

BRIGHTON MARINA REGENERATION PROJECT

proof of evidence - appendices
Richard Coleman

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APPENDIX A- ERRATA

- 1.0** **Corrections to TVIA June 2008-** Following a review of the document, I wish to point out some minor errors which I correct below:
- 1.1 Page 41, 11.2.4, (i), first bullet point, first-line- 'shopping' should read, 'regional'.
- 1.2 Page 41, 11.2.4, (ii), second bullet point, eighth line- omit 'at the top'.
- 1.3 Page 48, 11.5.3, first line insert as shown bold- 'is already satisfied by the Brunswick proposal'.
- 1.4 Page 216, 12.0 should be numbered 13.0.

APPENDIX B- CURRICULUM VITAE

Below is my Curriculum Vitae and further projects on which I have advised:

1972 – 1979 Diploma in Architecture and RIBA Part 3 at Canterbury School of Architecture

1976 – 1977

Professional Practice

- Restoration and refurbishment of Royal Parks and Palaces namely Richmond and Bushy Parks, Hampton Court Palace and Windsor Castle including Windsor Home Park.

1979 – 1984

Practising Architect

- Collaboration on the design of major civic buildings for central government's Property Services Agency; housing and educational buildings in the private sector.

1984 – 1996

Deputy Secretary of the Royal Fine Art Commission

- Assisting in the selection, research and preparation of over 2000 nationally important projects in England and Wales over 13 years in the post.
- Drafting Commission statements of advice for the benefit of Local Authorities, Developers, Architects and the general public, and subsequently meeting development teams to assist on a way forward.
- Co-Editor of 13 RFAC annual Reports.
- Member of Editorial Board for the following RFAC publications:
 - 1986 *Design in the High Street*
 - 1991 *Good Design and Urban Regeneration*
 - 1992 *On The Side Of The Angels*
 - 1992 *Medicis and the Millennium? Government Patronage and Architecture*
 - 1992 *Bridge Design*
 - 1994 *What Makes a Good Building?*

- 1995 *Design Quality in Higher Education Buildings*
- 1997 *Improving Design in the High Street*

- Founding member of the 'Learning to See' project which sought to establish a stronger place in the national curriculum for visual training and the stronger use of the visual environment as pedagogical material.

1997 – Present

Independent Consultant Architect specialising in Urban Design and Conservation

- Assisting Foster and Partners' design team on the 42 storey HQ building for Swiss Re Insurance (the Gherkin) on the Grade II* Baltic Exchange site in the centre of the City of London – (built).
- Assisting Merrill Lynch and their architects, Swanke Hayden Connell, in the planning of their new London HQ alongside two scheduled monuments, Grade I, Grade II* and Grade II listed buildings and three conservation areas just north of St. Paul's Cathedral – (built).
- Assisting Foster and Partners' design team in developing the urban analysis for a new residential development on the south bank of the River Thames at Albion Wharf, Wandsworth – (built).
- Assisting Foster and Partners' design team in developing the rationale for the Millennium Bridge between St. Paul's Cathedral and the new Bankside Tate Museum of Modern Art, at a time when the City Corporation was against it – (built).
- Assisting Sir Terry Farrell in the design development of a proposal for a new hotel adjacent to the Tower of London – (approved).
- Assisting Kohn Pederson Fox in the design development of Marks and Spencer's HQ office in Baker Street – (abandoned).
- Assisting John McAslan and Partners in the design development and urban strategy for the 12 storey Vitro building scheme in

APPENDIX B- CURRICULUM VITAE (CONTD.)

- Fenchurch Street – (built).
- Assisting Dixon Jones in the design development of Kings Place in Kings Cross – (built).
 - Assisting The Royal Palaces Agency to develop the case for its Heritage Lottery Fund application for the Tower Environment Scheme at the Tower of London.
 - Collaborating with Lord Rogers of Riverside and Sir Richard MacCormac CBE RA PPRIBA in requesting amendments to PPG15 through the publication of the 'Revised PPG15' and making a personal presentation to the Minister of Planning Mr Richard Caborn (mid October 1998).
 - Appointed by Deputy Prime Minister's Office in 2002 to working group rewriting PPG15 and PPG16.
 - RIBA assessor for the RFAC sponsored design competition for the Falkland Islands Memorial Chapel, Pangbourne – (built).
 - Senior RIBA assessor for an international architectural selection procedure for a new wing of the 'Royal College of Art', adjacent to the Royal Albert Hall – (abandoned).
 - Administrator and senior assessor of Europe-wide open competition for the design of the Unicorn Children's Theatre at Tooley Street, London, won by Keith Williams – (built).
 - Providing conservation guidance to the London Institute and their architects, Allies and Morrison, on development at the former Royal Army Medical College Buildings, Millbank London, to form the new Chelsea Art School – (built).
 - Advising Sainsbury's plc on the redevelopment of their sites in Southwark, and subsequently helping to achieve a 38 storey residential and 20 storey office development on the No. 20 Blackfriars Road site with architects Wilkinson Eyre –(approved).
 - Advising the Tate Gallery on the further development of their sites at Millbank, London and St. Ives, Cornwall.
 - Advising Shell on the development of their South Bank site in collaboration with Arup Associates – (approved).
 - Advising Selfridges on the development of their Oxford Street site in collaboration with Foster and Partners, including alterations to the listed building – (abandoned).
 - Advising client Scottish Widows, and architect Eric Parry on the redevelopment of 30 Finsbury Circus- (built and runner-up in 2006 Stirling Prize).
 - Various commissions providing independent assessments on historic buildings and new proposals for sites of heritage sensitivity involving outstanding conservation areas, World Heritage Sites, Royal Parks and listed buildings. Helping major developers such as Stanhope, British Land, Land Securities, Frogmore, Candy and Candy and Development Securities in their pursuit of excellence in urban design and architecture and occasionally assisting in the selection of an appropriate architect for challenging sites.
 - Assisting David Chipperfield and Candy and Candy to achieve planning permission for a new building at Victoria Road/ Kensington Road opposite Kensington Palace-(approved).
 - Advising Scottish Widows, and Eric Parry, architect on the restoration, rebuild and redevelopment of a major site between George Street, Maddox Street and New Bond Street- (under construction).
 - Assisting Ken Shuttleworth of MAKE Architects to achieve planning permission for the Brompton Crystal on Brompton Road, Knightsbridge in the Royal Borough of Kensington & Chelsea – (approved).

APPENDIX B- CURRICULUM VITAE (CONTD.)

- Appointed by Mayor Livingstone to write the first draft of the Supplementary Planning Guidance on the strategy for protecting views across London (LVMF) as outlined in Section 4 of the London Plan. Subsequently resigned.

- Appointed by Mayor Johnson to review the current LVMF, the consultation draft for which was launched in early June 2009.

- Assisting Sir Terry Farrell in British Land's project near Regent's Park at Osnaburgh Street – (under construction).

- Providing urban design and conservation advice to Kohn Pederson Fox, Benson Forsythe and Patrick Lynch, on behalf of Land Securities for the Victoria Interchange Project – (approved).

- Assisting Wilkinson Eyre on a major project at Brighton Marina, incorporating a 40 storey residential tower adjacent to several Grade I listed buildings and an Area of Outstanding Natural Beauty, now a National Park – (approved).

- Co-founder and Chairman of WorldArchitectureNews.com (WAN), No 1 Google search 'hit' for architecture news and Winner of 2008 International Building Press Award for best architecture web-site.

