:

SO1 Ensure that all major new development in the city supports the regeneration of the city, is located in sustainable locations, provides for the demands that it generates and is supported by the appropriate physical, social and environmental infrastructure.

SO2 Support the continued improvement of the economic performance of the city by identifying and safeguarding an appropriate range of sites and premises to meet demands of high growth and key employment sectors and ensuring there is a well trained and suitably skilled local workforce.

SO3 Develop Brighton & Hove as a major centre on the South Coast for sustainable business growth and innovation, creative industries, retail, provision, tourism and transport.

SO4 Address the housing needs of Brighton & Hove by working with partners to provide housing that meets the needs of all communities in the city, achieves a mix of housing types, sizes and tenures that is affordable, accessible, designed to a high standard and adaptable to future change.

SO5 Maintain and strengthen the role of Brighton city centre, improve its attractiveness and recognise and protect its unique cultural, tourism and retail mix and look to diversify the evening economy and leisure function.

SO6 Maximise the potential of Shoreham Harbour for the benefit of existing and future residents, businesses, Port-users and visitors through a long term regeneration strategy.

A Sustainable City

2.3 By 2030 the city will have made significant progress towards becoming a resource-efficient, Zero Carbon City²¹ and a city that is adapting well to climate change. This will be achieved by:

- Working towards a reduction in the city's carbon emissions by 42% by 2020 and a reduction of 80% by 2050 from the 2005 baseline of 5.7 tonnes per person.
- Having reduced the ecological footprint of the city; and working towards a target reduction of 2.5 global hectares (gha) per person by 2020; and 1.25 gha per person by 2050.
- Raising the standard of sustainable design and construction of homes and buildings in the city to ensure that all new and existing development contribute to radical reductions in greenhouse gas emissions and resource use, maximises the potential

²¹ Work towards a city that achieves zero carbon emissions.

for sustainable construction methods and minimises demolition and construction waste.

- Delivering major developments in the city, to act as exemplars of modern design quality and sustainable building practice²².
- Pioneering the drive towards a low carbon economy with a thriving environmental technology sector to support the development of renewable and low-carbon energy, recycling initiatives and reduced resource consumption.
- Achieve UN Biosphere Reserve status through working towards making Brighton & Hove a high quality natural environment where a balanced relationship exists between people and nature.
- A reduction in car use of 10-20%, less air borne pollution, less traffic noise and far lower carbon emissions.
- Low carbon transport - achieving a flexible transport network incorporating transport interchanges and more sustainable transport corridors that can accommodate peaks of demand; a rapid/express transit system to move people more efficiently to and between major leisure, retail, tourism employment and residential developments; measures to enable people to move more easily, safely and effectively around the city on foot, by bicycle and on public transport.
- An integrated package of long term and short term measures to achieve significant change and improvement in local air quality.

Strategic Objectives:

SO7 Contribute to a reduction in the ecological footprint of Brighton & Hove and champion the efficient use of natural resources and environmental sustainability.

SO8 Ensure design and construction excellence in new and existing buildings in Brighton & Hove which responds positively to the challenges posed by local impacts of climate change, resource-efficiency, and delivers biodiversity and environmental objectives and improvements to accessible natural green space.

SO9 Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.

SO10 To support the implementation of the objectives of the Biosphere Reserve²³, including the creation of green links between open spaces and changes in the design and management of spaces to create a functioning Green Infrastructure Network. To conserve and enhance the priority areas for

²² For example One Brighton is one of the country's first environmentally and socially sustainable 'One Planet Living' communities.

²³ Areas nominated by national government and designated under UNESCO's Man and Biosphere (MAB) programme. They can encompass urban areas, forming sites of excellence to explore and demonstrate innovative approaches to conservation and sustainable development. They aim to reconcile the conservation of nature with socio-economic development.

²⁴ A plan prepared by the city council and nature conservation organisations to reverse the decline in the variety of species of animals and plants.

biodiversity and to ensure that everyone has good access to and opportunities to be engaged with natural open space. Nature conservation opportunities in open spaces and in new development should be maximised to meet Local Biodiversity Action Plan²⁴ objectives.

SO11 Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion and promote active travel.

An Attractive City

2.4 The council wants to ensure that the city is and remains a rewarding, safe and healthier place for residents, businesses and visitors alike with a higher quality built environment and a protected and enhanced natural environment. By 2030 we aim:

- To have raised the standards of sustainable design and architectural quality to ensure that new development respects and positively enhances the distinctive townscapes of the city's different neighbourhoods. There will be a high quality public realm which will accommodate the needs of all people and create public places where people feel safe and at ease with reduced opportunity for crime and reduced fear of crime.
- To continue to bring new life to the city's built heritage, in recognition of the city's status as a premier historic resort of national significance and international renown, and the contribution such historic areas make to the city's regeneration.
- The city's open spaces will be well maintained and more accessible to everyone; the Valley Gardens in particular will be a more attractive, accessible and usable environment.
- A wide range of leisure opportunities will be provided where they are most needed including at Black Rock and King Alfred and the new community stadium will form a focal point for the city's sporting aspirations.
- The downland countryside will be conserved and its links to urban green spaces strengthened via a green network across the city where biodiversity is enhanced and equality of access to natural open space is achieved.
- To have taken a key role in promoting the city as a gateway to the South Downs National Park.
- The regeneration of the seafront will have continued, with significantly improved seawater quality and ensured that the location and design of development reduces and adapts to the risk of flooding and coastal erosion.

Strategic Objectives:

SO12 Ensure design excellence which responds positively to the distinctive character of the city's different neighbourhoods and creates an attractive and accessible well-connected network of streets, spaces and buildings.

SO13 Enhance and maintain the distinctive image, character and vibrant, varied heritage and culture of the city to benefit residents and visitors. Support the role of the arts, creative industries and sustainable tourism sector in creating a range of high quality infrastructure support facilities, spaces, events and experiences

SO14 Conserve and enhance the South Downs National Park, including the promotion of an enhanced downland landscape which delivers Local Biodiversity Action Plan objectives; more sustainable farming practices and improved public access. Enhance and promote physical and sustainable transport links between the city and the Downs.

SO15 Promote new opportunities for sport and recreation. Protect and enhance the quality and quantity of parks and green spaces in the city, formal and informal, improving their interconnectivity, enhancing their individual character, landscape and biodiversity to ensure that they are valued by the whole community and well used throughout the year.

SO16 Preserve and enhance the city's recognised cultural heritage and bring vacant buildings of national or local architectural or historic interest back into appropriate uses. Ensure new developments contribute positively to their historic surroundings.

SO17 Enhance the seafront as a year round place for sustainable tourism, leisure, recreation and culture whilst protecting and enhancing the quality of the coastal and marine environment.

SO18 Maintain and enhance the distinct character and physical environment of the city's established network of shopping centres to ensure they remain vibrant, attractive and accessible.

Healthy and Balanced Communities

2.5 Everyone has a right to a decent home, a good education, a job that pays for a decent standard of living, good healthcare and to feel safe in their community. No one should be disadvantaged from birth due to the neighbourhood or family circumstances they are born into. To tackle inequality in the city by 2030 we aim:

- To have helped to create more sustainable communities - by ensuring a mix of accessible and affordable new housing types and tenures in suitable locations, including family homes, which offer a good range of community facilities and with good access to jobs, key services and infrastructure and thereby reducing the need to travel, and so build strong communities that get involved in influencing decisions.
- To be a 'Healthy City' through promoting the active participation of residents of all age groups in sports and physical activity, healthier living conditions and a citywide network of walk-in polyclinics, health centres, children's centres and specialist services providing equality of access to healthcare facilities across the city.
- To continue to tackle the issues of homelessness and overcrowded households and to have made substantial progress in meeting housing needs and demand. In conjunction with partners the city's housing stock will be brought up to a decent standard.
- To have narrowed the gap between the deprived neighbourhoods and the rest of the city through improvements to infrastructure and support services, by widening access to learning and employment opportunities and by supporting and encouraging community engagement in regeneration and local decisions.
- To have parity in the quality of schools across the city giving parents the confidence to access their local schools. The role of the higher and further education establishments in the city will continue to grow and strengthen.

Strategic Objectives:

SO19 Contribute towards the delivery of more sustainable communities and the reduction of inequalities between neighbourhoods in Brighton & Hove.

SO20 Contribute towards reducing inequalities experienced by different groups within the city and recognise the special needs of younger people, older people, disabled people, lesbian, gay, bisexual and trans people and black and minority ethnic people, gypsies and travellers, refugees and asylum seekers and people of different religions and belief in the provision and improvement of accessible and appropriate community facilities, healthcare, education, housing, safety and employment.

SO21 Achieve more parity in the quality of education provided at schools and reduce the imbalance in demand for school places in different parts of the city. Assist in the long term planning of higher and further education establishments, and ensure that they play a full part in the city's economic, social and environmental development.

SO22 Across the city apply the principles of healthy urban planning and work with partners to achieve an equality of access to community services (health and learning), to opportunities and facilities for sport and recreation and lifelong learning. Ensure pollution is minimised and actively seek improvements in water, land and air quality and reduce noise pollution.

SO23 Ensure that Brighton & Hove is a city where all people feel safe in public places and within their neighbourhoods through working with partners to create a safer environment, reduce crime and reduce the fear of crime.

A Spatial Strategy for Brighton & Hove

2.6 Brighton & Hove is a coastal city providing a sub-regional focus for jobs and services to the surrounding areas. The local authorities along the Sussex coast face similar issues around physical and environmental constraints to accommodating growth and ensuring a balanced approach to housing and employment provision.

Strategy for the future of Brighton & Hove

2.7 The City Plan's aim is to seek a balanced and sustainable approach to accommodating growth over the plan period.

2.8 As a council we need to ensure that the city can grow and regenerate in a sustainable manner. Creating a more sustainable city means promoting economic success, meeting social needs but also protecting and enhancing the highly valued natural and built

environment. The council is committed to using the One Planet Living Framework²⁵ guiding principles to move towards a more sustainable city and these principles have been reflected in the policies of the City Plan. Table 2 outlines the ten ‘One Planet principles’ of sustainability.

Table 2 One Planet Principles of Sustainability

Zero Carbon	Making buildings more energy efficient and delivering all energy with renewable technologies
Zero Waste	Reducing waste arisings, reusing where possible, and ultimately sending zero waste to landfill
Sustainable Transport	Encouraging low carbon modes of transport to reduce emissions, reducing the need to travel
Sustainable Materials	Using sustainable products that have a low embodied energy
Local and Sustainable Food	Choosing low impact, local, seasonal and organic diets and reducing food waste
Sustainable Water	Using water more efficiently in buildings and in the products we buy; tackling local flooding and water course pollution
Land use and Wildlife	Protecting and expanding old habitats and creating new space for wildlife
Culture and Community	Reviving local identity and wisdom; support for, and participation in, the arts
Equity and Local Economy	Inclusive, empowering workplaces with equitable pay; support for local communities and fair trade
Health and Happiness	Encouraging active, sociable, meaningful lives to promote good health and well being

2.9 Brighton & Hove is a tightly constrained, compact city situated between the South Downs National Park and the sea. With a limited legacy of derelict or vacant sites these ‘natural boundaries’ define and limit the outward expansion of the city. The spatial strategy needs to achieve a balance between accommodating the city’s development needs, particularly for jobs and homes, with the continuing need to protect and enhance the city’s high quality environments and the nationally designated landscape that surrounds the city.

2.10 The assessed housing requirements (demand and need for new homes) for the city over the plan period are much higher than the city can realistically accommodate. The plan sets a minimum housing target of 11,300 new homes to be achieved by 2030 and this reflects the capacity and availability of land/sites in the city; the need to provide for a mix of homes to support the growth and maintenance of sustainable communities; the need to provide land for other essential uses (such as employment, retail, health and education facilities and other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.

²⁵ a framework for a simple way to plan, deliver, communicate and mainstream sustainable development and a sustainable economy.

2.11 The City is expected to continue to function as an economic growth hub for the wider sub-region and the council with its partners share an ambition to improve the City's employment rate. Recent studies have consistently identified employment premises and employment land supply as threats to business and employment growth in the city. The Employment Land Study forecasts a shortfall of between 96,100 sq m and 121,000 sq m B1a and B1b employment land over the period 2006-2026. The spatial strategy therefore seeks to ensure that employment sites across the city are safeguarded and upgraded and through the regeneration of key sites new employment floorspace created. Without the industrial heritage of other cities, the supply of employment land and premises is limited in the city. In order to achieve the local housing target opportunities some employment sites have been identified to bring forward a mix of housing and employment floorspace. However further releases will harm the ability of the city to create new jobs for the growing population.

2.12 Retail needs to 2030 have been estimated at 58,313 sq m of comparison floorspace and 2,967 sq m of convenience retail. New retail development will be directed to the city's existing retail centres in particular the Brighton centre to consolidate and enhance its role as a regional shopping centre.

2.13 To ensure the successful regeneration of the city, other development needs generated by a growing population; schools, community facilities', sport and recreation and cultural provision also need to be accommodated. As the population density of the city increases, the demand for and use of parks and open spaces increases. The council will optimise the use of previously developed land whilst ensuring sufficient green infrastructure is delivered alongside new development. The council is committed to working with partners to achieve the objectives of a UNESCO Biosphere Reserve for the city and its hinterland as an international 'centre of excellence' to integrate the needs of people and nature.

2.14 Part of what makes Brighton & Hove an attractive place to live is the quality of the historic built environment and public realm. Respecting the urban context of development is essential. The City Plan seeks to optimise the use of previously developed land across the city and opportunities for higher density or taller buildings new development will be guided by urban characterisation studies and the emerging Urban Design Framework.

2.15 The City Plan is accompanied by an Infrastructure Delivery Plan which sets out the infrastructure requirements for the city over the plan period but no critical issues have been identified that would restrict the councils ability to achieve the level of growth the Plan provides for.

The Spatial Distribution of Development

2.16 Spatially the majority of new housing, employment and retail development will be directed to eight specific development areas (DA1 – 8). These are areas of the city which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration will secure substantial benefits for the city. This approach ensures that transport impacts will be minimised and that the city's countryside and the South Downs National Park will continue to be protected.

2.17 The eight development areas are:

- DA1 - Brighton Centre and Churchill Square Area
- DA2 - Brighton Marina, Gas Works and Black Rock Area
- DA3 - Lewes Road Area
- DA4 - New England Quarter and London Road Area
- DA5 - Eastern Road and Edward Street Area
- DA6 - Hove Station Area
- DA7 - Toads Hole Valley
- DA8 - Shoreham Harbour

2.18 The Development Areas are proposed to accommodate a significant amount of development because they contain the potential capacity and opportunities for change, they can deliver development of a citywide or regional importance and/or because they are in need of regeneration. Proposals for each of the Development Areas are set against a guiding 'area strategy' which sets the framework for future development and change within each identified area. Local priorities (such as transport improvements, community safety, open space or public realm improvements) are identified together with broad strategic amounts of additional development required and any associated key infrastructure requirements. Strategic allocations are proposed within Development Area proposals as they are considered critical to the overall delivery of housing and employment growth over the plan period.

2.19 Development on a more modest scale will also occur across the rest of the city on suitable brownfield site opportunities. Such development will help to secure the growth of or maintain sustainable neighbourhoods and communities and can also help to protect valuable open spaces.

2.20 Additional areas of the city are identified as special policy areas requiring effective partnership working and a comprehensive and coordinated policy approach to managing future development and change. These areas are:

- SA1 - The Seafront
- SA2 - Central Brighton
- SA3 - Valley Gardens
- SA4 - Urban Fringe
- SA5 - The South Downs
- SA6 - Sustainable Neighbourhoods

Table 3 sets out the amount of development distributed across the city.

Table 3 Summary of Development proposals

	New Homes	New B1 Employment Floorspace (sq m)	New Retail floorspace (sq m)
DA1 Brighton Centre and Churchill Square	20		20,000
DA2 Brighton Marina	1940	4,000 ²⁶	5,000
DA3 Lewes Road	885	15,600	
DA4 New England Quarter and London Road	1140	20,000	
DA5 Eastern Road and Edward Street	600	33,200	
DA6 Hove Station	575	4,000	
DA7 Toads Hole Valley	700	25,000	
DA8 Shoreham Harbour	400	7,500	
Rest of the City	3925	21,107 [these are commitments where not included in DA figures]	
Small site development ²⁷	1130		
Total	11,315	130,407	25,000

2.21 City wide policies (CP1- CP22) set out the council's approach to strategic policy issues such as the scale and type of housing to be achieved, securing sustainable economic development, the provision of open space, sports and recreation facilities, achieving more sustainable buildings, a healthy city and an improved public realm. The city wide policies are arranged under thematic headings: a strong and prosperous city, a sustainable city, an attractive city and healthy and balanced communities.

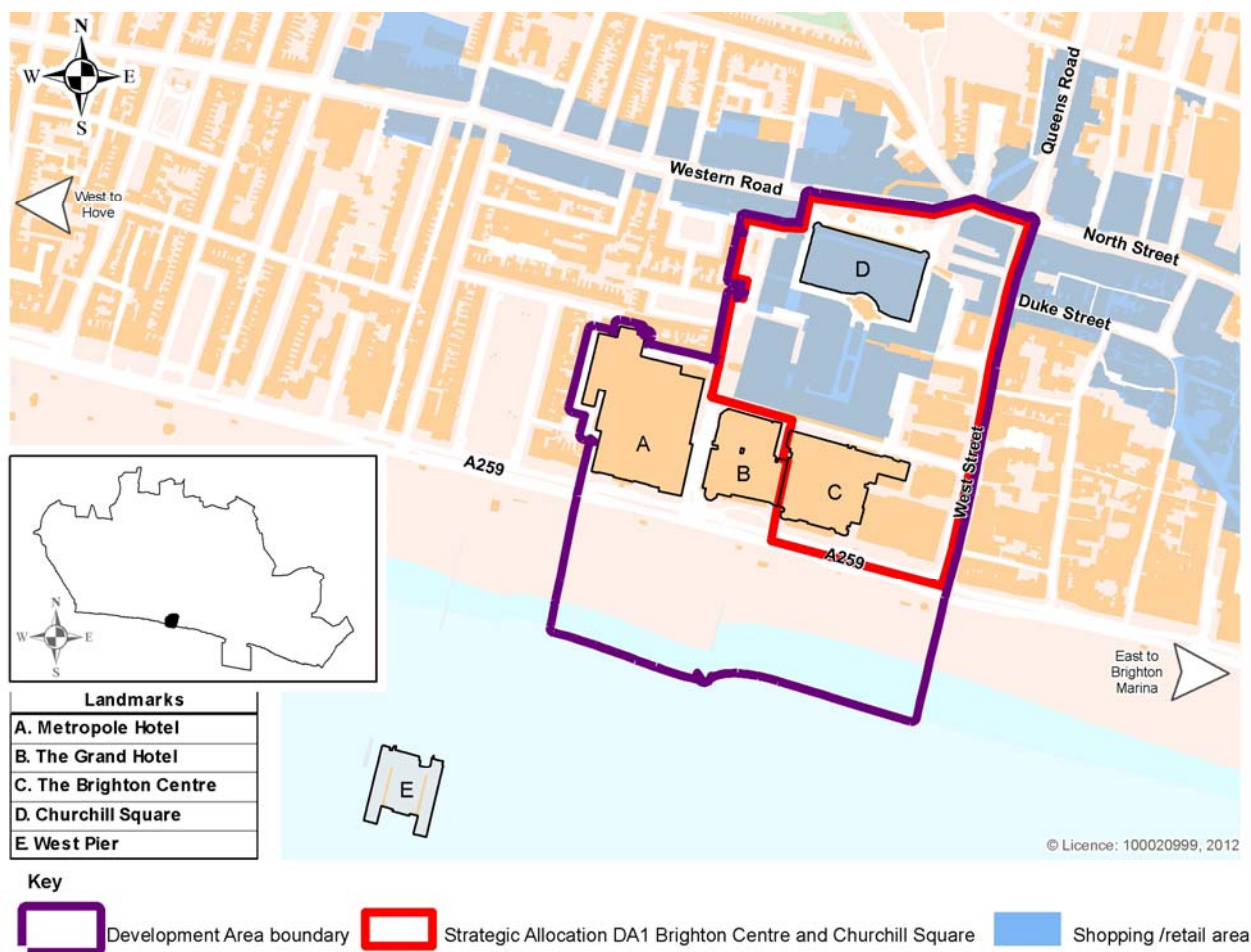
²⁶ B1-B2 uses identified for Gas Work Site

²⁷ Development from small identified sites estimated to be 530 units pre-plan adoption and small windfall development in last 6 years of the plan allowance is for 600 units.

Part Three

Development and Special Area policies

DA1 Brighton Centre and Churchill Square Area



Context

3.1 The area around the Brighton Centre is in the heart of the cultural, retail and commercial core of the city and contains the key drivers of the local tourism, leisure and shopping economy. The development area encompasses Churchill Square Shopping Centre and Western Road to the north; both of which form part of the Regional Shopping Centre, the Brighton Centre to the south and West Street to the east. The Brighton Centre, compared with other modern conference centres, is now thought to be outdated in terms of its design, specification and appearance. The long term aspiration of the council is to secure the redevelopment of the Brighton Centre as a successful, high profile and sustainable conference centre. West Street contains a concentration of bars and large nightclubs and is part of an area of the city experiencing high incidences of violent crime. The priority here is to improve community and public safety including improvements to West Street to ensure a balanced range of complementary evening and night-time economy uses.

DA1 Brighton Centre and Churchill Square Area

The strategy for the development area is to secure a new state of the art conference centre in a landmark new building to benefit the city and the region and to sustain the tourism and service economy for the next 30 years, positioning Brighton & Hove as one of Europe's leading conference and meeting destinations. The redevelopment of the Brighton Centre will form part of a comprehensive scheme including the extension of the Churchill Square Shopping Centre and new leisure facilities.

A. The local priorities to achieve the strategy are:

- 1. The council will work in partnership with landowners to plan for a replacement facility for the existing Brighton Centre with a new state of the art convention facility incorporating the highest standard of environmental design;**
- 2. Ensure that the redevelopment benefits the surrounding area through high quality building design and townscape; public realm and biodiversity improvements (in accordance with the adopted Brighton Centre SPD and Nature Conservation and Development SPD);**
- 3. Support the extension of the Churchill Square shopping centre to provide a minimum 20,000 sq m of new retail comparison goods²⁸ floorspace and A2/A3 use floorspace;**
- 4. Improve community and public safety in the area, by ensuring replaced/ new leisure and cultural facilities promote a balanced range of complementary evening and night-time economy uses and address, where appropriate, community safety concerns, in particular along West Street and the lower seafront promenade (see SA2 Central Brighton).**
- 5. To ensure high quality public and sustainable transport facilities serve new development;**
- 6. Improve pedestrian and cycle access through the area and reduce the severance between the northern side of the A259 and the seafront to accord with the Public Space Public Life Study;**
- 7. Ensure improvements to local air quality at the West Street/ A259 junction through the implementation of the council's Air Quality Action Plan and ensure developments do not increase the number of people exposed to poor air quality.**
- 8. Ensure that redevelopment proposals complement the priorities for the seafront in this area as set out in SA1 The Seafront.**

B: The Strategic Allocation for the Brighton Centre and Churchill Square Development Area is:

²⁸ Non-food items in shops

1. New Brighton Centre and expansion of Churchill Square.

Redevelopment of the Brighton Centre Area²⁹ to provide a new 25,000 sqm conference centre, and expansion of Churchill Square shopping centre to provide a minimum of 20,000sqm new comparison goods A1 floorspace (and A2 and A3 use classes). New hotel and leisure facilities including a cinema will also be permitted. Proposals will be assessed against the local priorities set out above, citywide policies, informed by the adopted Brighton Centre SPD and the following criteria:

- a) Securing improved legibility, permeability and connectivity within the area through high quality building design, townscape and public realm (see CP12 and CP13).**
- b) Proposals for new retail floorspace should promote strong linkages with the primary shopping frontages along Western Road. Edge of centre proposals should be accompanied by a Retail Impact Assessment³⁰.**
- c) Appropriate transport infrastructure improvements will be required that provide and promote public and sustainable transport to support the redevelopment including the need for integrated links to rapid/express bus-based services on the A259 (see CP9 Sustainable Transport).**

Supporting Text

3.2 The Brighton Centre re-development will deliver a sustainable city centre regeneration scheme, over a 30 year timeframe, with an economic impact of some £2 billion for the local economy. The main objectives for the council are:

- To deliver a world class state of the art convention centre
- To continue to deliver significant positive impact to the local economy
- To protect and enhance Brighton's position as a leading conference destination
- To increase the target market and to re-establish Brighton & Hove's position in the international association conference market.
- More detailed planning guidance is contained within The Brighton Centre SPD (adopted January 2005).

3.3 A further priority will be to ensure that redevelopment of the Brighton Centre delivers new retail floorspace as an extension of Churchill Square to enhance and consolidate Brighton's role as a primary Regional Shopping Centre within the South East³¹. There is

²⁹ As defined in the Brighton Centre SPD01 a core 'block' has been identified (comprising a number of smaller blocks) bounded by Western Road, West Street, Queensbury Mews and Cannon Place. Further detail is set out in the adopted SPD.

³⁰ Policy CP4 requires a retail impact assessment for all major edge and out of centre retail developments over 1,000 sqm net as a locally set threshold.

³¹ Agreement has been reached with the Council and owners of Churchill Square (Standard Life Investments) to explore with a selected architect the opportunities for extending the shopping centre, and providing a brand new conference centre for the city.

considerable potential to enhance the pedestrian environment, unit configuration, appearance and national multiple retailer representation within this primary retail area. In order to enable existing retailers to trade up, and to attract major new retailers to the centre, it is necessary to identify new opportunities for creating additional retail space, in addition to the ongoing redevelopment and modernisation of current stock.

3.4 It will be necessary to facilitate fundamental townscape improvement opportunities in the area and improve the built form to create a new bold iconic landmark building and explore opportunities for a tall building.

3.5 Proposals should promote strong linkages with the primary shopping frontages, along Western Road in particular and connectivity through to the seafront to address the problem of pedestrian severance. Improvements should include an enhanced pedestrian environment around Churchill Square, a new gateway link through from Churchill Square Shopping Centre to the seafront, and an improved junction at West Street and Kings Road. On completion of the redevelopment the primary retail frontage of the regional centre will be extended to include any new retail elements of the scheme.³²

3.6 Previous air quality assessments³³ have indicated that the West Street/ A259 junction exceeds the Government's Air Quality Objective for Nitrogen Dioxide and the area is now included within the declared Air Quality Management Area³⁴. Improvements to local air quality at the West Street/ A259 junction will be a priority for the area.

3.7 West Street contains a concentration of bars and large nightclubs and central Brighton and particularly the West Street area, continues to experience higher incidences of violent crime³⁵. A priority will therefore be to improve community and public safety including West Street improvements to ensure a balanced range of complementary evening and night-time economy uses and initiatives to reduce public place violence.

³² As advised in the Brighton & Hove City Council Retail Study Update 2011

³³ The 2007 Detailed Air Quality Assessment

³⁴ 2008 Air Quality Management Area

³⁵ Brunswick & Regency Neighbourhood Action Plan 2007-2010

DA2 Brighton Marina, Gas Works and Black Rock Area



Context

3.8 Brighton Marina is situated at the base of the cliffs to the east of the city centre. It was created in the 1970's and now functions as an independent component of the city's urban area. The Marina contains a mix of housing, shopping, commercial, leisure and recreational buildings together with yacht moorings and a working harbour which creates a unique marine character.

3.9 Recreation and leisure uses have expanded over the years, as have the number of residential developments. However, different construction phases within the Marina have occurred without the benefit of a planned approach. Consequently, the Marina has become characterised by piecemeal development and areas of poor public realm.

3.10 The development area covered by this policy extends beyond the Marina encompassing other key sites in the vicinity, including the former Gas Works site to the north and the Black Rock site to the west of the Marina. These sites have been incorporated within the development area because they are likely to be affected by any future development of the Marina and vice versa, particularly in terms of traffic generation and impact on nearby junctions.

3.11 The long term aspiration of the council is to address the deficiencies of the Marina and the wider area and facilitate the creation of a mixed use district of the city, through the generation of a high quality marina environment which creates easier and more attractive

access for residents and visitors, extends the promenade environment up to and around the Marina and creates stronger pedestrian and visual links with the sea from the Marina.

DA2 Brighton Marina, Gas Works and Black Rock Area

The strategy for the development area is to facilitate the creation of Brighton Marina and the wider area as a sustainable mixed use district of the city, through the generation of a high quality marina environment by supporting proposals which:

- Secure a high quality of building design, townscape and public realm while recognising the potential for higher density mixed development in accordance with the aims of the Spatial Strategy to optimise development on brownfield sites;
- Do not breach the cliff height within the Marina;
- Improve connectivity and legibility between the Marina, Black Rock and the former Gas Works site
- Enhance the transport infrastructure at the Marina, promote more sustainable forms of transport and maximise opportunities to reduce car ownership;
- Protect and enhance the ecological environment at the Marina, including improving linkages to green spaces and the existing Green Network;
- Secure a more balanced mix of retail, including support for independent retailers, leisure and tourism and commercial uses, which accords with its District Centre status;
- Deliver a substantial amount of additional residential units including affordable housing, over the plan period; and
- Deliver the amounts of development as set out in part B below.

A. The local priorities to achieve this strategy are:

1. The council will work in partnership with the different landowning interests to ensure that the regeneration of the Marina is comprehensive and conforms with an updated master plan (Supplementary Planning Document) for the Marina, to avoid further piecemeal development in the future.

2. Encouraging the development of housing, retail floorspace, employment floorspace and community facilities to increase opportunities and to meet the needs of local communities.

3. Protecting and enhancing areas of marine character and the role for marine-related leisure, recreation and employment opportunities.

4. Securing improved legibility, permeability and connectivity within the Marina and the surrounding areas through high quality building design, townscape and public realm (see CP12 and CP13).

5. Enhancing the transport infrastructure at the Marina and promoting more sustainable forms of transport including enhanced bus services; promoting smarter travel choices for people; minimising freight movements; improving pedestrian and cycle access; securing improved emergency vehicle access (see CP9); and provision of, and support for, emerging and advanced technologies.

6. Balancing uses with an emphasis towards boating, surfing, leisure and recreation and the enhancement of the District Centre through encouraging the provision of mixed retail activity and services to support any additional expansion in population (see CP4).

7. Ensuring an appropriate mix of housing reflecting housing needs³⁶ within the city and which is accompanied by open space provision (see CP19 and CP16)

8. Maximising opportunities to ensure the efficient, effective and sustainable use of previously developed land so that any increase in residential density will positively enhance the Marina environment and help deliver other local priorities (see CP14)

9. Enhancing the social infrastructure to support any expansion in the residential population through the provision of, or contributions towards, community, education and health services or facilities (see CP7).

10. Conserving and enhancing the biodiversity and geodiversity of the area through the implementation of an ecological master plan which ensures wildlife habitats are integrated throughout and ensures that protected sites (RIGs³⁷, SSSI and SNCI) are protected in accordance with Biosphere principles and having regard to proximity to the National Park Boundary (see CP10).

11. Ensuring development proposals accord with the relevant Shoreline Management Plan and incorporate a site specific Flood Risk Assessment in line with the requirements and recommendations for the area set out in the Brighton & Hove Strategic Flood Risk Assessment and guidance contained within the National Planning Policy Framework (see CP11), to protect development from all types of flood risk.

12. Maximising opportunities to support the city's sustainability objectives through large-scale zero and low-carbon energy technologies to serve the Marina and wider city, particularly those that take advantage of the Marina's coastal location (see CP8).

B. Provision will be made for the following amounts of additional development to be provided by 2030:

1,940 residential units (including the 853 residential units already granted planning permission for the outer harbour);

5,000 sq m retail (A1-A5) floorspace;

4,000 sq m industrial (B1-B2) floorspace;

9,000 sq m of leisure and recreation floor space

A community building within the Marina;

³⁶ B&H Housing Requirements Study June 2011

³⁷ Regionally important geological sites.

A health facility within or in the vicinity of the Marina to be agreed with the PCT³⁸;

A primary school or increase in the number of school places within or in the vicinity of the Marina.

C. The Strategic Allocation in the Marina, Gas Works and Black Rock Development Area is:

1. Brighton Marina Inner Harbour

Provision is made for a mixed use development comprising a minimum of 1,000 residential units, 5,000 sq m of retail development (A1-A5), 3,500 of leisure and recreation use, community facilities (including health facility and community centre). Proposals will be assessed against the Development Plan policies and the following criteria:

- a) Design – development should be of a high quality with excellent use of durable materials to reflect the unique location of the Marina;**
- b) Townscape and public realm – development should improve the legibility and quality of the townscape and public realm and should demonstrate good connectivity between buildings and spaces within the Marina and wider area;**
- c) Housing mix – development should provide for a mix of dwelling type, tenure and size to cater for a range of housing requirements and to improve housing choice;**
- d) Flood risk - development should demonstrate that the most vulnerable land uses will be located in areas of lowest flood risk in accordance with Brighton & Hove's Strategic Flood Risk Assessment.**

2. Gas Works site

The Gas Works site has been identified for approximately 4,000 sq m of employment floor space, 85 residential units and some ancillary retail development. The key criteria against which proposals will be assessed are:

- a) Employment provision – development should provide an appropriate mix of employment floor space of varying sizes that cater for business uses ranging from office to light industrial, including small starter units or managed units (Use Classes B1 and B2);**
- b) Housing mix – development should provide for a mix of dwelling type, tenure and size to cater for a range of housing requirements and to improve housing choice;**

³⁸ Primary Care Trust. In Brighton & Hove, this organisation is known as NHS Brighton & Hove

- c) **Design – development proposals should demonstrate high quality design which positively contribute to the varying character of existing residential and commercial properties in the vicinity to create a cohesive and attractive urban environment;**
- d) **Connectivity – development proposals should enhance existing links between the Marina, Gas Works and Black Rock and contribute to the creation of safe links and coherent integration between the Gas Works site and the surrounding neighbourhood**

3. Black Rock site

The Black Rock site has been allocated for 7,000 sq m of leisure and recreation purposes, not including ancillary retail and café uses associated with the primary leisure use. Proposals will be assessed against the citywide policies and the following specific criteria:

- a) **Provision of a high quality leisure and recreation facility that enhances the seafront leisure function, draws tourism to the city and attracts visitors and residents to the seafront;**
- b) **Proposals for development will need to fully demonstrate how this would enable conservation of the historic environment including the setting of nearby listed buildings and the Kemp Town Conservation Area, and complements allocated designations and uses at both the adjacent Inner Harbour and Gas Works sites;**
- c) **Creation of links between Black Rock and the Marina, including the provision of a pedestrian and cycle connection from the west allowing the continuation of the seafront promoting strong linkages through to the Inner Harbour area of the Marina, contributing towards the creation of coherent and safe public access between the seafront, Marina and the Gas Works site and;**
- d) **Protect and enhance the vegetated shingle area which is a rare and important habitat for local and migrating species and provide opportunities for appreciating the special quality of the Site of Nature Conservation Importance (SNCI) designated Black Rock beach**

Proposals for uses in addition to the recreation and leisure use will only be considered where it can be demonstrated that these uses support the delivery of a leisure and recreation facility and are not in competition with the District Centre status of the Marina. Supporting or enabling uses should perpetuate informal leisure uses associated with the seafront, conserve the historic environment and enhance linkages between Black Rock, the Marina and the Gas Works site.

Supporting text

3.12 A holistic approach to the regeneration of the development area will be achieved through the preparation and adoption of a Supplementary Planning

Document (SPD) for the Brighton Marina and wider area. The SPD will replace the existing Supplementary Planning Guidance (SPGBH20, 2003) and Planning Advice Note (PAN04, 2008) for Brighton Marina.

3.13 The SPD will be supported by a Public Realm Strategy for the Marina, providing comprehensive design guidance for developers and will form part of the citywide Urban Design Framework (CP12). It will contribute to improving the visual appearance of the area, focussing particularly on shop fronts and pedestrian routes and connections to key attractions both within and in the vicinity of the Marina. The strategy will also include guidance on how to improve the biodiversity of the area and access to areas of ecological importance e.g. the SSSI cliffs and SNCI beaches, which will make a significant contribution to improving the quality of life within the development area.

3.14 In response to the economic downturn and the rate of economic recovery, it is recognised that the financial viability of some large scale development proposals continues to present challenges in the short to medium term future. High density development proposals should demonstrate that the proposed capacity and density of development is verified through a sound assessment of key financial viability issues and will only be considered where it can be robustly demonstrated that the delivery of regeneration benefits and local priorities through a sustainable development can clearly justify a significantly high density. Enabling development for either the Black Rock or the Gas Works site should be used to support and deliver their respective leisure and recreation, and employment uses.

3.15 The Marina is identified as a District Centre in the city's retail hierarchy (see Policy CP4). The majority of retail activity takes place in the Merchant's Quay and at the Asda superstore. Whilst the District Centre contains a range of bars, restaurants and factory outlet stores related to its wider recreation and leisure role, it lacks the full range of shops and services, such as banks and post offices, found typically in District Shopping Centres. The strategy for the development area is to enhance the choice and performance of retail activity in the District Centre through the encouragement of mixed retail activity and improvements to the public realm. Ancillary retail development on the Black Rock and Gas Works sites must not compete with or prejudice the District Centre status of the Marina.

3.16 Improvements to the transport infrastructure, in particular to the cycle, pedestrian and bus routes will be implemented and funded through planning obligations. These improvements will be closely linked to other priorities for the area, especially those relating to enhancement of the public realm and ecology. The bus routes servicing the development area are relatively good but there is scope to improve bus services as well as the infrastructure i.e. through the provision of a transport interchange within the Marina, in response to the additional demands resulting from the implementation of major development schemes. There are plans for the provision of rapid/express bus-based services along the seafront to contribute to improved public transport provision to the Marina and options are currently under consideration. Work will be undertaken with transport operators to secure improvements through both the Community Infrastructure Levy (CIL)³⁹ or planning obligations.

³⁹ CIL Regulations came into force in April 2010. Money raised from CIL can be used to fund a range of infrastructure needed as a result of development.

3.17 The identified amount of development will largely be met by the strategic allocations set out in part C of the policy. The Inner Harbour is located immediately south of the cliffs and is central to the regeneration of the western part of the Marina, acting as a catalyst to transforming its appearance and dysfunctional linkages. The Black Rock site to the west of the Marina and has been identified for development of a recreation and leisure facility that will redress the lack of modern, prestigious, good quality recreation facilities in this part of the city (see also CP17). The Gas Works site to the north of the Marina is remote and cut off by the A259 from the rest of the development area. Consequently, there are potential opportunities to establish a choice of stronger and clearer routes between the Marina, Gas Works and Black Rock sites to enable ease of movement and a more pleasant environment for pedestrians and cyclists.

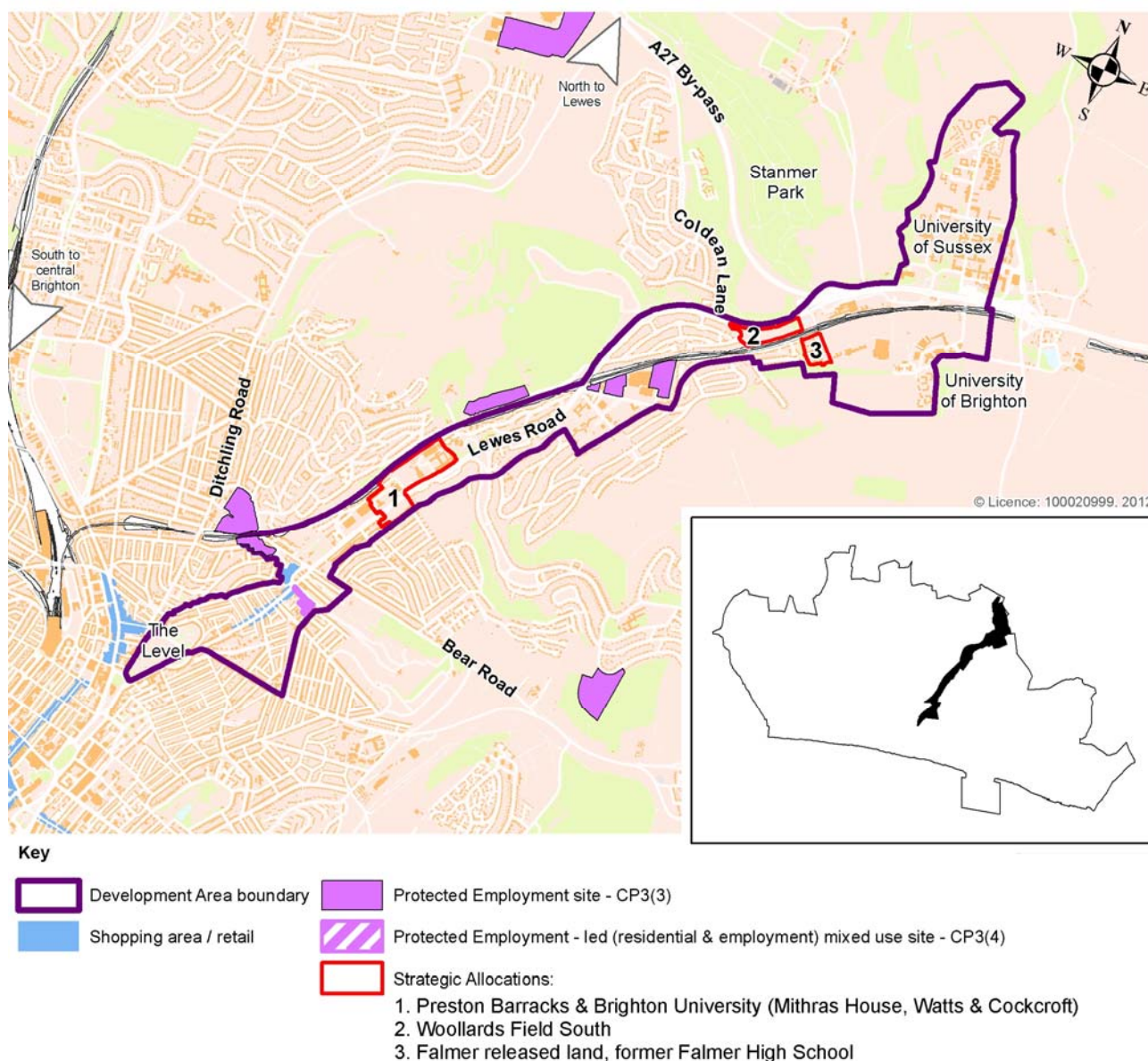
3.18 Any residential development proposals coming forward within the development area will need to demonstrate that they have the necessary physical and social infrastructure to support the expansion in the residential population through the provision of, or contributions towards, community, education and health services or facilities. Provision of facilities within the development should be of sufficient size to accommodate the end users. Physical infrastructure, such as the provision of sufficient sewerage and water capacity to serve the new development, will also need to be provided through the impending Community Infrastructure Levy charging schedule.

3.19 The council's Strategic Flood Risk Assessment (2008) and SFRA update (2012) has identified Brighton Marina and Black Rock as falling within an area of higher probability of flooding (Flood Risk Zone 3a). A Sequential Test has been carried out to demonstrate the appropriateness of development in this area and this is available as a background paper to the City Plan. Any development proposal will need to demonstrate that the most vulnerable land uses will be located in areas of lowest flood risk. Detailed guidance and specifications for addressing flood risk in this area is set out in the Strategic Flood Risk Assessment (2008) section 7.2.9, and in the SFRA (2012) Appendix B.

3.20 The majority of the site is at risk of surface water flooding during the 1 in 200 year event and the northwest corner of the Marina is also at risk of surface water flooding during the 1 in 30 year event. The SFRA 2012 sets out specifications in relation to reducing the consequence of flooding and to maintain existing flow paths. The SFRA 2012 found that the Standard of Protection (SOP) provided by the existing inner harbour walls will reduce over time, when assessed against extreme sea levels that may result as a consequence of climate change. Defences should therefore be maintained to ensure the SOP is sufficient for the lifetime of the development.

3.21 The natural environment is an important part of the Marina. The cliffs directly behind it are nationally important for their geological interest and are included within Brighton to Newhaven Cliffs Site of Special Scientific Interest, which also includes the cliff top and foreshore immediately to the east. Open water within the Marina supports an unusual marine fauna and is designated a Site of Nature Conservation Importance. Two areas of vegetated shingle (an internationally threatened habitat) occur at Black Rock beach and along the Volks Railway and the whole area is noted as an important area for migrating birds.

DA3 – Lewes Road Area



Context

3.22 The Lewes Road is the largest development area identified in the City Plan. It extends the length of Lewes Road from The Level in the south (open space) northwards to the Universities and the South Downs National Park at the city's boundary. Lewes Road is one of the main routes into the city and is identified as a sustainable transport corridor. The southern section of the development area is dominated by The Level, the Lewes Road District Shopping Centre and the Cemeteries to the east. The middle section is mixed in character including taller buildings and the Preston Barracks site. To the north are residential areas, open space at Wild Park and Stanmer Park, the two main University campuses and the Community Stadium. The area as a whole has a mixed and often poor quality townscape and public realm, dominated by the dual carriageway. There are two residential renewal areas on the eastern side of Lewes Road at Moulsecoomb and Bevendean.

3.23 The main thrust of the strategy for the Lewes Road Development Area is to promote and enhance the role of the area for higher education in Brighton & Hove. In addition there are a number of significant development sites within the area including three strategic allocations (the Preston Barracks site, Woollards Field South and the Falmer Released Land). The area will benefit from an improved public realm and townscape along with greening of the route.

DA3 Lewes Road

The strategy for the development area is to further develop and enhance the role of Lewes Road as the city's academic corridor⁴⁰ by supporting proposals which:

- **improve further and higher education provision in the Lewes Road area;**
- **facilitate improved sustainable transport infrastructure that provides choice, including travel by bus, walking and cycling;**
- **secure improvements to the townscape and public realm;**
- **deliver inter-connected green infrastructure and biodiversity improvements, contributing to Biosphere objectives (see policy CP10);**
- **improve air quality in the Lewes Road area; and**
- **deliver the amounts of development set out in part B below.**

A. The local priorities to achieve this strategy are:

- 1. The council will work in partnership with the Universities to support the sustainable redevelopment and expansion of the University campuses; deliver appropriate accommodation for students; and develop closer links between the Universities and local communities through sharing facilities and developing local opportunities for training and learning.**
- 2. Promoting and investing in improved bus, cycling and pedestrian routes along Lewes Road from The Level to the Universities in partnership with public transport operators in order to achieve a modal shift and thereby help reduce the impact of traffic and ensure that new development does not negatively impact on the air quality of the area.**
- 3. Encouraging the development of housing, employment floorspace and community facilities to increase opportunities for and to meet the needs of local communities.**
- 4. Securing improvements to the public realm and townscape, including greening the route, through the adoption of comprehensive design guidance that will inform future planning decisions and investment in the area and encourage more efficient use of underused sites (see CP12 Urban Design).**

⁴⁰ Academic Corridor: Concentration of three major higher and further education institutions (the Universities of Brighton and Sussex and City College) along the A27/A270 axis in the Brighton area, which together provide enhanced facilities for high-technology and knowledge-based businesses.

