

# Consultation on Policy Options Papers for Brighton & Hove's City Plan

October 2011

## Summary Leaflet



Brighton & Hove  
City Council



## Building a new City Plan for Brighton & Hove

A new City Plan for Brighton and Hove is being written to replace the Core Strategy. The City Plan will set the framework for future development in Brighton and Hove up to the year 2030 and will be an important tool for attracting and directing investment in the city. It will also facilitate the delivery of much needed affordable homes and encourage the most sustainable forms of development with the highest quality of design.

There will be consultation on a full version of the City Plan in March and April next year.

As a stepping stone towards writing a new City Plan between we are asking for your views on four important policy areas where significant changes are being considered. These are:

- Housing Targets and Housing Delivery
- Employment Policy
- Park and Ride (Transport Policy); and
- Student Housing

This paper provides a summary of each of these four policy areas and the options the council is consulting on between 17 October and 2 December. If you want to find out more about the background to the policy areas and the advantages and disadvantages of each option the full Options Papers, can be found on the council's consultation website at <http://consult.brighton-hove.gov.uk/portal/bhcc/ldf/optionspapers>, in all libraries and in City Direct Offices. We have also published a 'Frequently Asked Questions' paper which will help to answer some questions you may have about the Options. Details about how to respond are included at the end of this paper.

## The story so far

In Spring 2010, the city council published its Submission Version of the Core Strategy. This document was created following city wide public consultations undertaken in 2008 and 2009. However, at an early stage in the Plan's Public Examination, the appointed Planning Inspector raised 'soundness' concerns and was not satisfied that the council had identified enough sites for new housing in the city to meet published regional housing targets. For the plan to be found 'sound' by an Inspector, it must meet the tests set out in government guidance. It should be based on robust evidence, be credible and be effective. Since then, the government has announced that it intends to remove regional housing targets and wants councils to produce their own local housing targets based on local evidence.

A number of important changes over the last year also indicate the need to update and amend the Plan. These changes include the government's proposed changes to national legislation and guidance (the Localism Bill and draft National Planning Policy Framework), reduced government funding for capital projects and a number of updates to various planning studies (e.g. the housing capacity study) which will help inform and secure an effective, up to date and sound Plan for the city.

## Where we are now

In September 2011, the Council formally withdrew the Core Strategy to allow it to be updated and amended.

The need to update and amend the Core Strategy is a real opportunity to prepare a City Plan with greater potential to plan for the future of the City. There will be further consultation on a full version of the whole plan early next year but as part of the preparation for that it is necessary to consult on the four key policy areas summarised below.

### **POLICY AREA 1 - Housing Targets and Housing Delivery**

#### **Summary of the Issue**

The government has made clear it intends to abolish Regional Spatial Strategies including the South East Plan through enactment of the Localism Bill. It wants local councils together with their local communities to set their own housing targets. At present, the housing target set for the city in the South East Plan is to build 570 new homes each year. Over the last 9 years, an average of 575 new homes each year have been built.



A new local housing target will still need to be 'evidence based' and will be thoroughly tested by an Inspector at the Plan's Public Examination. A range of factors have to be taken into account in setting any target and these include the needs of current and future households, the needs of the local economy and the physical capacity of the city to accommodate new housing development.

Studies indicate that to meet local housing requirements (housing need/ demand) in full over the lifetime of the plan to 2030 would mean 15,800-19,400 new homes need to be built within the city. An updated housing capacity study has identified potential sites in the city which could accommodate up to 8,000 new homes over the lifetime of the plan. The capacity study also indicates other sources of housing supply (e.g. more mixed use development on some sites, including some development on the urban fringe, counting future development at Shoreham Harbour) to help boost supply.

Taking account of the need for evidence, national guidance and local infrastructure and environmental considerations the following options are being consulted on:

#### **Housing Target Option 1 - 9,800 new homes (490 per year)**

All new housing would be within the existing urban area. This option relies on mixed use development on many key sites; allows for taller buildings in appropriate locations and includes longer term regeneration on some of the council's own land. Under this scenario, target provision is well below the full level of housing requirements and would present fewer opportunities to secure a range of housing types including family sized and affordable housing.

**Housing Target Option 2 - 11,200 new homes (555 per year) - Preferred Option**

In addition to the sources of housing supply identified in Option 1 identified above, this option includes the housing part of development envisaged at Shoreham Harbour; a more intensive mixed use development approach at some of the city's employment sites and the allocation of one urban fringe site at Toads Hole Valley on the northern edge of the city.