APPENDIX C- SUPERSEDED POLICIES OF EAST SUSSEX AND BRIGHTON AND HOVE STRUCTURE PLAN

- 1.0 The South-East Plan published on 6th May 2009 has now superseded the Structure Plan policies; however since the reasons for refusal refer to them I consider both the old and the new policy regimes. As such the old policies should be given little weight.
- 2.0 *Policy S1- Twenty one criteria for the 21st century: In order to meet the needs for development and change in the plan area in a way that is more environmentally sustainable in the longer term, all planning activities and development decisions should take account of 21 criteria. Where appropriate, local planning authorities may require proposals for development to demonstrate how far they contribute to the achievement of these criteria. Of the 21 criteria I will deal with three in my evidence:*
- (f) protecting and enhancing the attractiveness and individual character of urban and rural areas for residents, businesses and visitors;***
- (j) according with the objectives of and not causing damage to the Sussex Downs and High Weald Areas of Outstanding Natural Beauty (AONB), Ashdown Forest, downland, wetland, open heath land, ancient woodlands, undeveloped coast (including Heritage Coast), Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites, nature reserves, ancient monuments, conservation areas, historic parks and gardens, battlefields and other areas of designated or recognised important landscape, archaeological, geological, ecological or historical character and their settings;***
- (m) protecting and enhancing conservation areas, other areas of acknowledged townscape importance, listed buildings and other buildings of acknowledged importance and their settings;***
- 3.0 *(f) protecting and enhancing the attractiveness and individual character of urban and rural areas for residents, businesses and visitors;*
- 4.0 The proposed development will greatly enhances the western end of the Marina by way of a new and individual urban character, an attractive townscape and public realm and a mix of uses which will ensure a lively city atmosphere. It does this while doing no harm to the existing surrounding environments which have their own individual characters. The form of the development, its design quality and its proximity to those environments will ensure that views from these areas are mostly enhanced and certainly protected.
- 5.0 *(j) according with the objectives of and not causing damage to the Sussex Downs and High Weald Areas of Outstanding Natural Beauty (AONB), Ashdown Forest, downland, wetland, open heathland, ancient woodlands, undeveloped coast (including Heritage Coast), Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites, nature reserves, ancient monuments, conservation*
- 6.0 The proposed development will not cause damage to designated landscape sites. It will affect some wider settings and some views out of them, but in a beneficial way. The Marina site is divorced from these sites and in the case of the Heritage (undeveloped) Coast, while adjacent, is infact already a developed part of the coast. The Marina's clearly defined perimeter ensures that the neighbouring, undeveloped coast will not be impinged upon. In the case of the Cliff SSSI, which forms part of the perimeter of the Marina, its immediate setting will be greatly enhanced. The existing development between other designated areas means that only views of them or out of them are affected. In this regard the explanation of effects is better described under (m) below. The new National Park is dealt with under policy EN2 at paragraph 8.9.14.
- 7.0 *(m) protecting and enhancing conservation areas, other areas of acknowledged townscape importance, listed buildings and other buildings of acknowledged importance and their settings;*
- 8.0 The development will change views of listed buildings within the Kemp Town group and on views from Kemp Town Conservation Area. . While the appeal site is not part of them nor part of their immediate settings, great care has been taken to ensure that the centre piece, Marina Point a 28 storey building, does not adversely affect either their wider setting or views from them. Seeing a building from such a place does not make its impact adverse. Where a building has been designed to a high quality with particular reference to the environment it will be seen from, the impact can be beneficial. It will be so in this case, in particular by virtue of the carefully chosen height and the quality of the design, including its highly sculptural shape.
- 9.0 *S6 Change within Towns: The existing settlement pattern will be broadly maintained and no new settlements will be developed. Development will be focussed on towns, maintaining and enhancing their character and quality. This is expanded in six sub-statements. I deal here with (c) and (d).*
- (c) town centres will be developed and regenerated a lively, multi-purpose centre for residents and visitors, including making the best use of underused and vacant premises. Emphasis will be given to improving the environmental quality of town centres as places to live, work, shop, visit and obtain a variety of services.*
- 10.0 The Marina is not a town centre; but is a designated District Centre,. It is a site, however, with the potential to provide the qualities desired in this policy. The appeal scheme makes the best use of the sites available and its regeneration will fulfil all the aspirations listed in this policy. It

APPENDIX C- SUPERSEDED POLICIES OF EAST SUSSEX AND BRIGHTON AND HOVE STRUCTURE PLAN (CONTD.)

does so through its rich mix of uses, through providing a quantum of housing that ensures a safe place for people and through the enhancement of the public realm both adjacent to the individual sites and between the sites.

11.0 *(d) the special features, distinctive buildings, areas, open spaces and other qualities within towns that contribute positively to their characters will be protected and enhanced from inappropriate development and change.*

12.0 The visibility of the appeal scheme and its high quality design ensure that the existing assets such as Kemp Town, other listed buildings, the coastal area and the South Downs which all contribute positively to the surrounding character, are protected and enhanced.

The Environment

13.0 *Policy EN1: Development and change will be required to sustain, conserve and, where possible, enhance the character, local diversity and quality of the landscape and natural and built environment of the plan area including, where appropriate, the creation of new, equally good and distinctive local character.*

14.0 The appeal scheme in this case creates a new distinctive local character of its own at a very high quality of design. It does not belong to and is separate from existing environments of worthy character such as Kemp Town and the South Downs. By virtue of the high quality of design and the carefully chosen form for the individual appeal scheme buildings, the development enhance both its own site and the existing worthy environments.

Landscape- Areas of Outstanding Natural Beauty (AONB)

15.0 While not yet legally constituted the new National Park will supersede the AONB. The policy remains relevant, for both designations however, since in planning terms both designations enjoy the same level of protection.

16.0 *Policy EN2: Conserving and enhancing landscape quality and character will be the primary objective in the Sussex Downs and High Weald Areas of Outstanding Natural beauty.*

17.0 Of the measures to be employed to achieve this aim, two are relevant to my evidence. They are listed thus: (a) careful control of development and; (f) minimising the impact of development close by. The appeal scheme is not development within the AONB or the new National Park. The appeal scheme, therefore, will not directly affect the landscape quality

and character of it. The map in my Visual Assessment document at Fig. 6.1 shows the proximity and the differing boundaries between the AONB and the new National Park. As an extension of the existing city built form, the appeal scheme will form part of the edge condition between city and the landscape, but there is already substantial development between the site and the boundaries of both the National Park and the AONB. The proximity of development to these areas of landscape is an inevitable dynamic in Brighton and the scheme has been designed to, (i) ensure it is not dominant over the landscape and (ii) to a high standard, in view of its level of visibility. The principal effect will be of good views of the appeal scheme from the designated area and, to some extent views of the area with the appeal scheme in the foreground. The latter will be neutral in effect and one covered in section 11.4 of this evidence.

18.0 *Policy EN3: In order to protect and promote the quiet enjoyment of the Areas of Outstanding Natural Beauty, development within them will be limited to that derived from the character and qualities of the countryside, having regard to the social and economic well-being of the areas, Development involving change or damage to their character or qualities, including significant increases in noise and/or intrusion from traffic or other activity, or having a significant effect on established views will not be permitted.*

19.0 This policy refers to development within the AONB. The last sentence refers to significant effects on established views by development. The main concern here must be established views within the AONB but the wording is not specific. While no views confined to the area within the AONB are affected, there are a number of informal views of the development from inside the AONB, particularly of the 28 storey tower at the centre of the scheme. These are represented in the Assessment of Visual impact of the TVIA. None of these views are strategic or designated. In as much as they are established views, in each case the viewer is already aware of the city, of which the development is a part. Views of the city from the AONB are established. The design of the building is of a high quality and its visual effect varies from view to view. In that there is delight in seeing parts of the city from such views, the development, the design of which is high quality, will heighten the delight.

Built Environment

20.0 *Policy EN26: Encouragement will be given to the development of programmes and packages of measures to regenerate urban areas, town centres, seafront and other popular visitor areas, through linked initiatives on environment, economic development and transport improvements. In particular, support will be given to local plan policies, strategies, action programmes and proposals which identify a number of area categories. The relevant category here is listed as (b), i.e.:*

APPENDIX C- SUPERSEDED POLICIES OF EAST SUSSEX AND BRIGHTON AND HOVE STRUCTURE PLAN (CONTD.)

'run down' areas needing comprehensive regeneration and develop programmes of improvement or redevelopment which build on their distinctive local character

- 21.0 The west end of the Marina is indeed run down and in need of comprehensive regeneration. The relevant advice on this is the council's PAN04 study on the Marina. The appeal scheme builds on and transforms the existing urban order, with buildings and spaces which maximise the use of the land, create a sense of place and consist of a mix of uses which will promote a lively city character. In my view the appeal scheme fits this policy and represents an exemplar of good practice in regeneration.