5. Supporting and enhancing the district shopping centre by securing improved pedestrian links along and across the Lewes Road together with environmental and physical enhancements including high quality shopfronts.

6. Securing improvements in community safety, landscaping, air quality, open space, interconnected green infrastructure and biodiversity.

7. To ensure improvements to local air quality through implementation of the council's Air Quality Action Plan and ensure new developments do not increase the number of people exposed to poor air quality.

B. Provision will be made for the following amounts of additional development to be provided by 2030. Provision will be made through strategic site allocations (below) and through allocations made in the City Plan Part 2 for:

885 residential units;

15,600 sqm employment floorspace including an Innovation Centre;

Business School and additional academic floorspace (16,000 sqm);

Student Accommodation (1300 rooms); and

Community building at Bevendean.

C. Strategic Allocations in the Lewes Road Development Area are:

1. Preston Barracks and Brighton University (Mithras House and Watts/Cockcroft Site)

The city council will work with the University of Brighton and other partners to provide a mixed use employment-led development comprising a new business school, 10,600sqm employment floorspace, including an Innovation Centre; 750 rooms of student accommodation; 300 residential units and other ancillary supporting uses. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies and the following criteria:

a) Proposals will be required to have a high standard of public realm, including a central square, and effective links across the Lewes Road and to Moulsecoomb Station in order to improve the quality and permeability of the area.

b) Residential development should provide for a mix of dwelling type, tenure and size to cater for a range of housing requirements and to improve housing choices.

c) The development should aim to be zero carbon and through creative landscaping solutions (including features such as green walls) should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements.

d) Sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact;

e) The developer will be required to enter into a training place agreement to secure training for local people.

2. Woollards Field South

Provision of 5,000 sqm of B1 office space south of the archive centre, known as The Keep, approved in 2011. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies and the following criteria:

- a) The development will be required to achieve a high standard of design.
- b) Sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact.
- c) As a greenfield site, the development will be expected to be zero carbon and to achieve an Outstanding BREEAM rating and, through creative landscaping solutions (including features such as green walls), should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements.
- d) Development should ensure that there will be no adverse impacts on the setting of the South Downs National Park or any locally or nationally designated landscape, historic or ecological sites.
- e) Development will be required to contribute towards reducing the heat island effect and reduce surface water run-off and flood risk, with run-off being controlled to maintain greenfield run-off rates.
- f) The developer will be required to enter into a training place agreement to secure training for local people.

3. Falmer Released Land, Former Falmer High School

Redevelopment for a range of uses including housing, purpose built student accommodation, offices (B1), educational use, a car park related to the American Express Community Stadium and the provision, on or off site, of permanent accommodation for the Bridge Community Education Centre. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies and the following criteria:

- a) The development will be required to achieve a high standard of design.
- b) Sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact.
- c) Development should ensure that there will be no adverse impacts on the setting of the South Downs National Park or any locally or nationally designated landscape, historic or ecological sites.

- d) The development should aim to be zero carbon and, through creative landscaping solutions (including features such as green walls), should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements.**

Supporting Text

3.24 The strategy recognises the contribution made by the city's two universities, based on the Lewes Road, to the economic, social and cultural life of Brighton & Hove and the wider region⁴¹. The Universities offer popular and respected courses and have plans for overall growth and for improvements to their campus facilities to meet student demand and rising expectations. This will require improvement and expansion of their campuses and the need for appropriate new student accommodation on and near the campuses. The Council is keen to work with the universities to secure these objectives, which align closely with council strategies, particularly on student housing.

3.25 The Council will work with the universities and other education providers, in conjunction with Policy CP21 on student housing, to address the need for dedicated purpose built student accommodation in the local area where there is increasing pressure to accommodate students within the existing housing stock. The council will seek to control the location of new small Houses in Multiple Occupation (C4 use class) within the Lewes Road corridor in order to avoid problems of overconcentration and to maintain healthy and inclusive communities.

3.26 In terms of providing benefits for and working with local communities, the Universities recognise that they have a role in forging closer links with local people by expanding learning opportunities and sharing education, community and sports facilities. There are also opportunities to encourage technology and innovation transfer from the Universities to existing businesses and to support new opportunities for suitable new business accommodation that further develop links. The universities also contribute positively to the community through student volunteering and other outreach work.

3.27 Improving the sustainable transport corridor and access to the South Downs National Park via the Lewes Road, in particular the cycle and pedestrian routes, will be implemented and funded through the Local Transport Plan⁴² and developer contributions. These improvements will be closely linked to the other priorities for the area, in particular better air quality⁴³ and improving the public realm and community safety. There is currently relatively good bus and train access to the area, but there is scope to significantly improve services in response to the additional demands resulting from the implementation of major development schemes. Work will be undertaken with Lewes District Council and bus and train operators to identify and secure improvements.

⁴¹ The universities have a combined annual revenue expenditure of approximately £350 million. They directly employ 5000 staff and support several thousand jobs in the wider area, predominantly in the city. The universities contribute to employment through initiatives such as the Sussex Innovation Centre at the University of Sussex which provides support for start-up businesses and the ProfitNet programme at the University of Brighton that has worked with over 1000 local small and medium sized businesses. Work with local community groups is sustained by the University of Brighton Community University Partnership Project (CUPP).

⁴² LTP3, the city's current Local Transport Plan, was adopted in 2011 and sets out a fifteen year strategy for transport proposals and improvements. It is prepared in order to bid for Government funding for all forms of transport.

⁴³ The area of Lewes Road south of the Vogue Gyratory is included in the 2008 Air Quality Management Area as it exceeds the government's Air Quality Objective for annual Nitrogen Dioxides. This will be addressed through the implementation of the council's Air Quality Action Plan.

3.28 A holistic approach to improving the public realm and townscape will be achieved through the preparation and adoption of comprehensive design guidance for the area that will form part of the citywide Urban Design Framework (see policy CP12) and will be subject to community engagement. It will cover matters such as improving biodiversity and greening the corridor. This will make a significant contribution to improving quality of life within the area. It will also contribute to improving the appearance of the built environment, such as shopfronts, and to enhancing pedestrian routes and connections through the district centre.

3.29 Lewes Road District centre was identified in the 20011 Retail Study Update⁴⁴ as a potentially vulnerable shopping centre. Additionally the LR2 Regeneration Strategy⁴⁵ identified a number of opportunities to improve the local shopping environment. The comprehensive design guide will help to achieve this by influencing future development proposals and future Local Transport Plan proposals. Melbourne Street Industrial Area is located to the east of the Lewes Road District Centre and is in need of investment. It has been identified in policy CP3 for employment led (residential and employment) mixed use development.

3.30 There are a number of local priorities for the area that will be delivered through city council and other strategies supported by appropriate developer contributions. These extend to benefits for disadvantaged neighbourhoods adjacent to the Lewes Road. One is to address lower incomes and unemployment in adjoining neighbourhoods by securing training and job opportunities for local people in major development schemes. There is also an identified need for investment in public open spaces in the area including Saunders Park and William Clarke Park as well as under-used open spaces in Moulsecoomb and Bevendean and to connect otherwise isolated green spaces via the development of green networks.

3.31 Lewes Road south of the Vogue Gyratory is identified as a community safety priority area⁴⁶. Public realm and park improvements will help to address this priority. In terms of community facilities, the need for a dedicated community building is identified in Bevendean (Audit of Community Level Infrastructure 2004⁴⁷) and for youth facilities.

3.32 Preston Barracks is a large mixed use site which has significant potential for high quality employment, training and academic floorspace and for a significant number of

⁴⁴ The Brighton & Hove Retail Study Update 2011 provides an update to the earlier 2006 study, which identified current and future capacity for retail floorspace in Brighton & Hove. The studies assess the existing network of larger and smaller centres in the city and in the function and effectiveness of the current retail hierarchy. Whilst surrounded by a dense area of housing and containing a good range of everyday services, such as a post office, bank and pharmacy, there is a poor range and quality of comparison goods retailers in Lewes Road. Vacancy rates are high, pedestrian flows are low and the environment and pedestrian movements hampered by traffic congestion. The 2011 update recommended traffic management and improved pedestrian linkages in order to provide an upgraded shopping environment for the local catchment population.

⁴⁵ The LR2 Regeneration Strategy (London Road and Lewes Road Regeneration Strategy 2007) identifies options and opportunities for the regeneration of the London Road and Lewes Road area. The emphasis is on measures to improve the quality of urban design, streetscape and enhance the gateways to the city and to seek development opportunities in the area.

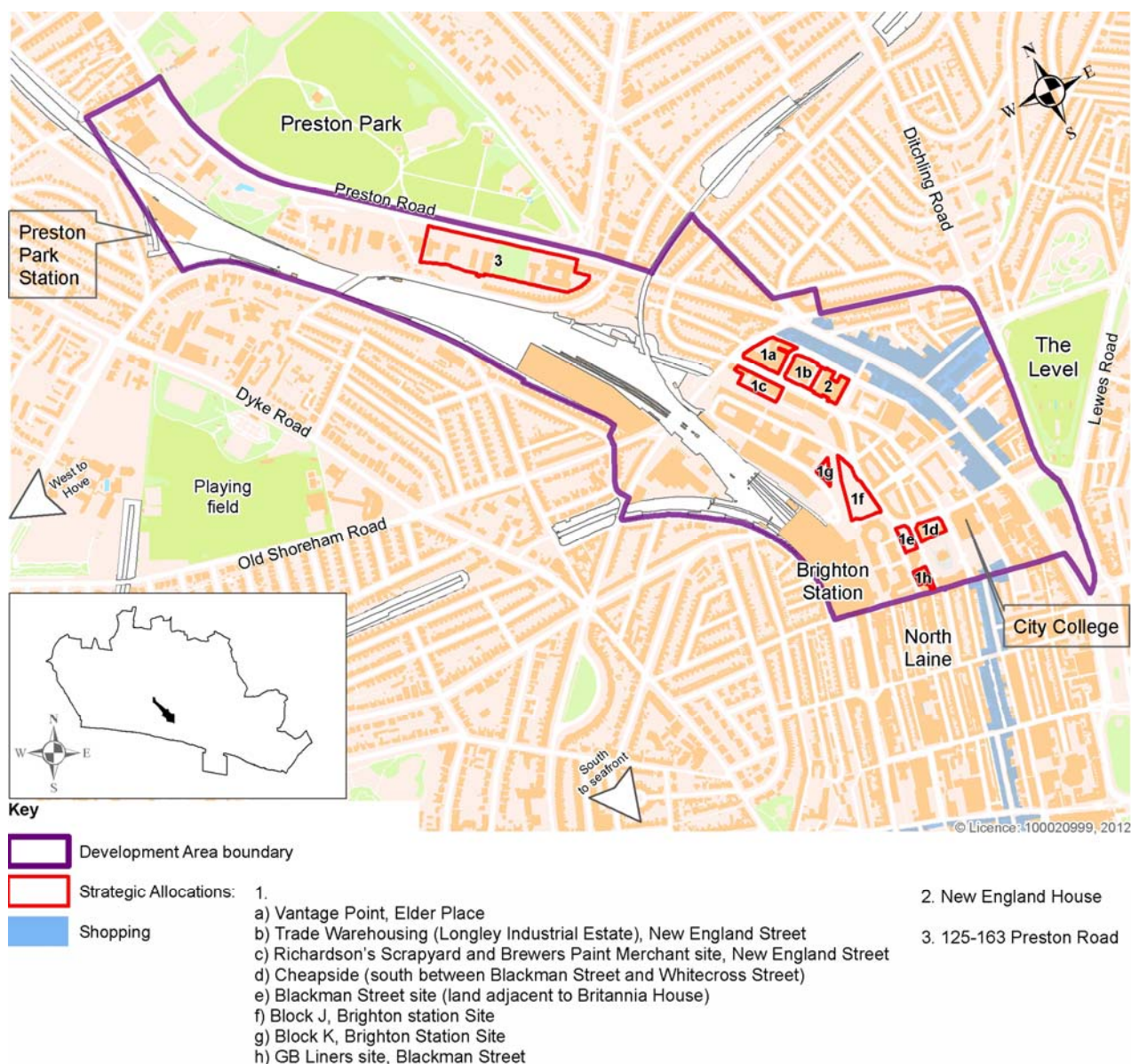
⁴⁶ The Community Safety, Crime and Drugs Audit 2004 identifies the Lewes Road as a community safety priority area and proposed measures for improving safety.

⁴⁷ The Audit of Community Level Infrastructure 2004 was commissioned by the Local Strategic Partnership to identify the level of community infrastructure in the 15 Neighbourhood Renewal areas across Brighton & Hove.

residential units and purpose built student accommodation, integrated with creative urban greening. It is a strategic allocation due to its potential to help meet targets for housing and employment floorspace in the city. Future development on the site will be employment-led and there is scope for it to provide an element of affordable managed workspace for local small businesses and education floorspace linked to the University. The council is signed up in principle to a shared vision for a wider development opportunity for Preston Barracks and the nearby University of Brighton sites. A planning brief for Lewes Road (Preston Barracks and University of Brighton) was adopted in September 2011.

3.33 Planning permission was granted in 2011 for an archive centre with related conference, education and research facilities on the Woollards Field site to the south of Falmer Station. The remainder of the site to the south is allocated for office (B1) floorspace totalling 5,000 square metres. This development will help provide local training and employment opportunities and could help to strengthen the Universities' positive role within the local economy. Land at the southern end of the former Falmer High School site is no longer required for educational purposes. The site has potential for redevelopment for a range of uses, including student accommodation, residential, offices and educational use. These uses could work in conjunction with car parking use for the nearby American Express Community Stadium. Permanent accommodation for the Bridge Community Education Centre should also be provided, either on the Falmer Released Land or in an acceptable alternative location.

DA4 – New England Quarter and London Road



Context

3.34 The regeneration of the New England Quarter has been acting as a catalyst for the redevelopment of the surrounding area east of Brighton Station. Built to support the One Planet Living principles, One Brighton has been designed to help its residents reduce their ecological footprint and is an exemplar of Sustainable Living. Opportunities for further development within this area arise from it being in close proximity to the retail and commercial core of the city and the area is well placed to capitalise on excellent transportation links provided by Brighton Station, London Road and Preston Road Stations. To the south, Trafalgar Street provides a link to the vibrant North Laine shopping and conservation area. There is real potential to invigorate this part of the city and create a high quality public realm which improves the arrival experience of those coming to the city by train.

3.35 London Road Town Centre serves as a community hub and key shopping centre for the surrounding residential areas and, with the city's only permanent Open Market, offers

affordable goods for those on lower incomes. However its performance as a 'town centre' has been in decline and there is a great need for regeneration and improvements, with particular attention to the Open Market. A particular aim of the policy is to achieve greater integration and accessibility between the London Road Shopping centre and the Brighton Station/New England Quarter area.

3.36 London Road itself is the main entrance and exit route from the city and is designated a sustainable transport corridor. It has the potential to become a strong and attractive gateway to the city. It is lined by mature trees and punctuated by large open green spaces (Withdean Park, Surrenden Field and Preston Park). The area west of Preston Road is currently characterised by high rise office blocks opposite Preston Park's western boundary along with a hotel and new GP practice and pharmacy. This is a secondary office location and provides the potential for high quality mixed use (employment/residential) future redevelopment.

DA4 – New England Quarter and London Road Area

The strategy for this development area is to revitalise the London Road shopping area, create a major new business quarter for Brighton & Hove consisting of high quality business accommodation connecting London Road with the New England Quarter, and to maintain and enhance a green gateway to the city to the west of Preston Road.

A. The local priorities to achieve the strategy are:

- 1. Planning for a new business quarter for the city in the New England Quarter and London Road area to accommodate 20,000 sq m of additional new office floorspace post 2016.**
- 2. Managing, enhancing and consolidating the existing retail provision within the defined prime frontage of London Road Town Centre, recognising the importance of retaining key retail sites to act as 'anchors' for the centre as well as recognising the role of small independent/local traders.**
- 3. Working with landowners and traders to secure the redevelopment/refurbishment of key retail sites along London Road.**
- 4. Working with education providers and funding partners to support improvements in vocational training and further education within the area as an extension to the Academic Corridor⁴⁸.**
- 5 Working with Southern Rail and Network Rail to enhance the environment around Brighton Rail Station (Brighton Station Gateway) recognising its important role as a gateway to the city, a public space and a transport interchange.**
- 6. Ensure improvements to local air quality through the implementation of the council's Air Quality Action Plan, through improvements to bus, pedestrian and cycle**

⁴⁸Academic Corridor: Concentration of three major higher and further education institutions (the Universities of Brighton and Sussex and City College) along the A27/A270 axis in the Brighton area, which together provide enhanced facilities for high-technology and knowledge-based businesses.

routes to achieve a modal shift and help reduce the impact of traffic and ensure developments do not increase the number of people exposed to poor air quality.

7. Strengthening links between the New England Quarter, London Road shopping centre and the North Laine shopping area with high quality streetscapes and a greater choice of routes and ease of movement through the area with an improved pedestrian and cyclist environment.

8. Maintaining and strengthening the significant digital media and creative industries business cluster in the area through the delivery of ultrafast broadband and ensuring that workshops, office space, studios, storage and other premises remain affordable, appropriate and available for use.

9. Enhancing the social infrastructure to support any expansion in the residential population through the provision of, or contributions towards community, education and health services or facilities;

10. Ensuring redevelopment opportunities extend and strengthen green infrastructure including the connection between the existing open space and greenway network of The Level, Brighton Station Greenway and Preston Park and secure enhancements to open space and biodiversity in the area.

A Supplementary Planning Document (SPD) has been prepared by the council to assist the delivery of development and guide developers on the form and content of development and the provision of infrastructure in the London Road Central area.

B. Provision will be made by 2030 for the following minimum amounts of development:

**1140 residential units;
300 bed space student housing
20,000sq m B1a B1b floorspace**

C. The Strategic Allocations in the New England Quarter and London Road Area are:

1. Provision is made for 20,000 sq m net additional B1a, B1 b floorspace and 165 residential units through the implementation of extant commitments for B1 floorspace and the mixed use development of the following sites⁴⁹:

- a) Vantage Point, Elder Place (including Circus Parade) - 1,000 sq m**
- b) Trade Warehousing (Longley Industrial Estate) 4-6 New England Street - 3,000 sq m**
- c) Richardson's Scrapyard and Brewers Paint Merchant Site, New England Street - 3,000 sq m**
- d) Cheapside (south between Blackman Street and Whitecross Street) - 2,000 sq m**
- e) Blackman Street Site (land adjacent to Britannia House) - 2,000 sq m**

⁴⁹ These sites fall within the Elder Place Development Zone or the Pelham Street Development Zone as identified in the London Road Central SPD 10 2009

Proposals will be assessed against the citywide policies, the London Road Central SPD and the following specific criteria:

- i. Each site would be expected to deliver the minimum office/ research and development (B1a, B1b) floorspace indicated above through a range of offices and flexible workspaces including larger floorplate office stock and affordable business floorspace suitable for small business and the digital media/ creative industries;**
- ii. An appropriate mix of uses including residential (C3) and ancillary retail (A1) and restaurants and cafes (A3) at ground floor will be permitted;**
- iii. Development will be expected to be of a high quality of design and incorporate active uses at ground floor level, contribute to an improved public realm and improved connectivity to the wider development area for pedestrians and cyclists;**
- iv. Development will be expected to contribute to green infrastructure improvements to increase green space connectivity and enhance biodiversity.**

The following sites⁵⁰ within the DA4 area with extant planning permission for B1a office uses will not be granted planning permission for alternative uses:

- f) Block J Brighton Station Site**
- g) Block K Brighton Station Site**
- h) GB Liners site, Blackman Street**

2. New England House, New England Road

Safeguard and strengthen New England House as the city's creative industry and digital media hub through:

- a) the council working in partnership to deliver its upgrade and refurbishment;**
- b) the council as landowner ensuring the workspace remains competitively priced, appropriate and available to use;**
- c) Supporting proposals which provide a range of appropriate workspaces to support the creative industries and digital sector;**
- d) Where it is necessary to make a refurbishment and upgrade of the building financially viable, appropriate enabling development around the building will be considered, providing it does not affect the operation and long term vision for the building.**

⁵⁰ The station sites are identified in the Masterplan for the regeneration of the New England Quarter and GB Liners site within the Pelham Street Development Zone as identified in the London Road Central SPD 10 2009

3. 125-163 Preston Road

Provision is made for mixed use (office and residential) developments retaining as a minimum across the development sites 14,000 sq m of office floorspace and 460 residential units. Proposals will be assessed against the citywide policies and the following specific criteria:

- a) A high quality design which respects and enhances the local historic environment, the residential character of the area and the parkland setting;**
- b) A development which contributes positively to the creation of a coherent cluster of tall buildings with a consistent building line and a strong street frontage;**
- c) A minimum office floorspace should be retained on each development site:**
 - 125-135 Preston Road (Telecom House) - 3,000 sq m**
 - 137-147 Preston Road - 3,000 sq m**
 - 149 -151, 153, 157-159, 161-163 Preston Road - 2,000 sq m each**
- d) Development should provide for a mix of dwelling type, tenure and size to cater for a range of housing requirements and to improve housing choice (see CP19);**

Supporting text

3.37 The London Road Corridor has the potential to become a strong and attractive gateway to the city (London Road and Lewes Road Regeneration Strategy 2007⁵¹) and there are opportunities for regeneration in distinct areas (including the area east of Brighton Station, the London Road Shopping Centre and west of Preston Road) which would strengthen and enhance the overall character and diversity of the city.

3.38 With the success of the Brighton Station redevelopment, the area east of Brighton Station, is the preferred location for new office development needed in the city (see Employment Land Study (ELS) 2006). This well established mixed use area is particularly well placed in terms of transport links, its close proximity to Brighton Station and the retail and commercial core of the city; and it already benefits from having an established office and creative industries cluster. The council, through the Station Gateway Project, is seeking to enhance the environment around Brighton Station, recognising the importance of Brighton Station in this area as a transport interchange, public space and important gateway into the city. These environmental improvements will also link with improvements planned for the station and outstanding developments planned to the north of the station.

3.39 A number of sites have been identified as offering particular redevelopment potential to bring forward the net additional office floorspace proposed in this area to meet the city's forecast need. Permitting a mix of uses to come forward on these sites alongside new office floorspace provision recognises the positive impact mixed use development will have on the regeneration of the wider area as well as ensuring a more vibrant streetscape. The council

⁵¹ LR2 Study, London Road/Lewes Road Regeneration Strategy, 2007

recognises the need to take into account the sensitivity of financial viability appraisals to changing market circumstances with regard to the mix of uses proposed. However the priority for these sites is that an appropriate amount of new office floorspace is delivered. Therefore a minimum office floorspace requirement has been set out for each site informed by the Strategic Viability Assessments 2012. Appropriate other uses include residential and ancillary retail and café and restaurant uses at ground floor to create a more active building frontage. Developments will need to be carefully designed and managed to ensure that residential and other occupiers of the sites will have an appropriate level of amenity. Monitoring of planning commitments in this area shows the potential to deliver c.10,000 sq m of office floorspace through extant planning permissions. These commitments are considered capable of being implemented and will contribute significantly to the proposed net additional employment floorspace to be delivered within this Development Area.

3.40 The opportunity to, bring forward employment floorspace offering a range of office space and type, on the edge of the city centre and close to the main train station offers local businesses the opportunity to grow and would build upon the success of the New England Quarter to create a mixed use area of the city (LR2 Study). The greater numbers of people living and working in the area will help to revitalise the shops and the market in London Road and will reduce the need for people to travel outside of the city for work.

3.41 Within this area, City College is a key provider of vocational training in the city, meeting the rapidly expanding demand for a broad range of workers to support Brighton and Hove's economy with campuses at Pelham Street and at Preston Road. As an extension to the academic corridor (see DA3) the council will work with education providers and funding partners and support proposals for the modernisation and expansion of facilities at the City College Pelham Street campus including the provision of student accommodation (see CP21 Student Accommodation and Homes in Multiple Occupation).

3.42 The creative industries sector has been identified as a growing and dynamic sector in the city with a shortage of affordable and appropriate workspace⁵². The Creative Industries Workspace Study 2008 highlighted the importance of the existing creative industries cluster in the city centre and New England House as a unique and successful example. Currently 60% of New England House is let as workshops and office units to a mix of businesses, many of which fall within the creative industries and, more particularly, the digital media industries, but also include others like food, retail and wholesale, construction and direct marketing. The building is largely divided into workshops and office units. Many businesses have formed into 'clusters' to promote joint working, synergy and bulk purchasing. In October 2010 the council agreed to work in partnership to pursue an option for the refurbishment of the building to provide affordable and flexible managed space.

3.43 The policy seeks to safeguard and strengthen the existing cluster presence through the strategic allocation of New England House. This policy supports proposals that provide a range of much needed and workspaces appropriate for the creative industries and digital media sector including start-up spaces, second phase move on space and networking facilities. The council will work with providers to ensure the provision of appropriate information and communication technology (ICT) infrastructure; in particular ultrafast broadband infrastructure within this area to support the creative industries and digital media sector (CP2 Sustainable Economic Development),

⁵² Creative Industries Workspace Study 2008

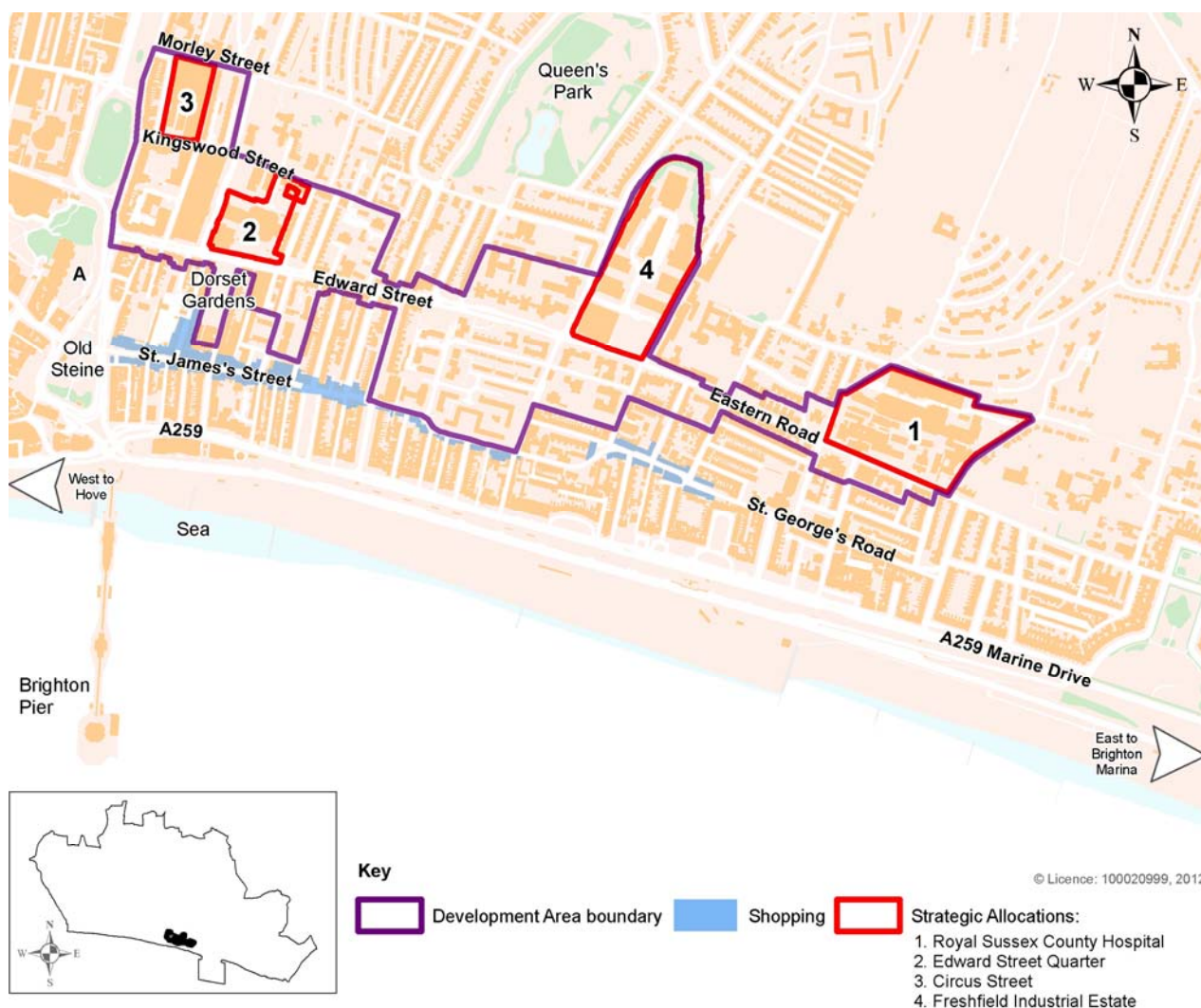
3.44 To the west of Preston Road is an area characterised by medium and high rise office blocks opposite Preston Park's western boundary and tall residential blocks midway along the route. In recognition of this area as a secondary office location twinned with the priority to direct new office development into primary locations (New England Quarter and Edward Street) together with the need to secure future investment in the Preston Road office sites and meet local housing targets for the city these sites are identified for high quality mixed use development and have been identified as a strategic site allocation for this development area. Retaining a minimum office floorspace as indicated in Part C will ensure that the area continues to provide valuable employment floorspace as part of the mix of uses. Redevelopment should enhance the setting of the adjoining Preston Village conservation area, the setting of the Viaduct and the setting of Preston Park as a registered park of special historic interest, as well as respecting the amenity of the neighbouring residential area. Regard should be had to the Supplementary Planning Guidance note 15 on Tall Buildings.

3.45 The Brighton and Hove Retail Study Update (September 2011) indicates that London Road is not exploiting its full potential as a town centre shopping area. The priority for the shopping area is to enhance and consolidate the existing retail provision within London Road shopping centre and improve the physical environment. This will lead to an improved shopping experience which will be helped by effective management of the town centre. The council will look to enhance the retail provision, particularly for comparison (non-food) goods which are currently under represented by encouraging the re-use of vacant key retail units to new retail tenants.

3.46 Environmental improvements should include a better pedestrian environment, better local air quality, improved interconnected green infrastructure which maximises opportunities to integrate urban biodiversity and improved streetscape together with the need to create better walking and cycling links between London Road, the area east of Brighton Station, the Level, Valley Gardens and the Seafront. The £18m regeneration of the Open Market will provide 44 new permanent market stalls, creative workshops, a large central square and 87 affordable homes and should provide a catalyst for the regeneration of London Road.

3.47 London Road, south of Preston Circus has been designated as part of the 2008 declared Air Quality Management Area due to exceeding of the government's Air Quality Objective for Nitrogen Dioxides and the council's Air Quality Action Plan 2011 sets out measures to ensure improvement to air quality. The massing of residential developments adjacent to particular roads in the area should be carefully designed so as not to increase the number of people exposed to poor air quality. Opportunities to improve streetscapes and the connection between the existing green spaces and greenways will help improve air quality, the ecology of this green network and better links between the open spaces.

DA5– Eastern Road and Edward Street Area



Context

3.48 Eastern Road/Edward Street is the main east-west corridor running from Pavilion Gardens towards Kemp Town and is identified as a sustainable transport corridor. It is close to St James Street which is a vibrant district shopping centre. The development area extends from the junction with Pavilion Gardens in the west, northwards to include the Circus Street site and eastwards to the Royal Sussex County Hospital. The area is mixed in character in terms of the scale of buildings, uses and building types with the central area dominated by modern residential tower blocks. The main problems of the area are poor public realm and poor quality townscape that is dominated by a dual carriageway. The corridor lies adjacent to a number of lower income residential areas and has a high proportion of older and disabled residents.

3.49 The main purpose of the development area designation is to make Eastern Road and Edward Street more attractive for all residents as well as visitors, workers and employers. It is to secure a better public realm, encourage more cycling and walking and greater use of buses. The development area is underpinned by four strategic development sites the Edward Street Quarter (including the American Express Site), Circus Street site, Freshfield Road Business Park and the Royal Sussex County Hospital.

DA5 Eastern Road and Edward Street

The strategy for the development area is to secure significant improvements to the public realm and townscape making the area more attractive, accessible and safer for residents, employees and visitors and to deliver the amounts of development as set out in part B below.

A. The local priorities to achieve the strategy are:

- 1. Improving the public realm and townscape through the adoption of comprehensive design guidance that will inform future investment in the area and planning decisions (see CP12 Urban Design).**
- 2. Promoting and investing in safe and sustainable transport improvements in the area including the public realm to, encourage walking, and to transfer road carriageway to sustainable transport measures (buses, bicycles and pedestrians).**
- 3. Ensuring that infrastructure is in place to enable the introduction of rapid bus-based services (see CP9 Sustainable Transport).**
- 4. Improving air quality.**
- 5. Development should incorporate the findings of the Strategic Flood Risk Assessment 2012 and any subsequent revisions.**
- 6. Undertaking measures to improve community safety, invest in open spaces, provide additional school places within existing schools, improve youth facilities and create employment opportunities for local communities.**
- 7. Making more efficient use of under-used sites that will be identified through the strategic allocations below and Part 2 of the City Plan.**
- 8. Ensuring that there is satisfactory provision of water and wastewater infrastructure to serve new development.**
- 9. Enhancing urban biodiversity through investment in green infrastructure including substantially increasing tree planting and soft landscaping to ameliorate the existing poor public realm (see CP10 Biodiversity).**

B. The minimum amounts of development to be secured by 2030 through strategic allocations (below) and through allocations in the City Plan Part 2 are:

600 residential units;
33,200sqm employment floorspace;
74,000 sqm hospital floorspace;
400-bed student accommodation
3,800sqm University education floorspace;
Dance Studio (D1)

**a multi-practice GP's surgery for Kemptown;
a community building for Queens Park and Craven Vale.
ancillary supporting uses**

C. Strategic allocations in Eastern Road/Edward Street Development Area are:

1. Royal Sussex County Hospital

Comprehensive redevelopment and enlargement of the hospital to provide 74,000sqm additional hospital (D1 use) floorspace, including the floorspace granted planning permission in 2012, that will be considered in the context of citywide policies and the following criteria:

- a) Sustainable transport infrastructure improvements will be required including bus, walking and cycling improvements, and a comprehensive transport strategy will be required, including a feasibility study (see below) to support the enlargement of the hospital taking into account its wider sub regional role;**
- b) There will be a comprehensive and integrated approach to the redevelopment of the site that will be of a high standard of design and which will be sympathetic to the surrounding historic built environment; and**
- c) The developer will enter into a training place agreement to secure training for local people.**

2. Edward Street Quarter

Employment-led redevelopment of the Edward Street Quarter (1.3 ha. Site including former Amex House and the Job Centre) comprising demolition of the former Amex House and replacement with 30,000sqm of high quality office floorspace and 165 residential units. The proposal will be considered in the context of citywide policies and the following criteria:

- a) A comprehensive approach to the redevelopment of the Edward Street Quarter will be required including the need to address relationship with existing buildings, massing, the layout of the site and provide for a high quality of design.**
- b) The proposal will contribute towards improving the existing townscape and public realm in the surrounding area including improvements to Dorset Gardens.**
- c) Sustainable transport infrastructure improvements that provide and promote public and sustainable transport will be required to support the scheme; and**

d) The developer will enter into a training place agreement to secure training for local people.

e) A Planning Brief will be prepared for the site. An attractive and safer environment contributes toward improved mental health, well-being and community cohesion⁵³.

3. Circus Street Site

Mixed use redevelopment of the former Fruit and Vegetable Market and Kingswood Street Car Park (0.75 ha) comprising 400-bed student accommodation, a minimum of 160 residential units, a minimum of 3200sqm office space, a Dance Studio and 3,800sqm of University floorspace and ancillary supporting uses. The proposal will be considered in the context of the citywide policies and the following criteria:

- a) The new development will be of a high standard of design that is sympathetic to the surrounding historic townscape and adjacent residential properties.
- b) A minimum of 750sqm of the proposed 3000sqm office space will be provided in the form of B1 affordable managed workspace.
- c) Sustainable transport infrastructure improvements that provide and promote public and sustainable transport will be required to support the scheme; and
- d) The scheme will deliver wider community benefits including new/improved play space and public realm including improved links to the surrounding area and St James Street and a training place agreement to secure training for local people.
- e) Ancillary supporting uses will be limited to small scale retail and café/restaurant uses linked to the development.

4. Freshfield Road Business Park and Gala Bingo Hall

Long term opportunity for comprehensive mixed use redevelopment of the Freshfield Road Business Park and Gala Bingo Hall (3.7 ha) comprising replacement of the existing employment floorspace in the form of a mix of B1 office/light industrial floorspace and B8 warehousing and provision of a minimum of 215 residential units. The proposal will be considered against citywide policies and the following criteria:

- a) A comprehensive approach to the redevelopment of the both sites will be required to ensure that modern employment space is provided alongside residential development and that a community facility (to retain or replace the Bingo Hall) will be included.
- b) The redevelopment will be of a high standard of design, that is sympathetic to the surrounding historic built environment and will make efficient use of

⁵³ The Primary Care Trust state that improvements to the quality of the built environment, connectivity between neighbourhoods, access to employment and green space play a vital role in contributing to improved mental health, well-being and perceptions of community cohesion and safety.

the site in terms of height of buildings and layout and re-introduce development along the frontage of Eastern Road.

- c) The developer will enter into a training place agreement to secure training for local people.**

Supporting Text

3.50 This development area has been designated on the basis that it is a sustainable transport corridor with the scope and opportunity for extensive townscape and public realm improvement. It lies within a tall buildings area and there are two large potential development sites.

3.51 The main priority in helping to deliver the strategy will be through the adoption of a comprehensive design guide. This will be linked to an Urban Design Framework for the city (see policy CP12). The guide will be subject to community and stakeholder consultation and address the concerns of local communities. The priority areas for improvement are Eastern Road and Edward Street (between Pavilion Gardens and Sutherland Road) and the Essex Street/Hereford Street Area. Issues to be addressed include creating a high quality public realm along the dual carriageway which is pedestrian friendly, the need to create active frontages and boundaries, improving permeability through spaces and around buildings, improving

Essex and Hereford Street Estate, greening the area and improving biodiversity. The design guide will be implemented through future development schemes, developer contributions and city council strategies particularly for Housing and Transport. An attractive and safer environment contributes toward improved mental health, well-being and community cohesion⁵⁴. Funding has been secured to improve sustainable transport infrastructure and the public realm on Edward Street and Eastern Road (see policy CP9).

3.52 A feasibility study will be carried out to consider the re-routing and reduction of through-traffic (with the exception of residents' vehicles, public transport including taxis, ambulances other hospital transport and vehicles directly accessing the hospital) along Eastern road in the immediate vicinity of the hospital with the aim of reducing congestion, improving air quality and ensuring adequate emergency access to the hospital. A bus-based rapid transport system is intended to extend along Edward Street and Eastern Road as part of an east-west link. The timing of implementation (after 2016) will be the subject of future bids for funding from the Regional Transport Board. Sustainable transport initiatives and improvements to the public realm⁵⁵ are a priority for the area and will contribute to the aims of the Low Emissions Strategy (2011) to improve air quality in the area.

3.53 Community infrastructure priorities for Eastern Road and Edward Street are based upon citywide strategies including Sustainable Community Strategy⁵⁶, Audit of Community

⁵⁴ The Primary Care Trust state that improvements to the quality of the built environment, connectivity between neighbourhoods, access to employment and green space play a vital role in contributing to improved mental health, well-being and perceptions of community cohesion and safety.

⁵⁵ Eastern Road has been identified in the 2007 Air Quality Detailed Assessment as exceeding the government's Air Quality Objective for nitrogen dioxide and is within the 2008 Air Quality Management Area.

⁵⁶ Sustainable Community Strategy was refreshed and adopted by the 2020 Local Strategic Partnership in 2006. It sets out a long term plan to improve the economic, social and environmental well-being of the city and is based upon 8 priority themes.

Level Infrastructure⁵⁷, Parks and Green Spaces Strategy⁵⁸ and Infrastructure Capacity Study⁵⁹. Priorities extend beyond the area including to nearby disadvantaged residential areas to contribute towards the reduction of inequalities. Priorities for strategies and developer contributions include:

- Open space improvements – Tarner, Dorset Gardens;
- Schools – additional primary school spaces required by 2026;
- Youth facilities –improvements needed in Tarner and Queens Park/Craven Vale areas;
- Community Safety – Edward Street is identified as a environment improvement zone;
- Community Building – Queens Park and Craven Vale is a priority area;
- Employment Opportunities – apprenticeship opportunities for local people to be secured via legal agreements attached to major new development
- Multi-practice GPs Surgery – Kemptown – a priority for the Primary Care Trust
- Biodiversity improvements

3.54 The Strategic Flood Risk Assessment (SFRA) 2012 shows that some sites within the Development Area are at risk of surface water flooding. The area around Circus Street and the Stevenson Road area are both at risk of deep water flooding in a 1 in 200 year event. Development proposals within these areas will need to demonstrate that they have been sequentially planned and the buildings built within surface water flood risk considered. Southern Water has identified the need for water and wastewater infrastructure to serve new development. Where appropriate, developer contributions will be sought towards meeting these priorities.

3.55 As part of the wider strategy for the sub-region, the Royal Sussex County Hospital has been identified as a centre for expansion of hospital healthcare provision in ‘teaching, trauma and tertiary’ sectors. As a result the Universities NHS Health Trust has planning permission to redevelop the site to provide an additional 60,000sqm. Particular care has been taken in relation to the sensitivity of the surrounding historic environment, managing servicing and transport access to the site sustainably and ensuring there are benefits for the wider area.

3.56 Edward Street Quarter will be the focus for new office development in the city that will contribute to strengthening the city’s economy. The northern part of the site has been redeveloped by American Express to provide a new headquarters building. The remaining part of the site should be redeveloped as part of a comprehensive approach to the area. Redevelopment should be for office-led mixed use including some residential development and should include consideration of all buildings on the site, opportunities for improvements to townscape and the public realm within the site including the extension of Mighell Street and improving public space between.

3.57 The Circus Street site provides the opportunity for an integrated modern mixed use development that will provide modern offices and workspace alongside student accommodation, a new University Library and a number of new residential units. As part of

⁵⁷ Audit of Community Level Infrastructure 2003 – the Audit was commissioned by the Local Strategic Partnership to identify levels of community infrastructure in the 15 neighbourhood Renewal Areas. It identified the need for a dedicated community building in Queens Park/Craven Vale.

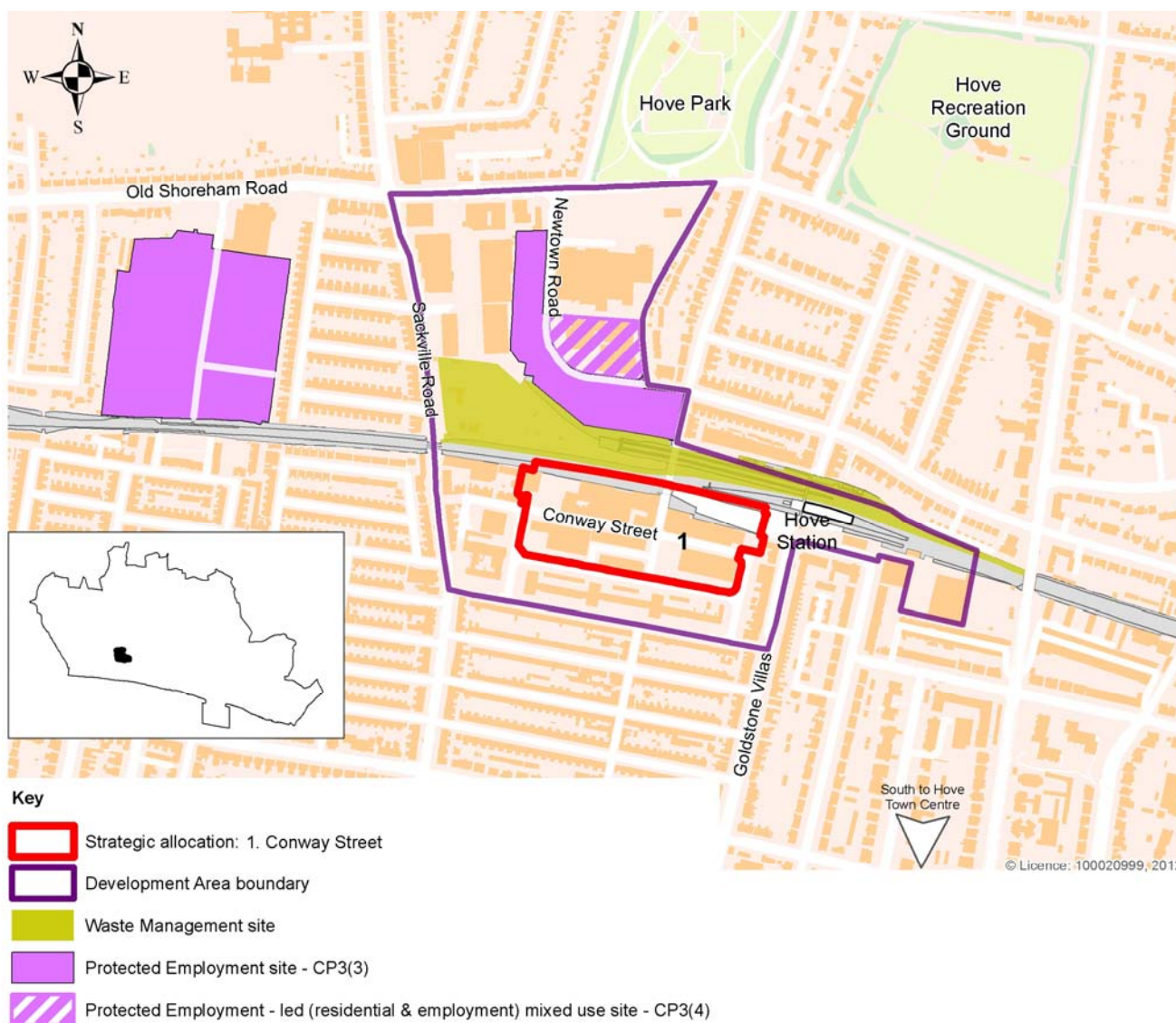
⁵⁸ Parks and Green Spaces Strategy 2006 sets out the council’s plans for improving city’s parks.

⁵⁹ The Infrastructure Capacity Study assesses the city’s future needs for physical and community infrastructure to 2026.

the scheme South East Dance will be provided with a studio. As part of the scheme some benefits will be provided to the wider area in terms of a better public realm and play spaces and training opportunities.

3.58 The final strategic allocation for the area, Freshfield Road Business Park and the Gala Bingo Hall car park, has been identified as a development opportunity in the longer term (post 2024). The buildings within the Business Park are currently largely in storage and trade counter uses. Due to the accessible location of the site, which is on a sustainable transport corridor, and its topography (it is at a lower level than the surrounding area) it is considered there are major opportunities to use the site more intensively. This will include the introduction of more intensive employment uses such as offices, alterations to the layout and provision of housing.