This is the preferred housing target option and is supported by a Sustainability Appraisal. It maximises housing provision whilst maintaining a balanced development strategy that considers housing alongside the city's other social, economic and environmental development needs. The majority of all new housing would still come forward from within the existing built up area.

**Housing Target Option 3 - 13,500 new homes (675 per year)**

Meeting this higher target level of provision would require significant losses of employment and open space land and/or considerably higher residential densities and many more taller buildings in the city. It would also require significant physical, social and environmental infrastructure requirements to support such a level of housing. It is not considered 'deliverable' in the next 20 years.

**Housing Target Option 4 - 15,800 new homes (790 per annum)**

This option would achieve the lower end of the range of full housing requirements. However, to reach this higher level of provision would require greater losses of land currently in employment and open space use. Such a scenario is likely to have significant negative impacts in terms of the loss of the city's open space and biodiversity resource and again is unlikely to be 'deliverable' in the next 20 years.

**POLICY AREA 2 - Employment Land**

**Summary of the Issue(s)**

Evidence suggests that Brighton & Hove's economy may be more resilient now than during the previous economic slow down. In a study produced by the HSBC (Future of Business Report 2011) Brighton has been recognised as one of 5 'Supercities' that will lead the country's economic recovery. Brighton & Hove is a city of entrepreneurs with many more very small businesses than the national average. A growing population means the city needs to find 6,000 jobs by 2014 if it is to maintain its employment rate of 71%.



There is strong evidence to indicate that the council should continue to protect the city's employment sites and premises. Both the protection of employment sites and the development of new high grade employment space are fundamental to the economic wellbeing of the city to allow businesses to prosper and grow.

The city is an attractive place to live. However, the strong physical constraints mean that most employment land will have to be found by reusing existing employment sites and premises and other redundant sites.

The Employment Policy Option Paper sets out the opportunity to clarify and strengthen how the City Plan will support sustainable economic growth in the city.

The Paper outlines the opportunities that are available to make better use of under-utilised employment sites. This can be done by allowing mixed-use development on some sites to deliver high quality employment space, more jobs and to deliver much needed new homes.

Due to the number of issues covered by the Paper (six) the list below sets out a summary of the preferred options for taking forward the Employment Policy. Please go to the Paper for full details on the issues, options and sites proposed for allocation.

- Protect Central Brighton as the city's primary office area
- Allocate a range of sites to accommodate an additional 20,000 sq m of office floor space in the New England Quarter and London Road area
- Allocate strategic employment sites in order to secure regeneration, inward investment and high quality modern employment floorspace.
- Create a hierarchy of industrial estates by allocating those industrial estates which will continue to be safeguarded and allowing older sites to be re-developed for employment-led mixed use development
- Continue to safeguard secondary employment sites to ensure a good supply of appropriate employment land to serve the city's economy

## POLICY AREA 3 - Park and Ride -Transport

### Summary of the Issue



The aim of Park and Ride is to intercept traffic on the main roads entering Brighton & Hove city and provide an efficient and cheap bus service into the city. Its purpose is to reduce traffic levels, improve the environment and reduce pollution whilst increasing the capacity for more visitors. Provision of Park and Ride facilities has been part of the traffic and transport management strategy for the city for a number of years. This ambition has been reflected in policies in the current and previous Local Plans. In spite of this, a Park and Ride site has not been delivered.

Due to a number of significant changes since the City Plan was last drafted, it is proposed that now is a good time to review the Park and Ride policy. These changes include:

- severe public spending restraint;
- designation of the South Downs National Park;
- increased pressure for development land in the city

The following Options are being consulted on:

**Option 1: Remove Park and Ride from the sustainable transport policy - Preferred Option**

This option suggests that Park and Ride should be removed and replaced with more viable and deliverable alternative measures that will ease the impact of increased travel into and around the city. These measures include, working with rail and bus companies to increase patronage for longer distance journeys, improve their affordability and link up rail and bus journeys. A further element would be to increase the use of travel management measures and to consider monetary measures to influence travel decisions and manage car use in the city centre (e.g. increases to car park charging).

**Option 2: Retain proposal for Park and Ride in the form of a revised criteria-based policy incorporated into the sustainable transport policy**

This option is for the retention of Park and Ride as a traffic management tool in the medium to long term. Any potential site must meet certain criteria to be considered suitable for Park and Ride facilities. A sequential approach would be taken in searching for a site which means certain types of land are considered first, such as previously used land, as well as management, amenity and environmental considerations. To ensure the measure is effective, the policy also specifies that Park and Ride should be provided as part of a package of measures to manage car parking in the city centre (e.g. reduction in spaces, increased parking charges).