APPENDIX D- Figures, Illustrations & Relevant Correspondance

LISTED BUILDINGS MAP

FIG. 1



Fig 1: Map showing listed buildings and registered historic gardens. The red boundary line shows the area where the development site is located.

CONSERVATION AREAS MAP

FIG. 2

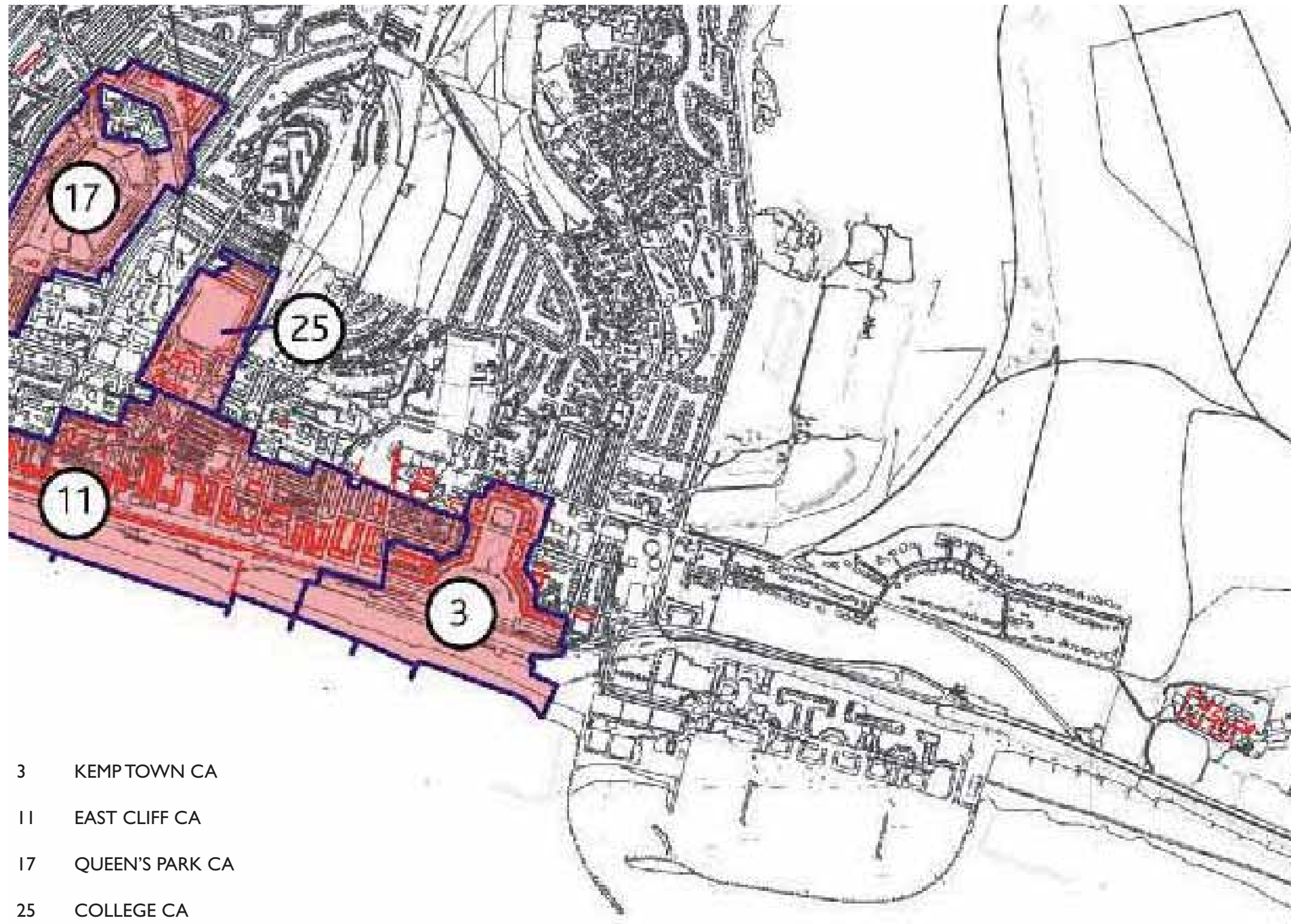


Fig 2: Map showing conservation areas. The red boundary line shows the area where the development site is located.

HISTORIC MAPS

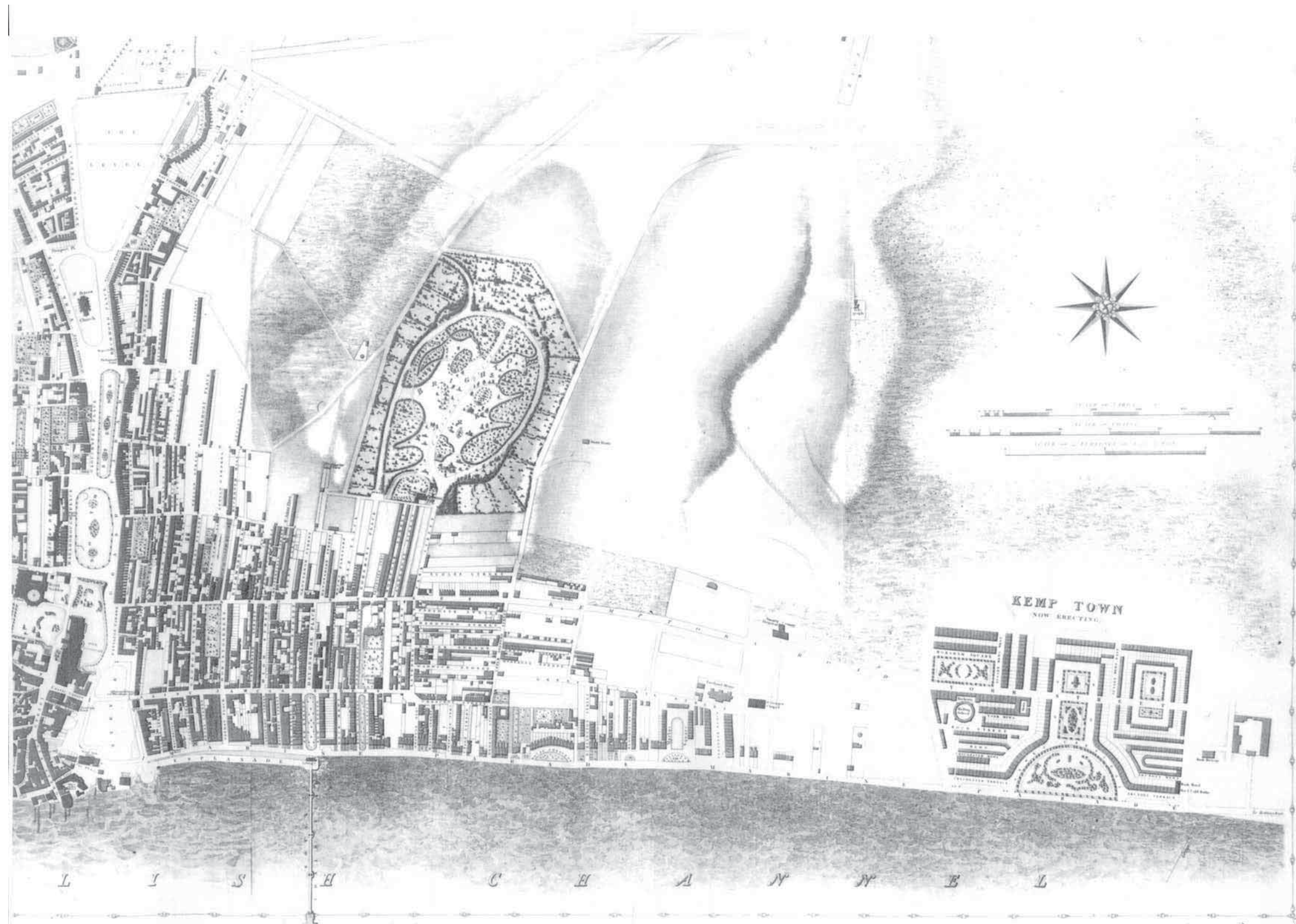


Fig 3: 1825 map of East Brighton and Kemp Town.