DA6 Hove Station Area



Context

3.59 The area around Hove Railway Station contains key local and regional transport connections. Both the railway and Old Shoreham Road are important east-west corridors. The presence of Old Shoreham Road and the railway line have however resulted in north-south severance, a dominance of road traffic in some parts, and a lack of high quality infrastructure for pedestrians and cyclists trying to travel within or through the area. Addressing these issues will be key to securing improvements within the area.

3.60 This development area is near to Hove Town Centre, several residential areas, Hove Park and the seafront. There is a significant amount of employment floorspace within the area which should continue to be protected. There is also a range of out-of centre bulky goods retail stores. A number of sites have large areas of surface car parking and single-storey developments and have scope to be used more efficiently.

3.61 There is a poor public realm and poor quality streetscape in several areas due to a lack of defined street frontages particularly around the large retail sites. Within the area there is

lack of green infrastructure, including a shortage of all types of open space when compared to the city as a whole. Redevelopment of sites within the area could therefore help to increase the capacity of under-utilised sites and also to address townscape and public safety improvements. In particular the area includes part of the Portland Road and Clarendon Road Neighbourhood Renewal Area⁶⁰, which has been identified as a community safety hotspot.

DA6 Hove Station Area

The strategy for the development area is to secure the long term regeneration opportunities around the Hove Station area and enable its development as an attractive and sustainable employment-led mixed-use area. The aim is to secure the creation of a high quality employment environment that will attract investment and new employment opportunities for the city and promote the efficient use of land through mixed use developments.

A. The local priorities to achieve the strategy are:

- 1. The preparation of guidance to promote and coordinate employment led mixed-use regeneration of under-used land and buildings;**
- 2. Improving the public realm and townscape focusing on the Conway Street area and the industrial/retail frontages along Sackville Road, Old Shoreham Road and Goldstone Lane;**
- 3. Ensure that development takes account of and contributes to the improvement of the public realm and townscape, environmental and open space improvements, pedestrian and public safety particularly around the Conway Street area;**
- 4. Enhancing the sustainable transport interchange at Hove Station by improving the walking and cycling network in the wider area, improving permeability within the area and strengthening north-south connections and east-west connections along Old Shoreham Road;**
- 5. Continuing to encourage more efficient use of under-used sites, to retain employment floorspace⁶¹ and protect employment sites in accordance with CP3 Employment Land;**
- 6. Maintaining and strengthening the creative industries business cluster in the area by seeking to ensure that workshops, office space, studios, storage and other premises remain affordable, appropriate and available for use;**
- 7. Ensuring sufficient water and sewerage capacity is either available or can be provided in time to serve new development. Development must address surface**

⁶⁰ A previous Government initiative aimed at bridging the gap between the most deprived neighbourhoods and the rest of England by tackling five key themes of: poor job prospects; high levels of crime; educational underachievement; poor health; and problems with housing and the physical environment.

⁶¹ Current employment floorspace within : Newtown Road Industrial Area is detailed as 16,000 m² (171,000 sq ft) in the Employment Land Study 2006; Sackville Trading Estate is indicated to be 5,080m² B uses and 5,080m² restricted A1 retail within the planning report for BH2009/00761

water flooding risks and incorporate appropriate surface water drainage measures (see CP11);

8. Creative use of development to integrate new green infrastructure including green space, accessible green roofs, green walls and other features which support Biosphere objectives.

B. Provision will be made by 2030 for the following minimum amounts of development:

575 residential units;

4,000sqm employment floorspace;

C. The Strategic Allocation in the Hove Station Area is:

1. Conway Street Industrial Area

Comprehensive employment-led mixed use redevelopment to deliver more effective use of the under-used land and buildings, requiring the retention⁶² and provision of an additional 3,000m² net gain in employment floorspace with a shift into high quality flexible office/business (B1) floorspace, the provision of 150 residential units and enhancements to the streetscape. This will be considered in the context of Development Plan policies and the following criteria:

- a. Proposals relating to individual buildings and/or sites within this area will need to demonstrate they will not prejudice the objectives of this allocation and will facilitate the retention of employment floorspace and the delivery of the amounts of B1 employment floorspace and residential units;**
- b. Additional employment floorspace and changes in existing employment uses will be expected to provide a range of office and flexible workspaces including larger floor plate offices and affordable business floorspace suitable for small business and the digital media/creative industries;**
- c. Measures to improve safe pedestrian and cyclist access through the site to Hove Station will be expected;**
- d. Proposals within this area will be expected to pay particular attention to facilitating social inclusion, social integration and crime reduction measures.**

Supporting Text

3.62 The Hove Station area has a number of special characteristics. It is a sustainable transport hub with local and regional connections and there are strong links to Hove Town Centre, the seafront and proximity to Hove Park. Improving the north-south links could unlock further potential within the Hove Station area and the council recognises the longer term role that this area could provide in terms of new, high quality employment opportunities for the city.

⁶² Current employment floorspace within Conway Street Industrial Area is detailed as 18,700m² (200,000 sq ft) in the Employment Land Study 2006.

3.63 Growth that is based on utilising the sustainable transport connections, in particular Hove Railway Station is a priority in order to facilitate development within the area. The Hove Station Area lies within the 2008 declared Air Quality Management Area within which development proposals should pay particular regard to air quality, especially adjacent main transport roads and junctions such as the Sackville Road and Old Shoreham Road junction. Developments must avoid increasing the number of people exposed to poor air quality and should not cause deterioration in air quality. Also several of the junctions in the area are at or near capacity so any additional traffic is likely to add to delays.

3.64 This highlights that in order to support development in the area there needs to be a choice of alternative forms of transport to the private car and high emission vehicles for some journeys. This should include improved access to the railway station (especially from north of the railway line) and measures to encourage cycling and walking in order to facilitate and ease movements around and within the area. Such measures could be integrated with green infrastructure improvements. Future development will also need to address the surface water flooding risks indicated in the Strategic Flood Risk Assessment (SFRA) 2012 and any subsequent revisions.

3.65 The area makes an important contribution to employment land provision in the city. Important uses in the area currently include creative industry businesses and workshops (Use Class B1), general industrial (B2) and warehousing (B8). The units continue to be well-used, being relatively modern and still fit for their current purpose with few vacant units⁶³. It is therefore a priority to continue to protect and enhance the existing employment floorspace provision in the area in order to help maintain and strengthen the local economy. As part of future development proposals applicants should demonstrate that existing occupiers have been suitably relocated in order to minimise local job losses. For the purposes of this Development Area and Strategic Allocation employment relates not just to B1, B2 and B8 use classes but also the sui generis uses such as bus garage/depot, car sales, builders yard, petrol filling garage and plant hire yard/depot uses, which are currently located within this area.

3.66 There is significant potential for the area in terms of higher density, higher value job opportunities. The area therefore provides opportunities to deliver significant growth in relation to employment, although these are likely to be in the latter part of the plan period. Mixed use redevelopment will facilitate regeneration and create a more vibrant area but not at the expense of net gains in employment floorspace. Therefore a minimum employment floorspace figure is set out in the policy. Development will need to be carefully designed and managed to ensure residential and the other occupiers in the area have an appropriate level of amenity, including improved access to green infrastructure. It is anticipated that the majority of the capacity would be for additional office uses (B1) but also for the intensification (more efficient and effective use) of existing warehouse and distribution uses (B8) particularly within the Newtown Road Industrial Area in accordance with CP3 Employment Land.

3.67 It is intended that the area will become increasingly important for accommodating creative industries during the plan period, particularly for businesses that either cannot afford to locate in the creative industry clusters in the city centre (see Policy SA2) or for those that cannot afford to remain in more central locations (see DA4). The Hove Station

⁶³ Brighton & Hove Employment Land Study 2006

area offers the advantage of a slightly out-of centre location, an existing small cluster of creative industries, proximity to potential employees, and good sustainable transport links.

3.68 It is recognised that as part of employment-led growth there may be opportunities for high quality mixed-use development in the area. High quality, new residential development could be accommodated on some sites through employment-led mixed use development where it does not prejudice existing or future employment floorspace provision in the area. It is also recognised opportunities for sport and gym/health and fitness facilities may arise within the Conway Street Industrial Area from future residents, office workers and commuters.

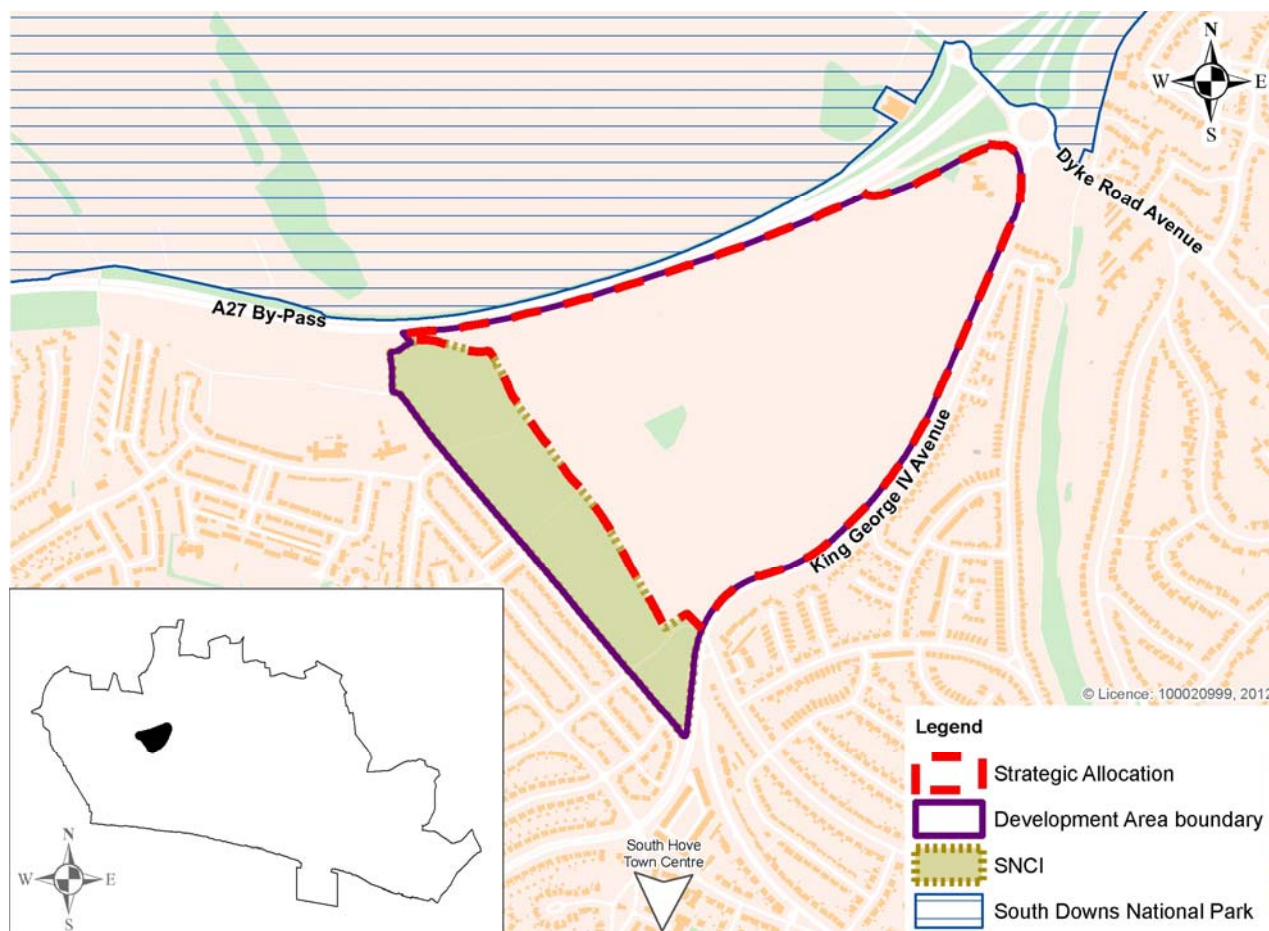
3.69 Public realm and townscape improvements will be required and will help to attract high quality office development. There is currently poor public realm and streetscape within the development area due to a lack of defined street frontages on under-utilised sites and around the large retail sites which have large areas of surface car parking. Priorities for developer contributions in the area are therefore environmental and open space improvements, sustainable transport improvements and general public realm improvements. Traffic calming measures and, in some areas, public safety improvements (as identified in the Portland Road and Clarendon Neighbourhood Action Plan⁶⁴) will also be required. Creating more active street frontages, a more attractive public realm and improved access to green infrastructure is interlinked with the priority to improve the environment for pedestrians. Redevelopment opportunities could therefore both help to increase the development capacity of under-utilised sites and also to address townscape, green infrastructure and public safety improvements. Detailed design will be considered through preparation of guidance for the area.

3.70 The out-of-centre bulky retail goods units at Goldstone Retail Park and Sackville Road Trading Estate do not represent a designated retail centre therefore any proposals for new retail floorspace would be considered against the impact tests set out in national guidance and local policy. This is to ensure that the viability and vitality of Hove Town Centre and other existing retail centres is protected, and to recognise the defined hierarchy of centres as set out in policy CP4.

3.71 The coal yard site close to the railway line is currently allocated for waste management uses. It will continue to be safeguarded to meet the future waste management needs of the city in accordance with the Waste Local Plan and emerging Waste and Minerals Development Framework. Any proposal for waste uses on the site should explore the opportunities for the development of district heating/combined heat and power technologies.

⁶⁴ An action plan funded through the Neighbourhood Renewal scheme.

DA7 Toad's Hole Valley



Context

3.72 Development of Toads Hole Valley and Court Farm represents a major opportunity to create a model for mixed use sustainable development that will provide family and affordable housing, modern office space and a new school to meet the future needs of the city. There is also an opportunity to conserve and enhance the Site of Nature Conservation Importance on the south-western boundary of the site, to provide new public open space and to improve links to the South Downs National Park. All new development will be expected to meet high standards of sustainability and design.

3.73 The site, including Court Farm, is 47 hectares and is privately owned land. It is located on the northern fringe of Brighton and Hove bounded by the A27 bypass to the north, the south-eastern side is bounded by King George VI Avenue, the major route from Devil's Dyke round-about into Hove, with the Goldstone Valley/Hove Park residential area to the south and Hangleton and Knoll to the west. The site is not accessible to the public with the exception of the Site of Nature Conservation Importance on the western embankment, which is statutory open access land.

DA7 – Toad’s Hole Valley

The strategy for the development of Toads Hole Valley and Court Farm is to secure a modern, high quality and sustainable mixed use development to help meet the future needs of the city, improve accessibility and provide new community facilities to share with adjacent neighbourhoods.

A. The local priorities to achieve this strategy are:

- 1. That the site is used efficiently and effectively to assist in meeting the development and infrastructure requirements of the city.**
- 2. Ensure that development is of an exemplary standard in terms of environmental, social and economic sustainability, achieving One Planet Living principles and promotes the city’s UNESCO Biosphere objectives.**
- 3. Ensure that development complements the setting of the South Downs National Park and enhances links to the National Park for local residents and tourists.**
- 4. Secure development that will benefit residents in terms of the mix of uses, an improved provision of community facilities, road safety improvements and the provision of green infrastructure including public open space and natural green space.**
- 5. To improve sustainable transport links to the area.**
- 6. To incorporate appropriate landscaping and planting to maximise opportunities to increase biodiversity across the site.**
- 7. Conserve and enhance the designated Site of Nature Conservation Importance.**
- 8. Protect sensitive groundwater source protection zones from pollution and ensure the reduction of surface water run-off and flood risk.**

B. Provision will be made for the following amounts and types of additional development to be provided by 2030:

- A minimum of 700 residential units**
- A minimum 25,000sqm of B1a and b Office Space**
- A new secondary school – site area 5ha**
- Public open space with children’s play space and informal sports facilities – 2 hectares**
- Provision of Supporting uses – shops and cafes**
- Multi-use community facility**
- Food growing space – 0.5 hectares**
- Green infrastructure integrated through the site to deliver Biosphere objectives and contribute to Biodiversity Action Plan targets**
- Energy infrastructure such as district cooling, heating and power networks**

C. The strategic allocation for Toad’s Hole Valley is:

1. Toads Hole Valley east of the SNCI and south of the A27 embankment

Provision will be made for a high standard sustainable, mixed-use development across the site comprising a minimum of 700 residential units, 25,000sqm office

space, a new secondary school, a multi-use community facility and ancillary supporting uses.

The following criteria will form the framework for detailed planning guidance and the basis for considering development proposals:

- a) New development will be expected to make the best use of the site and residential densities should fall within a range of 50 - 75 dwellings per hectare.
- b) There will be a minimum of 50 per cent 3+ bedroom family sized dwellings provided as part of the residential scheme.
- c) The office element of the scheme will be high tech, modern office space that will provide a range of unit sizes to attract new businesses to the city and support growing business.
- d) The height and massing of new buildings will be designed to ensure that views to and from the South Downs National Park will not be adversely affected.
- e) Development should contribute towards a reduction in the ecological footprint of the city. Environmental sustainability will be central to the design and layout of the scheme which will be expected to meet Code for Sustainable Homes Level 6, BREEAM Outstanding and be zero carbon (or carbon neutral).
- f) An energy strategy will be expected to encompass the wider development maximising opportunities for low carbon energy solutions.
- g) The scheme will make provision for 5ha of land to accommodate a new secondary school to be developed in partnership with the city council.
- h) Development will make provision for improved pedestrian and cycle links to the South Downs National Park.
- i) The provision of a new multi-use community facility to include a community meeting place, a doctor's surgery and a resource promoting links to the National Park
- j) Development proposals will provide a detailed Transport Assessment that will address highways safety on King George VI Avenue, noise and other traffic impacts from the adjacent A27 and demonstrate improved links to adjacent residential areas.
- k) Sustainable Transport – improvements to public transport access and a good quality public realm that encourages healthy lifestyles (walking and cycling).
- l) Provision of children's play facilities, public open space (2 ha. minimum), improved links to existing parks and food-growing space (0.5 ha.) and opportunities.
- m) Developer contributions will be sought to secure the sustainable conservation and enhancement of the adjacent Site of Nature Conservation Importance.
- n) The site will be the subject of detailed guidance provided in a future Supplementary Planning Document.

Supporting Text

3.74 Brighton & Hove is a tightly constrained urban area. With the sea to the south and the recently designated South Downs National Park boundaries drawn tightly to the city's edges there are few opportunities for the city to physically expand. The development needs of the city are such that making effective use of a scarce land supply is essential. This is particularly so given the need to balance development requirements with the city's need for

open space and the need to safeguard the city's highly valued natural and historic environments.

3.75 The identification of land at Toads Hole Valley represents an opportunity to secure new housing, employment, education, open space and community facilities for the city. It is also an opportunity to achieve exceptionally high standards of development, improve accessibility in this part of the city and secure new community facilities, green infrastructure and open space for residents of the new development and for adjacent neighbourhoods. As a result, development at Toads Hole Valley should provide an exemplar of sustainable development and demonstrate that the city's UNESCO Biosphere Reserve objectives can be successfully integrated throughout the development scheme.

3.76 In terms of design, care will be taken to ensure that future development will not adversely affect views to and from the South Downs National Park. A future Supplementary Planning Document for the area will provide a design framework for the future development of the site.

High standards of sustainable development

3.77 Environmental sustainability will be central to the design and layout of development at Toads Hole Valley which will be expected to meet Code for Sustainable Homes Level 6, BREEAM Outstanding and be zero carbon or carbon neutral. Development will be expected to meet One Planet Living Principles⁶⁵ and incorporate measures to help mitigate or adapt to climate change, reduce greenhouse gas emissions, address fuel poverty and security and reduce the city's ecological footprint. Measures to help achieve the delivery of these objectives include:

- facilitating lifestyles and practices of low ecological footprint both on site and in the surrounding area;
- rationalising site layout to maximise passive design;
- maximising the potential to generate energy renewably on the site;
- delivering a decentralised energy network; and
- offering options to extend energy infrastructure to the surrounding built environment.

Housing

3.78 The city's housing requirements are such that it is important for the council to identify all suitable opportunities to secure new housing for the city's growing population (see Policy CP1). The scale of housing requirements forecast for the city coupled with the constrained nature of the city's urban land supply supports the planned release of this land at Toads Hole Valley.

3.79 The strategic allocation at Toads Hole Valley will secure a significant amount of new housing provision of which a significant amount will be family-sized accommodation and affordable housing. Most of the city's urban sites are relatively small in terms of site area and more suited to flatted forms of development. The evidence base⁶⁶ indicates that over the course of the plan period, an estimated 53 per cent of overall housing need and demand

⁶⁵ See table 2, page 24

⁶⁶ Implications of Demographic Change on Demand for Homes in Brighton & Hove, GL Hearn, March 2012.

is likely to be for larger (3 and 4 bedroom) properties and in terms of house types demand/need is likely to be greater for houses (68 per cent) than for flats (32 per cent)⁶⁷. In reality, the likelihood of delivering this mix of housing in the city is restricted by the types of sites likely to be brought forward for development. Planned development at Toads Hole Valley allows for a better housing mix to be integrated within the overall development. For this reason the policy requires at least 50 per cent of the new housing to be family-sized. The specified density range should also enable the provision of a mix of housing types and sizes to achieve a choice in the range of housing at this location.

Office Development

3.80 The allocation of 25-30,000 sq m B1a, B1b floorspace at Toads Hole Valley will support a key growth sector in the economy - the knowledge based economy. This will be done by providing the opportunity for high quality, sustainable and flexible business space offering move-on space for successful companies that need to expand and incubation space linked to the universities. Parking provided in connection with a future office use should be considered for informal weekend Park + Ride (see CP8 Sustainable Transport).

Secondary School

3.81 There is a strategic need for an additional secondary school places in the city. Since 2005 the council has expanded a number of primary schools to provide an additional 11.5 forms of entry (345 more places) per year. These additional places will need to be provided in secondary schools by 2018. To go towards meeting this requirement it is proposed that a 6 form-entry secondary school is provided on the site as part of the mixed use development. This would have a minimum space requirement of 5 hectares. Playing fields provided with the school should be for dual use by the local community when not being used by the school.

Transport

3.82 The key issue for any comprehensive redevelopment of Toads Hole Valley is to ensure there are improved sustainable transport links to the area. Work will be undertaken with sustainable transport providers to ensure that links are improved. In terms of promoting cycling and walking, improved links to adjacent neighbourhoods will be sought as part of a redevelopment scheme.

3.83 The site is bounded by King George VI Avenue which is a main route into Hove from the A27 Bypass. The redevelopment of Toads Hole Valley represents an opportunity to improve safety on this steep and curving road. Redevelopment proposals should give consideration to slowing traffic, realigning the road and improving the local environment. More details will be provided in the future Supplementary Planning Document.

3.84 Improved walking and cycling links to the South Downs National Park will be expected to be provided as part of the redevelopment scheme. This may involve improving existing links or providing new links to the Park.

⁶⁷ See Figure 11 and 12, Implications of Demographic Change on Demand for Homes in Brighton & Hove, March 2012.

Public Open Space

3.85 Toads Hole Valley is privately owned and not accessible to local residents. As part of a redevelopment provision a minimum of 2 hectares of public open space should be provided as part of the scheme. This should include a children's playspace as well as a landscaped space and consideration should be given to ensuring long term maintenance.

3.86 As part of the scheme a minimum of 0.5 hectares should be set aside for food growing by local residents within and in neighbourhoods near to the site.

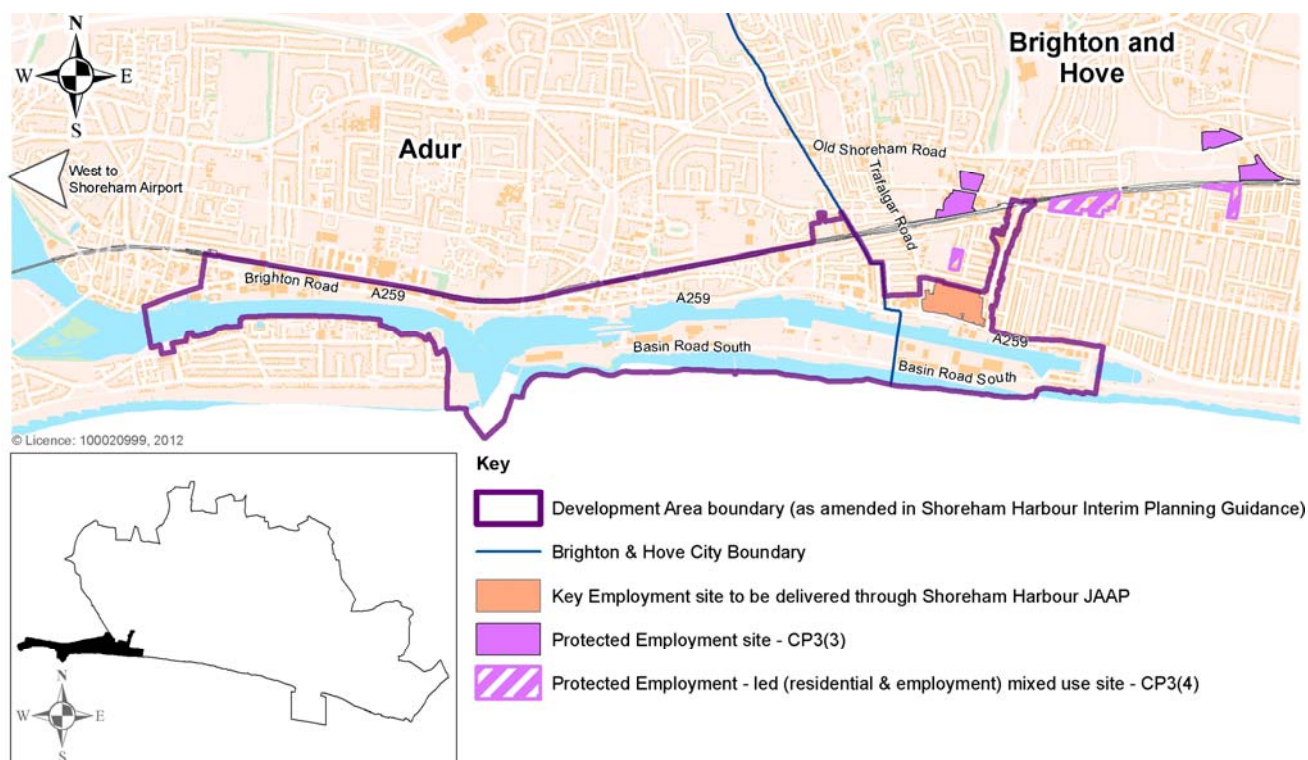
Local Shops, Community facilities

3.87 In addition to a new school as part the scheme provision should be made for a multi-purpose community facility that may include a doctor's surgery, a community meeting place and National Park Interpretation/education facility. Further facilities required as part of a balanced and sustainable community will be for local shops and services.

Site for Nature Conservation Improvement

3.88 The western bank of THV is identified as an SNCI. As part of the redevelopment of the strategic development area measures will be expected to be undertaken to improve the quality and biodiversity of the SNCI and to improve walkways through the area.

DA8 – Shoreham Harbour



Context

3.89 Shoreham Harbour and the A259 coast road provide an important “gateway” into Brighton & Hove from the west. The harbour itself extends for approximately three miles west of Hove along the Kingsway / A259 coastal road. The Harbour contains the entirety of the long established, commercial trust Port of Shoreham operated by the Shoreham Port Authority (SPA), an important local employer. Part of the harbour falls within Brighton & Hove City Council area and a larger part is located within the neighbouring Council area of Adur District in West Sussex. A Shoreham Harbour regeneration area has been broadly defined which takes in the southern parts of the coastal communities of West Hove and South Portslade in Brighton & Hove; and Fishersgate, Southwick, Kingston-by-Sea and the eastern edge of Shoreham-by-Sea town centre in Adur District.

3.90 In order to maximise the opportunities offered by this diverse waterfront location a Joint Area Action Plan (JAAP) is being developed with Adur District Council and West Sussex County Council that will set out a comprehensive, deliverable plan for the future revitalisation of the area. Working closely with the Shoreham Port Authority there is an opportunity to bring back in to use vacant and underused sites for new employment and housing developments as well as raising the quality of the local environment and increasing recreational opportunities and waterfront access. The development plans for the harbour are driven by an underperforming coastal economy, worsening pockets of deprivation, the need for port modernisation and the increasing challenge of finding strategic growth sites given the physical constraints of the sub-region.

3.91 The aims of the plans for Shoreham Harbour over the next 15-20 years are:

- To maximise the potential of Shoreham Harbour for the benefit of existing and future residents, businesses, Port-users and visitors through a long term regeneration strategy.
- To deliver a series of appropriately located, high quality, sustainable, mixed-use developments including new housing, employment space, leisure opportunities, improved public realm and associated supporting infrastructure including flood defences and measures to encourage the use of sustainable transport.
- The consolidation and enhancement of the operations of Shoreham Port recognising the vital role it will continue to play in the local economy.
- Developments will be encouraged that are consistent with the Vision and Strategic Objectives for the area that will be set out in the Shoreham Harbour JAAP.
- This broad location policy identifies the areas within Shoreham Harbour that will be subject to changes of land use including new areas of housing and employment that will be further detailed in the JAAP.

DA8 – Shoreham Harbour

The City Council will work with Adur District Council, West Sussex County Council, Shoreham Port Authority and other key partners to support the long term regeneration of Shoreham Harbour and immediately surrounding areas. A Joint Area Action Plan (JAAP) is currently being prepared that will contain detailed policies for the harbour area.

A. Development Capacity

Shoreham Harbour is identified as a broad location for future development. Development Capacity assessment has indicated the potential to accommodate the following levels of development which will be further tested and explored through the JAAP process:

400 new residential units within Brighton & Hove (which are included as part of the City's long term overall housing target)

7500 sq m net additional employment floorspace

B. The local priorities to achieve the strategy

The priorities for the Character Areas that fall within the Brighton & Hove part of the harbour are as follows.⁶⁸

⁶⁸ An Area Vision and Development Proposals will be defined for each of the 7 Character Areas within the Harbour within the Draft Joint Area Action Plan. Note that Character Areas 1, 3 and 5 fall across the boundary with Adur District Council while areas 4, 6, 7 fall entirely within Adur District.

i) South Quayside / Port Operational:

Area Priorities:

- a) To support Shoreham Port Authority in improving operational efficiencies, developing new trade and exploring opportunities for sustainable energy generation, in line with the adopted Port Masterplan.
- b) To accommodate the relocation of existing port operators from elsewhere within the Port.
- c) With the exception of the existing Power Station, and the Waste Water Treatment Plant, non-port operations will not be permitted in this area.
- d) To take into account the proximity to Wharf Road and Basin Road South which is a popular recreational route for walking and cycling providing access to Southwick Beach.

ii) Aldrington Basin:

Area Priorities:

- a) To accommodate a vibrant mix of new and improved port operational facilities as well as compatible non-port employment uses, including A and B use classes. The balance of land uses will be determined in accordance with a future development brief that will form part of the JAAP.
- b) To maximise intensification and redevelopment opportunities of existing lower grade, vacant and under-used spaces.
- c) To accommodate carefully located residential developments as part of mixed use redevelopment schemes
- d) To ensure that all development takes in to account the findings and recommendations of the 2012 Strategic Flood Risk Assessment and any subsequent revisions.
- e) To improve access arrangements and townscape upgrades to create better linkages to surrounding areas.

iii) North Quayside / South Portslade

Area Priorities:

- a) To develop North Quayside as a new and improved Port operational area accommodating new and relocated port uses with limited land reclamation and a new access road (within the Port boundary) in line with the Port Masterplan.
- b) To designate the South Portslade Industrial Area as a Strategic Employment/Mixed-use Area and promote a comprehensive redevelopment approach, including some appropriately located mixed-use residential development, in accordance with a future brief that will form part of the JAAP and

- c) **To improve connections and townscape around key linkages including the Boundary Road/Station Road (B2194) district retailing centre, Church Road (B2193) and along the A259.**
- d) **To ensure that all development takes in to account the findings and recommendations of the 2012 Strategic Flood Risk Assessment and any subsequent revisions.**
- e) **To ensure that new development proposals take account of impact on local air quality and that improvements are sought wherever possible.**

iv) Portslade and Southwick Beaches

Area Priorities:

- a) **Improvements to the quality, access, appearance and maintenance of the Public Right of Way corridor, beach promenade and public areas.**

Supporting Text

3.92 The regeneration of Shoreham Harbour has been an objective of the three local authorities: Brighton & Hove City Council (BHCC), Adur District Council (ADC) and West Sussex County Council (WSCC) for a number of years. In 2006 a re-appraisal of a previous regeneration project (known as “Shoreham Maritime”) by the South East England Development Agency (SEEDA) and the Shoreham Port Authority concluded that a comprehensive mixed-use scheme covering a wider area than just the Port itself and providing up to 10,000 homes and 8,000 jobs could be viable.

3.93 These aspirations for the Shoreham Harbour area were subsequently identified in the Regional Spatial Strategy (RSS) for the South East (May 2009). The published South East Plan⁶⁹ indicates the Sussex Coast as a priority area for regeneration (SCT2) and specifically identifies Shoreham Harbour as a Growth Point2 (SCT1). The harbour is one of three sites in Adur described as requiring coordinated action to unlock economic development potential (Policy SCT3). An interim figure of 10,000 dwellings was identified subject to detailed studies.

3.94 Since this time land capacity and viability studies along with other technical studies concluded that the development capacity at the harbour was significantly less than 10,000 dwellings. This was mainly due to significant land reclamation from the sea (that would have enabled additional development space to be accommodated) not being financially viable under foreseeable market conditions. There were concerns about the impact on the environment and character of the local area as well as loss of employment land that would be required to accommodate that level of housing. The technical evidence underpinning the reduction in the proposed scale of development is outlined in further detail within the JAAP.

3.95 In October 2010 the Shoreham Port Authority adopted a Port Masterplan setting out the Port’s plans for future growth. The Masterplan has been subject to public consultation and was endorsed by the three local authorities. The activities of the Port represent a key economic advantage for the area, with direct and indirect economic benefits arising from its planned development. The delivery of the Port Masterplan is vital to the success of the

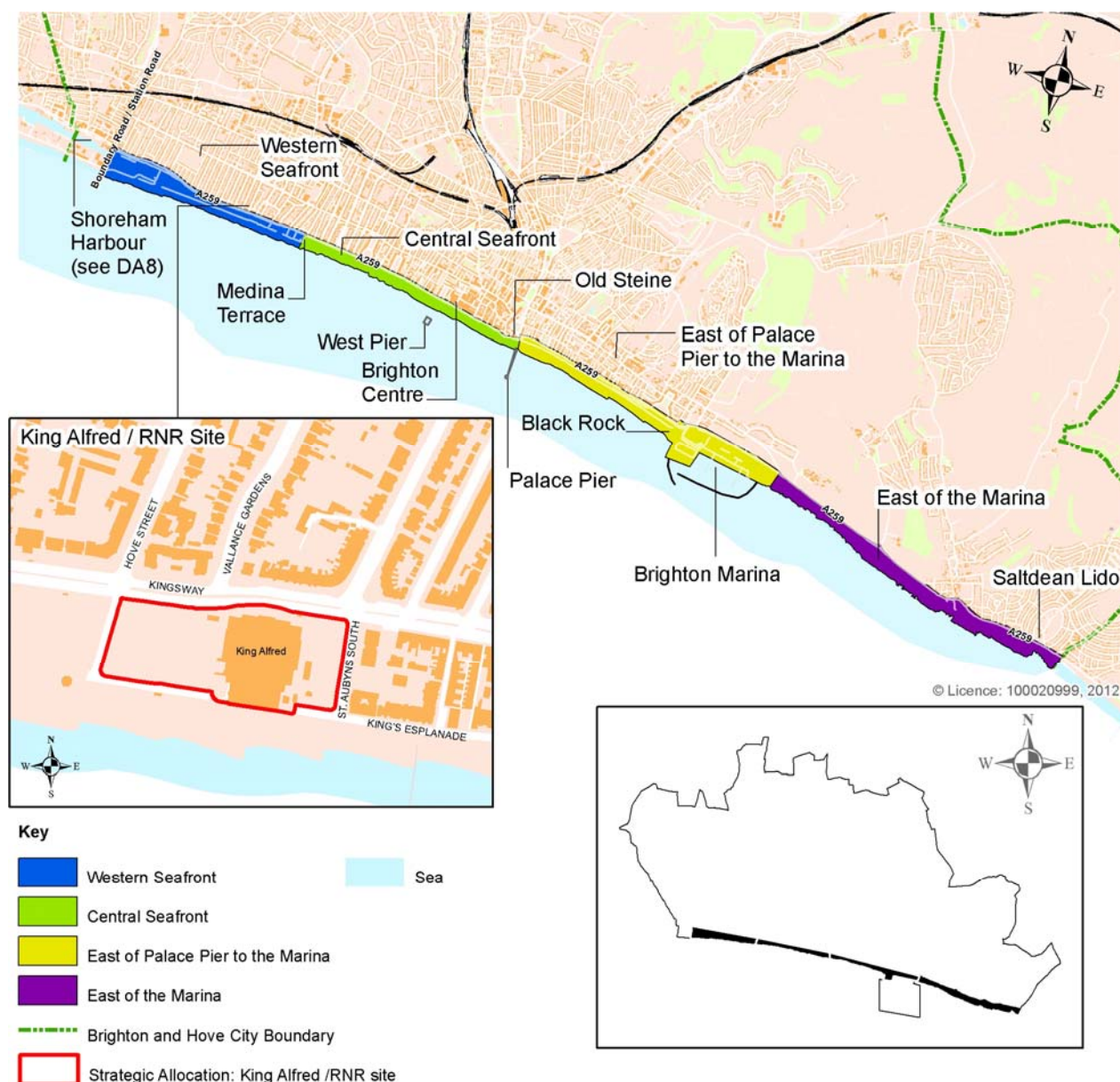
⁶⁹ Regional strategies remain part of the development plan until they are abolished by Order using powers taken in the Localism Act.

wider regeneration of the area as the latter relies on the consolidation of port uses into the eastern part of the port.

3.96 The Shoreham Harbour Regeneration Partnership have prepared an Investment Strategy which provides a work programme for taking forward the delivery of the regeneration on the ground and underpins the emerging JAAP. The delivery of the proposals are dependant to a certain extent upon securing public funding which will be used in conjunction with developer contributions from Section 106 agreements to support the provision of enabling infrastructure, including flood defences and transport network improvements. The partnership is currently exploring the extent to which the Community Infrastructure Levy (CIL) can assist in delivering essential infrastructure and is working closely with various agencies and funding bodies to secure the necessary investment. The infrastructure requirements for the harbour area will be set out in the Infrastructure Delivery Plans (IDP) that underpin the City Plan and the Adur Local Plan.

3.97 This broad location policy has set out the high level strategy and approach to future planning at the harbour based on a more realistic, deliverable scale of development which aims to protect the economic opportunities offered by the port and the environment of the local area. The detail of the proposals and associated planning policies will be set out in the JAAP to be jointly adopted by Adur District Council, Brighton & Hove City Council and West Sussex County Council.

SA1 - The Seafront



Context

3.98 The seafront has been, and always will be, the ‘shop window’ of Brighton & Hove, encompassing a year round hub of leisure and recreation activities for residents and visitors. From the Marina in the east to the city boundary at Shoreham Harbour in the west, the coastline is heavily urbanised and is set against a largely Victorian and Regency townscape. It is considered by English Heritage to be one of the finest urban seafront townscapes in Britain.

3.99 In addition to recognising the significance of the coastline for leisure and recreational purposes, the importance of conserving coastal habitats and improving the marine environment including sea water quality and coastal zone management is also strongly recognised. Maximising the nature conservation potential of the seafront is an important part of the Biosphere Reserve initiative. The space along the seafront, the sea, the beach and

the buildings behind the main road all offer important opportunities for further improvement and enhancement and for new development to complement the outstanding historic setting and natural landscape value of the seafront.

SA1 - The Seafront

The council will work in partnership to ensure the on-going regeneration and maintenance of the seafront in an integrated and coordinated manner.

Proposals should support the year-round sport, leisure and cultural role of the seafront for residents and visitors whilst complementing its outstanding historic setting and natural landscape value. Proposals should ensure a good marine environment, enhance biodiversity in accordance with Biosphere objectives and consider options for small scale renewable energy provision.

A: Priorities for the whole seafront are to:

- **Enhance and improve the public realm and create a seafront for all; to ensure the seafront has adequate facilities for residents and visitors (including public toilets, waste disposal facilities, seating, signage, lighting and opportunities for shelter and shade) and continue to improve access to the beach and shoreline and ensure the seafront is accessible to everyone;**
- **Promote high quality architecture and urban design which complements the natural heritage of the seafront and preserves and enhances the character and appearance of the Conservation Areas, and the historic squares and lawns that adjoin the seafront⁷⁰;**
- **Secure improvements to sustainable transport infrastructure along the A259, including a rapid/ express bus-based services (see CP9) and improve air quality, pedestrian and cycle routes and crossing opportunities in order to achieve a modal shift and thereby reduce the impact of traffic;**
- **Monitor, conserve and expand designated coastal habitats and secure nature conservation enhancements to the marine and coastal environment;**
- **Work in partnership with Defra, the Environment Agency, Natural England and Southern Water to continue to maintain coastal defences and to ensure appropriate waste water treatment infrastructure.**

B: Priorities for specific parts of the seafront are:

Western Seafront (Medina Terrace to Boundary Road/Station Road)

- **To enhance and improve the public realm and create a more coherent townscape through greater consistency of scale, height and roofline along the north side of Kingsway.**

⁷⁰ Kemp Town; East Cliff; Valley Gardens; Old Town; Regency Square; Brunswick Town; The Avenues; Cliftonville; Old Hove; Pembroke & Princes and Sackville Gardens.

- Opportunities for tree planting and coastal habitat creation north and west of the Lagoon should be explored to soften the appearance of the A259, improve microclimate⁷¹ and provide shade and enhance biodiversity.

Central Seafront (Medina Terrace to Palace Pier)

- To secure ongoing improvements to and maintenance of the upper and lower promenade which respect the more tranquil areas west of the Peace Statue.
- Develop a future vision and landscaping option for the lower promenade area either side of the West Pier site to complement the i360 Observation Tower proposal and maximise nature conservation opportunities.
- Secure improvements to traffic flow, air quality and pedestrian and cycle routes and crossing opportunities related to the Brighton Centre redevelopment.
- The council will work with the West Pier Trust and English Heritage to find a high quality solution for the West Pier which complements the seafront regeneration and values its biodiversity interest.

East of Palace Pier to the Marina

- Deliver the regeneration of Madeira Drive as a centre for sports and family based activities supported by a landscaping and public art strategy which also provides for an improved public realm and the conservation and enhancement of the historic and nature conservation features present in this location;
- Safeguard the vibrant and important event space at Madeira Drive as this presents a unique location for a mix of cultural, sport and leisure activity to take place; and
- Improve beach and seafront access for pedestrians and cycle users, linking with access improvements at the Marina/Black Rock.

East of the Marina

- Safeguard the important community and recreation facility at Saltdean Lido.
- The council will monitor the cliffs behind and to the east of the Marina and take appropriate measures to safeguard coastal communities, important infrastructure (A259 & trunk services) and coastal access in the longer term;
- Ensure the nationally important nature conservation interest of the cliff top, cliff and foreshore is conserved and promoted;

⁷¹ Local climatic conditions.

- **Adopt a risk-based approach to all new cliff top development and examine proposals rigorously in respect of cliff stability, nature conservation and impact on coastline views and Rottingdean Conservation Area; and**

C: Strategic allocation for the Western Seafront:

1. King Alfred/RNR site

Secure the redevelopment of the King Alfred/ RNR site to ensure the replacement of new indoor public wet and dry sports facilities which provide for the local Hove communities and contribute to the wider mix of facilities in the city.

Provision of 400 residential units.

Other D2 leisure uses in accordance with national planning policy, ancillary retail and café/restaurant uses and community health facilities would also be acceptable as part of a mixed use scheme.

Proposals will be assessed against the priorities for the Seafront, city wide policies and the following criteria:

- a) The development will be required to achieve a high quality of design and sustainability which preserves and where possible enhances the setting of the three adjacent Conservation Areas, adjacent Listed Buildings, the character of the seafront and strategic and sea views;**
 - b) Provide active ground floor uses and high quality, integrated and attractive landscaping and public realm which promotes biodiversity in accordance with Biosphere objectives and improves connectivity between Kingsway and the seafront;**
 - c) Provide appropriate flood protection and mitigation measures in accordance with CP11;**
 - d) Provide for sustainable means of transport to and from the site and demonstrate good linkages for pedestrians and cyclists,**
- Development should accord with the council's sports and development briefs for this site and any subsequent amendments⁷².**

Supporting text

3.100 The seafront is one of the unique attractions of the city. It is the city's main public space and provides an important opportunity for the promotion and enhancement of both formal and informal recreation. It is also the location of two exceptional groups of historic buildings fronting the sea, east of Palace Pier to the Marina and west of the Brighton Centre to Fourth Avenue. This historic 'backcloth' provides for both commercial and residential uses and makes a significant contribution to the setting, heritage and vibrant character of the seafront. The seafront area as a whole varies in its intensity of activity with both lively and tranquil stretches. This variety necessitates a sensitive and qualitative approach in terms of managing future change and development.

⁷² King Alfred/RNR Planning Brief SPG (2002).

3.101 Since the early 1990s the central seafront area has been transformed through a mix of public and private investment much of which has been coordinated through the Brighton Seafront Development Initiative⁷³. The council will continue to work towards achieving a seafront for all, and supports an integrated process of improvement and regeneration along the coastal strip. Regeneration will be designed to protect and enhance biodiversity and the natural environment, to achieve quality in the planning and urban design of the built environment, to preserve its setting and heritage and to develop the recreational potential of the area for both active and passive pursuits.

3.102 Alongside private development schemes have also come forward for the i360 Observation Tower in the West Pier area and development of the Yellowwave beach sports facility (now open) a number of major regeneration opportunities have been identified along the length of the seafront⁷⁴:

- Brighton Marina and Black Rock – mixed use development including leisure/recreation development at Black Rock, see DA2.
- The International Conference Centre – to replace the existing Brighton Centre, see DA1
- Shoreham Harbour regeneration – see DA8.
- The King Alfred leisure centre – a redevelopment opportunity to ensure the replacement of the existing swimming pool and leisure facilities.

3.103 The council will continue to work towards a deliverable scheme for the redevelopment of the King Alfred/ RNR site⁷⁵ to deliver sport facilities for the local Hove communities and to contribute to the wide mix of sports provision for the city. The council recognises that to secure the regeneration of the site to deliver a new indoor public wet and dry sports facilities an appropriate mix of uses (of which housing is likely to be the predominant part) will be required. The overall development of the site needs to be of high quality which is sustainable and which positively enhances the seafront and surrounding area.