**Option 3: No change to the small sites Park and Ride policy in the Core Strategy**

Option 3 is to retain the Park and Ride policy set out in the submitted Core Strategy that states Brighton & Hove will - 'Provide three to five Park and ride sites adjacent to key strategic corridors that will be identified in the Development Policies and Site Allocations Development Plan Document/Part 2 of the City Plan.' The criteria for assessing future Park and Ride sites are set out in the supporting text of the policy. The advantage of this approach is the reduced impact of smaller sites on the surrounding area and that small sites are easier to identify. However there are questions around whether this approach is viable and therefore whether it can work and consequently be delivered.

## **POLICY AREA 4 - Student Housing**

### **Summary of the Issue(s)**



Both Sussex University and the University of Brighton and their students make an important contribution to the economy of the city estimated at £65m annually. There are approximately 37,000 students at Brighton and Sussex Universities, which includes 5,200 international students from 150 countries.

The recruitment of new full time students is expected to increase gradually over the coming years and as a result there is

expected to be a shortfall of bed spaces in purpose built student accommodation despite recent developments in the city.

As the supply of purpose-built student accommodation by universities has not matched the expansion of the student population, the private sector has responded to the increasing demand for student housing and there has been conversion of family housing to student Houses in Multiple Occupation (HMOs) in many neighbourhoods.

The city has the highest number of HMOs in the UK (15,000 in 2007). In some areas of Brighton & Hove high concentrations of HMO's have led to neighbourhoods becoming dominated by the student population. This process has been called 'studentification'.

This summary paper sets out options for tackling these two issues.

### **Issue A: Over Concentration of HMO's**

#### **Option 1: Adopt an Article 4 Direction and policy framework for managing HMO accommodation - Preferred Option**

The policy would set a limit for the proportion of properties within an area that could be occupied as Houses in Multiple Occupation via what is known as an 'Article 4 Direction' which restricts development normally allowed without needing planning permission. As a result a planning application would be required to change the use of a house to a HMO (no fees required). The application would not be permitted where there are already more than 10% of properties within 100 metres of the application site in HMO use. This approach would prevent new HMOs from being allowed where there is already a high concentration and allow houses to be retained. The Sustainability Appraisal identifies this as the preferred option for Issue A.

#### **Option 2: No Article 4 Direction or policy framework for managing HMO accommodation**

This option would let the market decide where HMOs should be located and would not seek to restrict the proportion of properties in this use in certain areas. This would not stop new small (six or less bedrooms) HMOs from being created.

Issue B: New Student Accommodation (new build)

**Option 1: No policy framework**

This policy option would let the market decide where new build student accommodation could be built and would not identify sites nor include a criteria based policy to manage the development of sites. Under this scenario there is greater pressure on sites earmarked for other forms of housing to be turned into student housing proposals.

**Option 2: Criteria based policy with no preferred sites identified**

This policy option would set out a criteria based policy in order for the council to assess planning applications for new student housing. The future wording of this criteria based policy would seek to ensure that proposals for student housing were located in the best possible sustainable locations, designed to the highest standards with regard to the surrounding neighbourhoods. This approach would not identify any preferred student housing sites.

**Option 3: Identification of specific sites - Preferred Option**

The proposals is for a pro-active policy to identify sites for student accommodation based upon recognising that the most appropriate locations for student accommodation are close to university campuses and in central locations. Preferred sites have been identified by the universities at

Varley Halls, Coldean Lane,  
Preston Barracks, Lewes Road,  
Pelham Street,  
Circus Street

This approach would be set out in the form of a criteria-based policy against which proposals for new student housing would be considered along with the identification of preferred sites supported by the universities for development. The Sustainability Appraisal identifies this as the preferred option for Issue B.

## Further Information

There are more detailed technical papers available for each policy area if you would like to find out more about each issue and the reasons the options were selected. There is also a 'Frequently Asked Questions' paper to help answer questions on the policy papers. These are available council's consultation web site <http://consult.brighton-hove.gov.uk/portal/bhcc/ldf/optionspapers> and are available to read in libraries and City Direct Offices across the city.

## How to Comment

An online questionnaire has been prepared to assist with the consultation process with questions about each of the four policy areas - this can be completed on the council's consultation web site at <http://consult.brighton-hove.gov.uk/portal/bhcc/ldf/optionspapers>

All responses should be completed and received by Friday 2nd December 2011.

If you have any queries or are unable to use the online questionnaire please contact the LDF Team at [ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk) or telephone 01273 292505.





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