FIG. 3

HISTORIC MAPS (CONTD.)

FIG. 4



Fig 4: 1928 map showing the tight urban grain of the city embracing the Kemp Town estate but before the construction of Marine Gate.

HISTORIC MAPS (CONTD.)

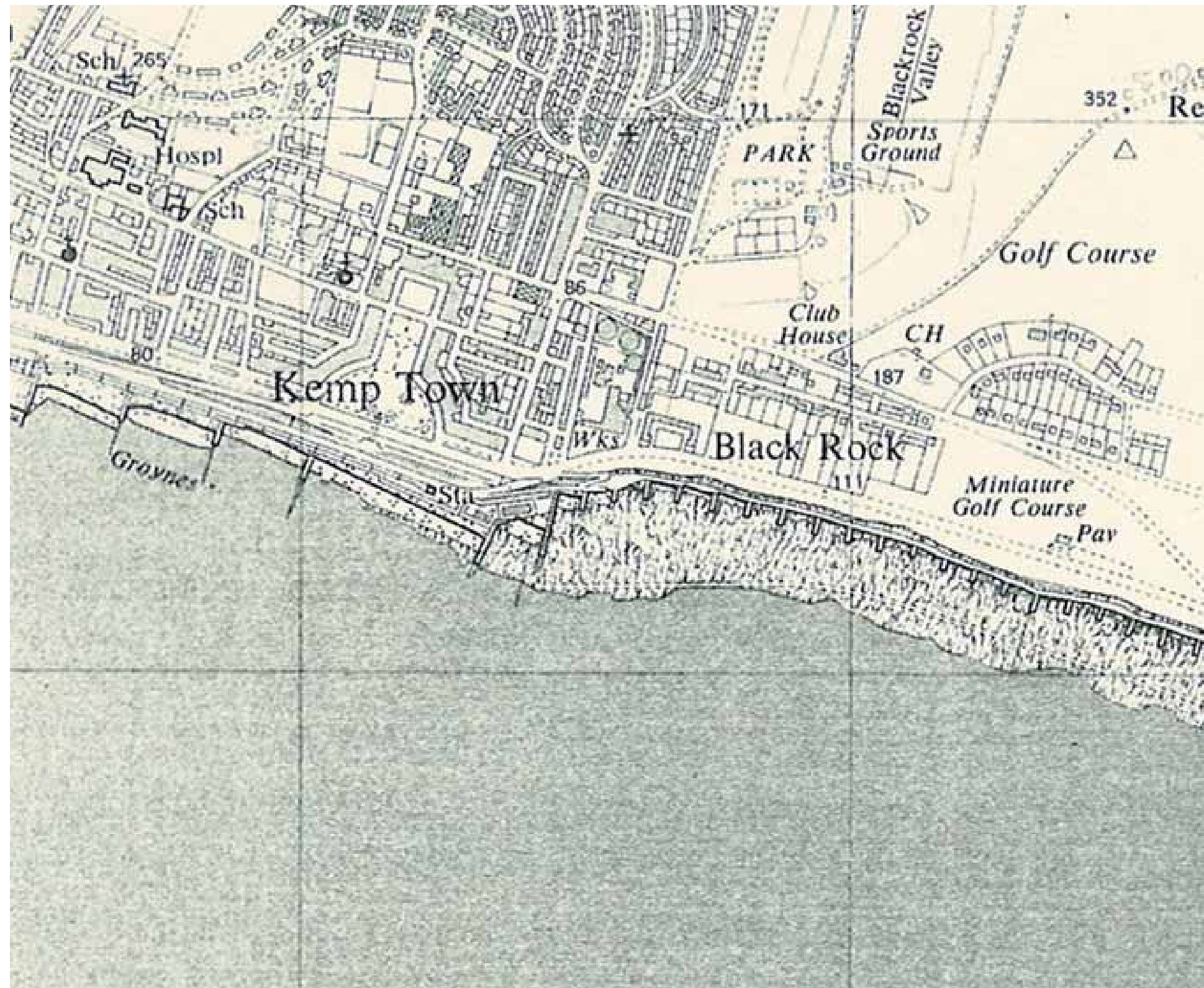


Fig 5: 1965 map showing Marine Gate, one of the largest single buildings in this part of Brighton. It also shows the shift in the shape of the coast which provided an ideal site for the Marina.

FIG. 5

HISTORIC MAPS (CONTD.)

FIG. 6

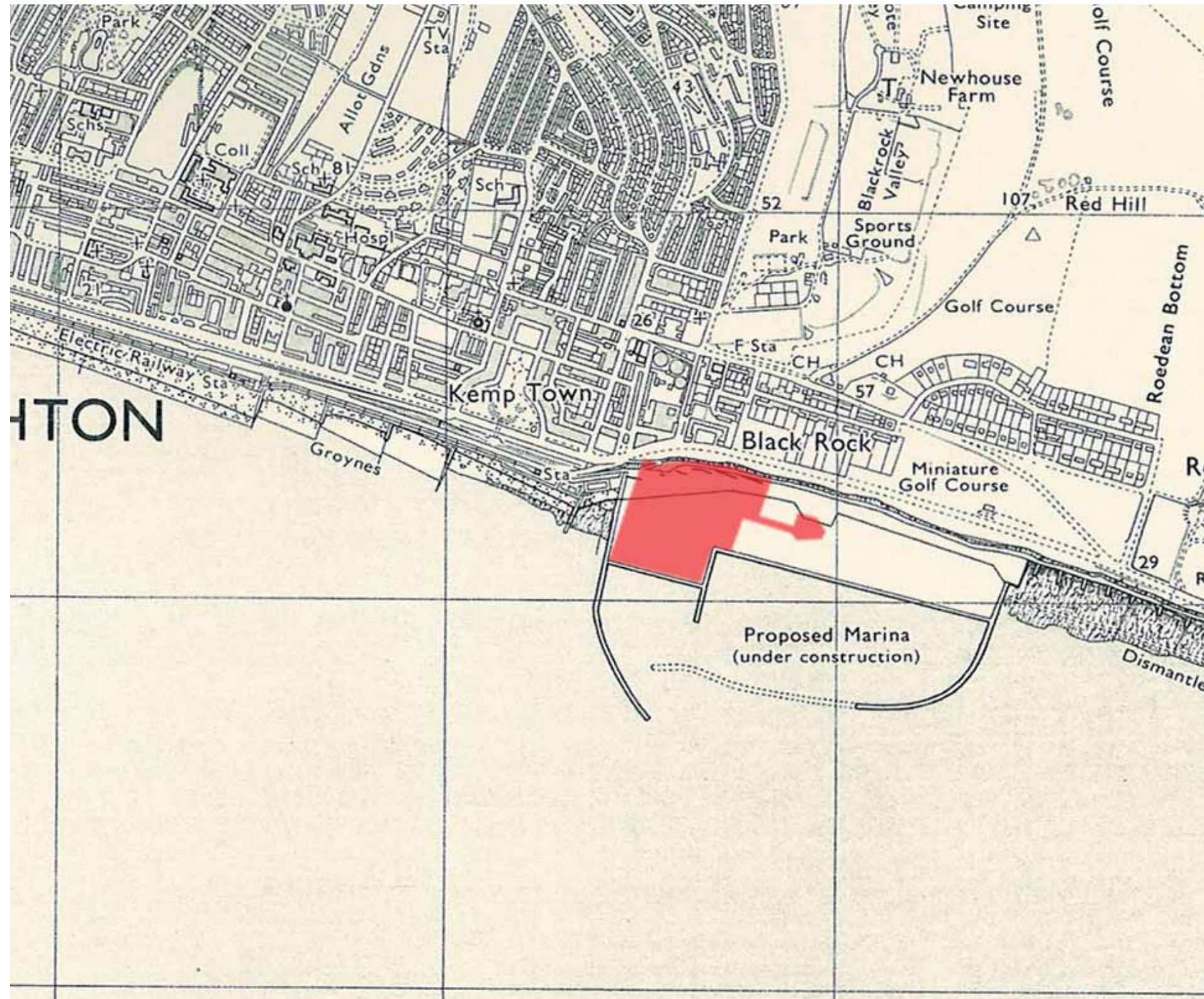


Fig 6: 1975 map showing the Marina under construction.