3.104 Saltdean Lido, near to the seafront is an important community facility including a library and community centre as well as the Lido outdoor swimming pool and health & fitness facilities. The Lido itself is the largest enclosed outdoor swimming facility for the city and therefore has a wider catchment area. The overriding requirement of the council is to seek a vibrant, accessible, high quality facility that befits the status of the Lido as a key asset of both the local and wider city community.

3.105 The need to enhance and improve the public realm along the length of the seafront is recognised. New opportunities should encourage people to extend the amount of time they spend at the seafront as well as exploring opportunities to provide shade and shelter⁷⁶. The popular cycle route which runs along the seafront forms part of the 'National Cycle Network' and opportunities for its further improvement will also be encouraged and supported. Opportunities will also be sought to standardise road capacity along the length of the A259

⁷³ Brighton Strategic Seafront Development Initiative, 1992.

⁷⁴ Brighton Centre SPD (2005); Brighton Marina SPG (2003) and PAN (2008)

⁷⁵ Planning permission was granted in 2007 for the redevelopment of the King Alfred/ RNR site. In November 2008, the council's agreement with the Developer for the Frank Gehry designed project on Hove seafront expired. The Agreement which was to have delivered a new sports centre, 751 flats and a new public realm is no longer to be delivered due to withdrawal of funding from the principal funders for the project.

⁷⁶ Opportunities should relate to the Parks and Green Spaces Strategy; the Public Space and Public Life Study and the Tourism Study.

and to reduce its severance effect with the seafront and improvements to sustainable transport infrastructure along the A259 will be secured. The Air Quality Further Review and Assessment (2010) and the Air Quality Action Plan (2011) identified certain junctions on the A259 as exceeding the annual nitrogen dioxide air quality objectives and the A259 between Arundel Road and the city boundary with Adur District Council is included within the 2008 declared Air Quality Management Area.

3.106 The importance of conserving coastal habitats and improving the marine environment including sea water quality and coastal zone management is also recognised. The beach, the shoreline and the marine environment are important natural assets providing valuable habitats that must be protected and enhanced for their biodiversity and geological value and because they have great potential to enhance the seafront experience for visitors, in accordance with Biosphere objectives. Almost half of the coastline of Brighton and Hove is of national nature conservation importance and there are also four sites of city-wide nature conservation importance between Brighton Marina and Shoreham. These smaller sites provide a reservoir from which to enhance and expand urban natural habitat as part of regeneration schemes throughout the Seafront. There are also opportunities to consider small scale renewable energy provision such as solar and wind energy technologies along the seafront.

3.107 The coastal frontage of the city is considered to be at risk from tidal flooding⁷⁷. CP11 sets out the approach to managing flood risk. The defence of Brighton & Hove's coastline over the next 50 years is addressed by strategies prepared in partnership with the Environment Agency and adjacent authorities. The reconstruction of the defences between Ovingdean and the Marina, under the 'Brighton Marina to Ovingdean Coast Protection Scheme' is now complete. The 'Brighton Marina to River Adur Strategy' recommends the maintenance of existing coastal defences with some enlargement of groynes and beaches in the King Alfred area and a scheme to upgrade defences between the western end of Hove Lagoon and the River Adur through Shoreham Port. The Strategy will be revised following advice and funding from Defra. In Brighton & Hove the long term management of coastal flood risk and erosion is set out within the Beachy Head to Selsey Bill Shoreline Management Plan (SMP).⁷⁸ The Shoreline Management Plan for the coastline west of the marina proposes to continue to 'hold the line' in terms of coastal defence.

3.108 To the east of Black Rock and behind the Marina a chalk cliff line runs all the way to Newhaven. The landscape quality of the coastal area of downland countryside at Ovingdean Valley and Roedean bottom is such that it has been included in the South Downs National Park. The cliffs (Brighton to Newhaven Cliff), cliff top and foreshore are designated a Site of Special Scientific Interest (SSSI), a Regionally Important Geological Site (RIGS) and a Geological Conservation Review site (GCR). How the cliffs will react to changing climate is not yet fully understood. Adopting a monitoring and management approach to the coastline in this location will increase the longer term understanding of the evolution of the cliffs, in the light of climate change. This should advise and enable the council in partnership with Natural England and other key stakeholders and the local community to properly manage this unique and valuable natural feature and plan for the future.

⁷⁷ Strategic Flood Risk Assessment – 2008, updated in 2011

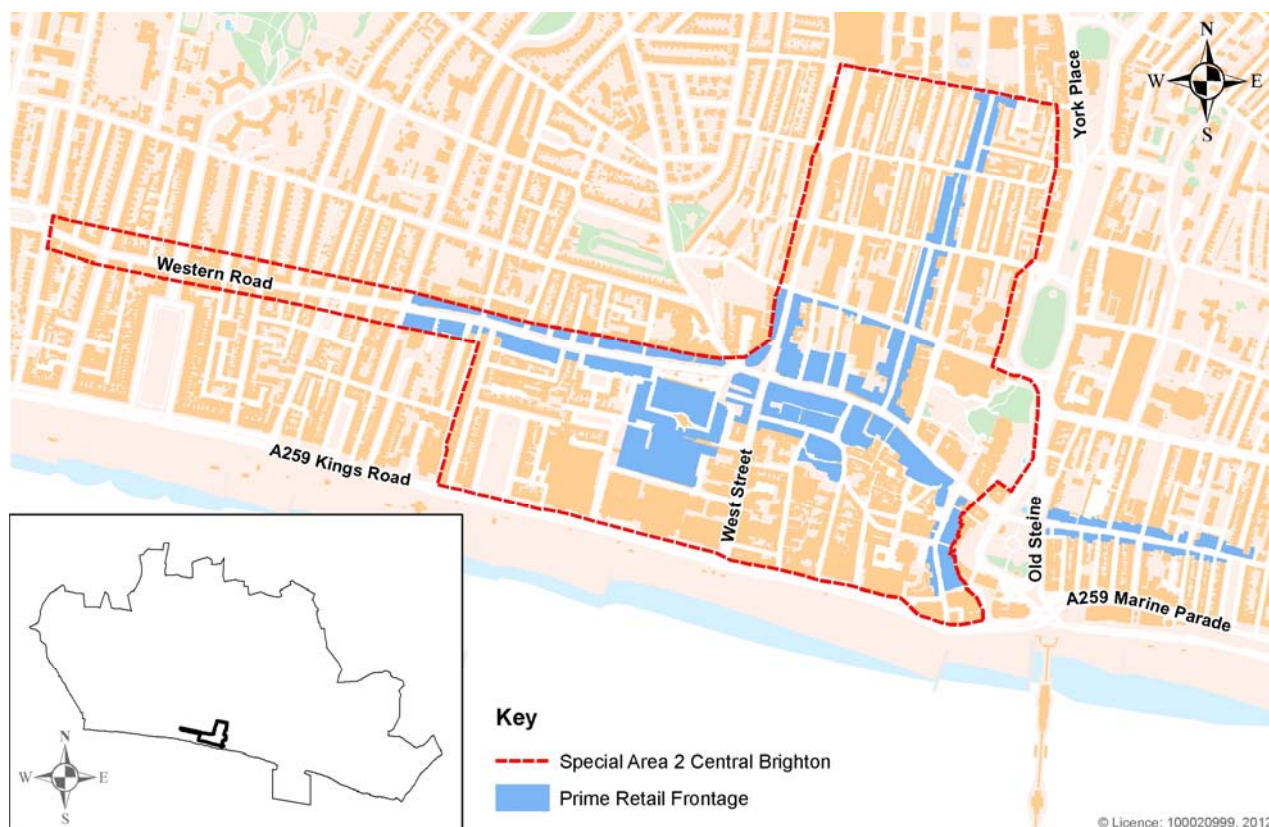
⁷⁸ The Seafront boundary has been informed by the Shoreline Management Plan.

3.109 The National Planning Policy Framework requires risk to be reduced from coastal change by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast. Should a coastal change management area⁷⁹ need to be identified for the stretch of the coastline east of the marina, this will be addressed in future development plan documents.

3.110 Southern Water has constructed a storm water storage tunnel along Brighton Seafront as a buffer to control outflows from the combined sewerage system. Storm water from this tunnel will eventually connect to a new wastewater treatment works at Peacehaven. The policy supports the provision of further appropriate waste water treatment infrastructure that may be required along the length of the seafront.

⁷⁹ An area identified in Local Plans as likely to be affected by coastal change (physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion).

SA2 Central Brighton



Context

3.111 Central Brighton is a dense and complex area of urban quality townscape. It extends from Brighton Station in the north to the seafront in the south; with North Laine, The Lanes, The Royal Pavilion Estate and Old Steine to the east and the major seafront hotels, conference centres, Churchill Square shopping centre and major high street retailers along Western Road to the west. The area's historic form is a fundamental part of its distinctive character and resulting sense of place. The area contains a unique independent retail sector, restaurants and cafes, a diverse evening economy (clubs, theatres, cinema and mixed arts entertainment venues), a commercial core and hub for media and creative industries as well as some of the city's key cultural and heritage assets.

SA2 Central Brighton

To reinforce central Brighton's role as the city's vibrant, thriving regional centre for shopping, leisure, tourism, cultural, office and commercial uses:

1. The Council will strengthen the distinctiveness and legibility of the 'cultural quarter'⁸⁰ and ensure its long term success and viability through ongoing improvements to the attractiveness of the physical environment and public realm; ensuring that historic buildings are maintained and enhanced and by requiring new

⁸⁰ 'Cultural Quarter': - the area centred on Church Street, Jubilee Square, the Royal Pavilion Estate and the Theatres

development to support and maintain the vibrant mix of cultural activities, business, retail, leisure and tourism uses.

2. The focus for significant new retail development will be Brighton Regional Centre. New retail development should respect the different but interconnecting shopping identities of the following areas:

- Churchill Square/ Western Road (see DA1)
- Western Road (the secondary retail frontage that runs from Montpelier Road to the east and Holland Road to the west including Brunswick Town).
- Queens Road/West Street
- Old Town including the Lanes/ Duke Street/ East Street
- The North Laine
- North Street

The council will support proposals to improve and refurbish existing retail units and shop frontages and recognise the role of small independent/local traders in maintaining the Regional Centre's viability and attractiveness.

3. Within Central Brighton existing office accommodation will be protected and their refurbishment and upgrade encouraged. Proposals that result in the loss of B1a office floorspace will be permitted where owners/developers are able to demonstrate:

- a) The site has been marketed for B1a office use at a reasonable price and for a reasonable time period and no viable occupiers have expressed an interest in taking up the accommodation either as single/ multiple occupier so it has been concluded that the site is inherently unsuitable for continued B1a office use; and
 - b) That the redevelopment or reuse would make a positive contribution to the vitality and vibrancy of Central Brighton and create employment opportunities; or
 - c) That change of use was the only practicable means of preserving a listed building.
- Partial loss of office floorspace will be permitted where the change of use enables the refurbishment and upgrade of the remaining office floorspace.

4. The Council will promote a balanced range of complementary evening and night-time economy uses which appeal to a wide range of age and social groups, avoid a spread of large bars/pubs and night clubs and address public safety concerns.

5. Mixed use developments will be promoted which retain active ground floor uses and accord with a range of appropriate city centre uses.⁸¹

6. Maintaining and strengthening the significant digital media and creative industries business cluster in the area through the delivery of ultrafast broadband and ensuring that workshops, office space, studios, storage and other premises remain affordable, appropriate and available for use; particularly in the North Laine area;

7. The council will secure urban realm improvements to reduce congestion, improve air quality and encourage improved pedestrian and cycling movements within the city centre (See CP13)

⁸¹ The National Planning Policy Framework March 2012 defines main town centres uses to include culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Supporting Text

3.112 Within central Brighton, there is a concentration of nationally and internationally significant cultural businesses and buildings including the Royal Pavilion, the Brighton Museum and Art Gallery, the Brighton Dome, the Theatre Royal, the new Jubilee Library and the Komedia. At the heart of the area is the iconic and internationally famous Royal Pavilion without which, little of the cultural and historic development of the city centre would have occurred. The wider area is described as the city's cultural quarter. Cultural and creative industries and the retail, tourism and hospitality sectors continue to innovate, strengthen and grow within this area and it is important to ensure that the cultural role of the area is promoted and supported⁸².

3.113 As an integral part of the attraction of Brighton as a tourist destination, and in order to provide residents with the highest quality shopping provision, Brighton Regional Centre should continue to be the focus for significant new retail development. The Retail Study Update 2011 identifies that demand exists for new comparison retail floorspace in order for Brighton to secure its position as a Regional Centre.

3.114 Whilst there are limited opportunities to find new sites within or on the edge of the Regional Centre, the opportunity to provide new comparison floorspace, possibly incorporating a new department store to attract new retailers to the city, as part of the Brighton Centre and Churchill Square development area should be investigated (see DA1). Further opportunities will be considered as part of the preparation of the City Plan Part 2.

3.115 The different but interconnecting shopping areas within the Regional Centre are identified and described in the Retail Study Update 2011⁸³ and there is active support for the protection of existing and provision of new small unit retail space, largely catering for local independent traders, located within The Lanes and North Laine. The balance and mix of uses in these areas will be carefully monitored and maintained (see CP4).

3.116 Environmental improvements and proposals to improve and refurbish existing retail units and shop frontages to help maintain the Regional Centre's attraction to new retailers and shoppers will be supported. Improved connectivity and integration, including clear and improved pedestrian linkages, improved pedestrian circulation and 'signposting' between the different shopping 'quarters' within the Regional Centre is a key priority over the plan period.

3.117 The City's prime office market is principally focussed within Central Brighton, located on the east and southern side of Brighton Station, within the New England Quarter and interspersed within the city centre. Much of the existing office stock is within older purpose built buildings or converted period buildings and offices above shops. Opportunities for significant new office floorspace within Central Brighton are limited and therefore DA3, DA4, DA5 and DA6 indicate the opportunities for new office floorspace on the edge or outside Central Brighton. Nevertheless over the timeframe of the City Plan, Central Brighton will continue to remain a location where high quality offices will be demanded for a variety of occupiers such as media, creative, financial, business and professional services and

⁸² Creative Industries Workspace Study 2008

⁸³ Retail Study Update 2011.

information communication industries. A good supply of high quality, modern and sustainable office accommodation is required to meet the needs of the city's commercial occupiers. Policy SA2 therefore safeguards office accommodation within Central Brighton and encourages improvements in quality to meet future business needs. Examples such as 1 Gloucester Place, Brighton demonstrate the trend of owners to refurbish and upgrade existing office accommodation to Grade A status with a BREEAM rating of Very Good to secure occupation and improved rental levels. Given the current economic climate which mitigates against speculative office development, the willingness of property owners to invest in their existing properties to bring them up to modern standards is an essential aspect of the city's economic strategy.

3.118 In considering proposals for the loss of office floorspace, the Council will require clear demonstration that the site is no longer suitable for office use. The type and scale of marketing should be commensurate with the scale of the office floorspace proposed to be lost. Therefore the council will require evidence that a marketing exercise has been carried out for at least 18 months for purpose built, large scale Grade 'A' accommodation and at least 12 months for other sites. Evidence is required that the marketing price is realistic and that the marketing has been appropriate and genuine. A record of all the required marketing will need to be presented with the application proposal. In all cases the marketing process requires as a minimum:

- Confirmation by the marketing agent on headed company paper that the premises were appropriately and extensively marketed for the required length of time as set out by the council.
- Dated photographs of marketing board/s of an appropriate quality, size, scale, location and number, during this time, on the premises.
- An enquiry log, how it was followed up and why it was unsuccessful
- A copy of all advertisements in the local press and trade journals (should be at least four weeks' worth of advertisements spread across a six month period).
- Evidence of marketing via the internet.

3.119 The period of marketing must have ended on a date within the six months prior to the date the planning application was submitted. In some instances, where the proposal includes the loss of significant office floorspace, the marketing process may need to be extended. The advice of the council should be sought prior to the commencement of any marketing campaign to ascertain the period and extent of marketing required. Partial loss of office floorspace will only be considered where it is clearly demonstrated to enable the refurbishment of the remaining office floorspace; that the non office use is the minimum necessary to bring the employment floorspace up to modern standards required and the proposed use is a main town centre use.

3.120 As well as new retail opportunities, mixed use developments within the North Laine area and the Air Street/ North Street Quadrant have included important employment floorspace from new high quality office accommodation to new creative industries workspace. The Creative Industries Workspace Study 2008 identified the attractiveness of central Brighton to creative businesses including evidence of a vibrant cluster in the North Laine and Old Steine area. However creative industries clusters are vulnerable to redevelopment pressure and the importance of their role requires reinforcement and protection. New development should strengthen the mix of uses in central Brighton and retain active ground floor uses. Within the North Laine area the valuable contribution of small premises and workshops in supporting creative arts, IT and media related businesses

will be safeguarded, as they support small scale industry and encourage new enterprises to set up and add vitality to the cultural quarter⁸⁴. The council will work with providers to ensure the provision of appropriate information and communication technology (ICT) infrastructure; in particular ultra-fast broadband infrastructure within this area to support the creative industries and digital media sector (CP2 Sustainable Economic Development).

3.121 New development has also contributed towards additional housing in the central Brighton area. Residential uses, as part of mixed use developments or above shops, subject to other planning considerations can also contribute to enhancing the vitality of central Brighton and improving safety during the daytime and evening. Brighton & Hove's Empty Property Strategy encourages bringing flats above shops back into use.

3.122 Central Brighton and particularly the West Street area has been identified as a violent crime hotspot⁸⁵. Through effective coordination of relevant strategies and policy areas (e.g. licensing, policing and public safety) the council will seek to improve safety by encouraging a more balanced range of complementary evening and night-time economy uses which appeal to a wide range of age and social groups and managing existing late night uses within identified parts of central Brighton. Local work to reduce violent crime is coordinated through the Local Public Service Agreement/Violent Crime Action Plan. In addition, a 'Cumulative Impact Zone' within central Brighton has been adopted by the Council's Licensing Committee and grants greater powers to control the number of licensed premises in the city centre.

3.123 Central Brighton is designated an Air Quality Management Area⁸⁶. There is a continuing scheme of urban realm improvements⁸⁷ which will be informed, undertaken and developed as part of a consistent vision based on the findings of the Public Space Public Life Study (2007). This will link to the existing Air Quality Action Plan to improve local air quality.

⁸⁴ Creative Industries Workspace Study 2008.

⁸⁵ Community Safety, Crime Reduction and Drugs Strategy 2011-2014

⁸⁶ Air Quality Further Review and Assessment (2010) and the Air Quality Action Plan (2011) identified that West St, North St, Queen's Road and

Western Road exceed the government's air quality objectives for nitrogen dioxides.

⁸⁷ Local Transport Plan 3 (LTP3 2011-2014)

SA3 Valley Gardens



Context

3.124 For the purposes of this policy, the Valley Gardens comprise the open spaces and surrounding roads that run in a linear manner from Old Steine in the south to the Level in the north, excluding the Pavilion Gardens. This area is of unique strategic and topographic significance to Brighton & Hove in the way in which a number of major issues co-exist and, in some cases, conflict. These include: the area's role as an arrival/departure point for visitors; its function as a major traffic route (the A23 sustainable transport corridor); its cultural and heritage significance; its provision of public open space; its inclusion within the academic corridor; its wide mix of land uses; and its role as a venue for major events. However, the area is currently failing to fulfil its potential.

SA3 Valley Gardens

The city council will work with public and private sector partners and the local community to enhance and regenerate the Valley Gardens area in an integrated manner that reinforces its strategic significance, emphasises its historic and cultural character, reduces the adverse impact of vehicular traffic, improves local air quality and creates a continuous green boulevard that reconnects the open space to the surrounding urban realm.

The seven overall aims are:

1. Creating a vibrant and attractive new public park for the city centre.

2. Reducing the severance impact of traffic on the enjoyment of the public realm through environmental and transport improvements;
3. Creating safe and legible links with adjoining areas;
4. Enhancing the appearance and setting of historic buildings;
5. Finding appropriate new uses for key buildings;
6. Accommodating provision for high quality outdoor events; and
7. Enhancing the biodiversity of the area.

The distinct role and character of each green space will be clarified having regard to the following priorities:

Old Steine - the hub

- Emphasise its role as a visitor destination space.
- Enhance the arrival and departure experience for visitors by ensuring simple, comprehensible links to and from the seafront and the Lanes.
- Ease the movement of pedestrians and cyclists through recapturing road space and creating direct crossing points, particularly to reconnect St James's Street with the city centre.

Victoria Gardens - the cultural park

- Pursue a comprehensive landscape / townscape scheme to:
 - a) Improve navigable links for pedestrians both between the two gardens and with the Cultural Quarter.
 - b) Redesign the gardens to include new pathways, tree planting, benches and public art and investigate the potential for a café building.
 - c) Improve the junctions with Kingswood Street, Morley Street and Richmond Parade through environmental improvements or redevelopment where appropriate.
- Encourage a comprehensive solution to the re-use or redevelopment of buildings on Gloucester Place for a mix of uses.
- Seek the restoration of historic buildings on Grand Parade.

St Peter's - the historic landmark

- Enhance the setting of St Peter's Church through public realm improvements.
- Support proposals for refurbishment/enhancement of the facilities and appearance of the Phoenix Gallery building, possibly through a mixed use redevelopment.
- Enhance the retail environment through alterations to, or redevelopment of, the supermarket building on the corner of Cheapside and through shop front improvements to York Place.

The Level - the vibrant recreation and leisure space

- **Pursue a comprehensive landscaping scheme for The Level that will distinguish functions of spaces, enhance entrances, extend the range of facilities and improve public safety.**
- **Improve the key links to London Road and the Open Market.**
- **Enhance the public realm to the south of The Level.**
- **Ensure the specific provision of facilities for older younger people with appropriate activity areas.**

Supporting Text

3.125 The purpose of this policy is to ensure that the strategic potential of the Valley Gardens as public open space is fully realised and that future proposals for the regeneration of this historic area are considered within the context of an overall spatial framework. Recently completed council studies; the Public Space Public Life Study and the LR2 Study⁸⁸ argue that Valley Gardens could become the grand civic route into the city and propose the creation of an attractive and inviting 'green lung', with each green space embodying a unique character and offering a different experience.

3.126 The public open spaces of Valley Gardens have the potential to be linked together to create a single continuous public park, which would form a key connecting section of the 'green network' in the city. Accessibility to the open space will need to be improved, whilst new planted tree screening and water features, for example, can help towards improving local air quality and biodiversity as well as reducing the impact of traffic noise. New landscaping and planting must also reinforce existing local character and may include productive planting that contributes towards improving urban food productivity where appropriate. A Landscape Design Report was approved for The Level in 2011, following public consultation, and forms a master plan for the planned comprehensive improvement of the park in a manner which will restore and re-animate this key public space.

3.127 Reducing the severance impact of vehicular traffic will involve redressing the balance between road space and other land uses. This may include rerouting traffic and would need to be accompanied by improvements to provision for sustainable transport. Valley Gardens has bus lanes serving key city routes and cycles lanes that, with enhancement, would form a direct link from the seafront to the north of the city.

3.128 The City Council will be reviewing and improving its existing transport modelling capability (see CP9 Sustainable Transport) which will allow for a rigorous basis for assessing the impact of future transport measures. As a result, details of significant measures that may result in changes to the road network in Valley Gardens will be reserved until such an assessment has been undertaken.

3.129 Throughout the area, but particularly on Grand Parade and York Place, there are historic buildings in visibly poor condition. A co-ordinated and pro-active approach will be necessary to address this issue. Allied to this, new uses must be found for key vacant historic buildings. Arts-based uses will be encouraged in and around Victoria Gardens.

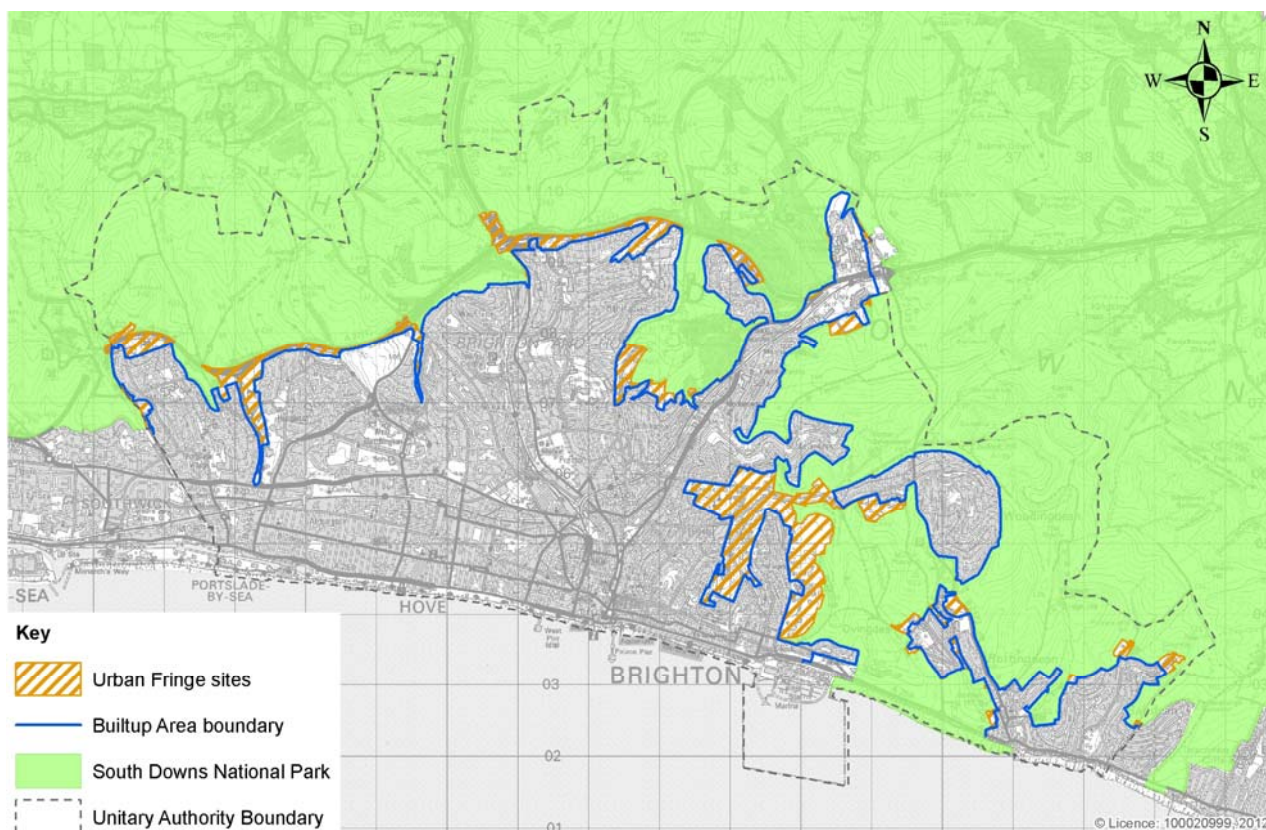
⁸⁸ Public Space Public Life Study, 2007 and London Road and Lewes Road Regeneration Strategy, 2007.

3.130 Parts of Valley Gardens, notably The Level and around St Peter's Church have a poor reputation in terms of crime and anti-social behaviour and these problems must be actively addressed in all proposals for new uses and the layout of buildings and public spaces.

3.131 With regard to the Old Steine, its proximity to Pool Valley coach station, the seafront and the Lanes, as well as the presence of major hotels, warrant greater attention to the provision of legible routes, appropriate facilities and clear information for visitors.

3.132 Where appropriate, new developments will be expected to contribute towards these aims (where they relate to the development and meet the tests in the National Planning Policy Framework). Such developments will include the nearby Circus Street site, which is clearly visible from Victoria Gardens (see policy DA5).

SA4 – Urban Fringe



Context

3.133 Most of the land surrounding the built up area of the city is managed as open space or farmed downland and much falls within the boundaries of the South Downs National Park. For the purposes of the City Plan the term 'urban fringe' applies to those areas of land that lie between the defined built up urban area boundary and the boundary of the South Downs National Park.

3.134 In many instances the South Downs National Park boundary is contiguous with the built up urban edge of the city. The urban fringe is therefore now made up of 'pockets' of residual green space rather than any homogenous green 'belt' around the city. These areas are vulnerable to development pressures, farm fragmentation and anti-social behaviour such as fly-tipping, vandalism and inappropriate recreational activity such as illegal motor biking. Elsewhere there has been piecemeal enclosure both for the keeping of horses and garden use.

3.135 Careful use and management of land within the urban fringe is therefore essential in terms of helping to retain the setting of the city in its downland landscape.

SA4 Urban Fringe

The council will promote and support the careful use and management of land within the urban fringe to achieve the following objectives:

- 1. The protection and enhancement of the wider landscape role of land within the urban fringe, the setting of the South Downs National Park and the protection of strategic views into and out of the city.**
- 2. Securing better management of the urban fringe, environmental improvements and safe public access to the countryside through sustainable means.**
- 3. The promotion of the urban fringe as part of the city's green network and encouraging opportunities for multi-functional uses such as, appropriate recreation and cultural experience, new allotments and local food production and biodiversity conservation and enhancements (see CP5 Biodiversity).**
- 4. The protection of sensitive groundwater source protection zones from pollution and encouraging land management practices that reduce rapid surface water runoff and soil erosion.**
- 5. The creation of 'gateway' facilities and interpretative facilities in connection with the South Downs National Park to support sustainable tourism.**

Development within the urban fringe will only be permitted where:

- a) a site has been allocated for development in a development plan document; or**
- b) a countryside location can be justified;**
- c) the proposal has regard to the downland landscape setting of the city;**
- d) all adverse impacts of development are minimised and appropriately compensated for; and**
- e) where appropriate, the proposal helps to achieve one or more of the objectives set out above.**

Supporting Text

3.136 The spatial strategy for the City seeks to accommodate future development primarily within the existing built up area of the city. Significant amounts of new development are directed to areas which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development can secure substantial benefits for the city. This approach ensures that transport impacts will be minimised and that areas of countryside and the South Downs National Park will continue to be protected.

3.137 There are however some uses for which sites are unlikely to be found within the built up area but are necessary to service the needs of the city. Such uses might include new forms of waste or water management, renewable energy generation, local food production and the facilitation of a gateway to the South Downs National Park by sustainable transport means. Sites for such uses may need to be identified in Part 2 of the City Plan. Some sites falling within the urban fringe were allocated for development in the 2005 Brighton & Hove Local Plan.

3.138 Where appropriate, proposals for development should help to achieve the five principal objectives for the urban fringe as identified in the policy. These objectives reflect

the key aims and objectives of other council strategies and plans and also reflect Biosphere Reserve principles and objectives which aim to bring people and nature together. For example, the council's 'Downland Initiative Strategy' and the city's 'Rights of Way Improvement Plan' seek to ensure that management of the downland estate achieves social, environmental and economic benefits and 'reconnects the people of Brighton & Hove to a more biodiverse downland with better education and improved access and a better sense of connection to the land'⁸⁹.

3.139 There are also other types of developments that are likely to justify an urban fringe/countryside location. These might include, for example, householder extensions appropriate in scale and design to the parent building or farm diversification schemes which are necessary for the efficient operation of the farm and do not prejudice the agricultural use⁹⁰. Proposals for farm diversification within the urban fringe should accord with the council's adopted Planning Advice Note 01 Farm Diversification (October 2005) or subsequent revisions. The NPPF (March 2012) advises that local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances⁹¹.

3.140 The protection of water supply and water quality are also key responsibilities in the urban fringe because the chalk under the downland around the city is the aquifer or groundwater storage that supplies the city. The EU Water Framework Directive introduces a new concept of 'good status' that is far more rigorous than current water environment quality measures and it includes the protection of groundwater. This valuable resource needs to be protected from pollution and from land uses with a high risk of pollution. Towards this end, the city council has adopted a sustainable farming strategy for the management of its farmland to prevent soil erosion, flooding and pollution of the city's water supply. The River Basin Management Plan⁹² (South East River Basin Districts – including Adur and Ouse Catchment and prepared by the Environment Agency) looks to influence land management to reduce, or ensure no increase in, run-off rates and to encourage activities that may have the potential to reduce run-off rates from the South Downs and contribute to wider benefits (such as biodiversity, soil conservation and water quality improvements).

3.141 The council works with other landowners and DEFRA to seek sustainable management of the Downland not in its ownership and control.

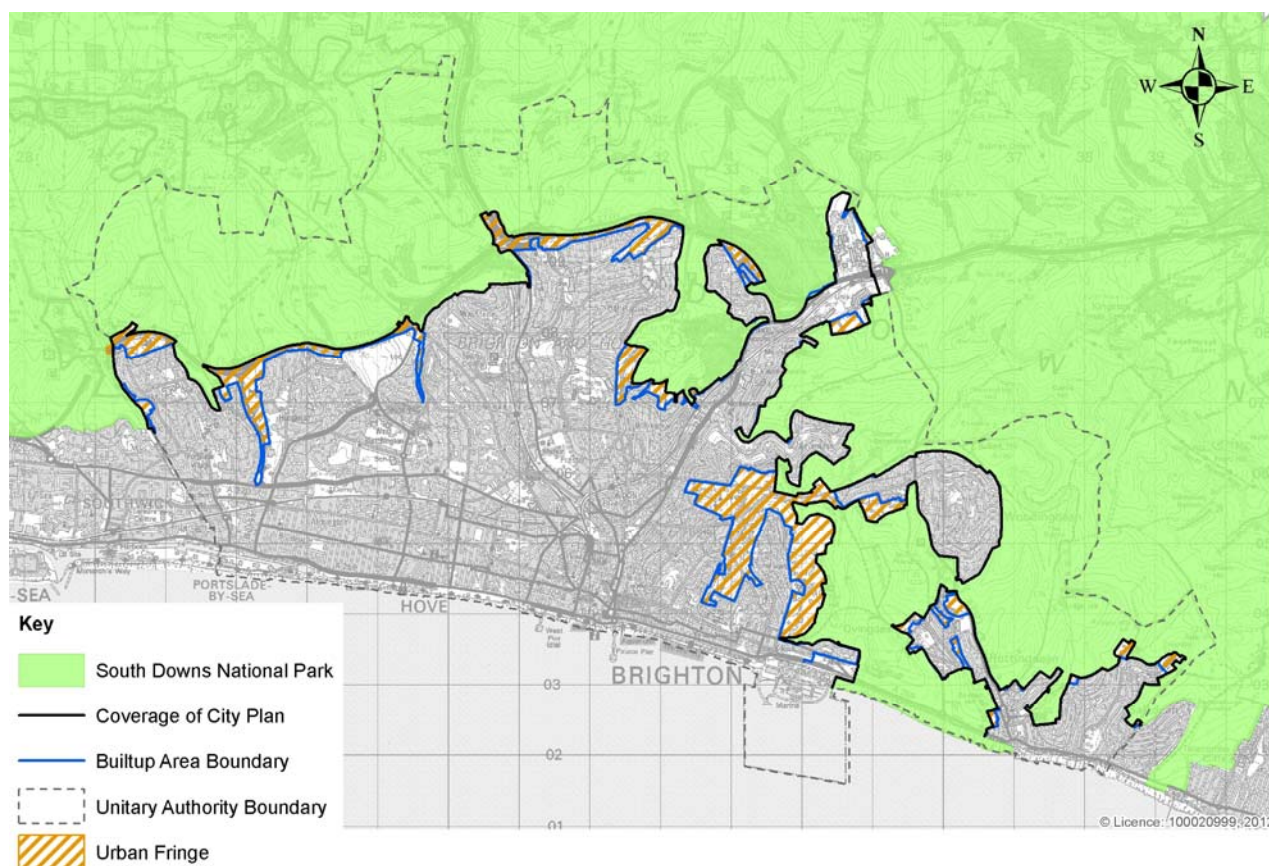
⁸⁹ Downland Initiative Policy was first developed in 2005.

⁹⁰ Minor development proposals will not necessarily be expected to contribute towards the achievement of the five primary objectives set out in SA4.

⁹¹ Paragraph 55, NPPF, March 2012.

⁹² River Basin Management Plan – South East River Basin Districts, Environment Agency, December 2009.

SA5 – The South Downs



Context

3.142 The South Downs National Park, covering the chalk landscapes of the South Downs stretching from Hampshire in the west to Beachy Head in East Sussex, came into being in 2010⁹³. The National Park is administered by the South Downs National Park Authority (SDNPA), which has full planning responsibilities and a statutory duty to prepare development plans for the National Park. When making decisions in relation to the National Park area consideration must be given to the purposes of the National Park, which are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park and provide opportunities for the understanding and enjoyment of its special qualities by the public.

3.143 The Sussex Downs Area of Outstanding Natural Beauty (AONB) that fell within the city was revoked upon the creation of the National Park. For the administrative area of Brighton & Hove the South Downs National Park boundary includes most of the land that was previously designated as part of the Sussex Downs AONB). It also includes a major tract of land west of Woodingdean and Ovingdean, south of the race course and the cliffs and coast south of Beacon Hill which did not previously enjoy AONB status. Much of the National Park boundary abuts the city's convoluted built up area boundary. The National

⁹³ The Secretary of State for the Environment, Food and Rural Affairs confirmed the creation of the South Downs National Park on the 12 November 2009. The South Downs National Park came into being on 31 March 2010. The South Downs National Park Authority was created on the 1 April 2010 and became fully operational on the 1 April 2011.

Park designation is a material consideration in the making of any planning decision that may significantly affect the Park.

SA5 The South Downs

The council will work in partnership with the South Downs National Park Authority and adjoining authorities and landowners to protect and enhance the natural beauty of the South Downs National Park. Proposals within the setting of the National Park must have regard to the impact on the National Park, in particular the purposes of the National Park and the ability of the South Downs National Park Authority to deliver its duty. The following priorities are recognised for National Park land and its setting that fall within the city's administrative area:

- 1. To promote Biosphere Reserve principles and objectives, bringing people and nature together.**
- 2, To promote sustainable land use management systems on the downs with greater emphasis on local healthy food production, diversification and farming practices that are sympathetic to wider downland objectives;**
- 3. To conserve and enhance downland habitats and species to meet Biodiversity Action Plan (BAP) targets and recognise the role of the Downs in the city's Green Network/Nature Improvement Area/open space framework (see CP10 Biodiversity and CP16 Open Space);**
- 4. To protect scheduled ancient monuments⁹⁴ and other downland features;**
- 5. To protect sensitive aquifer protection zones and address catchment flood management issues.**
- 6. To increase the amount of accessible land adjacent to the urban area and enhance access from the urban area to the Downs by sustainable transport including by walking, cycling and public transport modes (see CP9 Sustainable Transport and CP18 Healthy City).**
- 7. To promote a stronger visitor experience between the city and the South Downs, facilitate sustainable eco tourism in the South Downs and the provision of gateway facilities to the South Downs National Park, recognising in particular, the role of Stanmer Park (see SA4 Urban Fringe and CP5 Culture and Tourism) and the need to manage parking and traffic in order to reduce the risk of degradation of these gateway areas and to link them to a sustainable transport system.**

Supporting Text

3.144 The South Downs National Park Authority is the planning authority for land within the National Park boundary and therefore responsible for producing a local development plan for the park area and the determination of planning applications within the National Park.

⁹⁴ A statutorily protected building, structure or feature of national importance because of its archaeological and historic interest.

However Brighton & Hove City Council owns land within the National Park and is the local planning authority for the land outside the National Park within the city's administrative boundary, which includes land within the setting of the National Park (See Key Diagram). Proposals within the National Park must have regard to the purposes of the National Park. Proposals within the setting of the National Park must not undermine these purposes and will be expected to minimise any adverse impacts on the National Park which are being created by the proposal.

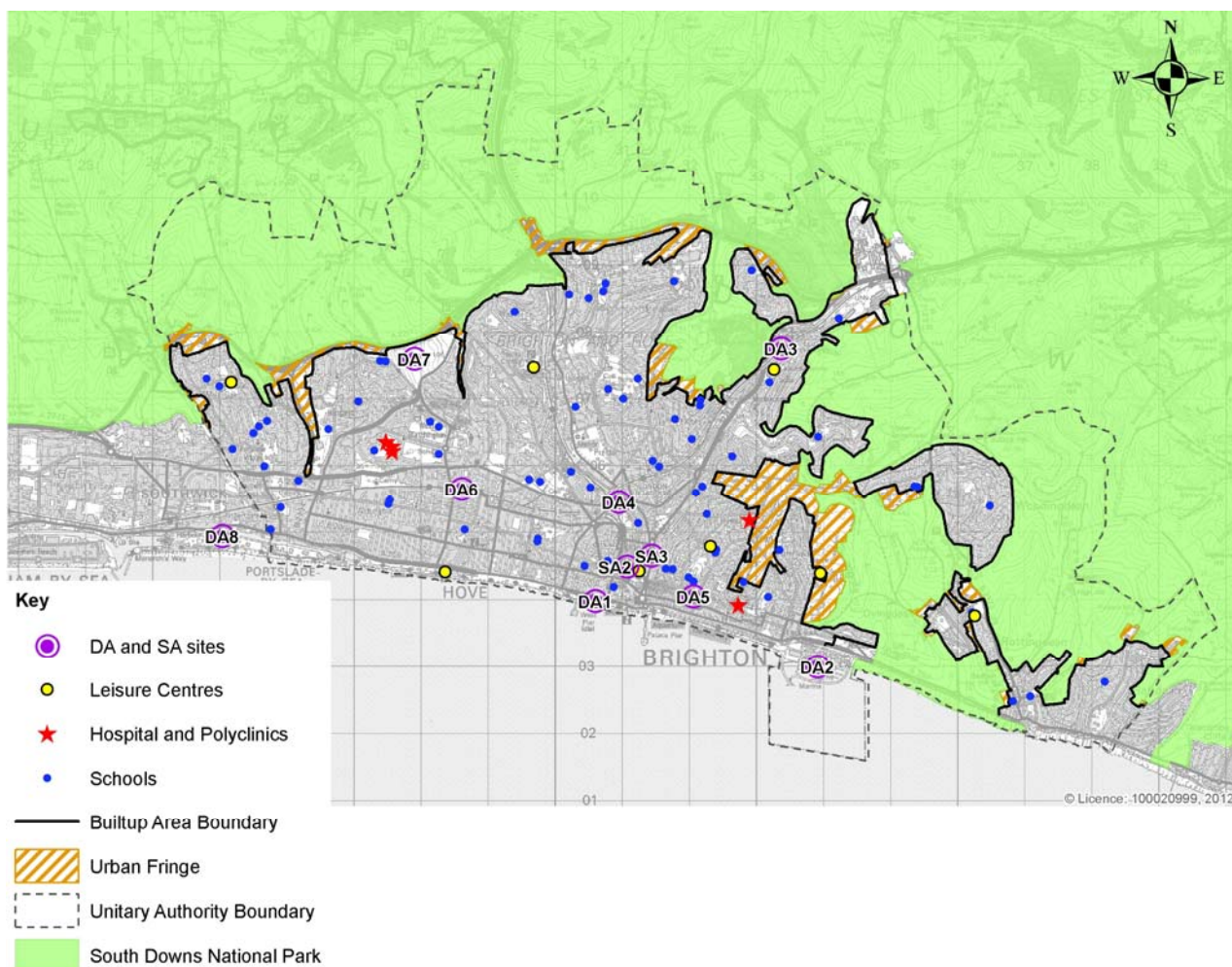
3.145 The purpose of this policy is to set out the council's aspirations for those parts of the South Downs National Park and its setting which fall within the administrative area of the city, to inform future partnership working with the National Park Authority. The majority of this land is owned and leased to tenants by the city council. The council is currently working towards a more sustainable approach to the land management of the South Downs, by improving conservation, public access and recreation (as appropriate to the location) whilst maintaining financially viable farm businesses⁹⁵. In order to conserve and enhance downland habitats and species, specific biodiversity management plans will be drawn up for various downland sites within the council's ownership. Further, in relation to the management of the chalk grassland, conservation mowing practices will be implemented to enhance and protect biodiversity.

3.146 An important role of the National Park Authority is to promote understanding of the South Downs and to promote access to the Park by sustainable means. A number of these measures are likely to be implemented within the administrative area of Brighton and Hove and this emphasises the need for good partnership working. Stanmer Park is a Grade II registered park of special historic interest, a 485 hectare rural estate with landscaped park, buildings and gardens, a village, farmland, woodland and amenity grassland used as public open space and all falling within the National Park. It is covered by a variety of nature conservation and conservation designations and is a major recreational resource for residents of and visitors to the city. Brighton & Hove City Council seeks to promote access to the South Downs by developing Stanmer Park as a gateway, promoting open access and improving public transport. There is also the need to manage parking at gateway locations in order to reduce the risk of degradation of these areas and to link them to a sustainable transport system.

3.147 The chalk under the downland around the city is the aquifer or groundwater storage that supplies the city. It is therefore important that it is protected from any development or land use that could cause harm by polluting or affecting the water supply held in the chalk. There are also a number of sites of archaeological and biodiversity interest designated within the South Downs National Park area that are subject to national and regional protection.

⁹⁵ Downland Initiative, 2005 - A programme of action compiled by the city council to deliver a sustainable downland landscape by integrating farming, recreation, biodiversity conservation and landscape objectives.

SA6 Sustainable Neighbourhoods



Context

3.148 The policy provides a strategic policy framework for Neighbourhood Planning alongside the other policies in the City Plan. It relates to all residential areas and neighbourhoods in Brighton & Hove. The aim is to create sustainable neighbourhoods bringing together the priorities agreed in city's Sustainable Community Strategy⁹⁶ and other citywide strategies.

3.149 A sustainable neighbourhood is a place where there are good quality public services; mixed and integrated communities with a number of housing choices (including, size, type and for different incomes); places where people regardless of their identity or interests, feel they can influence decision-making and have pride in their community; where there is good access to jobs, shops and other local services and where there is a healthy and safe environment. As with other special area policies this will require effective partnership and collaborative working between the public, private and community and voluntary sectors and coordination of policy and strategies in the city.

⁹⁶ Sustainable Community Strategy 2010, Creating a City of Opportunities sets out a long term plan to improve the economic, social and environmental well-being of the city. A number of the eight priority themes address the need to reduce inequality.

3.150 One of the biggest challenges for Brighton & Hove in creating a sustainable city is to reduce inequalities in health, employment, educational attainment, income, community safety and measures of child and family poverty⁹⁷. Research (Reducing Inequality Review 2008⁹⁸) shows that though the majority of low income residents are spread throughout the city, the most disadvantaged areas in the city remain significantly more deprived than the city as a whole. Twelve per cent of the city's areas (19 out of 164) are in the 10 per cent most deprived in England.

3.151 Neighbourhood Plans are a means by which local neighbourhood forums and parish councils can prepare plans to identify land use, design and development priorities for their area. This is an opportunity for greater involvement of local communities and businesses to have a greater say in the future of their areas.

SA6 Sustainable Neighbourhoods

Create and maintain sustainable neighbourhoods and reduce inequalities between neighbourhoods by working with public, private and community and voluntary sector partners, businesses and local communities.

A. Identified city-wide priorities for sustainable neighbourhoods are to:

- 1. Focus new development in neighbourhoods into local shopping centres and parades where proposals contribute to the range and viability of local facilities by maintaining and creating a focal point for community activities and encourage investment to improve sustainable transport.**
- 2. Ensure a good balance and mix of uses in existing defined local shopping centres is maintained and carefully monitored and encourage redevelopment of local centres where proposals contribute to local facilities (see CP4 Retail Provision).**
- 3. Support residents, stakeholders and local businesses in defining Neighbourhood Forums and support and advise them in preparing Neighbourhood Plans, Neighbourhood Development Orders and Community Rights to Build.**
- 4. Improve the quality of public services through joint working between public, private and community and voluntary sector partners and carry out effective engagement, development and activities with residents and neighbourhood groups⁹⁹. In particular, establish neighbourhood governance arrangements, measures and procedures that give communities the skills, confidence and power to shape and influence public services.**
- 5. Improve sustainable transport access to and from areas in outer locations, especially where car ownership levels are low, by working closely with public**

⁹⁷ Child Poverty Strategy 2011

⁹⁸ Reducing Inequality Review 2008 was commissioned by the Local Strategic Partnership to assess the effectiveness of the city's Neighbourhood Renewal Strategy, options for the future to reduce inequality and to provide measures for success that could be used as targets in the future.

⁹⁹ Copy of the Community Engagement Framework <http://www.brightonhove.gov.uk/index.cfm?request=c1189414>

transport operators and by improving cycle and walking links (see CP9 Sustainable Transport).

6. Promote and support environmental sustainability improvements to new and existing buildings (CP8 Sustainable Buildings).

7. In areas with a shortfall of community facilities ensure new or enlarged community facilities (e.g. surgeries, education and schools, youth facilities, community buildings) are provided by working with partners to identify appropriate sites; ensure new development contributes to community priorities through developer contributions (see CP7 Developer Contributions); and encourage shared use of existing and new community facilities.

8. Deliver balanced communities through the requirement for new residential development to provide an appropriate amount of affordable housing and mix of dwelling sizes and tenure types. In areas where there is a concentration of social rented housing promote a better choice of housing tenures will be sought (see CP1 Housing Delivery and CP20 Affordable Housing).

9. The city council will support and promote sports, local food growing, physical activities, arts and cultural initiatives and projects that improve the environment and help to develop community cohesion.

10. Encourage existing education and community organisations to provide local communities with a greater range of services and facilities for learning and training.

B. Priorities to reduce inequalities between neighbourhoods are:

1. Secure good quality employment and training opportunities for residents in areas with high levels of long term unemployment, for example, through planning obligations on major development schemes (see CP7).

2. In areas identified with significant environmental, community safety and access concerns support improvements to the public realm, biodiversity and open space (see CP13 Public Streets and Places and CP7 Infrastructure and Developer Contributions).

3. Support partners, programmes and strategies that aim to reduce health and learning inequalities between neighbourhoods and promote healthier lifestyles and wellbeing.

Supporting Text

3.152 The purpose of the policy is to create sustainable communities and to reduce inequalities within and between neighbourhoods. The overall main aims are to:

- create balanced communities that meet the needs of all residents and reduce the inequalities between different areas;
- engage with and listen to local communities;
- increase the availability of jobs and training;
- encourage healthier lifestyles and lifetime communities;

- improve accessibility and make roads in residential areas safer;
- encourage environmental sustainability; and
- build active and inclusive communities based on mutual respect.

3.153 The policy requires joint working between partners, including other public agencies for example NHS commissioning organisations and health care providers, the police, education providers (schools, colleges and universities), community and community and voluntary sector organisations, transport providers, businesses, and residents. Brighton & Hove's Strategic Partnership¹⁰⁰ and its 'family of partnerships'¹⁰¹ will help to enable effective partnership working.

3.154 The policy provides a strategic policy framework for Neighbourhood Plans that are a tier of development plans introduced by the Localism Act 2011. Neighbourhood Plans can be prepared by Parish Councils or Neighbourhood Forums that are representative of the neighbourhood and have been agreed as being the plan-making forum by the Local Planning Authority (in accordance with the Neighbourhood Planning Regulations 2012). These Plans will determine local priorities (e.g. outdoor sports facilities, defining local green spaces¹⁰², biodiversity, community safety improvements, safer streets measures); where development in the neighbourhood should go. Part A3 of the policy confirms the city council's commitment to working with local people and businesses to define neighbourhood forums and prepare Neighbourhood Plans.

3.155 Good quality development in local centres and hubs will be allowed where it helps to strengthen the provision and viability of local services including shops and community facilities and where it represents a better use of land in the city (see CP14 Housing Densities). A significant development can help improve public transport services to a neighbourhood, e.g. increased frequency of buses.

3.156 Local shopping centres and parades provide important local services to neighbourhoods and can often be a focal point for community activities. A sustainable community should have a reasonable range of shops, services, public houses and cafes within easy walking distance that serve day to day needs for local residents. It contributes towards creating community cohesion and is particularly important for those without access to transport and gives alternatives to travel by car. Additionally easy access to fresh food can encourage healthier lifestyles. Parts A1 and A2 of the strategy seek to secure investment in local parades/centres and ensure a healthy mix of uses is maintained. These centres should allow local communities and neighbourhoods to access fresh, locally produced food and key services.

3.157 A critical part of a sustainable community is robust and meaningful community engagement at all levels of participation and a thriving voluntary sector. This is a priority for

¹⁰⁰ The Brighton & Hove Strategic Partnership brings together representatives from the local statutory, voluntary, community and private sectors to address local problems, allocate funding, discuss strategies and initiatives. The first Local Strategic Partnerships were set up in 2000. They are responsible for agreeing an overarching Sustainable Community Strategy for the area. They aim to encourage joint working, and community involvement with the general aim of ensuring resources are better allocated at a local level.

¹⁰¹ The Family of Partnerships underpin the Local Strategic Partnership. It is made up of 12 partnerships including the Arts Commission, Economic Partnership, Crime and Disorder Reduction Partnership, Strategic Housing Partnership, Healthy City Partnership, Transport Partnership and the City Sustainability Partnership.

¹⁰² Local Green Space as defined by the National Planning Policy Framework paragraph 77.

all residential neighbourhoods in the city. A key action recommended in the Reducing Inequality Review, to achieve better outcomes for disadvantaged areas, is to improve engagement between services and local communities and empowering local communities. Neighbourhood governance arrangements will be set up to encourage all residents to engage in decisions on local services.

3.158 Providing effective sustainable transport access the city's neighbourhoods is important in enabling non-car owners to travel and in reducing the need to travel by car. This will contribute to the city's health priorities and Low Emissions Strategy to improve air quality in the city.

3.159 There remain several residential and suburban areas of the city in need of improved sustainable transport links. Work will be undertaken with partners to improve public transport links. These links will encourage active travel, cycling and walking, including improving public realm around key areas including local shopping areas and an integrated cycle network across the city (see CP9 Sustainable Transport). Making it easier for people to cycle and walk can also encourage healthier lifestyles.

3.160 The strategy is directed at providing good quality community facilities within walking distance of neighbourhoods where there is a shortfall. These facilities include primary health care and community health facilities, education, training, youth facilities, children's and health centres and community buildings. In terms of schools, there is, at present, an unbalanced demand for primary school places in the city with schools in the centre and west needing additional capacity. It is also recognised that by 2030 there will be increased demand throughout the city for school places that will be addressed. Where a need has been identified, work will be undertaken with service providers to help identify sites and, where appropriate, developer contributions sought to meet a resulting shortfall in infrastructure (see CP7 Infrastructure, Community Infrastructure Levy (CIL) and Planning Obligations).

3.161 Securing balanced communities includes providing for a better choice of housing type, size and tenure and affordability ranging from single households to larger families and including the needs of diverse groups such as older people, disabled people, the black and ethnic minority and LGBT¹⁰³ community. In some disadvantaged areas of the city there is a concentration of social rented housing. Introducing a better balance of housing choice to these communities can be addressed, for example, by allowing a higher proportion of intermediate housing as part of the affordable housing element of new developments (see policy CP20 Affordable Housing).

3.162 It has been demonstrated that local arts and culture projects and sports and food growing can contribute to building community cohesion as well as improving the environment. Work will be undertaken to encourage local arts, culture and sports groups to undertake projects with local communities. Initiatives are underway and will continue to promote food growing (Food Growing Planning Advice Note and the Food Strategy 2012) and encourage communal composting (in Brunswick and St Peters and North Laine wards).

3.163 Part A10 recognises the role that extending the use of existing sports and community facilities within schools, colleges and universities can have in facilitating and enabling

¹⁰³ Lesbian, Gay, Bisexual and Trans.

community cohesion and healthy lifestyles (see also CP16). The shared use of school facilities is already formally stated within the governments extended schools programme. The Strategy seeks to widen this to include colleges and the universities to allow shared use of their facilities too. This work is being developed through the Sports Facilities Plan 2012. Opportunities to share existing community buildings and facilities, like churches, will be maximised.

3.164 Shortfalls in the quantity and quality of open space, recreation and sports facilities have been identified in the Open Space, Sport and Recreation Study¹⁰⁴ and the findings will be taken forward into Open Space Strategies for the city. This will be tied in with identifying community safety priorities for improving open spaces, providing children's play space and encouraging residents to use their parks. This will have associated health benefits for residents. Future strategies will be informed by Sport England's Active Design Guide¹⁰⁵ which sets out how environmental design can encourage sport and physical activity and National Institute for Health and Clinical Excellence (2008) Public Health guidance 8: Physical Activity and the Environment¹⁰⁶.

3.165 The city and its partners are working towards designation as a UNESCO Biosphere Reserve, a world class centre of excellence where the benefits of nature conservation to people are clearly demonstrated. The policy helps to deliver Biosphere objectives by encouraging the integration of beneficial biodiversity as an integral part of sustainable neighbourhoods.

3.166 Disadvantaged areas are characterised by high levels of long term unemployment, high levels of child and family poverty and high levels of people on Employment and Support Allowance. The strategy aims to address this through providing job and training opportunities for working age residents within sustainable travelling distance of the areas. The strategy proposes the requirement for developer contributions, linked to major development schemes in the city to include employment training places for residents. Small employment units in residential areas will continue to be protected. Initiatives that help reduce economic inequalities include access to affordable financial services and affordable childcare.

3.167 Community safety is a priority for all residents of Brighton & Hove. Often, in more disadvantaged neighbourhoods the fear of crime and levels of crime are higher than in other more affluent parts of the city. The Crime and Disorder Reduction Partnership identifies environment improvement zones (parts of the city identified as hotspots for crime) which are priority areas for community safety initiatives. Matters relating to community safety are addressed in the Community Safety Strategy 2011.

¹⁰⁴ Open Space, Sport and Recreation Study 2009 establishes a baseline of existing provision and proposes standards for quality, quantity and accessibility. It identifies priorities for future open space, recreation and sport provision.

¹⁰⁵ Active Design (2007) was commissioned by Sport England and provides guidance to assist with environmental design which encourages sport and physical activity taking principles of character, continuity, quality and legibility. The Guide uses 3 objectives to frame advice on positive design: improving accessibility, enhancing amenity and increasing awareness.

¹⁰⁶ To see NICE guidance go to <http://publications.nice.org.uk/physical-activity-and-the-environment-ph8>

3.168 Part B3 of the policy encourages effective working between Health, Housing and Adult and Social Care and other support providers to identify areas of disadvantage where renewal or redevelopment and a package of support measures (e.g. education, training opportunities) could transform the long term prospects for vulnerable people, families and young people, their health prospects and the overall health of the neighbourhood. A vital way of improving how services are delivered in these areas is by working closely with residents, community development workers and community groups.

Part 4

City Wide Policies

A Strong and Prosperous City

CP1 Housing Delivery

A: Scale of housing provision

The council will make provision for at least 11,300 new homes to be built over the plan period 2010 – 2030 (this equates to an annual average rate of provision of 565 dwellings). This will be achieved by:

- a) Focussing new development in accessible areas and those with the most capacity to accommodate new homes;
- b) Ensuring the efficient use of land/sites including higher densities in appropriate locations (see CP12 and CP14)
- c) Making strategic allocations in this Plan for at least 3,635 additional new homes;
- d) Preparing Part 2 of the City Plan (Development Policies and Site Allocations) to allocate sites sufficient to accommodate a further 4300 additional new homes¹⁰⁷; and
- e) Ensuring that all new housing development contributes to the creation and/or maintenance of sustainable communities.

B: Distribution of new housing.

New housing will be delivered broadly in line with the following distribution:

Area / Source of Supply	No. of new homes
Development Area	
DA1	20
DA2	1940
DA3	885
DA4	1140
DA5	600
DA6	575
DA7	700
DA8	400
Development Area Total	6260
Development Across rest of City	3925
Small identified sites	530
Small Windfall Development	600¹⁰⁸
Total	11,315

C: Managing the rate of housing delivery

¹⁰⁷ This figure is based on 'capacity' identified in the 2011 SHLAA Update from identified sites and potential from broad locations. This figure will need to be kept under review through the regular monitoring of residential development progress and may be amended as a consequence.

¹⁰⁸ An allowance for small windfall development has been made for the final 6 years of the plan period 2024 – 2030; although it is anticipated that small windfall development will contribute to meeting the housing target in earlier parts of the plan period.

The release of land/sites for new housing will be managed so that it delivers the amount and broad distribution of housing as set out above. The adequacy of housing land supply will be assessed regularly in accordance with the Housing Implementation Strategy¹⁰⁹ and through annual reviews of the Strategic Housing Land Availability Assessment and the Infrastructure Delivery Plan. Progress will be reported through the council's Annual Monitoring Report. Depending upon the results of monitoring, it may be necessary to adjust the pace of housing delivery.

Supporting text

4.1 A key objective of the City Plan is to provide people with a choice of decent quality housing to meet their needs for a stable home at a cost they can afford. There is a need to plan for the scale of new residential development required (the overall amount of new housing), for the location of new housing and for a variety or mix of new housing (in terms of housing type, size and tenure see CP19 and CP20) to ensure that new development meets local housing requirements and contributes to the creation of mixed and sustainable communities.

Scale and location of new housing development

4.2 Based on demographic and economic factors, (reflecting scenarios of population and household growth and forecasts of economic performance), the city's housing requirements (both housing demand and housing need) have been assessed as likely to fall within a range of 15,800 – 19,400 new homes over the plan period to 2030. This would equate to an annual average of 790-970 new homes per annum)¹¹⁰.

4.3 There are however very significant constraints on the capacity of the city to physically accommodate this amount of development and this is particularly so in terms of environmental considerations such as the sea to the south and the South Downs (now a designated National Park) to the west, north and east of the city. With a limited legacy of derelict or vacant sites, these natural boundaries define and limit the outward expansion of the city.

4.4 The housing target of 11,300 new homes reflects the capacity and availability of land/sites in the city, the need to provide for a mix of homes to support the growth and maintenance of sustainable communities, the need to provide land in the city for other essential uses (such as employment, retail, health and education facilities and other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.

4.5 The fact that the city's housing target does not match the assessed full level of housing requirement means that there is a 'duty to cooperate' with the city's neighbouring local authorities. Brighton & Hove's housing market and travel to work areas extend westwards incorporating Adur District and parts of Worthing District; eastwards incorporating parts of Lewes District and northwards to Mid Sussex and Crawley. It is acknowledged that many of these areas also face similar challenges in meeting housing requirements. In accordance with government guidance, the council will continue to engage constructively, actively and

¹⁰⁹ A Housing Implementation Strategy is set out as a separate annex to the Plan.

¹¹⁰ Brighton & Hove City Council, Housing Requirements Study, GL Hearn, June 2011.

on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas.

4.6 The spatial strategy for the city is set out earlier in this Plan (see Spatial Strategy Part 2). In broad terms, the strategy seeks to direct a significant amount of new development to eight identified Development Areas (see Policies DA1-8) which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration and renewal will secure substantial benefits for the city.

4.7 The eight Development Areas account for just over half (55%) of the planned level of new housing delivery for the city. Within the Development Areas, the City Plan makes strategic allocations to secure the delivery of 3235 new dwellings (see spatial policies DA2 – DA8). In other parts of the city, there are also a range of opportunities for new residential development and such development will help to promote and secure the establishment of sustainable communities. Residential development will be required to respect the local character and distinctiveness of neighbourhoods (see SA6, CP12 and CP14).

Housing trajectory

4.8 Over the last 15 years¹¹¹ the average rate of new housing development in Brighton & Hove has been around 560 dwellings per annum. However, in recent years, annual rates of housing delivery have been far lower than this reflecting the ongoing impacts of global economic recession¹¹².

4.9 The expected rate of housing delivery over the Plan period is illustrated through a 'housing trajectory'. This illustrates the housing development that has been built in the city since 2010 and that which is anticipated to come forward over the rest of the plan period. The housing trajectory is illustrated in the council's Housing Implementation Strategy and will be monitored and updated on an annual basis through the council's Annual Monitoring Report and also through roll forward and further reviews of the Strategic Housing Land Availability Assessment (SHLAA) for the city.

4.10 The city's housing target implies an annual average rate of 565 dwellings per annum over the plan period as a whole. Based on the 2011 SHLAA update, the trajectory¹¹³ indicates that delivery may be at a slightly lower rate than this in the first ten years of the plan period (2010 – 2020), reflecting the ongoing impacts of economic recession. A gradual return to higher delivery rates is anticipated for the second ten year period of the plan. The council's Housing Implementation Strategy identifies a range of planning management actions to assist in bringing forward sites for development should this prove necessary.

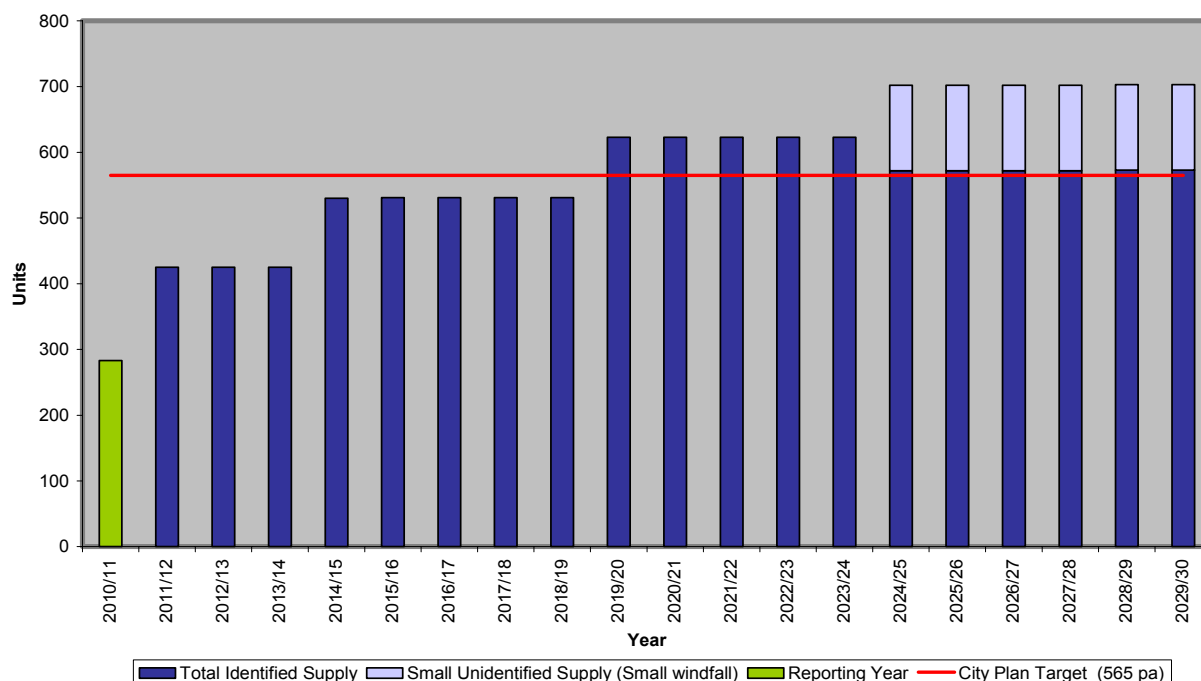
¹¹¹ 1996/7 – 2010/11.

¹¹² Initiated by the credit crunch financial crisis of 2007/8.

¹¹³ As informed by the 2011 SHLAA Update.

Figure 2: Housing Trajectory 2010 – 2030 (Based on 2011 SHLAA)

Brighton & Hove Housing Trajectory as at 1st April 2011



Components of housing land supply

4.11 Table 4 indicates the components of housing land supply for the period 2010 - 2030. It draws upon the council's latest Strategic Housing Land Availability Assessment (SHLAA) exercise¹¹⁴.

4.12 The table illustrates that approximately 2765 dwellings have either already been built since 2010 or are currently 'committed' for development in terms of sites having an extant planning permission or allocated in the 2005 Brighton & Hove Local Plan. This plan makes strategic site allocations to achieve a further 3635 dwellings. Further capacity is identified for an additional 4300 dwellings and appropriate site allocations will need to be made in Part 2 of the City Plan. These 'identified' sources comprise 94% of the overall housing target to 2030.

¹¹⁴ SHLAA 2011 Update.

Table 4: Housing Delivery, Supply Breakdown 2010 – 2030 (Based on 2011 SHLAA)

Spatial Area	Already Built or Committed	Strategic Allocations	Broad Locations	Further Capacity Identified in SHLAA	Allowance For windfall	Total
DAs						
DA1	13	0		8		21
DA2	853	1085		0		1938
DA3	126	300		460		886
DA4	281	460		398		1139
DA5	0	540		57		597
DA6	28	150		399		577
DA7	0	700		0		700
DA8			400			400
DA Total	1302	3235	400	1322		6260
Rest of City	931	400	500	2092		3923
Small id. Sites	532					532
Small Windfall					600	600
Total	2765	3635	900	3414	600	11315

Maximising development of previously developed land

4.13 Brighton & Hove is a tightly constrained city. In many instances, the boundaries of the South Downs National Park are contiguous with the built up area of the city. As a consequence, the majority (94%) of new residential development will take place on previously developed land or 'brownfield' sites. The Plan does however make a strategic allocation for the development of land at Toads Hole Valley to the north of the city which is a large greenfield site falling outside the boundaries of the National Park. Development at this location will contribute a significant amount of new housing development for the city and, as part of a mixed use development, will secure many other benefits for the city (see DA7).

Small site development

4.14 A significant proportion of residential development across the city takes place on smaller development sites (5 or less units). Over the last 10 years, development on small sites has accounted for 36% of total residential development across the city. The nature of this type of development (comprising small scale residential intensification, conversion activity and small scale changes of use) means that it is very difficult to identify the emergence of such sites. For this reason, the Brighton & Hove SHLAA does not attempt to specifically identify and assess such sites. Where small sites have the benefit of a planning permission at the SHLAA study base date, they are counted.

4.15 Government planning guidance requires sufficient specific sites and/or broad locations to be identified to meet planned housing targets for at least the first ten years of the plan¹¹⁵. In reality, small 'windfall' site development (as described above) will come forward throughout the plan period and will contribute towards meeting the planned housing requirements for the city and ongoing five year supply requirements. In this way, development from small windfall development activity will supplement housing supply achieved from identified sites and also provide a measure of contingency should there be an element of non-delivery from some of the large development sites. Given the NPPF requirements, an allowance for development from this source has only been included as part of the city's projected land supply after 2024.

Management of housing land supply

4.16 The housing trajectory is based upon reasonable assumptions about the deliverability of housing over the plan period. The trajectory illustrates that the rate of housing delivery in the city is expected to increase over the plan period reflecting anticipated recovery in the economy and financial markets which has severely affected development rates earlier in the plan period. The trajectory will be updated and reviewed on an annual basis to track delivery progress against planned housing requirements and the requirement to maintain a five year supply of housing land/sites. This will be reported through the council's Annual Monitoring Report. The council's Housing Implementation Strategy outlines how housing delivery will be managed over the plan period.

¹¹⁵ NPPF, paragraph 47.

CP2 Planning for Sustainable Economic Development

The council will positively and proactively encourage sustainable economic growth and continue to work with partners in the city and the region to:

- 1. Promote and secure inward investment opportunities; retain existing businesses and support indigenous business growth and support the diversification of the city's economy to ensure its resilience and versatility.**
- 2. Support proposals that drive the city's transition to a low carbon economy and to secure the range of benefits this will bring.**
- 3. Bring forward a mix of employment floorspace including the provision of small and medium sized and flexible floorspace to support the city's key employment sectors, in particular the knowledge-based economy, creative industries and environmental technologies through the preparation of Supplementary Planning Documents and Planning Briefs for regeneration schemes and major mixed use sites across the city (see also CP7 and CP5).**
- 4. The council will support the provision and delivery of the information and communication technology (ICT) infrastructure the city economy requires; in particular affordable, competitive broadband access meeting the needs of enterprises and individuals.**
- 5. Support appropriate expansion plans of hospitals and higher and further education establishments recognising their role as major employment generators (see also DA3 and DA5).**
- 6. Secure apprenticeships, training and job opportunities for local residents through the Brighton & Hove Local Employment Scheme and the linked requirement for contributions from developers from major development schemes towards training (see SA6 and CP7).**

Supporting Text

4.17 Brighton and Hove has one of the largest concentrations of employment in the South East region. The City is expected to continue to function as an economic growth hub for the wider sub-region. Brighton & Hove has become part of the Coast to Capital Local Enterprise Partnership area. The Coast to Capital LEP aims to support the development of 100,000 private sector jobs; promote entrepreneurship in schools and colleges and focus on supporting the growth of internationally trading businesses. The city needs to ensure a step-change in economic performance, reducing the gap with South East regional economic performance. In this context, attracting new inward investment is an explicit priority, although given the existing economic climate this is recognised as a long term priority for the council.¹¹⁶ The council will work with businesses, both major established employers and new start up companies, to weather the downturn and take advantage of new opportunities as they arise to build resilience and versatility in the economy.

¹¹⁶ Business Renewal Investment Initiative (2009)

4.18 The Employment Land Study identified in 2006 that the City had been a relatively successful economy which in the pre-recession period had experienced rapid employment growth, with falls in unemployment¹¹⁷ and rises in average earnings¹¹⁸. In 2008, the local economy was estimated to be worth £4.2 billion¹¹⁹. With the onset of the global recession in autumn 2008 it is even more important for Brighton & Hove to improve its resilience and to protect and provide for good quality jobs in the city. The City Plan is a long-term plan and needs to ensure that, when the economy recovers, local conditions are conducive to enabling forecast business and jobs growth to be realised. This will be addressed by supporting local businesses in the city's core sectors such as retail, tourism and hospitality; (retaining and enhancing jobs in business & financial services, diversifying the local economy, focusing on growth sectors (the knowledge based economy, creative industries, including digital media, and environmental technologies) supporting social enterprises¹²⁰; and securing training places, apprenticeships and jobs for local people as part of redevelopment schemes. The need to continue to grow the economic base with higher value services and to fully utilise the city's workforce assets are local priorities¹²¹.

4.19 Given the evidenced need for an appropriate supply of employment floorspace to meet the needs of growing businesses the focus of the City Plan is on ensuring that an appropriate mix and type of employment floorspace is a principal element of all regeneration, development and renewal projects within the city.

4.20 The two Universities and City College make the city well-placed to encourage higher level business growth through knowledge transfer partnerships within the city¹²². The City Plan through DA3 Lewes Road and DA7 Toads Hole Valley will encourage the creation of flexible incubation space for university spin out businesses and move-on space in the city. Lewes Road is a priority development area forming an important gateway to the city for visitors and businesses. The vision is for it to become a neighbourhood of knowledge and enterprise focused around the universities. The availability of development sites and the connections with the two university campuses and the Sussex Innovation Centre make its development a key priority.

4.21 The growing digital and creative industries are seen as having a key role in reviving and sustaining the city's economy. The sector is characterised as innovative, knowledge-based and future-proofed providing high value, highly paid jobs. Already Brighton & Hove is home to a cluster of around 1500 media-related companies employing 10,000 people, plus another 5000 freelance individuals¹²³. The council will support the further innovation, growth and maturity of the creative industries sector to become globally relevant especially

¹¹⁷ Falls from 7.5% in February 2000 to 6.2% in June 2008 but an increase to 7.6% in June 2011, ONS.

¹¹⁸ Average full-time pay increasing from £410.50 per week in 2002 to £480.00 per week in 2008 and continue to increase, in December 2010 £522.60 (The State of the City Report 2011).

¹¹⁹ Sustainable Community Strategy, update 2009.

¹²⁰ Social enterprise is a business with primarily social objectives whose surpluses are principally reinvested for that purpose in the business or in the community, rather than being driven by the need to maximise profit for shareholders and owners (Department for Business, Enterprise and Regulatory Reform)

¹²¹ See The City Employment and Skills Plan 2011-14, Sustainable Community Strategy (2009 Refresh), The Brighton & Hove Economic Strategy (2009), Business Renewal Investment Initiative (2009) and the Employment Land Study (2006 and revised 2009).

¹²² The Economic Strategy 2008-2016 cites the following successful examples: ProfitNet and the Collaborative Training Centre at the University of Brighton; the Innovation Centre (SInC) and the £1.35m collaboration with Animazoo at Sussex University and the SOLD project at City College

¹²³ Wired Sussex 2010

digital media, recognising the cities burgeoning success in the convergence of the creative, digital and IT sector. A recent study¹²⁴ indicated that whilst there is a reasonable amount of provision for micro and small businesses up to around 20 people there is a shortage of workspace in central Brighton of a suitable size and configuration for premises suitable for medium and larger scale sector businesses. Therefore through policies SA2 Central Brighton and DA4 New England Quarter the City Plan safeguards existing office accommodation, allocates sites suitable for new office accommodation and in particular safeguards New England House to support further growth in this sector. The council will work with providers to ensure the delivery of ultrafast broadband to further support growth in this sector.

4.22 Environmental industries¹²⁵ are a growing sector in the city and provide an important enterprise and employment opportunity for the city. The sector contains organisations of varying sizes, ranging from large companies to micro businesses. In 2009 around 75 businesses fell within the definition of environmental technologies¹²⁶. There are a number of potential major projects in the pipeline, including the Rampion offshore wind farm and through council initiatives and events the role of this sector will be promoted¹²⁷. Brighton & Hove has many of the key attributes needed to attract environmental industries. These include research specialisms connected to both the universities, the range of education and employment opportunities, the city's reputation as a sustainable city and its enterprise culture. There is a need to support this sector as it grows¹²⁸. Through the City Plan the council will support the development of an environmental technology cluster at Shoreham Harbour (DA8) and incubator space at Preston Barracks and Toads Hole Valley (DA3 and DA7) and through policies safeguarding and promoting new office accommodation (SA2, DA4 and CP3).

4.23 Supporting the development of a globally competitive environmental industries sector will also support the Council's one planet living aspiration to improve quality of life, the environment and the economy of the city and move towards a low carbon economy¹²⁹. A low carbon economy can provide opportunities for a wide range of businesses, not just the 'traditional' environmental sector. Businesses can benefit from a low carbon economy in two ways: diversify into new low carbon products or become more efficient in the way they work.

4.24 The council also encourages the growth of employment in socially focused businesses¹³⁰ and has signed up to the 2008 Social Enterprise Strategy. Brighton & Hove's Third Sector (Voluntary & Community sector) is well developed. It's estimated 1,600

¹²⁴ New England House, Brighton Digital Media Innovation & Enterprise Hub Joint Vehicle Business Case, DCA, October 2010. The study also indicates that businesses are looking for workspace with competitive rents, big capacity data connectivity, easy in easy out terms and flexibility to expand. Other important considerations were on site bike parking, good public transport links and a central Brighton location.

¹²⁵ Locally defined as "...businesses operating in the broad disciplines of energy efficiency, recycling and waste, renewable energy, sustainable construction and maintenance, consultancy and other services". A report of the Culture, Tourism and Enterprise Overview and Scrutiny Committee Ad Hoc Panel October 2009

¹²⁶ Business Renewal Investment Initiative (2009)

¹²⁷ Alongside an Eco Technology Show in 2012, there are plans to run an 'Invest in Sussex' conference that will a focus on growth post recession and how this can be done in a sustainable way.

¹²⁸ A report of the Culture, Tourism and Enterprise Overview and Scrutiny Committee Ad Hoc Panel October 2009

¹²⁹ Brighton & Hove's Climate Change Strategy 2011

¹³⁰ A social enterprise is a business with primarily social objectives whose surpluses are principally reinvested for that purpose in the business or in the community, rather than being driven by the need to maximise profit and shareholders and owners" Dept of Trade & Industry July 2002

organisations generate £96m for the local economy and employ 8,000 people with over 19,000 volunteers, but it is often under-appreciated. It has an important part to play in delivering economic prosperity and should be supported to ensure its potential is realised.

4.25 The council has prepared an ICT Strategy¹³¹ and is working with partners to tackle a number of areas around digital inclusion and economic development including broadband upgrades, connectivity and shared infrastructure. Brighton & Hove is a unique digital media hub, and the council will work with providers to ensure the provision of appropriate infrastructure to equip the city with access to affordable, competitive broadband access meeting the needs of enterprises and individuals.

4.26 The city contains a number of major employment generators including the two universities and the Royal Sussex County Hospital and the council will work with the higher and further education sector, Sussex University Hospital NHS Trusts and Brighton & Hove Primary Care Trust to support appropriate expansion (see DA3 Lewes Road Area, DA5 Eastern Road and Edward Street Area and CP18 Healthy City).

4.27 The Brighton & Hove Local Employment Scheme originates from the City Employment & Skills Plan¹³² and seeks to contribute towards reducing inequalities by securing training and job opportunities for unemployed and underemployed residents of Brighton & Hove¹³³. Contributions will be sought from new major development schemes towards training in building and construction skills with a minimum 20% target requirement.

¹³¹ Brighton & Hove City Council ICT Strategy 2011-2016

¹³² The Brighton & Hove City Employment and Skills Plan 2011-2014 indicates that the working age population is projected to increase by 12,650 over the next 10 years. If these projections prove accurate, the city may need to find work for an additional 6,000 residents by 2014 just to keep the employment rate at the current level of 71.1%. However these need to be quality jobs that allow people to progress and to earn incomes that will enable them to live successfully and sustainably.

¹³³ At the start of 2011, 7.5 per cent of our young people aged 16 to 18 (between 400 & 500 young people) were not in education, employment or training (NEET), down from nine per cent in 2010. The highest numbers of NEET young people are found in Moulsecoomb & Bevendean, Whitehawk & Queen's Park & Cravendale.

CP3 Employment Land

Sufficient employment sites and premises will be safeguarded in order to meet the needs of the city to 2030 to support job creation, the needs of modern business and the attractiveness of the city as a business location. This will be achieved through:

1. Strategic proposals and allocations for B1 employment floorspace as set out in DA2 Brighton Marina, DA3 Lewes Road, DA4 New England Quarter and London Road, DA5 Edward Street and Eastern Road Area, DA6 Hove Station, DA7 Toads Hole Valley and DA8 Shoreham Harbour (including South Portslade) and at Patcham Court Farm.

2. The identification of Central Brighton as the city's prime office location where B1a offices will be protected (see SA2 Central Brighton).

3. Protection of the following primary industrial estates and business parks for business, manufacturing and warehouse (B1, B2 and B8) use:

Centenary Industrial Estate

English Close Industrial Area, Old Shoreham Road

Home Farm Industrial Area

Hove Technology Park, St Josephs Close, Old Shoreham Road

Moulsecoomb & Fairways Industrial Estate

Sussex House (including BT depot)

Woodingdean Business Park

Hyde Business Park, Bevendean

Bell Tower Industrial Estate

Hollingbury Industrial Estate

Hollingdean Industrial Estate

Victoria Road Industrial Estate

Newtown Road Industrial Estate

The council will support proposals for the upgrade and refurbishment of these estates and premises so that they meet modern standards required by business, are more resource efficient and improve the environment or townscape of the site or premise.

Sui generis uses appropriate in nature to an industrial estate location will also be acceptable, provided that they generate employment which is quantitatively and qualitatively comparable to uses within B1-B2 Classes; do not harm the continuation of existing uses within those Classes and comply with other City Plan policies

4. In order to secure good quality modern, flexible employment floorspace the council will allow employment-led (residential and employment) mixed use development on the following employment sites:

Franklin Road Industrial Estate

School Road, Hove

Melbourne Street Industrial Area

Portland Road Trading Estate (including EDF and Martello House)

Land North of Newtown Road

There should be no net loss in employment floorspace.

- 5. Unallocated sites or premises in employment use (Use Classes B1-B8) will not be released to other uses unless the site or premises can be demonstrated to be both redundant and incapable of meeting the needs of modern employment uses (B1-B8). Where release is permitted the preference for re-use will be for alternative employment generating uses or affordable housing (in accordance with CP20 Affordable Housing).**
- 6. Further mixed use allocations will be set out in the City Plan Part 2.**

Supporting Text

4.28 A number of recent studies¹³⁴ have identified the need for new business space to meet the needs of businesses currently located in the city and to attract businesses considering Brighton as a business location to allow the city to grow as an economic base for the wider economic area.

4.29 The Employment Land Study 2006 and the 2009 Update indicate a forecast employment floorspace requirement of between 96,000 – 121,000 sq m B1 floorspace 2006-2026¹³⁵. To ensure that there are enough employment sites and premises to meet this forecast requirement and to facilitate economic growth, Development Area proposals identify strategic allocations to bring forward new high quality employment floorspace (DA2-DA8).

4.30 The table below summarises how the employment floorspace requirements will be met in Brighton & Hove through the Development Area proposals. A review of the Employment Land Study will be undertaken to review the floorspace requirements to 2030 and the findings will inform the final version of the City Plan.

Table 5 City Plan Employment Floorspace

Development Area	New B1 Employment Floorspace (sq m)
DA1 Brighton Centre and Churchill Square	
DA2 Brighton Marina	4,000 ¹³⁶
DA3 Lewes Road	15,600
DA4 New England Quarter and London Road	20,000
DA5 Eastern Road and Edward Street	33,200
DA6 Hove Station	4,000
DA7 Toads Hole Valley	25,000
DA8 Shoreham Harbour	7,500
Rest of the City – includes extant planning commitments where not included in development area proposals	21,107
Total	130,407

¹³⁴ City Employment and Skills Plan 2011- 14, the Business Retention and Inward Investment Strategy (2009), The Employment Land Study (2006 and 2009 update) and the Creative Industries Workspace Study (2007)

¹³⁵ The 2009 Employment Land Study update, using a 2009 forecast suggested there could be a need for approximately 25,000 sq m more office space than the 2006 Employment Land Study.

¹³⁶ B1-B2 uses identified for Gas Work Site

4.31 Due to the current economic downturn, changing economic forecasts nationally suggest that the requirements for employment land set out in the City Plan may be difficult to deliver during the first five years of the Plan period. Accepting this, the Plan nevertheless as a long term plan allocates sufficient employment sites to meet the council's priorities regarding high quality job creation and to support its growth potential over the next 20 years, with appropriate flexibility. It is important that the strategic allocations set out in the Development Areas bring forward high quality employment floorspace. However, it is also important to allow for reasonable flexibility, to promote successful regeneration and enable viable schemes to be delivered, particularly if over the short to medium term economic growth takes a different profile to that predicted in the Employment Land Study 2006, the 2009 update or subsequent Employment Land Study reviews. Therefore proposals which bring forward employment floorspace less than proposed on sites identified in table 1 will be considered, taking into account whether:

1. There is demonstrable benefit for early redevelopment and clear commercial and financial viability evidence that the figures in Table 1 are unlikely to be delivered within the next 5 years;
2. Allowing a different scale or mix of development will secure particularly strong planning benefits;
3. It is appropriate in light of ongoing monitoring regarding the delivery of the overall employment forecast targets and of economic growth.

4.32 The Employment Land Study (ELS) 2006 assessed the city's stock of industrial estates/ business parks for their suitability for continued protection for employment use and their ability to accommodate further floorspace¹³⁷. The study found that these established areas remain popular and there were few that could be said to be entirely unsuitable for their current purposes, as demonstrated by local vacancy levels. Comparing the existing stock of employment sites and premises against the current demand, the study suggests there is no significant excess of industrial and warehouse sites/ premises that needed to be released to other uses. It is therefore important to continue to protect these employment sites whilst encouraging new business investment and opportunities in order to facilitate renewal and growth.

4.33 The majority of these estates/ premises were constructed in the late 1950s/ early 1960s. These are now becoming dated and are not always best located for modern business requirements. However they still provide valuable employment for the residents of the city. Therefore the council will support proposals which:

- refurbish and upgrade the employment floorspace;
- makes more efficient and effective use of the site/premises delivering new floor space;
- delivers significant environmental improvements in terms of the public realm and landscaping of industrial estates and premises;
- improves the quality of the employment offer in terms of the type of employment and density of jobs, and;

¹³⁷ The city's Industrial /Warehousing (B1b, B1c, B2 and B8) stock of circa 300,000 sq m is primarily located on the 21 industrial estates / business parks around the city. They are all relatively small in size and located close to residential areas. Many others are clustered around the Old Shoreham Road, which was traditionally the main east west route into the city

- improves the environmental performance of buildings including improvements that will bring about reductions in water or energy consumption and improve resource efficiency.

4.34 These industrial estates/ premises are also considered suitable for certain “sui generis” uses, that is, those with industrial characteristics which are not included within the Use Classes Order. For example, car breaking, or metal recycling which could potentially harm residential amenity are thus likely to be considered most suited to an industrial estate. Whether or not a new sui generis use is judged to be acceptable will be considered against the comparability and the extent of the employment it would create and the impact of the use on existing employment uses. A sui generis use would not be acceptable, for example, if it harmed the continuation of the employment uses which the policy protects. Similarly new uses should not be introduced into an industrial estate/ premise that would preclude industrial and/or warehousing type uses.

4.35 The council has identified at part four of the policy, five employment sites suitable for employment led mixed use (residential and employment) development where the twin benefits of high quality modern business floorspace and additional housing units can be achieved through a more effective and efficient use of the sites. The starting position is that there should be no net loss of employment floorspace.

4.36 In considering proposals where a net loss of employment floorspace is being proposed the council will take into consideration the following factors:

- Site constraints (current site coverage and opportunities for more effective and efficient use of the site)
- The need for environmental and townscape improvements
- Access arrangements (improved access/circulation space).
- Safeguarding the amenity of surrounding users and occupiers
- The quality of the employment offer in terms of the type of employment and density of jobs.

Developments will need to be carefully designed and managed to ensure that residential and other occupiers of the sites will have an appropriate level of amenity.

4.37 Alongside Central Brighton as the primary office location where existing office accommodation will be protected (SA2), office accommodation can also be found in clusters elsewhere in the city (such as at City Park and along Preston Road) and scattered across the city. This office accommodation can be found within older purpose built buildings or converted period buildings, upper floor accommodation above shops, mews or modern flexible managed office space/ business centres. With the predominance of businesses in the city employing less than 10 people the council considers that a good supply of appropriate employment land should continue to be safeguarded to allow for a broad range of business types to serve the city's needs.

4.38 Together with the primary industrial estates / business parks identified in the policy, there are smaller industrial units/ workshops dispersed throughout the city which provide affordable accommodation for local businesses. There is often pressure to redevelop these sites/ premises for other uses, particularly residential. This has especially been the case with many older poorer quality industrial buildings in predominantly residential areas. There has also been pressure on these sites for warehousing and trade counter uses to support the local economy's service sector.

4.39 Safeguarding secondary employment land maintains the capacity for a diverse economic base in the city and provides jobs locally, reducing the need to travel. Redundancy and unsuitability for modern employment uses of unallocated sites or premises in employment use (Use Classes B1-B8) will be determined by considering the following criteria:

- a) location of the site;
- b) quality of the buildings;
- c) site or floor layout;
- d) accessibility;
- e) proximity to public transport/ trunk routes;
- f) other uses in the neighbourhood
- g) cost of demolition/ refurbishment sets against its future value for employment uses;
- h) the length of time the site has been vacant
- i) documented evidence of the marketing strategy adopted, particularly whether it has been marketed at a price that reflects local market prices and attempts to make the building attractive to different business or employment uses (the length of marketing will need to reflect the size and nature of the site or premise and therefore whilst a year is considered a reasonable marketing period for small sites/ premises a longer period may be required for larger sites/ premises).
- j) for office uses the prevailing vacancy rate for the size and type of office in Brighton & Hove should also be considered;
- k) for an office building whether change of use is the only practicable way of preserving a building of architectural or historic interest.

4.40 Alternative employment generating uses are any uses that generate employment but are not classified as an employment use (uses falling outside the Use Class B1- B8). This excludes retail or leisure uses unless they comply with the tests of national planning policy.

CP4 Retail Provision

Brighton & Hove's hierarchy of shopping centres will be maintained and enhanced by encouraging a range of facilities and uses, consistent with the scale and function of the centre, to meet people's day-to-day needs, whilst preserving the predominance of A1 use classes:

Centre Definition	Defined Centres	Linked Policies
Regional Centre	Brighton	DA1, SA2
Town Centres	Hove	
	London Road	DA4
District Centres	St James's Street	
	Lewes Road	DA3
	Boundary Road/Station Road	DA7
	Brighton Marina	DA2
Local Centres	Mill Lane, Portslade Portland Road, Hove 'The Grenadier', Hangleton Road Richardson Road, Hove Eldred Avenue, Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George's Road, Kempdown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell's Vale, Saltdean Longridge Avenue, Saltdean	SA6 (all centres)

The performance of existing centres will be monitored by the Council and this might result in a centre being moved higher or lower in the hierarchy; an amendment to an existing centre boundary; or, in the larger centres, a change to the defined prime retail frontage within that boundary.

New centres may come forward; particularly local centres in currently underprovided for areas (see SA6 Sustainable Neighbourhoods). Any change to the boundary, role or status of a centre, or a proposed new centre, will be brought forward through Development Plan Documents and not the planning application process.

Brighton Regional Shopping Centre should be the focus for future significant retail development (see policy DA1 and SA2). Consistent with the 'Character Areas' defined in policy SA2, major retail developments in Brighton Regional Centre should provide for a mix of small and large unit retail floorspace to cater for both national retail occupiers and the demands of smaller independent and local traders.

Applications for new retail development within the boundaries of Brighton & Hove's defined shopping centres will be permitted subject to the consideration of scale and mix of uses. Detailed policies regarding the appropriate mix of A1 and non A1 uses will be set out in the Part 2 of the City Plan.

Applications for all new edge and out of centre retail development will be required to address the tests set out in national policy¹³⁸. Applications will be required to complete an impact assessment at a locally set threshold¹³⁹ of 1,000 sqm (gross) floorspace or more.

Additional retail sites and proposed changes to retail centre boundaries will be allocated and/or amended in Part 2 of the City Plan.

Supporting text

4.41 Brighton & Hove has a wide variety of shopping centres. In addition to these defined centres, there are numerous small local shopping parades and individual 'corner' shops. It is important that Brighton & Hove's shopping centres and local neighbourhood shopping facilities remain vibrant, attractive and accessible. Our larger centres have wider roles than just shopping destinations, functioning also as places to work, live, visit, spend leisure time and access transport services (see also policies SA6 and CP5).