BACKDROP TO WORLD HERITAGE SITE

GREENWICH MARITIME WORLD HERITAGE SITE : LVMF 5A.1- GREENWICH PARK: THE GENERAL WOLFE STATUE



FIG. 7

Fig 7: (IMAGE IS FROM THE LONDON VIEW MANAGEMENT FRAMEWORK)

BACKDROP TO WORLD HERITAGE SITE (CONTD.)

TOWER OF LONDON WORLD HERITAGE SITE: LVMF VIEW 10A.1- TOWER BRIDGE UPSTREAM-THE NORTH BASTION

FIG. 8

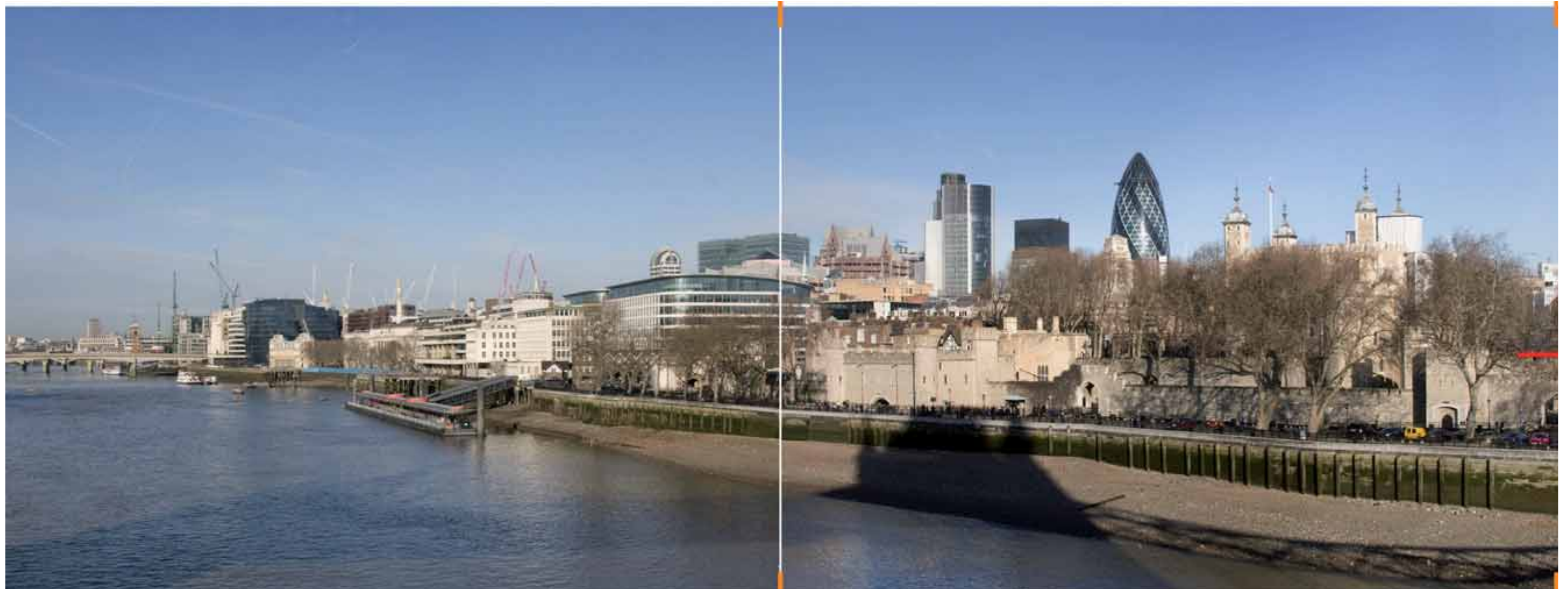


Fig 8: (IMAGE IS FROM THE LONDON VIEW MANAGEMENT FRAMEWORK)

BACKDROP TO WORLD HERITAGE SITE (CONTD.)



Fig 9: Showing an aerial view of the City of London, the Tower of London, Tower Bridge, More London and the London Bridge Station cluster of tall buildings, including a montage of the Shard of Glass, now under construction. In views from the former Royal Mint Yard, the Shard will be seen rising beyond the central silhouette of the Tower.

BACKDROP TO GRADE I LISTED BUILDINGS AND PARKS

FIG. 10



Fig 10: A view from the upper terrace of Somerset House Courtyard showing the dotted outline of the proposed Doon Street Tower.

BACKDROP TO GRADE I LISTED BUILDINGS AND PARKS (CONTD.)
LOTS ROAD POWER STATION INQUIRY IMAGE

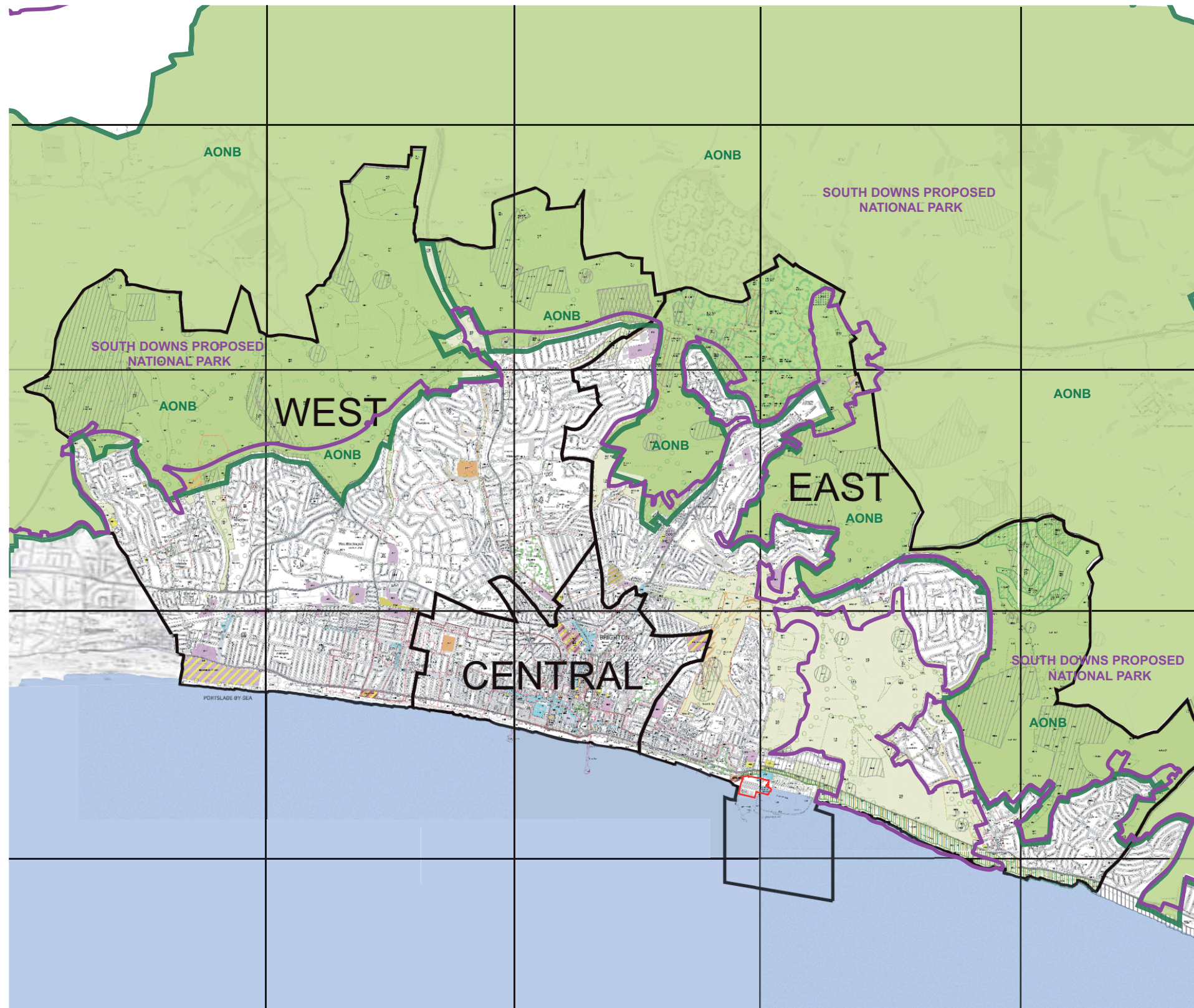


Fig 11: Brompton Cemetery looking south along its central axis. The Lots Road Power Station development is shown as a wire-line outline above the tomb at the left of the foreground.