4.42 Brighton Regional Centre includes the city's most significant retail offer. The combination of shopping opportunities in both the large stores in Churchill Square and the small independent units in The Lanes and North Laine give Brighton a unique character, which is integral to its attraction as a major tourist destination. SA2 Central Brighton recognises the different but interconnecting shopping identities that make up the Regional Centre; Churchill Square/Western Road, Western Road (the secondary retail frontage that runs from Montpelier Road to the east and Holland Road to the west including Brunswick Town), Queens Road/West Street, Old Town including the Lanes/ Duke Street/ East Street; the North Laine and North Street.

4.43 The city has an established hierarchy of shopping centres and the council is committed to ensuring that these existing shopping centres remain the focus for new retail development, which is appropriate to their role and function. A sustainable mix of A1 retail and non-A1 uses will be supported in these shopping centres. Detailed policies regarding the appropriate mix of A1 and non A1 uses will be set out in Part 2 of the City Plan (Development Policies and Site Allocations DPD). A major priority is to safeguard and enhance Brighton Shopping Centre as a primary Regional Centre and this is addressed in DA1 Brighton Centre, and Churchill Square and policy SA2 Central Brighton.

4.44 The Brighton & Hove Retail Study Update (2011)¹⁴⁰ has reviewed the vitality and viability of each of the shopping centres. The Study does not recommend that any new centres need to be designated but recommends that the District Centre designation for Brighton Marina should be removed. The Council's preferred approach for Brighton Marina

¹³⁸ The Draft National Planning Policy Framework July 2011

¹³⁹ The Draft NPPF states that local authorities can set their own locally set floorspace threshold for the requirement of impact assessments

¹⁴⁰ Brighton & Hove Retail Study Update 2011

is to maintain its designation as a District Centre and to continue to address the development and future uses at this location using site specific policy DA2.

4.45 The importance of a balanced network of local centres to facilitate access to food produce and key services on foot or by public transport is addressed in the policy SA6 Sustainable Neighbourhoods.

4.46 The Retail Study identifies capacity for new food and non-food retail floorspace to the period 2030¹⁴¹. In accordance with Government policy the council will prefer to direct retail applications to the town centre in the first instance and then edge of centre locations. Only if suitable sites are not available will out of centre sites be considered. Impact assessments will be required as a locally set threshold for proposals of 1,000 sqm net or more not within the town centre.

Table 6 Estimated Retail Need

Retail Study Update (2011)	2011	2016	2021	2026	2030
Comparison Floorspace (Sqm Net)	-4,476	25,259	36,283	47,689	58,313
Convenience Floorspace (Sqm Net)	-1,325	-2,281	-534	1,260	2,967

Retail Study Update 2011: Capacity identified 2011-2030

4.47 Any proposal in an edge or out of centre location must demonstrate that it meets the full requirements of national planning policy. The Retail Study 2011 identifies that there is additional capacity for comparison goods floorspace and recommends that this capacity should be directed into the redevelopment of the Brighton Centre and Churchill Square (DA1). Applications for additional comparison retail will be determined on their demonstration to satisfy the tests of national planning policy and on their impact on the delivery of the Brighton Centre and Churchill Square redevelopment.

4.48 The defined shopping centres will be regularly monitored to ensure that the hierarchy remains balanced, appropriate and representative. Regular monitoring will also determine whether it is appropriate to alter the boundaries of the centre, depending on changing retail characteristics and demand. Monitoring should include regular updates of the Brighton & Hove Retail Study, and annual audits of the defined shopping centres. On completion of the redevelopment of the Brighton Centre and Churchill Square the council will extend the designation of the prime retail frontage to include the retail elements of the scheme.

¹⁴¹ Brighton & Hove Retail Study Update 2011, Table 4.1 and 4.2

CP5 Culture and Tourism

The council will work with partners to maintain and enhance the cultural offer of the city to benefit residents and visitors. It will support the role of the arts, creative industries and sustainable tourism sector in creating a modern and exciting visitor destination with a range of high quality facilities, spaces, events and experiences.

1. New visitor attractions, arts and festival events will be expected, where appropriate to comply with the requirements of national planning policy¹⁴² and:

- be of a high environmental standard in terms of design, management and access;
- complement and build on the city's distinct tourism offer;
- reduce seasonality;
- promote diversity;
- widen local access;
- support the regeneration of the city; and
- be accessible by public transport.

The council will support the retention, upgrading and enhancement of existing visitor facilities to meet changing consumer demands and high environmental standards in terms of design, management and access;

2. Recognising the role of the South Downs as a visitor, education and recreation asset, the council will work with the National Park Authority, adjoining authorities and Tourism South East to promote eco-tourism and create a stronger visitor experience (see SA4 Urban Fringe and SA5 The South Downs);

3. The provision of affordable and appropriate arts and creative industries work space and creation, storage, performance, showing and rehearsal space will be promoted in regeneration schemes and in major mixed use developments across the city;

4. Existing arts and performance venues including; museums, art galleries, cinemas, live music venues, theatres and exhibition space will be protected and enhanced to maintain the city's cultural infrastructure. Proposals for change of use would need to demonstrate;

- a) availability of adequate provision elsewhere in the city, and;
- b) that the existing use was no longer viable or could no longer be sustained on a long-term basis;
- c) or that change of use was the only practicable means of preserving a listed building;

5. The council will support investment in spaces suitable for outdoor events and cultural activities that take place in the public realm and the enhancement and retention of existing public art works;

6. The council will support the temporary use of vacant commercial buildings for creative industries, arts and cultural sector.

¹⁴² The National Planning Policy Framework defines main town centres uses to include culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Supporting Text

4.49 Tourism is inextricably linked to the cultural life of the city and the historic built environment. Brighton & Hove is one of Britain's leading and established visitor destinations with an approximate 8m tourist visitors per year and an estimated £732 m visitor spend in 2009¹⁴³. The city has a strong cultural and creative industries sector and is home to several arts and creative industries organisations of regional and national importance¹⁴⁴. The city has a reputation as a 'producing' city where innovative and quality new works and products are exported worldwide and it serves as a cultural hub for the region. The City hosts the largest arts festival in England (which brings £20m into the local economy each year¹⁴⁵) as well as many other major arts festivals and community festivals. Regency Brighton is regarded as a nationally significant historic built environment.

4.50 The tourism industry has been successful in responding to changing markets, tastes and style and the city has seen nearly a decade of steady investment in its tourism product. If Brighton & Hove is to remain competitive as a tourist destination, it needs to develop unique visitor attractions and experiences. A well-planned, sustainable and prosperous tourism industry is a catalyst for improving the environment of the city and the wellbeing of its people. The Tourism Strategy highlights specific products where there is real potential for growth and therefore increasing the economic value of the visitor economy; these are health & activity; culture & heritage, events & attractions, business conferences; film & television and architecture & the built environment. The Council will support improvements to existing facilities and seek the highest standard from new tourism proposals and ensure they accord with the council's long-term vision for the city's tourism industry as set out in the Tourism Strategy¹⁴⁶ and its four guiding principles¹⁴⁷ and any subsequent tourism strategy.

4.51 Business tourism is vital for the city's success. Business events such as conferences, meetings and exhibitions bring Brighton & Hove year-round, higher spending visitors, ensuring the city's tourism industry invests in quality improvements and staff. The role of technology in the tourism, conferencing and business sectors is recognised as important in growing the economy of the City and encouraging business visitors. As such there is a commitment to seek delivery of next generation broadband access networks and improvements to access (see CP2).

4.52 As well as enjoying the seafront, leisure visitors come to the city to shop, eat out, and enjoy culture, the built heritage, entertainment and nightlife. The city has tapped into the growing short break and cultural tourism markets, still mainly at weekends, but this extends beyond the summer into the spring and autumn. It is also important to recognise the importance of the city's natural environment as a tourism asset and other areas of the city attractive to visitors. The Tourism Strategy identifies six tourism places across the city with a

¹⁴³ The State of the City Report 2011.

¹⁴⁴ Creative Industries Workspace Study 2008

¹⁴⁵ Tourism Strategy 2008: A refreshed strategy for the visitor economy 2008/2018. (page 10)

¹⁴⁶ The Refreshed Tourism Strategy 2008 has set out a vision that by 2018, Brighton & Hove will be a destination where the needs of the visitor, the tourism industry, the community and the environment are in complete balance and consequently will make a significant contribution to improving the quality of life for local people.

¹⁴⁷ The Tourism Strategy 2008 sets out four guiding principles to take the vision forward: investment in infrastructure & physical environment; sustainable & responsible tourism; improving quality & raising standards and partnership & consultation.

specific character and role when visitors come to the city¹⁴⁸ and this has been addressed in the City Plan Part 1 through DA1- 5 and SA1- SA5. With only three miles between the sea and the South Downs at the widest point there is the potential for the city to become one of the UK's leading destinations for eco-tourism, reflecting the growing maturity of the city as a tourist destination and the need to create a stronger visitor experience between the city and the South Downs.

4.53 Developing and promoting culture is a key way of attracting valuable off-peak visitors but also supports regeneration and sustainable communities. Recent investment by the Arts Council, SEEDA and Lottery funding for venues such as the Brighton Dome, Brighton Museum and Art Gallery have helped to establish a critical mass of cultural development around the Royal Pavilion and Dome (see SA2 Central Brighton). However the arts and cultural sector can also be found across the city including public art, open studios, retail galleries and exhibitions, street theatre and free arts events and festivals.

4.54 Brighton & Hove is the creative powerhouse of the region and has the potential to become a national cultural leader¹⁴⁹. It is important that the city's existing cultural infrastructure (arts, performance and creation space) is protected and enhanced. Examples include the Old Market in Hove and the Hippodrome in Brighton. To maintain the potential for a wide variety of arts and cultural uses existing venues (including stand-alone venues, those that are part of other facilities, or are contained within educational or community buildings) will be protected for their existing use or potential for such use. Proposals for change of use would need supporting documentation to demonstrate availability of adequate provision, equally as accessible by the community, elsewhere in the city and that the existing use was no longer viable or could no longer be sustained on a long-term basis (through marketing information, a business case, and information on the availability of funding).

4.55 Opportunities for continued investment in cultural provision for the city and new creative industries workspace have been identified, where appropriate, in Development Area and Special Area proposals. This will help meet the significant forecast demands for new workspace over the next ten years¹⁵⁰ and support the commitments in the council's Cultural Strategy¹⁵¹. Further opportunities will be sought through site allocations in the City Plan part 2, or SPDs or development briefs prepared for regeneration schemes and major mixed use developments across the city.

4.56 The role of iconic buildings such as the Royal Pavilion to the attractiveness of the city as a visitor destination is recognised and the importance of culture to the city's environment, image and prosperity is reflected in many of the City Plan policies. These include CP12, CP13 and CP15 relating to high quality design and improving the public realm and heritage, seafront regeneration proposals (see SA1 The Seafront), regenerating the Valley Gardens (see SA3 Valley Gardens), maintaining and enhancing the role of central Brighton including supporting the Cultural Quarter (see SA2 Central Brighton) and through the major

¹⁴⁸ They are gateways to the city (in particular railway and coach stations but also the Lewes Road, London Road); the Seafront; Neighbourhoods (Kemptown, central Hove and Brunswick); The Downs & Villages (South Downs and Stanmer, Rottingdean); Central Brighton Retail areas (The Lanes & North Laine); Parks & Open Spaces (Preston Park, The Level, Pavilion Gardens)

¹⁴⁹ Brighton & Hove City Council Cultural Strategy 2009

¹⁵⁰ Creative Industries Workspace Study 2008

¹⁵¹ See footnote 10.

development opportunities identified at Brighton Marina, Gas Works and Black Rock (DA2) and the Brighton Centre and Churchill Square redevelopment (DA1).

CP6 Visitor Accommodation

To support the city's tourism and business conference economy the council will support the provision of a sufficient and wide ranging type and cost of visitor accommodation:

- 1. Proposals for new hotel accommodation¹⁵² will be assessed in line with the national planning policy framework and the sequential approach¹⁵³ to site selection with proposals for new hotel development directed firstly to central Brighton (SA2).**
- 2. Proposals for new hotel accommodation are encouraged to be accompanied by an impact assessment to identify how the proposal would add to and impact on the current supply and offer of accommodation; whether it has the ability to create new demand and how it might meet needs currently unsatisfied in the city.**
- 4. The council will work with the hotel industry to encourage the creation of apprenticeship schemes/ local jobs.**
- 6. Proposed extensions to existing hotels will be supported where this is required to up-grade existing accommodation to meet changing consumer demands.**
- 7. Partial conversion of a hotel will be considered where there is adequate demonstration of the need to enable investment in the remaining hotel.**
- 8. The council will safeguard existing hotel and guest house accommodation that fall within the defined Hotel Core Zone. Applications for change of use of existing hotel and guest accommodation within the hotel core zone will need to demonstrate that:**
 - a) The accommodation is no longer viable; and**
 - b) Alternative types of visitor accommodation are not viable;**

Supporting text

4.57 It is vital that Brighton & Hove is able to support its tourism and business conference economy by providing a sufficient and wide ranging type and cost of accommodation to cater for visitors. The city's hotel stock has largely kept pace with changing customer expectations in response to year round business from conference delegates as well as "off-peak" custom from the short break market. The Tourism Strategy (2008) recognises that good quality hotels help support a strong conference business offer for the city.

4.58 The city has a significant stock of hotel and guest accommodation; a total of 160 hotels and guest accommodation predominantly located in central Brighton and along the seafront. The council undertook a capacity and needs analysis of hotel bedspaces in the city to understand the future capacity of the city to absorb new hotel accommodation (2007 Hotel Futures Study). Since the study was completed 3 new hotels have come into operation (Jury's Inn, MyHotel and Royal York hotel) adding 365 bedspaces. Furthermore there is the potential for an additional 372 bedspaces through outstanding planning commitments. This

¹⁵² Good Practice Guide on Planning for Tourism (2006) identifies several types of hotel accommodation: major hotels, other hotels, budget hotels, motels and travel lodges

¹⁵³ As set out in NPP4 paragraph 24.

would represent a significant increase in the total supply of serviced accommodation. The study indicated that much of the long term future growth in demand for the additional accommodation is likely to relate to a redevelopment of the Brighton Centre.

4.59 So whilst there remains continued interest in new hotel development in the city, the 2007 Hotel Futures Study projections for future requirements for hotel development indicate that the council does not need to identify additional hotel sites over and above that which were already proposed/ planned to 2016 nor does it need to prioritise specific types and standards of hotel in terms of hotel investment marketing. There is a concern in the short term with potential over-supply in hotel accommodation which could have a negative impact on the city's accommodation offer, its uniqueness being the range and type of independent hotel operators in particular the strength of the boutique hotel sector.

4.60 Therefore given the amount of new hotel development planned, and the constraints in identifying future sites, a more generic 'sequential approach' that directs new hotel proposals firstly to the central Brighton area will be used. This approach is the most sustainable in planning terms, since it allows greater access by public transport and will allow visitors to easily access other facilities and attractions in central Brighton. Given the potential for oversupply in the short term the council will encourage an impact assessment to be undertaken to support applications for new hotel accommodation to ensure that the city is able to support additional bed spaces without a significant impact in existing hotels and guest houses. Ongoing monitoring of hotel developments will inform the implementation of this policy.

4.61 It is recognised that there may be the potential to locate new development outside central Brighton either for a destination offer or to permit a hotel to serve a particular market, or potentially to help regenerate an area but national planning policy requirements for an out of centre location will need to be fully addressed.

4.62 A managed approach to existing hotel and guest accommodation follows the recommendations in the 2007 Hotel Futures Study. A defined hotel core zone, as shown on the proposals map, will relate closely to the main generators of demand and will ensure that key areas of the city centre are not compromised in their role as accommodation clusters. The redefined hotel core zone¹⁵⁴ provides a clear and visible sign of the core accommodation areas that support the city's tourism industry. An evidence based approach towards determining change of use applications within the hotel core zone is required to ensure accommodation continues to be protected unless it can be demonstrated that it is no longer viable.

4.63 In line with guidance advised by Tourism South East, evidence will need to be provided by the applicant of the efforts to sell the business as a going concern, its business performance related to national average occupancy levels and market analysis of the supply of accommodation in the city.

4.64 Applications for change of use will also need to be accompanied by:

- Proof of marketing for sale – as a going concern for a minimum period of 12-18 months at competitive prices;

¹⁵⁴ This has been revised since the 2005 adopted Local Plan and is shown on the updated Proposals Map.

- Evidence of business performance – details of occupancy and achieved occupancy rate data for the last three years along with accounts to explain how the business is performing in line with levels of occupancy typical of industry/ destination norms;
- Evidence of professional management – this includes details of marketing and business plans for the last three years to demonstrate investment plans and attempts to attract business;
- Evidence of attempts to save the business – for example, details of schemes to up-grade and re-position the business, partially convert to an alternative use in return for investment in the remaining rooms, and conversion to self-catering, as appropriate, with costs and performance forecasts and advice sought from by business support agencies and hotel advisors.

4.65 The policy also supports the up-grading of existing accommodation, including the addition of appropriate facilities such as spas and health clubs. It is also recognised that there may be some circumstances where there may be a case to be made for the partial conversion of a hotel to, for example, residential/ apartments, to enable investment in the remaining hotel. Applications will need to be accompanied by a clear evidence of the case for investment, the need for enabling development and the on-going viability of the accommodation. As a minimum 50% of the hotel rooms/ floorspace should remain.

CP7 Infrastructure, Community Infrastructure Levy (CIL) and Planning Obligations

To meet the needs of Brighton & Hove and the wider sub-region the council will work with partners to ensure that the necessary social, environmental and physical infrastructure is appropriately provided in time to serve the development. This will be achieved through the following:

- 1. Preparing, regularly updating and facilitating the implementation of an Infrastructure Delivery Plan¹⁵⁵ for the city that will set out the infrastructure to be provided in the city by infrastructure partners including the public sector and utilities, to meet future needs.**
- 2. Implementation of a locally adopted Community Infrastructure Levy (CIL)¹⁵⁶ that will provide for wider infrastructure and neighbourhood needs with contributions that will deliver general infrastructure to support area development.**
- 3. Contributions from CIL will relate to all aspects of land use, community infrastructure and services that may be affected by development and which accord with the council's identified local priorities and objectives identified in the Infrastructure Delivery Plan**
- 4. The cumulative impact of all development and differing needs for infrastructure provision and appropriate community needs for delivering sustainable neighbourhoods will be reflected in the CIL tariff.**
- 5. To make development acceptable and enable the granting of planning permission, inadequacies in infrastructure arising from proposed development will be required to be mitigated through planning obligations via a legal agreement and will be sought where they meet the statutory tests of being:**
 - Necessary to make the development acceptable in planning terms;**
 - Directly related to the development; and**
 - Fairly and reasonably related in scale and kind to the development.**

Supporting Text

4.66 To ensure the best for the city from all development, the council will ensure the provision of adequate physical, social and environmental infrastructure. Contributions will be required towards such adequate and effective provision that may provide for new or upgraded city wide infrastructure provision or to ensure that development functions appropriately in its surroundings. Development that is liable to contribute to CIL will provide for city wide general infrastructure as identified in the Infrastructure Delivery Plan for creating sustainable neighbourhoods as a whole. To mitigate site specific circumstances, contributions secured through Planning Obligations legal agreement at the time of granting planning permission will provide appropriate contributions to ensure that the impact of new development is minimised as well as improving the quality of our built environment.

¹⁵⁵¹⁵⁵ See Annex 2, Infrastructure Delivery Plan.

¹⁵⁶ Community Infrastructure Levy (CIL) will be adopted in 2013

Therefore Planning obligations will remain for detailed site impacts and some infrastructure requirements where not covered by CIL.

4.67 The policy as set out above accords with current Government guidance in the Community Infrastructure Levy Regulations April 2010 - as further amended April 2011. The policy tests for planning obligations have been made statutory in the CIL Regulations and require that development that is capable of being charged CIL must meet all of the policy tests set out in the CIL Regulations. The requirement for development to contribute towards necessary physical and social infrastructure and environmental benefits is also highlighted in the detailed proposals for each of the City Plan Development Areas. It is important that all priorities in the relevant areas are adequately considered. Priorities will also derive from key strategic objectives or key local needs identified in other strategies, plans and commissioned studies.

4.68 The range of infrastructure and service provision that may be supported by CIL or where contributions may be sought will include:

- Affordable housing, including accessible and life-time homes
- Sustainable transport measures that will include initiatives to encourage use of public transport, walking and cycling
- Employment and regeneration initiatives including securing local employment, training and apprenticeship
- Biodiversity, countryside and open space including access and interpretation facilities
- Sustainable development, efficiency measures, including renewable energy, reducing carbon footprint and air quality management measures
- Sports, recreation, youth facilities, play space and amenity space
- Highways infrastructure and access provision
- Local utility infrastructure, including water provision, wastewater treatment and drainage
- Education and learning including schools and libraries
- Flood-risk prevention measures
- New/replacement community rooms and mixed use facilities
- Tourism, culture and heritage
- Reducing crime, policing and community safety
- Public Art including public realm, and environmental improvements
- Social services, health and well being
- Design & conservation of historic buildings

4.69 If required a Planning Obligations Supplementary Planning Document (SPD) will be produced that will provide further guidance on the necessary contributions that may be required to support new development.

Part 4

City Wide Policies

A Sustainable City

CP8 Sustainable Buildings

The council will require all development to incorporate sustainable design features to avoid expansion of the city's ecological footprint, help deliver radical reductions in greenhouse gas emissions, particularly CO₂ emissions and mitigate against and adapt to climate change.

Unless it can be demonstrated that doing so is not technically feasible and/or would make the scheme unviable:

1. All development will be required to achieve the minimum standards as set out below, or equivalent standards from a quality assured scheme;

2013-2016 NEW BUILD	Development size		
	Non-major	Major	Greenfield
Residential Code for Sustainable Homes	Level 4	Level 5	Level 6
Non-residential BREEAM	Excellent	Outstanding	
CONVERSIONS	Non-major 1-2 units	Non-major 3-9 units	Major
Residential	-	BREEAM Very good	

Revised standards beyond 2016 will be set in other DPD documents and/or a review of this policy.

2. All development proposals including conversions, extensions and changes of use are required to demonstrate how the development:

- a. addresses climate change mitigation and adaptation;
- b. contributes to a reduction in the city's current level of greenhouse gas emissions by delivering significant reductions in fuel use and greenhouse gas emissions via: passive design; fabric performance; energy efficiency measures; incorporation of on-site low or zero carbon technologies and networks¹⁵⁷;
- c. aspires towards water neutrality¹⁵⁸ by meeting high water efficiency standards and incorporating facilities to recycle, harvest and conserve water resources;
- d. makes the most effective use of land and re-uses existing buildings;
- e. protects occupant health and the wider environment by making the best use of site orientation, building form, layout, landscaping and materials to maximise natural

¹⁵⁷ Technologies that harness non fossil fuel energy to create heat or generate electricity, i.e. sun, wind, and water. They are called zero carbon because they produce no carbon dioxide (CO₂) emissions when producing heat or power. These are also referred to as 'renewable' energy sources (solar thermal, photovoltaic's, wind turbines, hydropower and combined heat and power using renewable fuels such as biomass, biodiesel or renewable gas). These technologies are sometimes referred to as micro generation, producing heat or energy locally on a small scale.

¹⁵⁸ SEERA's 'Sustainability Appraisal Sounding Board' water neutrality is where 'for every new development, total water use ... after the development [is] equal to or less than total water use ...before the development'.

- light and heat, whilst avoiding internal overheating by providing passive cooling and ventilation;
- f. reduces 'heat island effect'¹⁵⁹ and surface water run-off;
 - g. uses sustainable materials¹⁶⁰;
 - h. enhances biodiversity;
 - i. minimises waste and facilitates recycling, composting and re-use;
 - j. reduces air and water pollution;
 - k. maximises operational efficiency through ongoing evaluation, monitoring and improvement of building performance especially in relation to energy and water use;
 - l. introduces means to encourage users, tenants and householders to reduce their ecological footprint;
 - m. is adaptable to respond to changing needs; and
 - n. encourages food growing.

When onsite sustainability standards cannot be met mitigation measures may be sought, including those in accordance with Policy CP7 Infrastructure and Developer Contributions.

The Sustainability Checklist and the Annual Monitoring Report (AMR) will be used to assess planning applications, monitor the effectiveness of the policy and inform the council of revised standards over the plan period.

Supporting text

4.70 The way in which we design, construct, operate and decommission buildings has significant impacts on the built and natural environment and requires major resource inputs such as energy, water and materials. Designing and constructing buildings that help to reduce or avoid adverse impacts can reduce not only resource inputs and the city's ecological footprint but also costs for developers and occupants. As such, raising standards of sustainable building design and construction in new and existing buildings is an essential part of the City Plan's response to the challenges of climate change, natural resource depletion, energy security, habitat loss, and wider environmental issues.

4.71 Brighton & Hove is particularly vulnerable to the impacts of present and future climate change. Opportunities for growth and expansion are constrained by the South Downs to the north of the city and the sea to the south. The city also contains a high proportion of protected and/or old buildings¹⁶¹. Within this context, the need to secure improvement in the environmental performance of the existing stock as well as more resource efficient and carbon neutral development is particularly challenging. The standards set out in this policy

¹⁵⁹ On hot days urban areas can have temperatures 20 to 60% higher than the surrounding countryside. This is due to a phenomenon called the urban heat island effect that causes air temperatures in large cities to be warmer than in neighbouring suburbs and rural areas. Warmer air temperatures can impact on air quality, public health and the demand for energy.

¹⁶⁰ These include materials that are produced locally where possible, procuring materials sustainably and ethically, and seeking to avoid materials which are polluting or with high embodied carbon and energy inputs;

¹⁶¹ 17.4% of the city's built up area is within conservation areas. The proportion of stock built before 1919 and during the inter-war period is 43.4% for England and 65.7% for Brighton & Hove (Brighton and East Sussex Together House Condition Surveys – Overview Report October 2008).

are commensurate with the scope of this challenge. Energy, water and waste have been identified as key resource issues of particular concern in relation to growth in the city¹⁶².

4.72 The City Plan reflects the council's and the city's commitment towards achieving excellence in sustainable building design and pioneering the delivery of zero carbon development in particular. The purpose of this policy is to ensure development in Brighton & Hove fulfills this commitment whilst helping deliver European, national and Sustainable Community Strategy targets¹⁶³. As such, all development are expected to contribute to City Plan's vision for energy, water and waste neutral, high-standard, cost-effective, resource-efficient future and the development of a low carbon economy for the city. A City Energy Study will identify opportunities for delivery of energy infrastructure and inform planning policies around low and zero carbon energy particularly for Development Plan and Supplementary Planning Documents.

4.73 The council's approach to deliver carbon neutral growth is through highly energy efficient buildings which incorporates low and zero carbon (LZC) energy generation on site¹⁶⁴ and connections to existing or planned local energy infrastructure. Energy efficient design is an essential element of the excellence in design envisioned in the City Plan being the most cost-effective, efficient way of reducing carbon emissions from buildings (focusing on building fabric, orientation, layout, insulation, natural light, solar gains and shading, and passive ventilation). Once the demand for energy has been reduced to a minimum in a building the next step is to supply energy efficiently via renewable and low carbon energy and connection to decentralised energy systems¹⁶⁵.

4.74 The Building Research Establishment Environmental Assessment Method (BREEAM) and the Code for Sustainable Homes (CSH) are widely recognised, accredited, independent methods for assessing environmental performance of non-residential and residential buildings, respectively. These tools will be used to support policy decision making because they cover a wide range of sustainability issues within a simplified score that provides flexibility for developers in meeting standards set in this policy. Successors to these tools and/or equivalent standards by nationally recognised certification bodies may also be accepted¹⁶⁶.

¹⁶² The latest data (2009) indicates that activities in Brighton & Hove emit about 1,230 kilo tonnes (1.2m tonnes) million tonnes of CO₂ every year, with the domestic sector alone accounting for 42% of total direct emissions (mostly from energy use), significantly higher than 31% regionally and 30% nationally. The city is within a 'highly water stressed' region (Environment Agency) with above regional average per capita consumption (South East average 150-160 litres per person per day (l/p/d); Brighton & Hove's is 169 l/p/d – Audit Commission). At present, the bulk of Brighton & Hove's untreated waste is disposed to landfill.

¹⁶³ The Brighton & Hove Sustainable Community Strategy commits to reducing the city's carbon emissions by 42% by 2020 and by 80% by 2050 from the 2005 baseline of 5.7 tonnes per person. It also commits to, 'from a starting point of no increase in 2012/13 on the 2006 per capita City Ecological Footprint baseline of 5.72 global hectares (gha) per person, achieve a reduction to: 2.5 gha per person by 2020; and 1.25 gha per person by 2050'. Commitment to delivering these targets are further detailed in the city's Climate Change Strategy.

¹⁶⁴ Zero carbon technologies harness non fossil fuel energy to create heat and generate electricity (e.g. wind, sun and water). Low carbon technologies use grid electricity or mains gas to generate heat or power more efficiently or use fuels that have small CO₂ footprint (e.g. biofuel).

¹⁶⁵ Decentralised energy generation is a series of local systems generating heat and power, at or near the point of use, connected to local distribution networks.

¹⁶⁶ Such as Passivhaus or AECB standards.

4.75 An assessment of the energy demand and carbon dioxide emissions will be expected from proposed major developments, which should demonstrate the expected energy and carbon dioxide emission savings from energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP and community heating systems. The assessment should include:

- calculation of baseline energy demand and carbon dioxide emissions
- proposals for the reduction of energy demand and carbon dioxide emissions from heating, cooling and electrical power
- proposals for meeting residual energy demands through sustainable energy measures; and
- calculation of the remaining energy demand and carbon dioxide emissions.

4.76 The National Home Energy Rating (NHER), Standard Assessment Procedure (SAP), Energy Performance Certificates (EPC) and Simplified Building Energy Model (SBEM) and other recognised, certified energy and carbon assessment procedures will be used to assess building performance and quantify emissions.

4.77 Standards set in this policy reflect the types of development that are expected to come forward across the city. Rather than an inflexible blanket policy for all development, standards are set specifically by development type and size, see Table 7 below.

Table 7 - Definition of Development Size

Development size	Definition
Non-major New residential and/or mixed use; residential extensions, conversions and changes of use; retail and other development	1-9 residential units; retail 151-999 sq m; or other development 236 sq m – 1000 sqm..
Major New residential and/or mixed use developments. Retail and other development.	10 or more residential units; other development over 1,000 sq m; or development on a site of 0.5ha or more.

4.78 More is asked of larger, new build and Greenfield types of development as these tend to benefit from economies of scale and easier, cheaper ways in which sustainable design and construction features can be designed in. A growing number of flagship schemes in the UK¹⁶⁷ and in Brighton & Hove¹⁶⁸ have demonstrated the viability of such developments. In order to provide clarity and flexibility for developers, criteria for considering instances where compliance with standards may not be possible as well as opportunities and mechanisms for mitigation are identified. In assessing technical feasibility and/or viability the council will consider site constraints, technical restrictions; financial viability and the delivery of additional benefits to the city. Given the contextual nature of these issues, the council will expect developers to make a case on a site by site basis.

4.79 The challenge to reduce the ecological footprint of the city means that there is a need to for the council and planning applicants to identify opportunities for improving standards in retrofitting the existing stock. Measures should be implemented which lower the

¹⁶⁷ See Homes and Communities Agency's Carbon Challenge website.

¹⁶⁸ A number of high standard developments have already been achieved under the 2005 adopted Local Plan policy SU2.

environmental impact from the existing stock through reuse and refurbishment of buildings, reducing carbon dioxide emissions and fossil energy use, increasing thermal efficiency, reducing waste and noise impacts, and conserving water, materials and other resources.

4.80 While the standards set in this policy are central to the delivery of sustainable buildings in Brighton & Hove, there are other aspects of sustainability that are integral to sustainable design and construction. These are also outlined in the latter part of the policy. Developments will, where appropriate, be required to demonstrate how sustainability has been addressed by submitting a completed Sustainability Checklist. An Energy Statement and other relevant information may also be needed as part of an application.

4.81 This policy has important links with CP12 Urban Design.

CP9 Sustainable Transport

The council will work with partners, stakeholders and communities to provide an integrated, safe and sustainable transport system that will accommodate new development; support the city's role as a sub-regional service and employment hub; and improve accessibility.

It will promote and provide measures that will help to manage and improve mobility and lead to a transfer of people and freight onto sustainable forms of transport to reduce the impact of traffic and congestion, increase physical activity and therefore improve people's health, safety and quality of life.

A. Implementing the city's Transport Strategy to manage, maintain and improve travel and movement.

1. Regional - Support and manage the role of the city as a sub regional centre for jobs, shopping, tourism and services by:

a. Working with adjoining authorities, the Highways Agency, businesses and public transport operators to improve and provide cross-boundary sustainable transport links.

b. Promote and facilitate better use of existing large car parks on the periphery of the city and transfer journeys onto existing and improved bus and rail services through partnership working with public transport providers, businesses/landowners and adjoining authorities.

2 Local - Ensuring the priorities of the Transport Strategy are delivered within the city by:

a. Directing significant development into areas with good sustainable transport links and ensuring that major development will be located in areas where measures can be taken to secure accessibility improvements for all (see DA1-DA8 Development Areas). Sustainable transport measures will be focused into these areas.

b. Improving access to significant uses, facilities and services by supporting or providing sustainable transport measures (public transport, cycle and walking), better public realm and improved safety.

c. Ensuring that all new, major development schemes submit a Transport Assessment to identify the likely effects of the demand for travel they create and include measures to mitigate their impacts by reducing car use and making appropriate contributions towards sustainable transport measures (see CP7 Infrastructure, Community Infrastructure Levy and Developer Contributions).

d. Working with communities to identify priorities for improved public realm, safer areas (e.g. child-friendly streets) and sustainable transport improvements (see SA6 Sustainable Communities).

B. The following transport measures will be undertaken to manage the demand for travel within and to/from the city, and deliver the Transport Strategy priorities.

1. Bus, Coaches and Taxis

Implement strategic bus network investment including priority lanes on key routes into and across the city. Priority routes are:

- **Lewes Road (A270)**
- **Edward Street and Eastern Road**
- **A259 Seafront serving Brighton Marina, Brighton Centre and Shoreham Harbour Development areas.**
- **London Road**

Ensure that sustainable transport infrastructure is in place to enable the introduction of rapid/express bus-based services with both east-west and north-south routes, by 2024.

2. Rail

Work with partners to:

- **improve capacity and efficiency of rail services, particularly at weekends; and**
- **promote transfer of journeys from car to rail by encouraging visitors to use station parking facilities and travel into the city by train.**

3. Cars and Freight

Work with communities and partners to promote and provide measures including :

- **traffic management measures including Intelligent Transport Systems that will improve traffic flow and reduce congestion;**
- **prepare and implement a Highways Asset Management Plan;**
- **car clubs;**
- **20mph zones in residential areas; and**
- **promote use of alternative fuels and provide associated equipment, e.g. electric charging points.**

Prepare and implement a Freight Strategy for the city.

4. Walking and Cycling

Improve the public realm in key areas to encourage walking and cycling. Measures will be undertaken in the following areas:

- **Valley Gardens**
- **Station Gateway**
- **Lewes Road**
- **London Road**
- **Edward Street and Eastern Road**
- **Old Shoreham Road**
- **A259 Seafront**
- **Seven Dials**
- **Hove Station**
- **Pool Valley**
- **Local shopping areas**

Implement an integrated cycle network by 2030.

Promote cycling and walking as ‘active travel’ by providing advice and information to residents, worker and visitors to the city.

Improve Rights of Way and access to open spaces and the National Park.

5. Travel Plans

Working with partners to increase and implement travel and mobility management measures to encourage more journeys by sustainable transport to reduce the number of car journeys to/from and within the city. Measures will include:

- **school travel plans; and**
- **workplace travel plans.**
- **personalised travel planning**

6. Parking

Co-ordinate the provision of public parking and traffic management measures across the city through an integrated approach to car parking charges, car park improvements, (including signing and information), controlled parking zones and ensure that capacity of public car parks is not increased in central areas.

Prepare new guidance on parking and servicing requirements for new developments that will put a priority on minimising off-street parking provision and establishing clear criteria for car-free housing.

Prepare and implement a strategy to manage coach parking.

Supporting Text

4.82 Brighton & Hove is a popular city to work, live and visit. It is a compact and historic city and is ranked as the fifth most densely populated area in the region. Road and rail links into the city have been determined by geography of the area with the main links from the north being the A23 and north-south rail link to London. The main east-west links are the A27 bypass, the A259 coast road and the Coastway rail links.

4.83 To ensure that Brighton & Hove continues to be attractive and thrive in the context of a growing population, more development and jobs it is important to maintain and improve travel and access into and within the city whilst providing a safe, (clean) and healthy environment. To help achieve this, the Transport Strategy for the city, adopted in May 2011, has the following priorities:

- support economic growth;
- reduce carbon emissions;
- promote equality and opportunity;
- improve safety, security and health; and
- increase quality of life.

4.84 The council's third Local Transport Plan [LTP3] provides a policy framework for capital investment in schemes and measures to maintain roads, pavements, street lights and street furniture; manage and provide increased transport choices; and improve access, infrastructure and the environment, with a focus on reducing pollution and carbon

emissions. The LTP3 sets out a 15 year Strategy to 2026 and a Delivery Plan for investment covering the period from 2011-14.

4.85 Sustainable transport is a key principle in the city's 'One Planet' approach to sustainability, and forms one of the five outcomes of the city's Climate Change Strategy (December 2011). It is estimated that transport contributes around 26 per cent to Brighton & Hove's carbon footprint, or 317,000 tonnes per year (2009). The main source of transport CO₂ emissions come from road transport, although overall transport emissions have been reducing since 2005.

4.86 Transport technology will play an important role in reducing carbon emissions. Local measures can also make a difference, including:

- Greater use of public transport – bus, rail, coach and taxis
- Greater use of zero carbon transport options – walking and cycling
- Changes in travel patterns and behaviour – such as car sharing or flexible working
- Reducing the need to travel – such as videoconferences, use of the internet or mobile services

4.87 By informing and influencing journey patterns, promoting and encouraging the use of more sustainable transport options, and providing measures that increase people's travel options, the council and city can help tackle climate change and reduce carbon emissions.

4.88 The Air Quality Action Plan (2010) identifies the need for successful transport planning and associated measures and initiatives to achieve a significant improvement in air quality, and therefore people's health. The Low Emissions Strategy (2011) seeks to promote measures through planning to reduce emissions. These include locating development in accessible locations and promoting clean technologies such as installing electricity charging points. These measures are included in part B of the policy. Significant health benefits will also arise from more sustainable travel as it encourages more active lifestyles and helps to reduce air and noise pollution from transport.

4.89 Brighton & Hove has a significant role as a regional transport 'hub' (an area with a high level of accessibility and interchange) which will be supported and implemented through partnership working with adjacent authorities, the Highways Agency and public transport operators (including bus, coach and rail) to provide alternative transport choices for some journeys and improve movement and access along the 'spokes' (A/M23, A27 and adjacent rail corridors). The city has concentrations of land uses and high level economic, cultural and service activities. The need for rail service capacity and line improvements within the sub-region is also supported.

4.90 Significant pressure results from car journeys entering the city at peak times during the week and from shoppers and visitors at weekends, especially during the summer months. To address this pressure the council is proposing to advise and work with landowners and businesses with existing large car parks (over 200 spaces) on the periphery of the city, where there are good road links, to promote their use for informal park + ride. The main purpose will be to intercept car journeys into the city and transfer workers and visitors onto existing and improved bus or rail routes. Work will be undertaken with adjoining authorities and sustainable transport providers to promote and facilitate this approach. Where planning

permission is required for increasing the capacity of existing car parks the following matters will be considered:

- safe and easy access to the site from the main road network;
- associated priority measures on routes that link the informal park + ride service to the central area;
- a pricing and management strategy will be submitted as part of the application;
- there will be no significant adverse effects on residential amenity and the local environment of the area;
- where a proposal involves an increase in parking provision, measures will be taken to ensure that any adverse impacts are minimised to an acceptable level; and
- informal park + ride locations will not have a significant adverse impact on a site of European Nature Conservation Importance.

4.91 Part A2 of the policy addresses matters relating to reducing the number of car journeys within the city. The main part of the strategy is to locate major new development into accessible locations or in places with significant scope for improvement. These are identified as Development Areas. The exception is DA7 Toads Hole Valley which will be expected to meet high levels of sustainability and safety in terms of transport and access. Increased development in some areas, particularly neighbourhoods, may provide the opportunity to improve access to the transport network and important services such as employment, education, health and leisure.

4.92 Improving the environment around, and on routes to, schools and increasing the transport options available to reach centres of economic activity and employment can assist in reducing congestion. Measures include those that will assist in encouraging travel behaviour change, such as workplace and school travel planning, in addition to the development of the popular JourneyOn website and the Personalised Travel Planning programme. Both will help to increase travel awareness and inform travel decisions and therefore achieve more sustainable travel patterns within the city.

4.93 Local shopping centres are a focus for many communities and provide a variety of facilities and services that can help to reduce the need to make a number of separate journeys. Enabling these locations to be more accessible and attractive to everybody and function practically e.g. deliveries and servicing, provides the opportunity for them to thrive as part of the local economy. Locations where measures are expected to be developed include, Preston Street, London Road, Western Road, Boundary Road/Station Road (in connection with plans to regenerate Shoreham Harbour). There are important destinations in the city for local residents and visitors.

4.94 Improving accessibility, safety and the environment of residential areas of the city is a priority and will include measures to create safer communities and shared spaces and to reduce the impact of traffic, especially driver speeds. It is expected that local priorities for improving neighbourhood roads can be brought forward through Neighbourhood Planning.

Measures

4.94 Part B of the policy details the measures to be undertaken in relation to 6 main aspects of transport in the city

Buses, Coaches and Taxis

4.95 The city council has a priority to invest in the identified sustainable transport corridors identified in the city as set out in part B1 of the policy. These measures include providing bus and taxi lanes, bus stop improvements and real time bus information. Funding has been secured to improve the Lewes Road and Edward Street corridors in terms of bus priority as well as walking and cycling (see part B4). There will also be investment in upgrading the real time bus information system which will reduce costs and improve reliability. Improvement proposals for these routes will be developed, consulted on and implemented by 2016. In relation to the remaining priority corridors, pro-active measures will be undertaken to secure funding with the objective of implementing improvements by 2024.

4.96 In terms of rapid/express bus-based services for the city, the focus will initially be on ensuring that the infrastructure is in place to enable these services to be implemented. It is important that future rapid bus services link key sites on the seafront, particularly Brighton Marina, the Brighton Centre and Shoreham Harbour. Additionally a north-south route rapid bus-based service remains a priority for the city.

4.97 The council will continue to work closely with the Taxi Trade to ensure better provision for taxis across the city.

Rail

4.98 The city council will work with the National Rail Authority to minimise the disruption to rail services at weekends arising from essential rail improvement works. The aim is to increase the quality and use of the north-south rail services to the city and encourage car users to park at stations and visit Brighton & Hove by train. This will involve close working with rail providers and adjoining authorities

4.99 Further work will be undertaken with rail companies including joint funded projects to encourage increases in train patronage and improve interchanges between sustainable modes. Measures to improve access and safety in and around all 8 stations in the city will be a priority. This will include improving real time travel rail information both in and around stations and through the councils 'journey on' website.

Cars and Freight

4.100 Managing road travel and congestion in the city is a critical issue in the context of a growing population and the levels of development expected over the life of the City Plan.

4.101 The council will continue to develop and implement an Intelligent Transport System which will improve the way the highway network is managed in real time to reduce congestion. This will be achieved by enhancing the current network of traffic signals, expansion of CCTV, ANPR cameras and updating and extending the city's existing Urban Traffic Management and Control System (UTMC).

4.102 The council is currently developing a Highways Asset Management Plan (HAMP) that will involve identifying and account for the city's highway assets that will be used to prepare medium and long-term programmes of works to maintain the highway asset.

4.103 Car clubs provide people with access to car without having to own one. The council will continue to work in partnership with the Car Club providers to ensure that on street

provision is located across the city to encourage use of car clubs as an alternative to car ownership.

4.104 The council will introduce a city wide speed limit of 20 mph within neighbourhoods and near schools. The aim will be to improve road safety while encouraging more people to walk and cycle.

4.105 The council has installed eight electric charging points across the city and will continue to work with providers to explore further opportunities to expand the network. This will include potential provision in council and private car parks, and working with car club operators, to encourage the use of electric vehicles.

4.106 In terms of freight the council will establish a Freight Strategy that will create an efficient system and network for delivery vehicles that supports economic growth particularly with local business and assists in reducing the impact of goods vehicles on the city's environment.

Walking and Cycling

4.107 The city council is committed to secure funding for and implementing improvements to the public realm to encourage cycling and walking in the areas specified in the policy. The Brighton Station Gateway Project is being developed in partnership with Southern Rail and Network Rail to create:

- a safe and accessible environment;
- a better walking and cycling environment;
- an environment that encourages businesses;
- better use of routes to the east of the Station;
- a high quality northern as well as southern station entrance.

4.108 Funding has been secured for improvements to walking and cycle facilities on Lewes Road and Edward Street. The councils Public Space Public Life Strategy sets the importance of negotiating the city from a pedestrian and cyclists perspective and emphasises the need for improved legibility and the importance of the public realm in relation to the 'liveability' of Brighton & Hove.

4.109 A coherent pedestrian and cycle network is vital to the legibility and overall quality of the city. An audit has been undertaken of the existing network of cycle routes in the city with a view to linking routes to create a comprehensive network within the life of the City Plan. There is a commitment to contribute at least 10% of the Transport budget towards promoting walking and cycling.

4.110 As well as establishing a core cycling network, additional improvements will include:

- one-way 'except cycles' networks;
- toucan crossings;
- on-street Cycle Parking;
- cycle provision in pedestrian priority streets;
- improve junctions for cyclists; and
- continue to invest in Bikeability training for children.

4.111 The council will continue to develop a coherent walking network and reduce the physical and mental barriers to walking and improve the links between key locations in the city such as the seafront and the city centre. Measures will include:

- introduction of more pedestrian priority routes;
- better crossing facilities;
- continue to introduce raised crossings & dropped kerbs;
- decluttering streets and improving Way Finding signs;
- continue to introduce drop kerbs;
- maintain and improve footways; and
- provide informal crossing points

4.112 There will also be continued investment in rights of Way and access to open spaces and the National Park reflecting priorities in the Rights of Way Improvement Plan and Downland Initiative.

Travel Plans

4.113 Other measures that will contribute towards promoting and improving the use of sustainable transport travel management measures known as 'smarter choices' initiatives. These include travel plans for schools and employees, to enable residents, employees and visitors to make more informed and active sustainable choices. This will involve sustained partnership working to develop measures which will help reduce car journeys into the city and within the city.

4.114 There will also be a sustained Personalised Travel Planning project targeting large areas on the city. This will involved working closely with individuals and community groups to assist them in making more informed travel choices with particular emphasis on more active travel to improve health and wellbeing.

Parking

4.115 Car parking can have a significant role in generating traffic. It is important that the city council has an integrated approach to parking in the city including setting parking charges, improving car parks¹⁶⁹; encouraging better use of out of centre car parks and implementing controlled parking zones (CPZs). A programme of CPZs will be prepared in consultation with residents and stakeholders and be considered alongside the wider parking issues of the city. A key measure to tackle congestion will be to ensure there is no enlargement of public parking provision in central Brighton alongside measures to encourage the transfer of car journeys onto sustainable modes.

4.116 In terms of new development, it will be a priority to review and prepare an up to date Supplementary Planning Document (SPD) setting out parking and servicing standards for new development. Car parking standards will continue to be based on maximum standards, and cycle and disabled parking will be minimum standards. Consideration will also need to be given to the level of provision of motorcycle parking. Standards and requirements for 'car free' housing proposals will be addressed in the SPD.

¹⁶⁹ The council has an on going refurbishment programme of its eleven off street car parks and will work towards achieving the industry standard 'Park Mark' for all its car parks (administered jointly by the Police and British Parking association) which is awarded to car parks that have good physical design and a high standard information management systems.

4.117 Coach parking is an important matter for the city and a strategy will be developed and implemented to manage this issue.

CP10 Biodiversity

The council will develop programmes and strategies which aim to conserve, restore and enhance biodiversity and promote improved access to it through the following:

1. Working with neighbouring local authorities, contribute to the delivery of biodiversity improvements within the South Downs Way Ahead Nature Improvement Area, which incorporates parts of the urban area, the urban fringe, the seafront and surrounding downland. Within the NIA, a strategic approach to nature conservation enhancement will be taken, with the objectives of:

- linking and repairing habitats and nature conservation sites to achieve landscape scale improvements to biodiversity;
- conserving, restoring, recreating and managing priority habitats and protecting and recovering priority species populations to contribute to Local Biodiversity Action Plan targets;
- enabling people to have improved access to and understanding of local habitats and species;
- ensuring development delivers measurable biodiversity improvements.

2. Ensure that all development proposals:

a) Provide adequate up-to-date information about the biodiversity which may be affected;

b) Conserve existing biodiversity, protecting it from the negative indirect effects of development, including light pollution;

c) Provide net gains for biodiversity wherever possible, taking account of the wider ecological context of the development and of local Biosphere objectives and

d) Contribute positively to ecosystem services, by minimising any negative impacts and seeking to improve the delivery of ecosystem services by a development

3. Establish criteria-based policies against which development proposals affecting designated sites of international, national and local importance; protected species; and biodiversity in the wider environment will be judged. Such policies will distinguish between the relative importance of each of these nature conservation features to provide clarity about when development may be permitted and about any mitigation, conservation and enhancement which may be required.

4. Monitor progress with the delivery of biodiversity objectives through suitably devised indicators.

Supporting Text

4.118 Biodiversity is the variety of life on earth, and includes all species of plants and animals and the natural systems that support them. Through 'ecosystem services', such as air and water purification and the amelioration of the effects of Climate Change, biodiversity is a core component of sustainable development, underpinning economic development and

prosperity. It also has an essential role in maintaining and improving quality of life, particularly in urban areas, and contributes to developing locally distinctive and sustainable communities.

4.119 All local authorities have a duty under the Natural Environment and Rural Communities Act 2006 to have regard to the conservation of biodiversity in exercising all their functions. The duty aims to make biodiversity conservation an integral part of policy and decision making.

4.120 Brighton & Hove has a strong foundation for biodiversity conservation, having two Sites of Special Scientific Interest (including one Special Area of Conservation), eight Local Nature Reserves (either proposed or declared) and a suite of Sites of Nature Conservation Importance.

4.121 Working in partnership with the Sussex Environment Partnership and the Sussex Wildlife Trust, the council has defined a Green Network for the city. The Green Network takes a landscape-scale approach, connecting the urban area, urban fringe and downland. Areas of new natural green space within it will contribute to the requirement for additional natural green space and new habitat identified in the council's Open Space Study and the Local Biodiversity Action Plan.¹⁷⁰

4.122 The South Downs Way Ahead Nature Improvement Area (NIA) includes all of the city's Green Network and much of the surrounding downland. The boundary of the NIA / Green Network is shown on the proposals map. This landscape scale designation was announced by the Government in February 2012 to deliver significant improvements for wildlife and people through the sustainable use of natural resources, restoring and creating wildlife habitats, connecting local sites and joining up local action. Within the setting of the NIA, development will be particularly encouraged to incorporate innovative approaches to nature conservation enhancement, such as the inclusion of biodiverse roofs and walls on buildings.

4.123 Brighton & Hove is working with local partners to achieve designation of the city and surrounding area as a Biosphere Reserve. Biosphere Reserves are designated by the United Nations Educational, Scientific and Cultural Organization as 'centres of excellence' to achieve three objectives:

Conservation - of landscapes, ecosystems, species and genetic diversity

Development - economic and social development which is culturally and ecologically sustainable.

Knowledge – environmental education, research and training to test and demonstrate innovative approaches to nature conservation and sustainable development

4.124 Local opinion and national policy all strongly support the need for biodiversity enhancements, including those which extend habitats, reduce the isolation of existing areas of habitat and improve 'local biodiversity' close to where people can appreciate it on a daily

¹⁷⁰ The Green Network addresses the citywide need for additional natural green space identified in the Open Space Sport and Recreation Study (October 2008) and Local Biodiversity Action Plan, but it does not address areas of deficiency in natural green space within the city. This requirement is addressed by Policy CP16.

basis. The priority habitats and species for conservation action in Brighton and Hove are described in the City Biodiversity Action Plan which also sets specific targets for their recovery and describes the actions needed to achieve them.

4.125 Working with the Sussex Biodiversity Record Centre, Brighton & Hove Council has carried out a detailed audit of the habitats of value to the city. This has established a baseline for monitoring the achievement of priority habitat and species targets. The audit highlights fragments of isolated habitat and identifies strategic opportunities for their reconnection as part of the Nature Improvement Area / Green Network.

4.126 Supplementary Planning Document 11 'Nature Conservation and Development' includes a clear procedure for identifying existing nature conservation features which may be affected by a development and for quantifying the amount of new nature conservation features which should be delivered, either on or off site. Off site provision will be directed to the Green Network / NIA wherever possible. The SPD will also be used to quantify the amount of developer contributions which will be required from development proposals which do not deliver adequate nature conservation benefits. These contributions will also be used by the council to deliver pre-defined objectives within the Green Network / NIA.

CP11 Managing Flood Risk

The council will seek to manage and reduce flood risk and any potential adverse effects on people or property in Brighton & Hove, in accordance with the findings of the Strategic Flood Risk Assessment (SFRA).

Development proposals in locations that have been subject to previous localised flooding events (including, surface water/muddy floods, groundwater, or sewer floods) will need to demonstrate that the issue has been taken into account and appropriate mitigation measures¹⁷¹ incorporated. Where a risk is identified then planning applications must be accompanied by a site specific flood risk assessment identifying how flood risk will be mitigated and minimised.

Where site-specific flood risk assessments are required they must be consistent with the latest guidance in the SFRA, national planning policy framework and technical guidance, and any supplementary information from the Environment Agency. In particular development should include appropriate sustainable drainage systems¹⁷² in order to avoid any increase in flood risk and to ideally reduce flood risk.

Where flood risk management or mitigation measures are required, the opportunity to simultaneously achieve wider sustainability and biodiversity objectives for the city (as identified in CP8 and CP10) should be investigated and will be encouraged.

The council is producing a Surface Water Management Plan¹⁷³ to manage surface water flood risk and help mitigate the effects of climate change on the city.

Supporting Text

4.127 The city's position on the coast and the potential for flooding and coastal erosion means that homes, buildings and infrastructure require protection and that the city is adapting well to climate change. In order to help appraise, manage and reduce flood risk in relation to the location of new development in the city the council commissioned a Strategic Flood Risk Assessment (SFRA¹⁷⁴), to assess the nature and extent of the flood risk. The SFRA identifies the current and potential future risks from different forms of flooding across the city, including taking into account climate change and likely associated rises in sea levels. The SFRA will be regularly reviewed to ensure that it contains the latest data and reflects the latest national planning policy, technical guidance¹⁷⁵ and legislation.

4.128 There are no surface water courses in the city so there is limited risk of flooding from main rivers or ordinary watercourses ('fluvial flooding') identified in the SFRA. However the

¹⁷¹ Actions to prevent, avoid or minimise the actual or potential adverse effects of a plan, policy, development, project, etc.

¹⁷² SUDS - An approach to drainage which seeks to decrease the amount of surface runoff, decrease the velocity of surface runoff, or divert it for other useful purposes, thereby reducing the contribution it makes to sewer discharge and flooding.

¹⁷³ A SWMP is a framework through which key local partners with responsibility for surface water and drainage in their area work together to understand the causes of surface water flooding and agree the most cost effective way of managing surface water flood risk.

¹⁷⁴ Brighton & Hove Strategic Flood Risk Assessment produced in April 2008, updated in 2011

¹⁷⁵ Technical guidance on flood risk has been published alongside the National Planning Policy Framework March 2012

SFRA identifies risks from other sources of flooding. As a coastal city, there is a risk of tidal flooding in some areas along the coastal frontage which lie within Flood Zones 2 (medium probability) and 3 (high probability/functional floodplain). Surface water flooding is a particular risk because of the highly urbanised nature of the city and in particular “muddy” flooding in suburbs of the city when surface water runs off the agricultural land on the South Downs during periods of high rainfall. Groundwater flooding is also a potential risk for the whole city due to the high permeability of the underlying chalk South Downs, and linked to this is the potential for sewer flooding if infrastructure becomes inundated with groundwater.

4.129 The proposed approach to accommodating growth in the city has been screened against all types of flood risk and the SFRA has informed the spatial strategy and the identification of Development Areas, whereby development has been steered to the areas of lowest flood risk first.¹⁷⁶

4.130 It has not been possible, consistent with wider sustainability objectives for the city, for all the proposed Development Areas to be located wholly within Flood Zone 1 (low probability of flooding). Two of the proposed development areas: DA2 Brighton Marina, Gas Works and Black Rock Area and DA7 Shoreham Harbour Area are both in Flood Risk Zone 3 and were therefore considered in a more-detailed flood risk assessment (a Level 2 SFRA). This provided consideration of the flood hazards in more detail and for sets out a framework for managing flood risk whilst still allowing necessary development to occur¹⁷⁷ subject to further, more detailed, flood risk assessments for specific sites in those areas. Nonetheless the more vulnerable land uses, such as residential development, should be directed to the parts of the Development Areas that lie in the areas of least flood risk. The risk of tidal flooding along the coastal frontage and specific requirements to manage that flood risk are addressed in DA2 Brighton Marina, Gas Works and Black Rock Area, DA7 Shoreham Harbour Area, and SA1 The Seafront.

4.131 Where flood risk management or mitigation measures are required, there is often scope to simultaneously achieve wider sustainability and biodiversity objectives for the city as identified in CP8 and CP10. For example green roofs can offer multiple benefits of helping to reduce surface water run-off, making buildings more sustainable, and enhancing biodiversity and the green network. Sustainable Drainage Systems (SUDS) can offer a similar range of sustainability benefits in addition to managing surface water. Solutions that offer multiple sustainability benefits will be encouraged.

4.132 Surface Water Management Plans (SWMPs) are identified as a tool to manage surface water flood risk on a local basis by improving and optimising coordination between relevant stakeholders by working together to understand the causes and effects of surface water flooding and agree the most cost effective way of managing surface water flood risk for the long term. Background work is underway to develop a Surface Water Management Plan for the city, and a Preliminary Flood Risk Assessment has been completed and a Phase 2 (Detailed risk assessment) is underway and is due to be completed in 2013.

¹⁷⁶ Sequential Test 2008

¹⁷⁷ Exception Test 2008 for Brighton Marina, and 2011 for Shoreham Harbour

Part 4

City Wide Policies

An Attractive City

CP12 Urban Design

A city-wide Urban Design Framework will identify and set out areas of the city which should largely be conserved; areas of the city suitable for localised, incremental development and enhancement; and areas of the city where positive and pro-active measures are required to secure major enhancement. Where appropriate, density will be raised through predominantly low-to-medium rise development but making most effective use of those identified areas which have the potential for taller developments, defined as 18 metres or more in height (approximately 6 storeys). The areas with such potential are:

- Brighton Marina
- Brighton Station / New England area
- Central Seafront
- Eastern Road / Edward Street
- Hove Station area
- Lewes Road corridor
- London Road / Preston Road corridor
- Western Seafront / Kingsway
- Shoreham Harbour

All new development will be expected to:

1. Raise the standard of architecture and design in the city;
2. Establish a strong sense of place by respecting the diverse character and urban grain¹⁷⁸ of the city's identified neighbourhoods;
3. Achieve excellence in sustainable building design and construction;
4. Conserve or enhance the city's built and archaeological heritage and its setting;
5. Protect or enhance strategic views into, out of and within the city;
6. Be inclusive, adaptable and accessible;
7. Ensure that the design of the external spaces is an integral element of the overall design approach, in a manner which provides a legible distinction between public and private realm; and
8. Incorporate design features which deter crime or disorder and the fear of crime;

Supporting Text

4.133 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 comprehensive design guidance, masterplans 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.

4.134 Given the city's physical constraints there is a need to increase density on existing brownfield land in a sustainable manner. Taller buildings (in the context of the city's

¹⁷⁸ General layout, pattern and footprint of buildings and streets as viewed overhead in plan form.

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 node¹⁷⁹ 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.
- 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 north of Wellington Road.

4.135 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).

4.136 This policy also sets out the general strategic design criteria expected of new development. Innovative contemporary architecture, which enhances the reputation of the city, and mixed use schemes which add distinctiveness to local neighbourhoods, will be actively encouraged. The function and design of the spaces between and around new buildings should be considered from the outset of the design process to ensure that they are fully integrated into the development as a whole and that they link positively to the wider urban or suburban context. Developers of major housing schemes will be encouraged to demonstrate, as part of their Design and Access Statement, how the development would meet the Building for Life¹⁸⁰ criteria.

4.137 The Urban Characterisation Study provides a comprehensive understanding of the diversity and quality of the city's urban character, its sensitivity to change and the development trends and pressures that affect Brighton & Hove. It has identified distinct landscape character types within the city and, within those, distinct neighbourhoods, in addition to the central conservation areas. Each of the neighbourhoods are studied in detail

¹⁷⁹ Node: A place where activity and routes are concentrated.

¹⁸⁰ A national standard for well-designed homes and neighbourhoods produced by the Commission for Architecture and the Built Environment (now part of the Design Council).

and this will assist in judging which areas are best able to accommodate, or might merit, positive changes in density and/or built form. The central conservation areas are covered by the Historic Character Assessment report for Brighton & Hove carried out as part of the Sussex Extensive Urban Survey. Both documents will inform the proposed Urban Design Framework.

4.138 Until that is adopted¹⁸¹, the Urban Characterisation Study will be used to guide consideration of backland or infill developments and more detail will be set out in the City Wide Plan Part 2. The council will aim to ensure that high quality is maintained through the rigorous enforcement of planning permissions.

4.139 Inclusive design includes removing physical barriers and exclusions imposed on people by poor design of buildings and their surroundings and ensuring that it reflects the needs and aspirations of minority groups. The council will therefore critically examine proposals to ensure accessibility to and between buildings and the adjoining private and public realm, to meet the needs of all sections of the community. With regard to adaptability, this policy requires that new development should comply with Lifetime Homes¹⁸² standards. Further guidance is set out in the council's Accessible Housing and Lifetime Homes Planning Advice Note.

4.140 This policy complements policy CP14 Housing Density and has important links with CP8 Sustainable Buildings, CP13 Public Streets and Spaces and CP18 Healthy City.

¹⁸¹ The anticipated adoption date for the Urban Design Framework is 2013.

¹⁸² Housing built to standards to cater for various lifestyle stages, e.g. wider corridors to cater for pushchairs and wheelchairs, scope for adaptations for disability needs, needs of the elderly, etc.

CP13 Public Streets and Spaces

The quality, legibility and accessibility of the city's public urban realm will be improved in a comprehensive manner, in conjunction with other partners, through new development schemes, transport schemes and regeneration schemes. Such improvements will be required to produce attractive and adaptable streets and public spaces that enrich people's quality of life and provide for the needs of all users by:

- 1. Positively contributing to the network of public streets and spaces in the city;**
- 2. Enhancing the local distinctiveness of the city's neighbourhoods;**
- 3. Conserving or enhancing the setting of the city's built heritage;**
- 4. Reducing the adverse impact of vehicular traffic and car parking;**
- 5. Utilising high quality, robust and sustainable materials for all elements of the street scene;**
- 6. Incorporating street trees and biodiversity wherever possible;**
- 7. Encouraging active living and healthier lifestyles;**
- 8. Helping to create safe and inclusive public spaces;**
- 9. Incorporating an appropriate and integral public art element; and**
- 10. Reducing the clutter of street furniture.**

In appropriate cases new developments will be expected to make a contribution to achieving these requirements (see CP7).

Supporting Text

4.141 Brighton and Hove's streets and public urban spaces do not always do the city justice. The pedestrian and cycle links between the areas that people want to get to are not as good as they could be, streets can be cluttered, materials are inconsistent and there may be too few places to rest. An opportunity exists to create a simpler but high quality urban realm that is pedestrian and cycle-friendly but accommodates the needs of all people. This may be in conjunction with improvements to sustainable transport (see policy CP9).3.20 The purpose of this policy is to ensure that new development contributes towards the implementation of public urban realm improvements proposed by the Public Space Public Life Study (2007), where appropriate, and that all public realm works (whether publicly or privately funded) are designed to achieve consistent aims and standards and use locally sourced materials where possible. The council's Streetscape Design Guidelines (2010) set out the appropriate street furniture etc. for use in the city.

4.142 The Public Space Public Life Study introduced to Brighton & Hove the concept of a public realm network which operates across the city. The principle underpinning this is that a distinctive hierarchy of routes should be developed and that the experience of moving through the city should be continuous and consistent. The award winning re-design of New Road in Brighton was the first project to be implemented using the approach advocated by this Study. The council will actively explore with local communities the potential for further pedestrian priority and shared space treatment, as part of the wider public realm network. New and improved public urban realm will be expected to make a positive contribution towards Lifetime Neighbourhoods. This will include ensuring that it meets people's whole lifetime needs: children; parents with pushchairs; people with mobility difficulties or visual impairment; those with temporary or permanent disabilities; and the elderly. The aim is to make it easier for everyone to move around the city, including clear signage, shade from the

sun, removing obstacles and the provision of public seating to allow regular opportunity to stop and rest. In this respect schemes will be expected to do more than simply meet minimum accessibility standards.

4.143 Tree and other planting should be incorporated into schemes in a manner that is integral to their design and will contribute to enhancing the city's 'green network' and to the city's Biosphere Reserve objectives as set out in policy CP10 Biodiversity. Where appropriate this may include productive planting that contributes towards improving urban food productivity.

4.144 The artistic tradition of Brighton & Hove is an important part of its identity. The provision of public art can create and enhance local distinctiveness in the public realm and help develop a desirable sense of place as well as improving legibility (e.g. the Aids Memorial in New Steine). Many public art schemes will provide important opportunities to involve the local community and all will offer work opportunities to artists, many of whom will be local. Public art may take many forms and, in relation to the public realm, can include construction details, landscape schemes, sculpture, water features, street furniture and lighting effects. Planning guidance on the implementation of public art will be produced to support this policy.

4.145 Public spaces often have a temporary function for outdoor events and community uses and good design can facilitate this (with removable street furniture for example).

4.146 Priority for implementation will be given to those urban areas set out in policy CP9 Sustainable Transport, namely Valley Gardens, Station Gateway, Lewes Road, London Road, Edward Street/Eastern Road, Old Shoreham Road, A259 Seafront, Seven Dials, Hove Station, Pool Valley and local shopping areas. Developer contributions for improvements to the public realm will be required where they relate to the development and meet the tests in the National Planning Policy Framework (see CP9).

4.147 This policy complements policy CP12 Urban Design and has important links with CP18 Healthy City and CP9 Sustainable Transport.

CP14 Housing Density

Residential development should be of a density that is appropriate to the identified positive character of the neighbourhood. Development will be permitted at higher densities than those typically found in the locality where it can be adequately demonstrated that the proposal:

- 1. Would be of a high standard of design and would help to maintain or create a coherent townscape;**
- 2. Would respect, reinforce or repair the character of the neighbourhood and contribute positively to its sense of place;**
- 3. Would include a mix of dwelling types, tenures and sizes that reflect identified local needs;**
- 4. Is easily accessible by sustainable transport or has the potential to be easily accessible;**
- 5. Is well served by local services and community facilities; and**
- 6. Provides for outdoor recreation space appropriate to the demand it would generate and contributes towards the 'green network' where an identified gap exists.**

To make full, efficient and sustainable use of the land available, new residential development in Brighton & Hove will be expected to achieve a net density of at least 50 dwellings per hectare (dph), provided it contributes positively to creating or maintaining sustainable neighbourhoods and that all of the above criteria can be satisfactorily met.

Within the Development Areas covered by policies DA1 to DA6 and DA8, the density of new residential development will be expected to achieve at least 100 dph on major development sites, provided that all of the above criteria can be satisfactorily met. Where any site-specific policy is in place for the site, the density level in that policy should be met.

Where a proposed development is below 50dph, a lower density will be accepted where it can be adequately demonstrated that the development would reflect the neighbourhood's positive characteristics, would meet the housing needs of a particular group or groups within the community and would better contribute towards creating a sustainable neighbourhood.

Supporting Text

4.148 In order to boost significantly the supply of housing, national planning policy¹⁸³ encourages local planning authorities to set out their own approach to housing density. The purpose of this policy is to ensure that the city, which is compact and constrained, makes

¹⁸³ National Planning Policy Framework (2012) – part 6.

the most efficient use of the limited brownfield land available whilst ensuring that sustainable neighbourhoods are achieved.

4.149 Net dwelling density is calculated by including only those site areas developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided. National statistics show that in 2010 new dwellings were built at an average density of 43 dwellings per hectare (dph), whilst on brownfield land this figure was 48 dph.¹⁸⁴ The South East Plan sets an overall regional target of 40 dph and states that there are significant opportunities to provide quality housing development in excess of 50 dph in many urban and suburban areas.

4.150 The council's Urban Characterisation Study (2007) has shown that the 19th century terraced development that typifies much of the existing urban core of the city now supports net density levels ranging between around 60 and over 200 dph. The upper range of these figures is comparable to some of the city's purpose built tall blocks of flats. Semi-detached dwellings in the urban core range between 25 and 80 dph, depending upon size and the degree of conversion to flats. In some outer 20th century suburbs the figure falls below 20 dph.

4.151 Over the three year period 2006 – 2009, 85% of new dwellings completed in the city (including conversions and change of use) were built at over 50 dph, with a further 15% built at between 30 – 50 dph¹⁸⁵. Densities of at least 100 dph were frequently achieved in central areas of the city and over 300 dph in some cases. The targets in this policy are therefore considered to be realistic.

4.152 Successful higher density development will depend upon a 'design-led' approach that respects its local context and minimises impacts on its surroundings. Higher density housing should also include measures that enable residents to make more informed and sustainable choices on transport, as set out in Policy CP9 Sustainable Transport. The Urban Characterisation Study will be used to guide consideration of backland or infill developments until more detailed policies are set out in the City Wide Plan Part 2 and the Urban Design Framework SPD.

4.153 Higher densities may not be achievable in those parts of suburban and village neighbourhoods where existing low density development contributes to a positive sense of place and community. Density may also be constrained by the need to retain key heritage assets in their settings and/or important landscape features.

4.154 In the case of mixed use schemes, the residential site area should be calculated using total net site area apportioned between the various uses, on a pro rata basis (i.e. reducing the site area by the same ratio as that of the residential to non-residential floor space). However, in assessing density on mixed use sites, the council will be mindful of the overall benefits of the proposals.

4.155 This policy is complemented by city wide policy CP12 Urban Design and will assist in the implementation of Development Area policies (DA1 - 8) and in creating and maintaining

¹⁸⁴ Land Use Change Statistics (England) 2010 – provisional estimates (July 2011)

¹⁸⁵ Calculations based on schemes of 10 or more dwellings.

sustainable neighbourhoods (SA6). The council's approach to achieving an appropriate mix of housing type, tenure and size is set out in policy CP1 Housing Delivery and CP19 Housing Mix.

CP15 Heritage

The council will work with partners to ensure that the historic environment plays an integral part in the wider social, cultural, economic and environmental future of the city through the following aims:

1. The city's historic environment will be conserved and enhanced in accordance with its identified significance, giving the greatest weight to designated heritage assets and prioritising those assets at risk through, neglect, decay, vacancy or other threats. The council will further ensure that the city's built heritage guides local distinctiveness for new development in historic areas;
2. Where proposals are promoted for their contribution to mitigating climate change, the public benefit of this will be weighed against any harm which may be caused to the significance of the heritage asset or its setting; and
3. The Conservation Strategy¹⁸⁶ will be taken forward and reviewed as a framework for future conservation area management proposals; to provide criteria for future conservation area designations and other local designations, controls and priorities; and to set out the council's approach to dealing with heritage at risk.

Supporting Text

4.156 The city's architectural heritage encompasses the internationally renowned Royal Pavilion and nearly 3,400 other listed buildings as well as 15 scheduled ancient monuments, six registered parks or gardens of special historic interest, 34 conservation areas, numerous locally listed buildings and over 80 archaeologically sensitive areas¹⁸⁷. The council's Conservation Strategy (2003) seeks to actively manage change within the historic environment and to ensure that available resources are put to the best possible use. It will be reviewed and revised in respect of any changes in legislation and governmental policy advice. A Historic Character Assessment report for Brighton & Hove (2007), carried out as part of the Sussex Extensive Urban Survey, provides an up-to-date assessment of the city's historic core and will inform relevant conservation area management plans.

4.157 The council will continue to maintain a register of those listed buildings considered to be 'at risk' or 'vulnerable' through neglect, decay, vacancy or other threats and will actively seek to bring such buildings back into appropriate use and/or a good state of repair. Conservation areas and other assets 'at risk' will also be monitored and action identified that would remove or mitigate the threats to their special interest. Such action may include the introduction of Article 4 Directions to control permitted development rights where such rights are undermining the aims for the historic environment.

4.158 Keeping heritage assets in use is inherently sustainable as it avoids the consumption of building materials and energy and the generation of waste from the construction of

¹⁸⁶ The Strategy for the Conservation of Brighton & Hove's Historic Built Environment (2003) (and subsequent revisions)

¹⁸⁷ These are sites that have been compiled by the County Archaeologist as part of the Sites and Monuments Record. These areas are judged to have county and city wide importance and are known to have archaeological remains or features. Some might on further detailed investigation merit designation as a Scheduled Ancient Monument.

replacement buildings. Where proposals that are promoted for their contribution to climate change objectives have a potentially negative effect on a heritage asset, the council will wherever possible help the applicant to identify feasible solutions that deliver similar climate change objectives but with less or no harm to the heritage asset and its setting.

4.159 CP5 Culture and Tourism recognises the relationship of the wealth and importance of the city's historic environment with tourism and cultural industries in the city.

CP16 Open Space

The council will work collaboratively to safeguard, improve, expand and promote access to Brighton & Hove's open spaces (public and private) and the diverse range of experiences offered by these spaces. This will be achieved through the following:

Retaining and enhancing open space

1. The council will require the retention of and seek better, more effective and appropriate use of all existing open space, as shown on the proposals map, having regard to the Open Space, Sports and Recreation Study and the Open Space Update Study¹⁸⁸.

Planning permission resulting in the loss of open space will not be granted unless:

- a) The loss results from a development allocation in a development plan and regard has been given to maintaining some open space (physically and visually); or
- b) The site is not part of a playing field (current or historical) and the loss is necessary to bring about significant and demonstrable long term enhancements to the city's public open space offer as a whole; or
- c) The proposed development is ancillary to the use of the open space and will result in only a small loss of open space, provides improvements to and better use of the remaining space and optimises public access; or;
- d) The site is physically incapable of meeting the city's wider open space needs; is not part of a playing field (current or historical) and, in accordance with the Open Space Study Update 2011, is of a poor quality (current and potential) and there is an identified surplus (current and future) in all types of open space within the locality (ward and sub area). In order to test the importance of the site to the local community the site must be actively marketed at a price that reflects its use, condition and local market prices for at least a year with no success before alternative proposals can be considered.

New development and requirements for new open space

2. New development will be required to contribute to the provision of and improve the quality, quantity, variety and accessibility of public open space to meet the needs it generates in accordance with the criteria and local standards set out below¹⁸⁹.

- a) Developments will be required to optimise the provision of safe on-site public open space with good passive surveillance and accord with Biosphere Reserve principles and objectives. Where it is not practicable for all or part of the open space requirements to be provided on site, an appropriate alternative agreed provision and/or contributions towards off-site provision will be required; and

¹⁸⁸ And any subsequent revisions, audits and strategies.

¹⁸⁹ Or subsequent approved revisions or open space strategies

b) Developments, especially those located in an area with open space deficiencies, will be expected to help improve sustainable means of access to open space and facilitate appropriate links to the city's open space framework (which comprises the open spaces shown on the proposals map, the Nature Improvement Area, beaches, the countryside and new open space allocations and links). The provision of public open space will be in addition to incidental amenity and landscaped areas. (See also CP7 and CP9)

c) All new provision should optimise accessibility to all users (including the local community and visitors), reflect the open space requirements, facilitate sustainable means of access, provide measures to improve public safety within and around the respective spaces and seek to improve the variety and quality of safe provision in the city.

d) The community use of private and schools open spaces will be sought when considering proposals affecting these sites including the temporary use of redundant or undeveloped sites. All open space proposals will be expected to have an agreed funded maintenance plan for the space. The council will seek to allocate new open space in the City Plan Part 2.

e) Where appropriate, help to secure investment in poor quality, under-used open spaces, particularly in disadvantaged areas (see SA6) and areas with open space deficiencies to bring about enhancements in quality and public use.

f) Seek proactive and appropriate management of open spaces including the enforcement of by-laws and seek the enhancement and improvement of open spaces and features. Lighting proposals, including floodlighting, will be required to minimise light pollution, help reduce crime and not cause significant harm.

Open Space Standards		
	Quantity Standard* (hectare / 1,000 pop)	Accessibility Standards
Parks and Gardens	0.92	15 minute walk time (720m)
Natural Semi-Natural	2.8	15 minute walk time (720m)
Amenity Greenspace	0.582	10 minute walk time (480m)
Allotments	0.23	15 minute walk time (720m)
Children & Young People (equipped play)	0.055	15 minute walk time (720m)
Outdoor Sport	See CP17	See CP17
Total –excl. outdoor sport (brackets show total inc. outdoor sport).	4.587 hectares/1,000 pop (5.057 ha/1,000 pop)	

* The 2008 Open Space, Sport and Recreation Study contains detailed information on Quality Standards expected.

Supporting Text

4.160 Brighton & Hove's green and open spaces play an essential role in maintaining and improving quality of life and also contribute to developing locally distinctive and sustainable communities. They are also important in aiding movement around the city and enabling physical activity. Green open spaces contribute to physical, mental, and emotional well-being and can offer lasting economic, social, cultural and environmental benefits. They act as heat sinks, help to cool urban environments and offer visual relief from the urban character of the city. Parks, outdoor sports areas, play areas, cemeteries, natural/semi-natural areas, school grounds, amenity spaces within housing estates and allotments are all part of this rich mix. Public consultation always highlights the importance of open spaces to both residents of and visitors to Brighton & Hove.

4.161 National policy and research recognises the importance of open space. It is therefore appropriate, in view of the competing pressures within the city, that the Council takes a proactive strategic approach to open space. The Open Space, Sport and Recreation Study 2008; which assesses the current and future open space needs and then recommends the local open space standards for accessibility, quality and quantity has not identified any open space to be surplus to the city's open space requirements (current or in the future). It demonstrates that the city will need to retain and use all existing (both public and private) open space more effectively and create additional areas of open space in order to meet the needs of an increasing population.

4.162 Due to the city's housing requirements a review of the capacity and need for open space, the findings of the Open Space, Sport and Recreation Study 2008 were further assessed through the Open Space Study Update 2011. The Update Study endorsed the local open space standards and the approach taken in the 2008 study. It devised a scoring system to assess open space which was applied to private open spaces and used to inform the 2010 Strategic Housing Land Availability Assessment. However the factors that produce a low open space offer (a combined assessment of 'quantity', 'accessibility' and 'quality' including potential) also limit a site's suitability for housing and no additional open space sites were identified as suitable for housing.

4.163 When the open space standards are applied, a significant increase in open space will be required by 2030 (an additional 170 hectares should be created, which equates to a 13% increase)¹⁹⁰. However due to the city's physical constraints, between the sea and the South Downs National Park, it is recognised that the future open space requirements are unlikely to be met in full. To compensate, more intensive use of existing open space will be needed in an attempt to maintain current quality of life including the opening up of school grounds to the community/public and an expectation that owners should endeavour to enable better open space use of under-used private spaces. There will also be a need to better connect green spaces together to improve accessibility and to improve access for quiet recreation to the South Downs National Park.

4.164 The Open Space Update Study undertook further analysis of open space at both a sub area and ward level having regard to open space offer. A significant variation in access to open space was found. Innovative solutions therefore need to be explored to overcome accessibility, improve quality and to enable people in areas with deficiency to access the

¹⁹⁰ In relation to 2008 ONS Population projections. ONS stands for Office for National Statistics.

open spaces in the areas with sufficient supply. A strategic approach therefore needs to be applied when considering local open space issues. It is widely recognised that the closer the open space, the greater the likelihood that people will use it or pass through and therefore gain from the health and well being benefits. However, some compensation can be provided for the lack of offer within areas of deficiency by improving the ease of access to other city spaces. Such an approach would not, however, justify the loss of an existing open space within the urban area and/or serving a local community. The provision of storage facilities for the drying and storing of water recreation equipment help developments increase the opportunities offered by the sea.

4.165 The retention of open space within the city is therefore important in view of the finite nature of the open space that serves the compact urban area. It is not sustainable to assume a reduction in open space can meet the needs of the city's increasing population. There is no statutory duty on a council to provide open space (except cemeteries and allotments) the policy approach to open space therefore applies to public and private open space. A clear approach of retention helps to set realistic open space land values, minimises land being left vacant by land owners seeking development opportunities in preference to open space uses and makes it more viable for local communities to purchase spaces in order to meet their open space requirements.

4.166 Whilst the open space standards are set for different recreational uses (such as children's play areas or parks) regard will also be made to the multi-use of open spaces and take account of the existing and potential recreational, historical, visual, biodiversity, educational, cultural, sporting and community site value. Particular value can be attached to community gardens. It may be appropriate to reclassify and redistribute open space within the city to make the spread in type more even, to facilitate the opening up of private sites to community/public use and to address disputes and changes made by private owners.

4.167 The Policy, however, does reflect that there may be instances when the loss of some open space could achieve overriding open space benefits and/or be justified due to open space surpluses in a localised area combined with a low quality offer so that it is unable to meet wider open space needs and/or citywide requirements. For example, the site is too small, steep or its configuration significantly limits its use that people in the areas with open space deficiencies cannot be encouraged to use the site even if its offer is maximised and accessibility improvements are made and/or services included enabling visits to be longer (eg toilets, refreshment kiosk etc). Any such loss should not conflict with other environmental objectives.

4.168 A priority is placed on retaining existing playing fields (including historical playing fields that currently lay vacant and unused or in an alternative open space use). In comparison with other authorities the provision of outdoor sports space is low and in view of the compact, dense and hilly nature of the city the delivery of additional outdoor sports facilities, which require large level spaces, is considered less likely than other types of open space. People are prepared to travel into and across the city to use formal outdoor sports facilities and to participate in matches. These factors therefore place a priority on retaining playing fields. The retention of current and historical playing fields helps to protect them as an asset for outdoor sports but, due to their potential multifunctional nature, does not preclude their use for alternative open space uses to meet changes in trends. In addition to this the Sports Facilities Plan 2012 -2022 identifies a demand for artificial grass pitches, the suitability of spaces for such a use should therefore be explored.

4.169 The provision and enhancement of well-designed green spaces that meet identified local needs should be planned positively and is the aim of open space and sport strategies or plans. New development will be expected to contribute towards open space provision by optimising additional on-site/off-site good quality open space provision in accordance with the local standards and, where there are shortfalls, to financially contribute towards existing open spaces and/or open space co-ordinators or similar in order to meet the needs generated by the development. On-site food growing initiatives and outdoor play opportunities will be required and should be designed to provide flexibility in use to reflect changes in trends. Proposals will be expected to accord with Biosphere Reserve principles, which seek to bring together people and nature, and should therefore aim to provide greener living and working environments. Innovative solutions will be explored to increase accessibility and for the pooling of funds to enable the best solutions for this compact city. The maintenance and consequent funding of open space is key to providing good quality provision and will be sought as part of the provision of open space.

4.170 Where possible, new open space sites will be allocated in the City Plan Part 2. The designation of Local Green Space will also be considered through the City Plan Part 2 and the Neighbourhood Planning process. The protection and enhancement of quiet open spaces will be explored and where appropriate a criteria based policy will be included within the City Plan Part 2. All existing and new open space, the urban fringe, the National Park, seafront/beaches and the Green Network/Nature Improvement Area form the open space framework. Improvements to the links between these spaces will be investigated. The council will actively work with tenant farmers to create more Open Access trails.

4.171 It should be noted that whilst outdoor sport facilities are included within the term 'open space' they are covered in more detail by policy CP17.

CP17 Sports Provision

To facilitate the council's aspiration to increase participation in sports and physical activity, the council will safeguard, expand, enhance and promote access to Brighton & Hove's sports services, facilities and spaces through the following:

- 1. Support for the delivery of the proposed Brighton International Arena / sports provision at Black Rock (see DA2) and the replacement and enhancement of sports provision currently provided at the King Alfred (see SA1).**
- 2. Require the retention, seek the enhancement and more effective use of existing indoor and outdoor sports facilities and spaces in accordance with the Sports Facilities Plan and the Open Space, Sport and Recreation Study and subsequent approved revisions, audits and strategies recognising the importance of major sporting venues such as the American Express Community Stadium, County Cricket Ground, Withdean Sports Complex and Brighton Racecourse. Planning permission resulting in the loss of indoor and outdoor sports facilities and spaces will not be granted except where:**

In respect of buildings:

- The building has been demonstrated to be redundant for a sports use and marketed for at least 18 months at a price that reflects its condition and market value, any loss in the surrounding space is minimised and necessary to provide improvements to and better use of the remaining space in accordance with the Open Space policy (CP16); or,**
- the facilities are to be replaced by improved facilities that help meet the sporting needs of the city and optimises access by sustainable transport modes.**

In respect of sports open space :

- The land has been marketed as detailed above and the proposal complies with the Open Space policy (CP16).**

- 3. Develop sports strategies and plans to guide the future provision of sports services, facilities and spaces and to inform the City Plan Part 2. The council will also investigate the potential for a new indoor multi-sports wet and dryside leisure centre, additional pool space and indoor sports halls.**
- 4. Work with partners to secure investment in poor quality, under-used sports services, facilities and spaces particularly in disadvantaged areas (see SA6) to bring about enhancements in quality and public use.**
- 5. Require new development to contribute to the provision and improvement of the quality, quantity and accessibility of sports services, facilities and spaces to meet the needs it generates in accordance with the local standards set out below (or subsequent approved revisions) (See also CP7 Developer Contributions).**
- 6. New sports services, facilities and spaces (including extensions to existing provision) will be encouraged especially those that meet identified needs. All new provision should meet quality standards, optimise their accessibility and affordability**

to all users, including the local community and visitors. Proposals should seek to improve the variety of provision in the city and increase participation in sport and physical activity, especially from sectors of the community currently under represented.

7. Proposals seeking to improve regional/sub-regional or tourist sport provision will be supported where they also address local needs, are of high quality, have an agreed and funded maintenance plan and add to Brighton & Hove's vibrancy.

8. The council will seek the opening up for community use of private and school sports facilities and spaces.

Standard for Indoor and Outdoor Sports Facilities			
Indoor Sports			
Quantity (indoor sport)			
Modelling undertaken in line with Sport England parameters. Standards to comply with national best practice.		The Open Space, Sport and Recreation Study recommends the council should aim to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice rink (See also the Sports Facility Plan for further recommendations).	
Accessibility (indoor sport)			
Standards to comply with national best practice.			
Quality (indoor sport)			
All facilities should be built or provided in accordance with national best practice			
Outdoor Sports			
Quantity (outdoor sport)			
Current Provision	Current Provision (Ha/1,000 pop)	Proposed Standard (Ha/1,000 pop)	Additional Space required by 2030 ¹⁹¹
Approx 118.5 Hectares	0.47	0.47	Approx 16 hectares
Accessibility (outdoor sport)			
20 minute walk time (960 metres)			
Quality (outdoor sport)			
Clean, litter-free sports facilities should be provided with appropriate, welldrained, well maintained surfaces. Ancillary accommodation should include toilets, changing facilities, dog waste bins and litter bins and appropriate amenity and sports lighting.			

¹⁹¹ Based on 2008 ONS population forecast for 2030 which is estimated to be 286,100

Standard for Indoor and Outdoor Sports Facilities
All sites should meet the minimum specifications of the appropriate National Governing Body of sport and meet Equality Act 2010 guidance.

Supporting text

4.172 The city is a major tourist destination and is of regional sporting importance. The city also helps to support the surrounding villages and towns, offering a wider range of facilities than those that can reasonably be provided within smaller urban areas. The city therefore needs to ensure it provides appropriate sports and recreational facilities to reflect its regional status and aspirations. Existing facilities such as the American Express Community Stadium, Sussex County Cricket Ground, Brighton Racecourse and Withdean Sports Complex should be retained and where possible improved with greater public access and uses provided to promote physical activity and sport. The proposed Brighton International Arena at Black Rock (see DA2) and the replacement and enhancement of the King Alfred sports provision (see SA1) will all help to ensure Brighton & Hove provides the type and quality of facilities expected from a regional centre.

4.173 The London 2012 Olympic Games and Paralympic Games is likely to generate an increased interest in sport especially with the identification of the city's beach volleyball venue at Nivea Sun Yellowwave Beach Sports Centre as a pre-games training venue. It is therefore recognised that the olympics generates opportunities for the city of not just sporting benefit but also cultural, health, educational, tourist, business and economic benefit.

4.174 As well as providing fun, exercise and a sense of achievement, participation in sport and active recreation helps to create sustainable communities, improve health and well being, supports social inclusion and educational attainment and helps to reduce crime. A varied choice of activities helps to appeal and engage more people in physical activity and helps in the adoption of a 'lifetime habit' of participation in sport and to bring about the associated wider benefits.

4.175 The Open Space, Sport and Recreation Study (2008/9) provides a robust evidence base to support the need to retain and effectively use existing (both public and private) sports services, facilities and space. It also suggests the need for additional sports space provision and facilities to meet the needs of an increasing population. The study evaluates indoor and outdoor sports provision and recommends standards for accessibility, quality and quantity. The city's outdoor sports space provision is low compared to other local authorities. However the compact and dense nature of the city means the delivery of additional outdoor sports facilities and spaces will be challenging. The study recognises that qualitative improvements can increase capacity within existing outdoor sports spaces and takes a pragmatic approach by recommending a local quantity standard based on current provision. Not surprisingly when the study applies the standard across the city no surplus outdoor sports space is identified.

4.176 Whilst the study indicates localised deficiencies it again recognises the likely problems in finding new space and recommends innovative solutions. Some of these might include multi-use sports areas (MUSAs), other flexible sports facilities including synthetic turf pitches (STPs) and a need to explore community/public use of educational sports space where the full space requirement cannot be found. Whilst formal outdoor sport primarily

takes place on pitches, wickets, courts etc, casual and informal recreational activities can take place in virtually all types of open space and therefore the multifunctional use of such space is and should continue to be recognised. The special regard to retaining playing fields is addressed in the Open Space policy, it is considered reasonable to expect their loss to be considered through the plan making process rather than an ad hoc basis. The restrictions on the loss of premises in sports use reflect the identified needs. The marketing period is considered reasonable and necessary because the decision to leave a premise would be taken in advance of vacating and a period of time is needed to ensure the use is genuinely redundant in view of the city's sports needs and fluctuations in market conditions.

4.177 The study also suggests that the council should explore the provision of additional adrenaline or less conventional sports facilities, such as climbing/bouldering, ultimate Frisbee and skating. Improvements in services such as the provision of sports co-ordinators can also help promote and intensify the use of existing provision. In 2011 an Open Space Update was completed. The study verified the appropriateness of all the local open space standards, devised a scoring system to assess 'open space offer' and undertook further analysis of the supply of all open space at both a sub area and ward level. It provides an additional level of information to assist in the consideration of existing and future outdoor sports provision.

4.178 In April 2012 the council adopted a Sports Facilities Plan 2012 -2022. The plan is based on the current and future demands of residents from 2012 through to 2022 and builds on the findings of the Open Space, Sport and Recreation Study. It concentrated primarily upon council provided indoor facilities but it also assessed the provision of athletic tracks and artificial turf pitches. It identified a need to expand and improve public facilities especially swimming pools, sports halls, health and fitness suites, artificial grass pitches and noted that many respondents felt a new major flagship centre was needed. It also identified a demand for specialist sport facilities such as a gymnastics centre, ice rink and large climbing centre and an improvement in the geographical spread in facilities

4.179 The council will consider existing and prepare further sports strategies and plans to provide more detailed assessments of the need for specific facility types across the city which will inform the City Plan Part 2. The council will also explore partnership arrangements with schools, through secured community access and initiatives, to meet the future demand for outdoor and indoor sports. The provision of additional indoor facilities will be investigated. Where new sites can be found these will be identified in the City Plan Part 2. The council will work with Sport England and, where appropriate, neighbouring authorities to develop sports hubs and clusters or centres of excellence that benefit the local community and wider public. The council will identify a rolling programme of maintenance works to the city's existing outdoor sports pavilions.

4.180 With the demand for additional housing and commercial development and the move towards increased residential densities it is important that new development is accompanied by appropriate amounts of sports services, facilities and space (both outdoor and indoor). This should be provided on-site where appropriate. Any shortfalls should be addressed via off-site provision and/or financial contributions towards enhancement of existing, sports co-ordinators and/or similar in order to meet the needs generated by the development (see CP7). The maintenance and consequent funding of sports facilities and spaces is key to providing good quality provision and will be sought as part of any new provision.