FIG. 11

MAP SHOWING AONB AND NATIONAL PARK

FIG. 12



KEY

- Boundary of Application 
- Local Authority Boundary 
- South Downs Proposed National Park 
- Area of Outstanding Natural Beauty 
- Countryside 

nlp Nathaniel Lichfield and Partners

Project Brighton Marina Regeneration Project

Title **Plan 1**
Site Context

Client Explore Living

Date August 2009

Scale NTS @ A3

Drawn by FP

Drg. No CL10578-019



IL10578/019
Based upon Ordnance Survey mapping with the permission of Her Majesty's Stationery Office. © Crown Copyright reserved. Licence number AL50684A

Fig 12: Showing the AONB in green and the extended parts forming the new National Park outlined in purple.

CLIFFTOP MASSING STUDY
TVIA VIEW C40

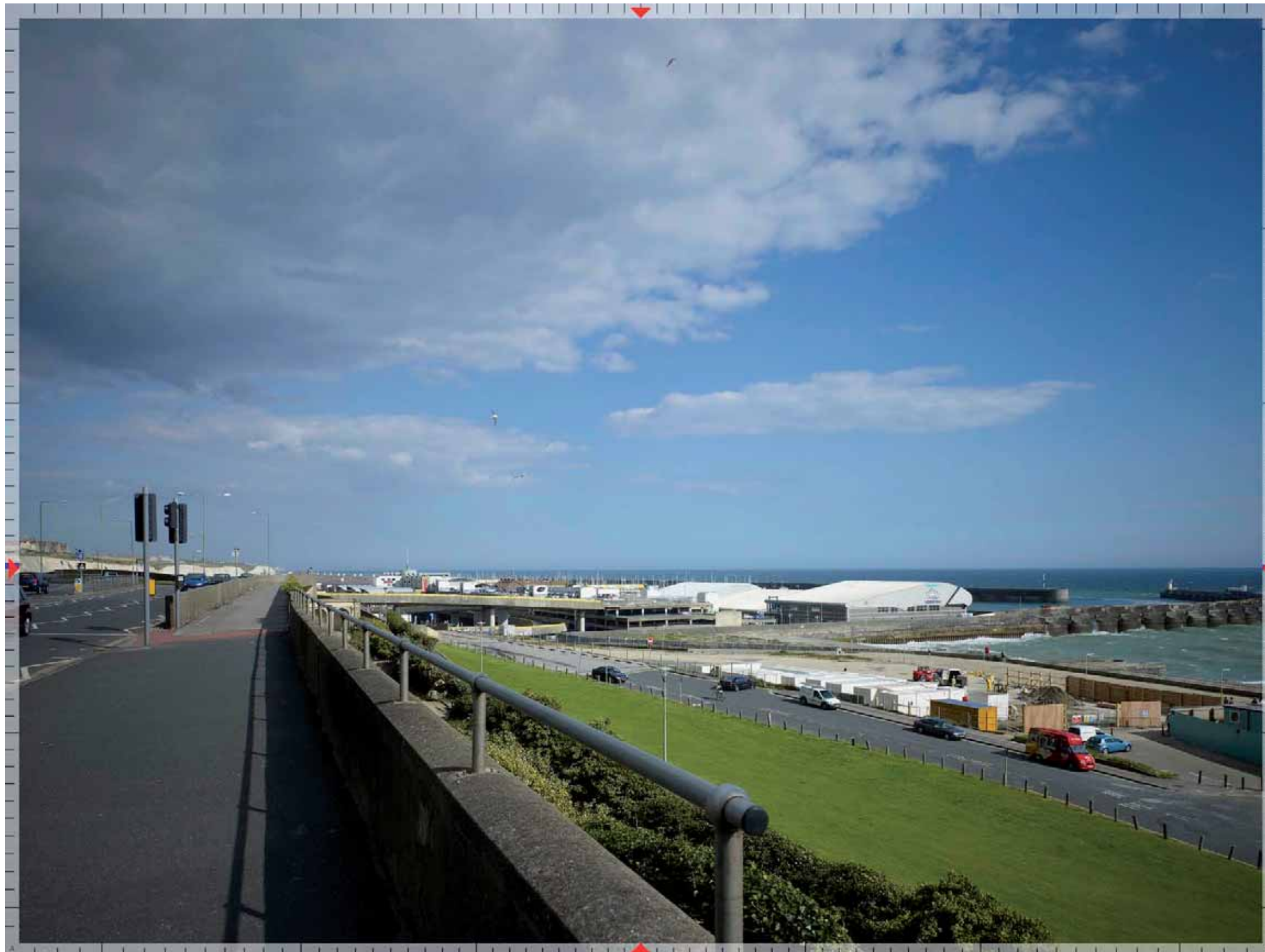


FIG. 13

Fig 13: As Existing.

CLIFFTOP MASSING STUDY (CONTD.)
TVIA VIEW C40

FIG. 14

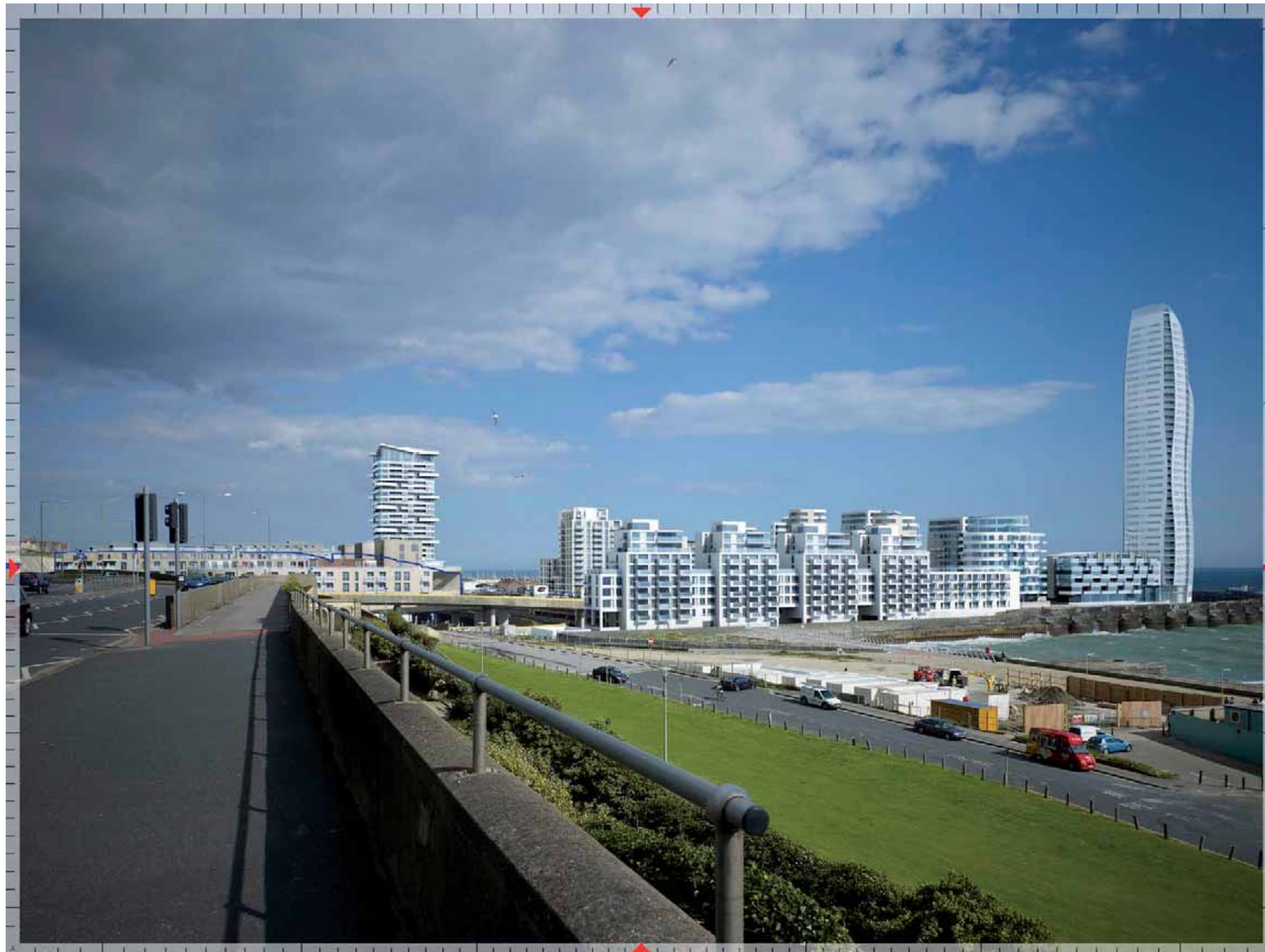


Fig 14: Shwoing the appeal scheme and the Brunswick scheme, with a blue line representing the form of a Cliff building responding directly to the height of the cliff.

CLIFFTOP MASSING STUDY (CONTD.)
TVIA VIEW C40



FIG. 15

Fig 15: Without the schemes but with the outlines representing a scheme at cliff height.

CLIFFTOP MASSING STUDY (CONTD.)
TVIA VIEW C9

FIG. 16



Fig 16: As Existing.

CLIFFTOP MASSING STUDY (CONTD.)
TVIA VIEW C9



FIG. 17

Fig 17: Showing the appeal scheme and the Brunswick scheme and including a 'blue' line indicating development limited to the height of the cliff.

CLIFFTOP MASSING STUDY (CONTD.)
TVIA VIEW C9

FIG. 18



Fig 18: Without the schemes but with the outline representing a scheme at cliff height.

CLIFFTOP MASSING STUDY (CONTD.)



FIG. 19

Fig 19: Animated view of the Cliff building with a red line representing the approximate height of the cliff.

CLIFFTOP MASSING STUDY (CONTD.)

FIG. 20



Fig 20: Animated view of a modified Cliff building which is explicitly at the height of the cliff.

CLIFFTOP MASSING STUDY (CONTD.)

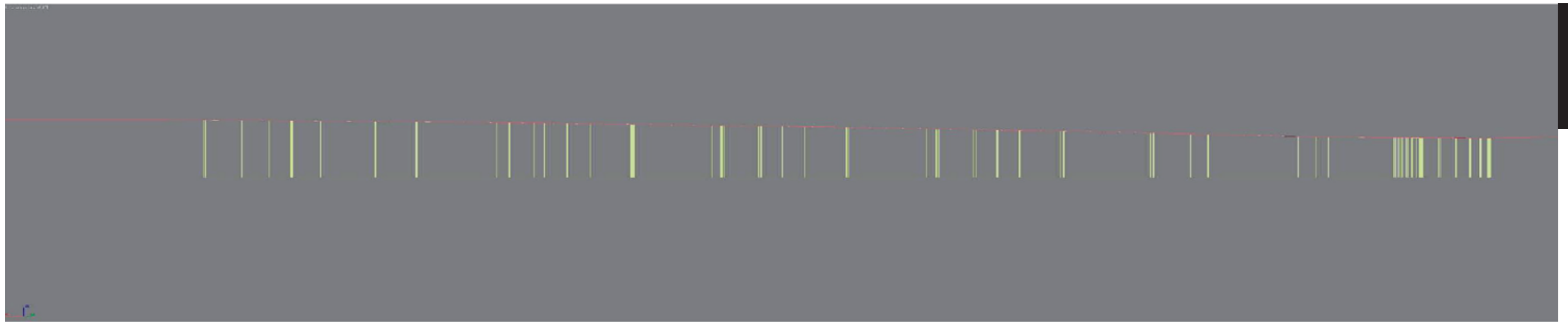


FIG. 21
& 22

Fig 21: Computer diagram showing the relationship of the height of the Cliff building with the top of the cliff as depicted by the red line (camera position is behind the cliff).

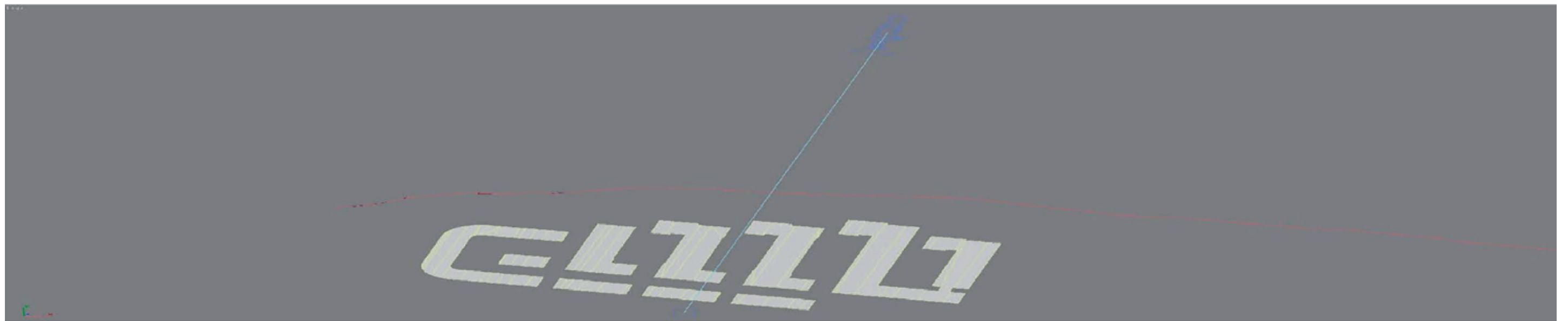


Fig 22: A plan of the Cliff building showing the relationship between it, the cliff-top and the camera position.