Part 4

City Wide Policies

Healthy and Balanced Communities

CP18 Healthy City

Planning will support programmes and strategies which aim to reduce health inequalities and promote healthier lifestyles through the following:

- 1. Carry out health impact assessments (HIA or incorporated into a sustainability appraisal) on all planning policy documents.**
- 2. Require HIA on all strategic developments in the city.**
- 3. Require larger developments to demonstrate how they maximise positive impacts on health within the development or in adjoining areas (where the benefits of new development can be maximised).**
- 4. Encourage development that works towards Lifetime Neighbourhood¹ principles; promotes health, safety and active living for all age groups, including healthy living options for older people (see also CP12 and CP13), active space for children and encourages physically active modes of transport.**
- 5. Recognise, safeguard and encourage the role of allotments; garden plots within developments; small scale agriculture and farmers markets in providing access to healthy, affordable locally produced food options.**
- 6. Joint working with health providers to help deliver and protect a sub regional network of critical care hospitals and a citywide integrated network of health facilities that is within reasonable walking distance of public transport.**
- 7. Through the City Plan Part 2 appropriate sites for health use with good access will be identified and safeguarded taking into account future growth and demand for health services in the city.**

Supporting Text

4.181 Brighton & Hove is a member of the World Health Organisation's Healthy Cities Network, whose healthy urban environment principles include:

- human health as a key element of sustainable development;
- co-operation between planning and health agencies;
- integrating health considerations into plans, strategies and policies.

4.182 Healthy urban environments aim to positively influence the determinants of health particularly by the encouragement of healthy lifestyles and through the design and provision of infrastructure which supports active and healthy living including access to safe open space (see CP16). This encompasses a need to facilitate access to healthy housing, sport facilities, recreation, cultural and community facilities, healthy food, care and health facilities. There are strong links between this policy and the City Plan policies on Urban Design (CP12); Public Streets and spaces (CP13); and Open space (CP16) where urban design, the provision, design of and access to open space (including natural green space) and the design of the public realm can encourage more active lifestyles and adaptations that facilitate this. Furthermore, the council is working with partners to achieve designation of the city as a Biosphere Reserve (see CP10). Healthy lifestyles can be promoted by good engagement with the natural world including access to natural green space close to home.

4.183 The geographical inequalities in health in Brighton & Hove are such that there are marked differences in physical and mental health and life expectancy between the most deprived and most affluent neighbourhoods in the city. The purpose of this policy is to help reduce these inequalities (see also SA6 - Sustainable Neighbourhoods). It is also recognised that alongside this geographical inequality; health issues affect different communities differently. The determinants of health are closely linked to quality of life factors such as the ability to earn a reasonable wage, access to healthy housing, open space, an active lifestyle, cultural and community facilities, healthy food, care and health facilities together with the impact of noise and air quality. Environmental factors and constraints in the public realm are increasingly being recognised in national guidance as having a significant impact on health. The council will investigate the possibility of establishing a 'Care Farms'¹⁹² programme with tenant farmers that encourage farms to develop opportunities for respite care, 'Farm to Fork' activities, mind exercise and nutrition.

4.184 Planning can have a real influence on these factors. The policy promotes access to healthy lifestyles including access to healthy food, facilitating healthy transport options including the potential for walking and cycling in new developments. It promotes access to community and cultural facilities that affect mental health especially in older people, ensuring a range of services that are responsive to the diverse needs of the city's residents, and an integrated network of primary and secondary care.

4.185 The policy aims to ensure that developments and policies are tested to ensure that they reduce adverse impacts (through HIA; parts 1 and 2 of the policy) and maximise positive impacts on health. Developers are asked¹⁹³ to demonstrate that they have made provision for accessing green space, cultural facilities, transport options, exercise, and healthy food (parts 3 – 5 of the policy). Developers should consider the whole lifetime needs of occupiers and overcome barriers to access to facilities both within and beyond the development. Strategic developments are defined as all developments requiring an EIA and developments covered by the Development Area proposals in this document or of an equivalent size. The type of health facilities referred to in part 6 include walk-in polyclinics, health centres, multipractice GPs surgeries, substance misuse clinics, ambulance facilities and critical care facilities including extension of the Royal Sussex County Hospital.

¹⁹² The National Care Farming Initiative involves commercial farms working with health and social care agencies to provide farming activities to improve physical and mental health and wellbeing of clients with various educational and mental health needs.

¹⁹³ Also through the council's Sustainability Checklist.

CP19 Housing Mix

To improve housing choice and to ensure that an appropriate mix of housing (in terms of housing type, size and tenure) is achieved across the city, the council's approach to housing delivery (CP1) will be further developed as follows:

a. The City Plan (Parts 1 and 2) will set out policies and site allocations responding to key objectives set out in the council's Housing Strategy¹⁹⁴. Policies will seek to respond to:

- i) the accommodation requirements of specific groups, for example, families with children; older and disabled people; housing for smaller household types; the accommodation needs of travellers and the city's need for purpose built student accommodation;
- ii) the need to retain residential uses in the city and to make the best use of the existing housing stock.

b. At site level, a housing mix (in terms of housing type, size and tenure) may be set for individual sites identified in Parts 1 and 2 of the City Plan; Action Area Plans; Supplementary Planning Documents and Site Planning Briefs.

c. Sites coming forward as 'windfall' development will be required to demonstrate that proposals have had regard to housing mix considerations and have been informed by assessments of local housing demand and needs.

d. All new residential development will have regard to the characteristics of existing neighbourhoods and communities to ensure that development makes a positive contribution to the achievement of mixed and sustainable communities (see also SA6 and CP14).

Supporting text:

4.186 As well as achieving an appropriate scale of new housing development (in terms of the overall amount and location of new housing to be developed in the city), the council gives a high priority to the importance of achieving a good mix and choice of housing (in terms of types and sizes of accommodation) to meet the diverse needs of the local community over the plan period.

4.187 In this respect planning policies will be further developed within the wider context of the council's Housing Strategy¹⁹⁵ which sets out three key priorities for housing provision. These are:

- To improve housing supply to make sure that the city has the right type of housing to meet the needs of the residents;
- To improve the quality of housing so that residents are able to live in decent homes suitable for their needs; and

¹⁹⁴ Housing Strategy 2009 – 2014, Healthy homes, healthy lives, healthy city.

¹⁹⁵ Housing Strategy 2009 – 2014, Healthy homes, healthy lives and healthy city and subsequent revisions.

- To improve housing support to make sure residents are supported to maintain and increase their independence.

4.188 Government guidance encourages local planning authorities to plan for a mix of housing on the basis of current and future demographic trends; market trends and the needs of different groups in the community. In doing this, the council will have regard to the diverse range of accommodation requirements across the city including the city's need for affordable housing, the need for family sized housing; housing suitable for the elderly and disabled, housing for smaller household types, for student housing and also the need to address the accommodation requirements of travellers (see also policies CP20 Affordable Housing, CP21 Student Housing, CP22 Gypsy and Traveller Accommodation and SA6 Sustainable Neighbourhoods). The need to encourage active living for all age groups including healthy living options for older people is addressed in CP18 Healthy City and the need for developments to be inclusive, adaptable and accessible is addressed in CP12 Urban Design.

4.189 The city's Strategic Housing Market Assessment (SHMA, 2008)¹⁹⁶ and the Brighton & Hove Housing Requirements Study (2011)¹⁹⁷ indicate that a range of factors are likely to influence both the demand and need for different housing types and sizes. These include the profile of the existing housing stock; housing affordability within the city; demographic changes (the scale of population and household growth and changes to the age structure); the quality of place; the local economy in terms of its influence on income and labour demand and the general accessibility of an area in terms of its relationship to other employment locations.

4.190 In terms of the city's current housing offer, 85% of the housing stock is in private ownership (approximately 62% owner occupation and 23% private rented) with the affordable housing stock accounting for around 15.5 % which while below the national average (18.1%) is slightly above the South East average (15.4%)¹⁹⁸.

4.191 The city has a particular concentration of flats/maisonettes/apartments which account for 46% of the total housing stock (compared to 37% in the wider coastal area and 18% for the South East) and a low proportion of detached (11%) and semi-detached (20%) housing (the wider coastal area has 17% detached and 24% semi-detached and the South East average is 29% detached and 28% semi-detached)¹⁹⁹. Terraced homes account for 22% of the city's housing stock.

4.192 The bias towards smaller flats and terraced homes is not dissimilar to that found in many other cities and urban areas but in Brighton and Hove it is likely to reflect the historic pattern of development in the city in terms of the many large seafront terraces that lend themselves to conversion; the city's constrained land supply and, in more recent times, the impact of higher house prices, intense affordability pressures and a lack of available sites.

¹⁹⁶ Brighton & Hove Strategic Housing Market Assessment SHMA, DTZ April 2008.

¹⁹⁷ Brighton & Hove Housing Requirements Study, June 2011 and supplementary papers titled Implications of Demographic Change on Demand for Homes in Brighton & Hove (March 2012) and Demographic Implications of the Housing Trajectory (March 2012).

¹⁹⁸ Paragraph 3.19, Brighton & Hove Housing Requirements Study, June 2011.

¹⁹⁹ 2008 SHMA, Section 6 and Figure 6.4.

Taken together, these factors have encouraged the development of higher density housing in more recent years²⁰⁰.

4.193 It is possible that this stock profile, coupled with affordability issues has supported some of the movement of family type households from the city out to surrounding areas (mainly to Adur and Lewes Districts) to access larger housing²⁰¹.

4.194 In terms of the local population, demographic information indicates that the city has a relatively young population, with population growth over the last 20 years concentrated in the 15-44 age groups²⁰². Average household size is relatively small (2.09) and there are significant levels of single person (single pensioner and other single adults) households (39%). Family households with children currently comprise about 21% of the city's households. Couple households (pensioner couples and childless couples) comprise 27.5% of the city's households²⁰³.

4.195 Moving forward over the next 20 years, the city's population will continue to be focused on households aged in their 20s, 30s and early 40s. The strongest growth in population is expected to occur in those people aged 55-69 (as the current population aged in their 30s, and 40s gets older). The school age population is expected to grow (reflecting current high levels of births) and the population over retirement age will increase but with the largest increases affecting those people in their late 60s and late 80s²⁰⁴.

4.196 However, the relationship between household type and size and dwelling size is not a straightforward one. The profile of households in an area does not necessarily translate into the types and sizes of property to be provided.

For example, in the market sector, households are able to buy or rent any size or type of property subject to what they can afford. The size of housing which households occupy relates more to their wealth and age rather than the number of people which they contain. Whilst 1 and 2 bed dwellings are almost exclusively lived in by small households, significant numbers of larger properties accommodate just one or two person households²⁰⁵ which indicates significant levels of 'under-occupancy'²⁰⁶.

4.197 A demographic analysis of the demand and need for homes in the city over the plan period²⁰⁷ indicates that an estimated 53% of overall housing need and demand (market and affordable) will be for 3 and 4 bedroom properties with 47% for 1 and 2 bedroom properties. In terms of housing types, the requirement for flatted development makes up around a third of the total. In practice, the land availability constraints faced by the city are likely to restrict the provision of larger properties.

4.198 As indicated above, it is clear that within the city's existing housing stock there is evidence of a 'bias' towards smaller dwelling types. It is also true that this has been the

²⁰⁰ See 2008 SHMA, Section 6, para. 6.5

²⁰¹ Brighton & Hove Housing Requirements Study, para. 3.9, SHMA, Section 10, para.10.13.

²⁰² Strategic Housing Market Assessment, 2008, para. 4.9 and Housing Requirements Study, Executive Summary,

²⁰³ See SHMA, Section 4, paragraph 4.21 and 4.32.

²⁰⁴ Para. 1.13 and Figure 1.6 , Demographic Implications of the Housing Trajectory, GL Hearn, March 2012.

²⁰⁵ See SHMA, Section 10, paras 10.17 – 10.28.

²⁰⁶ Nationally, about 36% of households under-occupy with slightly higher figures in the South East, see para. 1.8 Implications of Demographic Change on Demand for Homes in Brighton & Hove

²⁰⁷ Implications of Demographic Change on Demand for Homes in Brighton & Hove, paras. 1.34 – 1.39

case in terms of the pattern of recent residential development in the city²⁰⁸. This points towards a lack of 'choice' across the housing market in terms of property types and sizes available to current and future households and this is particularly so in terms of the availability of larger family sized types of dwellings. Where there are gaps in the choice of dwellings available to residents or where there are problems with particular neighbourhoods which might (in part) be tackled through changes to the types and sizes of dwellings available then there is a role for planning to help influence the mix of new housing development (see also Policy SA6). It will be important therefore to maximise opportunities to secure family housing on suitable sites.

4.199 The council's approach to housing mix will therefore be further developed through the preparation of subsequent local planning documents. Where appropriate (in terms of site suitability and with reference to the characteristics of existing communities/neighbourhoods), the intention will be to secure, through new development, a wider variety of housing types and sizes to meet the accommodation requirements of particular groups within the city. For larger sites, where new development will make an important contribution to existing communities in terms of regeneration and/or helping to make them more sustainable places to live, site allocations may set a required housing mix (in terms of housing type, size and tenure) to be achieved.

4.200 Policy CP20 Affordable Housing is clearly linked to housing mix considerations and sets out further information regarding the requirements for affordable housing in the city.

²⁰⁸ SHMA, April 2008. Section 10.

CP20 Affordable Housing

The Council will require the provision of affordable housing²⁰⁹ on all sites of 5 or more dwellings (net) and will negotiate to achieve the following affordable housing targets:

- a) 40% onsite affordable housing on sites of 15 or more dwellings;
- b) 30% onsite affordable housing on sites of between 10 and 14 dwellings or as an equivalent financial contribution;
- c) 20% affordable housing as an equivalent financial contribution on sites of between 5 and 9 dwellings.

This policy will apply to all types of residential development including conversions and changes of use.

The targets set out above may be applied more flexibly where the council considers this to be justified. The exact proportion and type of affordable housing deemed acceptable will result from an assessment against the following criteria:

- i. local need in respect of the mix of dwelling types and sizes including the city's need to provide more family-sized affordable housing;
- ii. the accessibility of the site to local services and facilities and public transport;
- iii. the costs relating to the development; in particular the financial viability of developing the site (using an approved viability model);
- iv. the extent to which the provision of affordable housing would prejudice the realisation of other planning objectives; and
- v. the need to achieve a successful housing development

Affordable housing provision should incorporate a mix of tenures. The exact tenure split on each site will be a matter for negotiation but should be informed by up to date assessments of local housing need and individual site and/or neighbourhood characteristics.

In terms of the affordable housing unit size mix, the preferred mix to be achieved across the city is 30% one bedroom units; 45% two bedroom units and 25% 3+ bedroom units. On individual sites, the preferred affordable housing mix (in terms of unit size and type of dwelling) will be determined through negotiation and informed by up to date assessments of local housing needs and site/neighbourhood characteristics.

On sites of 10 or more dwellings, affordable housing will normally be delivered on site in accordance with the targets set out in this policy. Only in exceptional circumstances²¹⁰ will the Council accept a commuted sum or free serviced land in lieu of on site provision. These circumstances may include provision where a Registered Provider finds it uneconomic or impractical to provide the units agreed. Any financial contributions will be pooled and used to enable affordable housing provision within the City.

²⁰⁹ The definition of affordable housing is that as set out in the National Planning Policy Framework.

²¹⁰ As set out in the Council's Developer Contributions Guidance.

NB: Enabling residential development on identified employment sites will be subject to the same requirements for affordable housing as set out in the above preferred option (see CP2 and CP3).

Supporting text

4.201 Housing affordability is a major issue for the city, particularly for many families and for newly forming households. The council is committed to enabling the provision of high quality affordable housing for people who are unable to access or afford market housing as well as helping people make the step from social or affordable -rented housing to home ownership. It will be essential to tailor the provision of affordable housing to the local housing needs of particular household groups including families, the elderly, key workers²¹¹ and groups with particular support needs.

4.202 In the period 1997 – 2007, average house prices in Brighton & Hove almost tripled. Although there has been some decrease in house prices since their peak in 2007, prices remain relatively high in relation to local incomes. Recent data for house prices and average household incomes²¹² indicates that a household income of £40,000 is now required to purchase an average priced one-bedroom flat in the city and a household income of £72,000 is required to purchase an average priced three-bedroom house²¹³. Households would also now be required to find a much higher deposit than was the case several decades ago. This means that new households wishing to enter the market face particular difficulties together with many family households wishing to move to larger properties. There is also evidence of significant affordability problems within the private rented sector.²¹⁴

4.203 The 2005 Housing Needs Survey identified a net shortfall of 1200 affordable homes per annum²¹⁵. The 2008 SHMA also details significant and comparable evidence of the scale of housing need²¹⁶ across the city. Although the city has a good track record for the delivery of affordable housing (both rented and intermediate forms), the demand for such housing significantly exceeds supply. As at 1 July 2011, there were almost 11,000 households on the council's Housing Register seeking a home with an additional 2,000 households already in housing seeking a transfer to more suitable accommodation.

4.204 There are a range of issues to consider when setting targets for the delivery of affordable housing from new developments. There is a need to achieve viable, sustainable developments and to provide for mixed and balanced communities. The city council considers that the most pragmatic approach is to require that all new suitable residential development (as defined with reference to the site size thresholds set out in the policy) provides a viable and deliverable proportion of affordable housing or (where appropriate) an equivalent financial contribution in lieu of onsite provision which can be pooled to help enable the provision of affordable housing elsewhere in the city.

²¹¹ A worker whose services are essential to local communities, who need to live close to those communities and the people they serve. Government guidance targets specific workforce groups such as teachers, nurses, social workers, fire and rescue officers, probation officers and the police.

²¹² Housing Costs Update, 2011.

²¹³ Average price 1-bed flat £172,000 and average 3bed house £314,000, 2011.

²¹⁴ Strategic Housing Market Assessment (April 2008), Section 7.

²¹⁵ Brighton & Hove Housing Needs Survey (2005), Executive Summary 1.16

²¹⁶ Strategic Housing Market Assessment (April 2008), Section 10 and Figure 11.2

4.205 Drawing on the findings of the council's most recent Affordable Housing Development Viability Study²¹⁷ and taking account of a number of other related considerations (for example, housing land supply, housing market trends, local needs and affordability, together with wider planning obligations) the council considers the most balanced way forward is to seek onsite provision of affordable housing on all suitable larger development sites (40% on sites of 15 units or more and 30% on sites of between 10 and 14 units) and a financial contribution equivalent to a lower target quota of 20% on smaller sites between 5 and 9 units. The council will seek the maximum reasonable amount of affordable housing when negotiating on individual schemes and the appropriate proportion and type of affordable housing will be assessed against the criteria i-iv as set out in the policy.

4.206 In terms of the preferred affordable housing mix (including unit size mix, dwelling type and tenure balance), ongoing monitoring of local housing needs together with individual site and neighbourhood characteristics will inform the approach to the application of the policy to individual sites. Affordable housing achieved across the city should reflect the distinct needs of different sections of the community including provision for the elderly, specialist groups in need of supported housing, families and key workers. City wide policy CP14 addresses the accommodation needs of Gypsies and Travellers²¹⁸. In accordance with policy SA6 Sustainable Neighbourhoods, it may be appropriate to allow higher proportions of intermediate housing in disadvantaged areas to help facilitate regeneration in those areas and achieve mixed and sustainable communities. Such an approach is supported by the 2008 SHMA.

4.207 In terms of the unit size of affordable housing required, the SHMA indicates that amongst those households identified as in the highest priority need (Bands A and B of the Housing Register), 41% need a 2 bedroom or larger property²¹⁹ often because they are young families with children. The SHMA also identifies that although the greatest need (in numerical terms) is for smaller (one/two bedroom) properties there are also significant pressures on the availability of larger family homes which results in an ongoing priority for a number of three/four bedroom properties²²⁰. These findings are confirmed by more recent work regarding the city's housing requirements²²¹. The need for family sized affordable housing will be a specific consideration when assessing the overall amount and type of affordable housing that is required to be provided by suitable development proposals.

²¹⁷ Affordable Housing Development viability Study, March 2012.

²¹⁸ Publicly funded Gypsy and Traveller pitches count as affordable housing provision.

²¹⁹ Strategic Housing Market Assessment (April 2008), Figure 10.18

²²⁰ Strategic Housing Market Assessment (April 2008), Section 11.

²²¹ Implications of Demographic Change on Demand for Homes in Brighton & Hove.

Policy CP21 Student Accommodation and Houses in Multiple Occupation

To meet increasing accommodation demands from students and to create mixed, healthy and inclusive communities, the Council will support the provision of additional purpose built accommodation and actively manage the location of new Houses in Multiple Occupation. The Council will continue to work closely with the two universities and other education providers to achieve these goals.

i) Purpose Built Student Accommodation

A. The council will encourage the provision of purpose built accommodation to help meet the housing needs of the city's students. Proposals for new purpose built student accommodation will need to demonstrate that the following criteria have been addressed:

- 1. Proposals should demonstrate that there will be no unacceptable impact upon residential amenity in the surrounding area through issues such as increased noise, disturbance ;**
- 2. High density developments will be encouraged but only in locations where they are compatible with the existing townscape (see CP12 Urban Design);**
- 3. Sites should be located along sustainable transport corridors where accommodation is easily accessible to the university campuses or other educational establishments by walking, cycling and existing or proposed bus routes;**
- 4. Proposals should demonstrate that they would not lead to an unacceptable increase in on-street parking in the surrounding area;**
- 5. Proposals should be designed to be safe and secure for their occupants whilst respecting the character and permeability of the surrounding area;**
- 6. Schemes should have the support of one of the Universities or other educational establishments. The council will seek appropriate controls to ensure that approved schemes are occupied solely as student accommodation and managed effectively;**
- 7. Permanent purpose built student accommodation will not be supported on sites with either an extant planning permission for residential development or sites identified as potential housing sites.²²²**

B) Strategic Allocations for Purpose Built Student Housing

In conjunction with the Universities and City College, the council will allocate the following sites for purpose-built student accommodation:

- 1. Varley Halls, Coldean Lane, Brighton**
 - Redevelopment of the remaining parts of the site wholly for student accommodation**
 - 150 bedspaces**

²²² Sites identified as potential housing sites will include those identified in other City Plan policies and those listed in the Strategic Housing Land Availability Assessment.

2. **Preston Barracks and the University of Brighton, Lewes Road, Brighton (See DA3 Lewes Road Area)**
 - Delivery of this site as part of a wider mixed use scheme
 - At least 750 bedspaces²²³
3. **Pelham Street, Brighton (See DA4 New England Quarter and London Road Area)**
 - Delivery of this site as part of a wider mixed use scheme
 - 300 bedspaces
4. **Circus Street, Brighton (See DA5 Eastern Road and Edward Street Area)**
 - Delivery of this site as part of a wider mixed use scheme
 - 400 bedspaces
5. **East Slope and land adjoining to the east, University of Sussex**
 - Redevelopment of existing accommodation and development of adjoining land for student accommodation providing a net increase over the existing 592 bedspaces in the East Slope Residences, subject to positive enhancement of the visual appearance of this part of the campus within the surrounding landscape

ii) Houses in Multiple Occupation (HMO's)

In order to support mixed and balanced communities and to ensure that a range of housing needs continue to be accommodated throughout the city, applications for the change of use to a Class C4 (Houses in multiple occupation) use or to a sui generis House in Multiple Occupation use (more than six people sharing) will not be permitted where:

- More than 10% of residences within a radius of 50 metres of the application site are already in use as Class C4, mixed C3/C4 or other types of HMO in a sui generis use.

Supporting Text

4.208 The city's educational establishments and their students make an important contribution to the economic and cultural life of the city. There are approximately 37,000 students at the Universities of Brighton and Sussex, which includes 5,200 international students from 150 countries. Many students also attend other educational establishments, such as City College, the language schools and Brighton Institute of Modern Music. The Council will work with students and their education providers to ensure that the accommodation needs of the students are met in a sustainable way and that healthy and inclusive communities²²⁴ are maintained and developed in the future.

4.209 Brighton & Hove City Council's 'Student Housing Strategy 2009-2014' identified a number of key issues associated with the large student population that need to be addressed in partnership with the city's two universities, other educational establishments, students, landlords and developers. The Strategy sets out several objectives, one of which

²²³ Lewes Road (Preston Barracks and University of Brighton) Planning Brief – September 2011

²²⁴ As stipulated in the National Planning Policy Framework

is to promote and enable the appropriate development of purpose built student accommodation at suitable locations within the city.

4.210 Over recent years the City Council has received an increasing number of speculative enquiries from developers regarding purpose built student accommodation. Assessing proposals for new purpose built accommodation against the above criteria will ensure that schemes are developed to a high standard and in appropriate locations which meet council, residents, students and educational institutions' priorities.

4.211 Six sites are specifically allocated for new purpose built student accommodation. Redevelopment of part of the Varley Halls site by the University of Brighton is underway. Although proposals must address the significant constraints imposed by the site's sensitive location in terms of landscape, ecology and archaeology, further redevelopment will create 150 net additional bedspaces. The Lewes Road (Preston Barracks and University of Brighton) planning brief adopted in September 2011 sets out three possible development scenarios. Each scenario includes 750 student bedspaces, as part of the wider proposed mixed use development. City College's Pelham Street campus has planning permission for a mixed use development incorporating 300 bedspaces for students. Circus Street is allocated for mixed use development, including 400 student bedspaces catering for the adjacent university site. Finally, the University of Sussex propose to redevelop their existing East Slope Residences and to develop adjoining land to the east. East Slope Residences currently has a significant negative impact upon views within the campus and upon the sensitive landscape setting. The setting includes the South Downs National Park and the Stanmer historic park. The Council supports the principle of developing this land to allow the University to better meet accommodation demands, provided that the scheme significantly improves the visual appearance and setting of the campus and surrounding landscape.

4.212 The provision of additional bed spaces in purpose built student accommodation will also assist in encouraging students to choose managed accommodation over HMO's, which is particularly important for first year students.

4.213 The city has a high number of HMOs, partly as the supply of purpose-built accommodation has not matched the expansion of the student population and partly due to housing prices and availability within the city. The private sector has responded positively to the increasing demand for student housing and there has been a significant conversion of family housing to student occupied HMOs in many neighbourhoods. Another aim of the Student Housing Strategy is to support and enhance the quality and management of housing and residential environments within HMO dominated neighbourhoods.

4.214 In 2010 a new C4 use class for Houses in Multiple Occupation was created. The council already had concerns about the over-concentration of HMOs in certain parts of Brighton & Hove, as expressed through the Student Housing Strategy, and felt that these areas had the exceptional circumstances necessary to warrant an article 4 direction. An article 4 direction was subsequently made, meaning that planning permission is required for changes of use to small HMO (C4) uses in five of the city's electoral wards.

4.215 This policy will be used to control future changes of use to small (C4) and large (sui generis) Houses in Multiple Occupation to address the potential impact of concentrations of

HMOs upon their surroundings and to ensure that healthy and inclusive communities are maintained across the city.

4.216 To aid implementation of this policy, the Council will maintain a database of properties in HMO use. It will include properties in small HMO (C4) use, mixed C3/C4 uses and larger, sui generis HMO uses. The database will use a variety of information sources including planning records, details of HMOs licensed by the council and those properties identified as student housing through Council Tax records.

4.217 In assessing planning applications for new Houses in Multiple Occupation, a circle with a radius of 50 metres will be drawn from the centre point of the application site's highway frontage. Residential properties partly or wholly within the circle will be checked to identify which are in HMO use (including C4, mixed C3/C4 or sui generis uses). Planning permission for the change of use will not be granted where more than 10% of these neighbouring properties are already in HMO use. The assessment will include only residential properties and will exclude commercial uses, such as retail or office units.

4.218 The 10% threshold contained in the policy above will be reviewed regularly to ensure that it continues to provide opportunities for a balance of household types. The baseline data of the current distribution of HMO's will be regularly kept up to date.

CP22 Traveller Accommodation

Provision will be made to meet the city's needs for traveller accommodation²²⁵.

The council will seek to deliver 16 permanent residential pitches to meet assessed needs for the period to 2016. Ongoing traveller accommodation needs will be reviewed. Any additional or outstanding requirements will be facilitated through site allocations in Part 2 of the City Plan or through joint working with adjacent local planning authorities.

In assessing the suitability of new traveller sites(or extensions to existing sites), the local planning authority will have regard to the following planning considerations and will need to be satisfied that:

- a) there is safe and convenient access to the road network;**
- b) there is satisfactory access to local services and facilities (including health services, GPs, schools, shops);**
- c) the potential for noise and other disturbance from the movement of vehicles to and from the site and any on-site business activities is not detrimental to the character and appearance of surrounding areas;**
- d) there is scope for appropriate landscaping and planting to help give structure and privacy and to maintain visual amenity; and**
- e) there is capacity to provide the necessary physical and social infrastructure (water, electricity, drainage, sanitation, play areas);**
- f) the location of sites will not compromise the essential features of designated areas of landscape, historical or nature conservation protection including the South Downs National Park;**

The following locations should be avoided:

- Sites on or near to significantly contaminated land, industrial processes or other hazards where there would be a detrimental effect on the general health and well-being of residents; and**
- Sites in areas of high flood risk; and**
- SACs, SPAs, Ramsar Sites and other areas with internationally recognised designations.**

Existing traveller sites will be safeguarded. Proposals that would result in the loss of all or part of an existing site will be refused unless:

- a) the local planning authority is satisfied that the need for the provision of the site no longer exists; or**
- b) the proposal complies with the policies in the development plan and a replacement site is to be provided in a suitable location.**

Supporting text

²²⁵ The definition of traveller accords with the definition of Gypsies and Travellers as set out in government guidance 'Planning Policy for Traveller sites', March 2012.

4.219 The council's 'Traveller Strategy' aims to promote community cohesion and to protect the rights and needs of both the settled and travelling communities. The Strategy²²⁶ acknowledges that traveller communities have a right to a nomadic lifestyle, to equal access to services (such as education, health and accommodation) and to protection from discrimination and harassment. The city's Traveller Strategy together with government guidance and the local evidence base²²⁷ provide the appropriate context for planning to meet the accommodation needs of travellers either living in or passing through the city.

4.220 The city's local need for permanent (residential) pitch provision was established through the Partial Review of the South East Plan process (2007 – 2010). Technical work undertaken as part of that process provides a robust evidence base for the local need for permanent pitch provision in the period to 2016. This establishes a need for 16 pitches to be provided in Brighton & Hove. This is additional to the short term transit site provision²²⁸ that the council currently makes at the Horsdean site just north of the A27. There is no local evidence of any need for Travelling Showpeople plots in the city²²⁹.

4.221 The council has undertaken a comprehensive site search exercise and has identified a site to accommodate its permanent need requirements to 2016²³⁰. As the site falls within the boundaries of the South Downs National Park, a planning application will be made to, and determined by, the South Downs National Park Authority.

4.222 Beyond this, levels of need for both permanent and transit site provision²³¹ will clearly need to be kept under review and updated through further local assessments of the need for traveller accommodation. The council will work with its adjacent local planning authorities to secure the provision of suitable sites should it not prove to be possible to identify sites within the City.

4.223 Government planning guidance also advises that plans should set out the relevant planning criteria and considerations for the location of traveller sites which may be used to guide the allocation of sites and to assess any planning applications that may come forward. These criteria can be used to meet unexpected demand for sites and to assist the city council in granting planning consent for suitable applications in advance of the formal adoption of Local Plan Documents.

4.224 There is a need to ensure that all sites (whether new or existing/improved):

- are sustainable, easy to manage and maintain;
- are of a decent standard, equitable to that which would be expected for affordable housing in the settled community; and
- support harmonious relations between gypsies and travellers and the settled community.

²²⁶ Traveller Commissioning Strategy 2012, Strategy March 2012.

²²⁷ Local evidence base consists of the East Sussex and Brighton & Hove Gypsy and Traveller Study as benchmarked, audited and amended through the Partial Review of the South East Plan process (2007 – 2010) and further needs assessment exercises.

²²⁸ Transit site provision – Horsdean provides 23 pitches for temporary accommodation for up to 3 months.

²²⁹ Draft Panel Report, Examination in Public of Partial Review of the South East Plan, 2010.

²³⁰ Site Search exercise and selection of preferred site was reported to the Council's Cabinet Meeting, 15th March 2012.

²³¹ Transit site provision relates to temporary provision and may include stopping places rather than additional formal transit provision

4.225 Any sites considered for allocation in Part 2 of the City Plan will be subject to consultation and have their social, environmental and economic impacts assessed in accordance with the requirements of the sustainability appraisal.

Appendix 1: Glossary of terms

This glossary provides a brief explanation of some terms used in this document.

Term	Definition
Affordable Housing	<p>Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Affordable housing should:</p> <ul style="list-style-type: none"> • Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. • Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision. <p>Social rented housing is: Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. The proposals set out in the Three Year Review of Rent Restructuring (July 2004) were implemented as policy in April 2006. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency as a condition of grant.</p> <p>Affordable rented housing is: Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime³⁴ but is subject to other rent controls that require a rent of no more than 80 per cent of the local market rent.^{35,36}</p> <p>Intermediate affordable housing is: Housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can include shared equity products (E.g. HomeBuy), other low cost homes for sale and intermediate rent but does not include affordable rented housing.</p> <p>The definition does not exclude homes provided by private sector bodies or provided without grant funding. Where such homes meet the definition above, they may be</p>

	considered, for planning purposes, as affordable housing. Whereas, those homes that do not meet the definition, for example, 'low cost market' housing, may not be considered, for planning purposes, as affordable housing.
Air Quality Management Area (AQMA)	Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.
Aquifer	Rock that provides a natural underground store for water. In Brighton & Hove aquifers are used to provide drinking water.
Biodiversity (Biological Diversity)	The range and variety of life (including plants, animals and micro-organisms), ecosystems and ecological processes.
BREEAM	Building Research Establishment Environmental Assessment Method - the most widely used means of reviewing and improving the environmental performance of buildings
Brownfield or 'previously developed land'	<p>Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the cartilage should be developed) and any associated fixed surface infrastructure.</p> <p>This excludes:</p> <ul style="list-style-type: none"> • Land that is or has been occupied by agricultural or forestry buildings; • Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; • Land in built-up areas such as private residential gardens, parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, has not been previously developed, and; • Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings).
Built Heritage (or Historic Built Environment)	Buildings and other structures considered to be of a special architectural or historic quality or interest. Includes, but not limited to, Listed Buildings and Conservation Areas.
Built up area	Area identified within which the development of the city has occurred already. The outer limits of the built up area are defined on a proposals map.
Carbon	The term "carbon footprint" refers to the amount of carbon

Footprint	dioxide (CO ₂) emitted as a result of specific activities. The carbon footprint is often considered over the period of a year and often is used specifically in relation to emissions resulting from energy use from buildings. 'Zero carbon' means that there will be no net annual CO ₂ emissions resulting from energy use in a building
Community Infrastructure Levy (CIL)	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.
Climate Change	Accounts for long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Often regarded as a result of human activity and fossil fuel consumption.
Code for Sustainable Homes (CSH)	The Code for Sustainable Homes (CSH) is an environmental assessment method for rating and certifying the performance of new homes. It is a Government owned national standard intended to encourage improvement in sustainable home building. The Code looks at various aspects of design such as (but not limited to): energy and carbon emissions; water; materials; ecology; waste; flood risk and health impacts
Connectivity	Connectivity or permeability refers to the visual and physical accessibility into and within an area.
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. In respect of Brighton & Hove they are usually designated by the city council, though the Secretary of State can also designate them.
Creative Industries	The creative industries include: advertising; architecture; art and antiques markets; computer and video games; crafts; design; designer fashion; film and video; music; performing arts; publishing; software; and television and radio.
Density (dwellings)	Measure used to describe the numbers of housing units associated with a given area e.g. dwellings per hectare. Net density includes access roads within the site; private garden space; car parking areas; incidental open space and landscaping; and local children's play areas where these are to be provided.
District Centre	Groups of shops often containing at least one supermarket or superstore and a range of non retail services such as banks and restaurants as well as local public facilities such as a library. Smaller in size than Town and Regional centres.
Downland	Usually treeless open land with only a thin covering of soil on the chalk uplands.
Ecological footprint	An " ecological footprint " measures the total amount of land and resources needed by an individual, and includes their carbon footprint
Environment	The leading public body for protecting and improving the

Agency	environment of air, land and water in England and Wales.
Exception Test	Applied following application of the Sequential Test (see separate definition), where it is not possible, consistent with wider sustainability objectives, for the development to be located in zones of lower probability of flooding the Exception Test can be applied. This provides a method of managing flood risk while still allowing necessary development to occur.
Green Network (GN)	A series of interlinked natural green spaces and nature conservation features connecting the urban area, urban fringe, the seafront and surrounding downland.
Greenfield Land	Site that has not been previously been built on (includes areas such as playing fields, allotments, countryside and gardens).
Gypsies and Travellers	Gypsies and Travellers are defined as persons of a nomadic habit of life, whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such.
Health Impact Assessment (HIA)	HIA is a practical approach that determines how a proposal (such as a development scheme or a policy) will affect people's health. Recommendations to 'increase the positive' and 'decrease the negative' aspects of the proposal are produced to inform decision-makers.
Historic Parks and Gardens	Gardens, parks and landscapes whose character reflects the period (or periods) of their design, and sometimes also the style of a particular designer. English Heritage compiles the list on the Register of Parks and Gardens of Special Historic Interest in England.
Hotel Core Zone	An area identified on a Proposals Map within which tourist accommodation would be afforded special protection by planning policy.
Housing Trajectory	The purpose of a housing trajectory is to track the provision of housing supply over the entire lifespan of a development plan and support the plan, monitor and manage approach to housing delivery by monitoring both past and anticipated completions.
Legibility	The degree to which a place can be easily understood and traversed by people.
Listed Building	A building of national importance due to its architectural or historic interest. They are buildings which have been included in the Statutory List of Buildings of Special Architectural or Historic Interest. The List is compiled by the Secretary of State (Department of Culture, Media and Sport), with advice from English Heritage and other specialist organisations, using agreed national criteria.

Local Centre	Include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, post office and a pharmacy. Other facilities could include a hot food takeaway and launderette.
Local Enterprise Partnership	A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.
Local Nature Reserve (LNR)	Local Nature Reserves are for both people and wildlife. They are places with wildlife or geological features that are of special interest locally. They offer people special opportunities to study or learn about nature or simply to enjoy it.
Local Development Framework (LDF)	The Local Development Framework or 'LDF' is the term used to describe the set of documents which will eventually include all of the planning authority's local development documents, one of which is the City Plan. As these new documents are adopted they will eventually replace the Brighton & Hove Local Plan.
Local Transport Plan (LTP)	(Also called the Full Local Transport Plan when it has been approved by the Government). It is the document prepared by the city council which sets out its transport policy and proposals and is prepared in order to bid for Government funding for all forms of transport.
Mixed use developments	A development that contains two or more uses e.g. residential, employment, leisure, community uses.
Natural England	A statutory body formed in 2006 with the bringing together of English Nature, the landscape, access and recreation elements of the Countryside Agency and the environmental land management functions of the Rural Development Service.
Nature Improvement Areas	Inter-connected networks of wildlife habitats intended to re-establish thriving wildlife populations and help species respond to the challenges of climate change.
Permeability	The degree of movement possible or permitted between public outside and private inside or between urban areas, buildings, places and spaces.
Planning Obligations/ Developer contributions	Planning Obligations or Developer Contributions are secured through Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. They are a legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990.
Proposals Map	Map that forms an integral part of the LDF and which identifies sites/areas to which particular policies apply.
Public Art	Public art includes permanent and temporary work, art facilities and arts training. Public art can create and enhance local distinctiveness and help develop a

	desirable sense of place. They often provide important opportunities to involve the local community and will offer work opportunities to local artists.
Public Realm	This is the space between and within buildings that are publicly accessible, including streets, squares, forecourts, open spaces and public and civic buildings.
Regional Centre	The highest level of shopping centre (also known as the city centre) serving a wide catchment area.
Renewable Energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat.
Sequential approach	The preferred hierarchy of land for certain uses in descending order of preference.
Sequential Test	A risk based approach to assessing flood risk, which gives priority to sites in ascending order of flood risk, i.e. lowest risk first.
Shoreline Management Plan (SMP)	Provides a large-scale assessment of the risks associated with coastal processes and present a long term policy framework to reduce these risks to people and the developed, historic and natural environment in a sustainable manner. A SMP is a high level document that forms an important element of the strategy for flood and coastal erosion risk management.
Site of Nature Conservation Importance (SNCI)	These are locally designated wildlife sites to support both locally and nationally threatened wildlife, and many sites will contain habitats and species that are priorities under the county or UK Biodiversity Action Plans (BAP)
Sites of Special Scientific Interests (SSSIs)	These are designated by Natural England (the government nature conservation agency) under the Wildlife and Countryside Act 1981. Such sites are of special national interest by reason of their flora, fauna, geological features or landforms.
South Downs National Park Authority (SDNPA)	The South Downs National Park came into being on 31st March 2010. As a National Park, the SDNPA has statutory purposes and socio-economic responsibilities as specified in the Environment Act of 1995.
Special Area of Conservation (SAC)	SACs are designated by the European Commission (EC) under the EC Directive on the conservation of habitats and wild flora and fauna (The Habitats and Species Directive 1992). The Habitats Regulations 1994 translate the Directive into UK legislation. SACs are outstanding examples of selected habitat types important for the continuing wellbeing and survival of selected non-bird species (birds are protected under their own European legislation). The Directive states that SACs are to be afforded absolute protection subject to 'imperative reasons

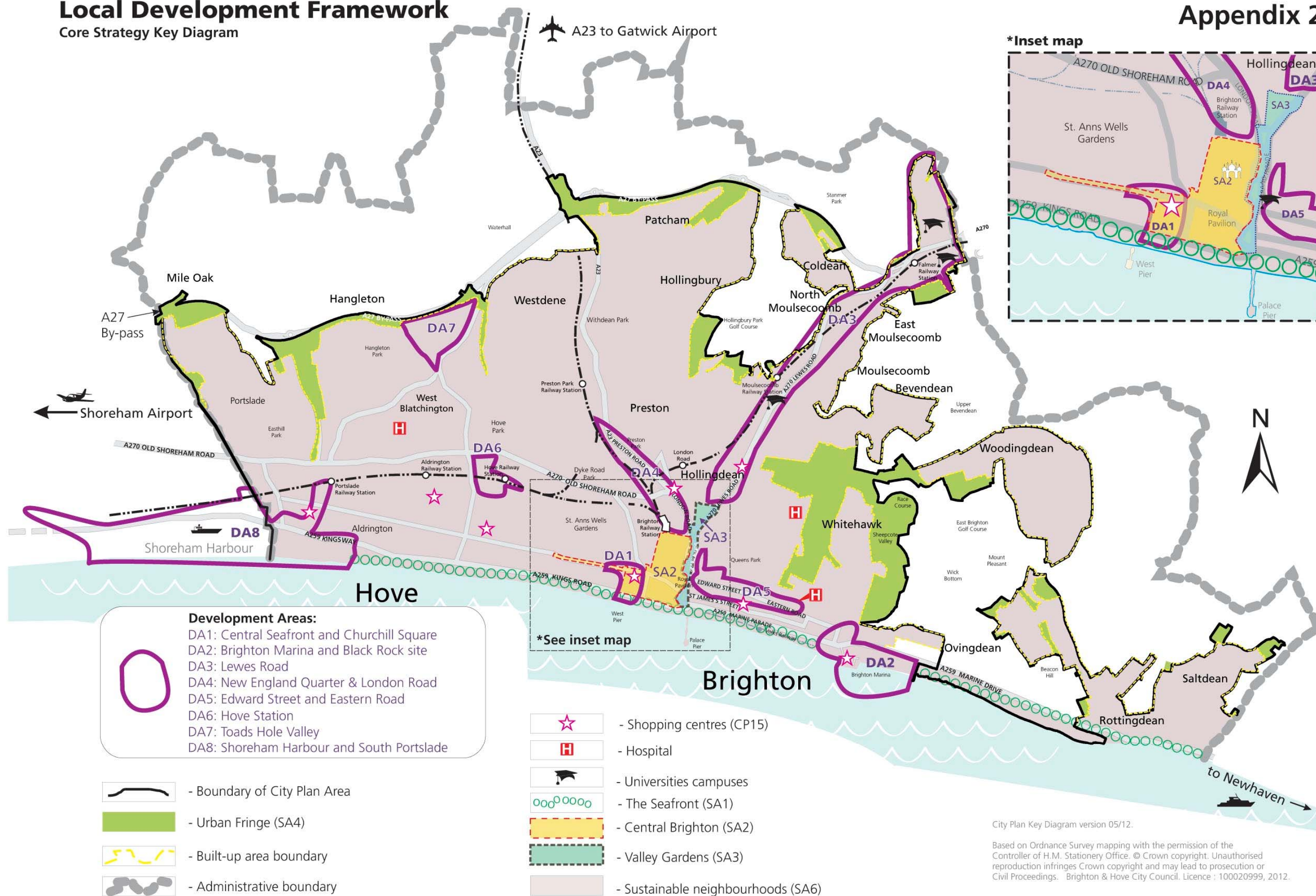
	of overriding public interest'.
Special Protection Areas (SPAs)	Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.
Strategic Housing Market Assessment (SHMA)	This assessment is to help understand the nature and level of housing demand and need within the joined market area and provides information and guidance for a variety of housing and planning policies including those in the City Plan.
Strategic Flood Risk Assessment (SFRA)	Created to help appraise, manage and reduce flood risk in relation to the location of potential new development in the city.
Strategic View	The line of sight from a particular point to an important landmark or skyline.
Supplementary Planning Document (SPD)	Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan.
Sustainability Appraisal (SA)	The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the Sustainability Appraisal (SA) achievement of sustainable development. A sustainability appraisal is a systematic process, to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document.
Sustainable Transport Modes	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.
Sustainable Community Strategy	Document that sets out the vision and plans of the agencies, organisations and communities who work together through the 2020 Community Partnership to improve the quality of life in Brighton & Hove.
Tenure	Housing tenure describes the legal status under which people have the right to occupy their accommodation. The most common forms of tenure are home-ownership (including homes owned outright and mortgaged) and renting (including social rented housing and private rented housing)
Town Centre	Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town

	centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.
Townscape	General view, appearance and character of an urban scene/landscape.
Transport Assessment	A comprehensive and systematic process of looking at the impact on transport of a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling, and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.
UNESCO Biosphere Reserve	Biosphere reserves are sites recognised under UNESCO's Man and the Biosphere Programmes, which innovate and demonstrate approaches to conservation and sustainable development. They share their experience and ideas nationally, regionally and internationally within the World Network of Biosphere Reserves.
Urban Fringe	The land between the defined built up area boundary and the South Downs National Park.
Windfall Site	Windfall sites are those which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available.
Zero carbon	'Zero carbon' means that there will be no net annual CO2 emissions resulting from energy use in a building

Local Development Framework

Core Strategy Key Diagram

Appendix 2



City Plan Key Diagram version 05/12.

Based on Ordnance Survey mapping with the permission of the Controller of H.M. Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or Civil Proceedings. Brighton & Hove City Council. Licence : 100020999, 2012.



Brighton & Hove
City Council