VIEWS OF ENTRY TO BRIGHTON FROM THE EAST MAP SHOWING VIEWS OF ENTRY TO BRIGHTON FROM THE EAST

FIG. 23

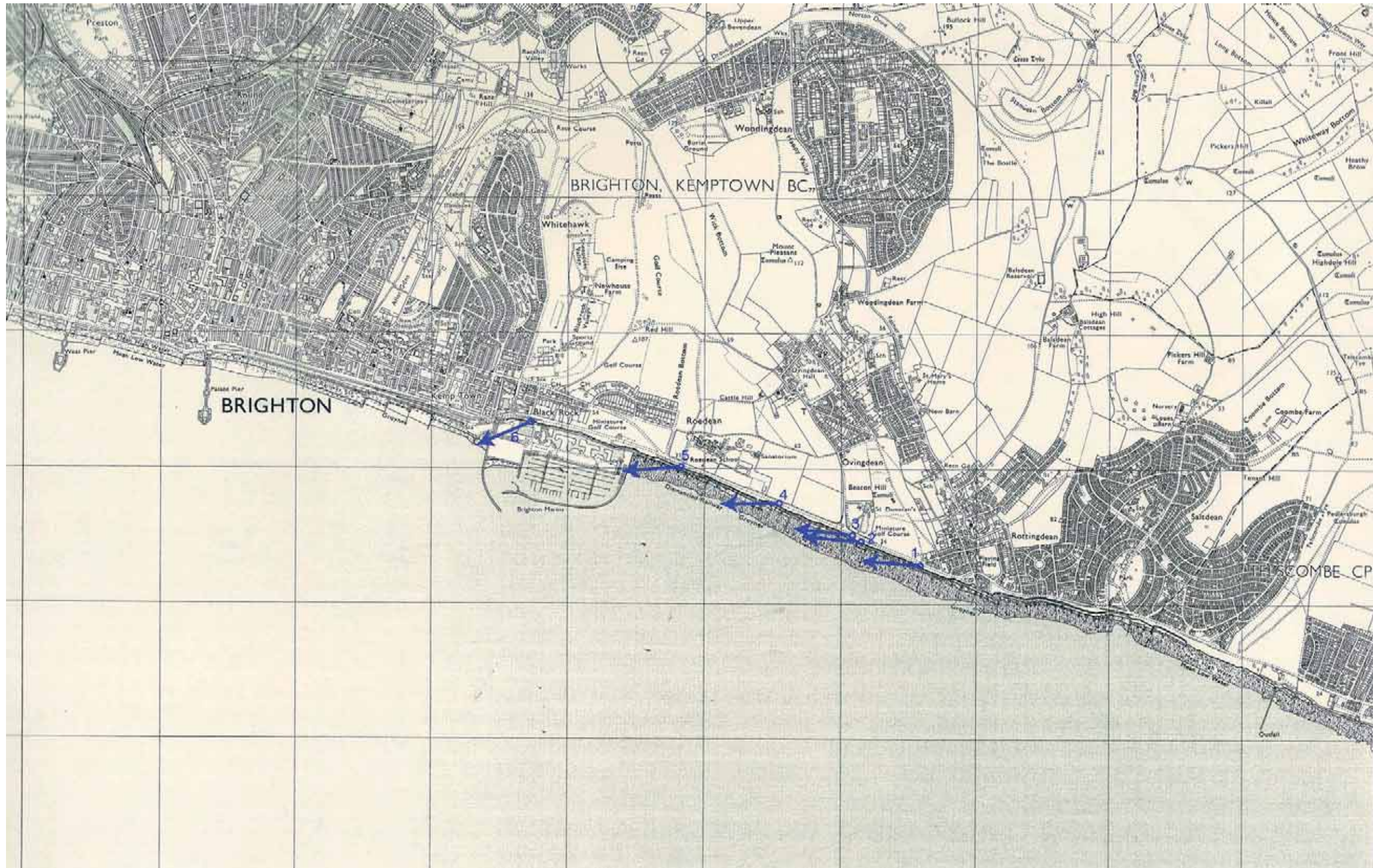


Fig 23: Map showing views which illustrate the relative visibility of the sea and the pier, from views on entry into Brighton from the east.

**VIEWS OF ENTRY TO BRIGHTON FROM EAST NO. 1
SEQUENCE OF VIEWS CORRESPONDING TO MAP ON FIG. 23**



FIG. 24

Fig 24:

VIEWS OF ENTRY TO BRIGHTON FROM EAST NO. 2
SEQUENCE OF VIEWS CORRESPONDING TO MAP ON FIG. 23

FIG. 25



2

Fig 25

VIEWS OF ENTRY TO BRIGHTON FROM EAST NO. 3
SEQUENCE OF VIEWS CORRESPONDING TO MAP ON FIG. 23



FIG. 26

Fig 26

VIEWS OF ENTRY TO BRIGHTON FROM EAST NO. 4
SEQUENCE OF VIEWS CORRESPONDING TO MAP ON FIG. 23

FIG. 27

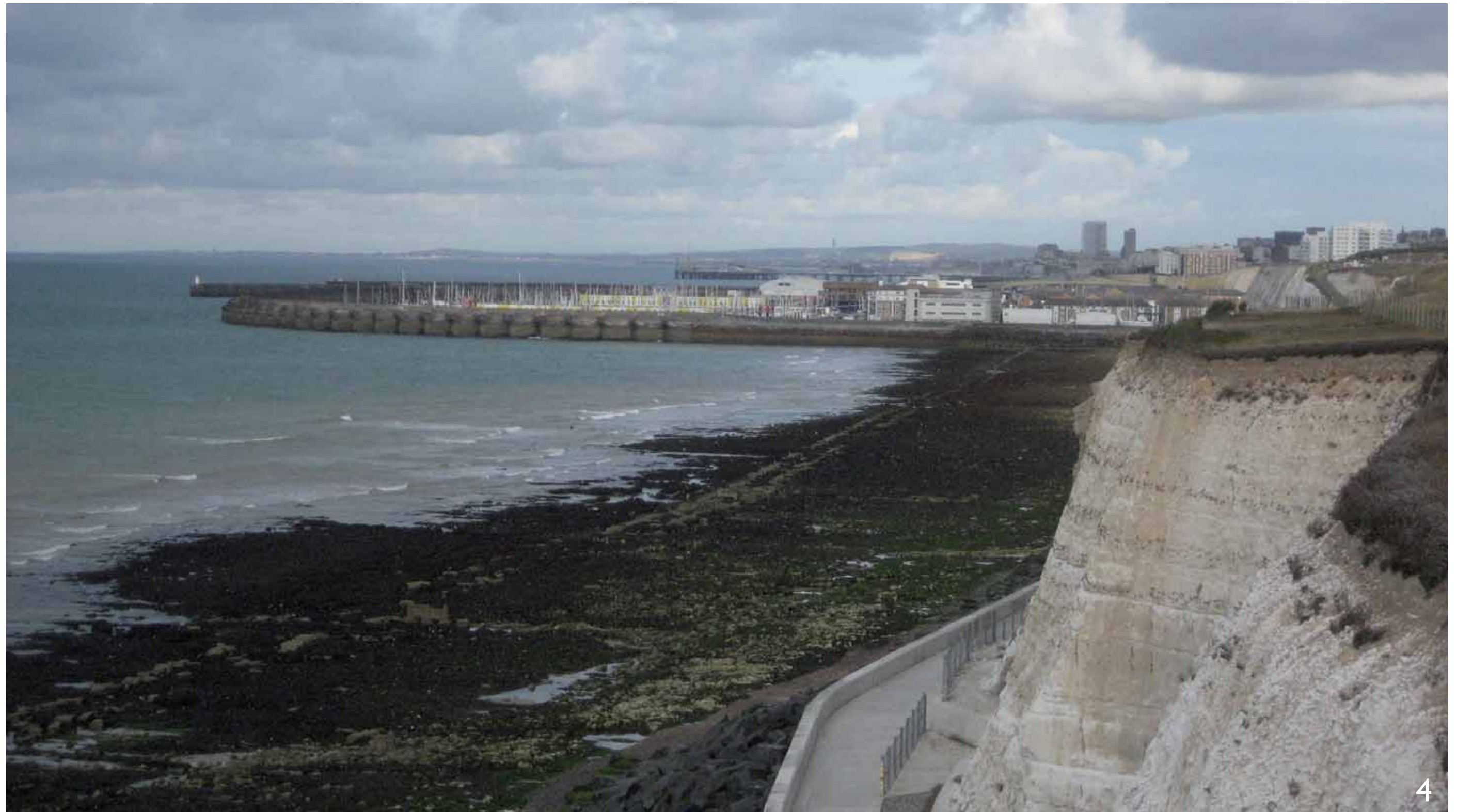


Fig 27

**VIEWS OF ENTRY TO BRIGHTON FROM EAST NO. 5
SEQUENCE OF VIEWS CORRESPONDING TO MAP ON FIG. 23**



FIG. 28

Fig 28

VIEWS OF ENTRY TO BRIGHTON FROM EAST NO. 6
SEQUENCE OF VIEWS CORRESPONDING TO MAP ON FIG. 23

FIG. 29



Fig 29

VISUAL IMPACT VIEWS EXTRACT
VISUAL IMPACT VIEWS MAP



FIG. 30

Fig 30: Map showing location of view assessments.

VISUAL IMPACT VIEWS EXTRACT (CONTD.)

VIEW T27 - LEWES CRESCENT, WEST SIDE, OUTSIDE NOS. 7-8- PROPOSED

FIG. 31



Fig 31

VISUAL IMPACT VIEWS EXTRACT (CONTD.)

VIEW T28 - LEWES CRESCENT, WEST SIDE, OUTSIDE THOMAS CUBITT'S HOUSE (NO.13)- PROPOSED

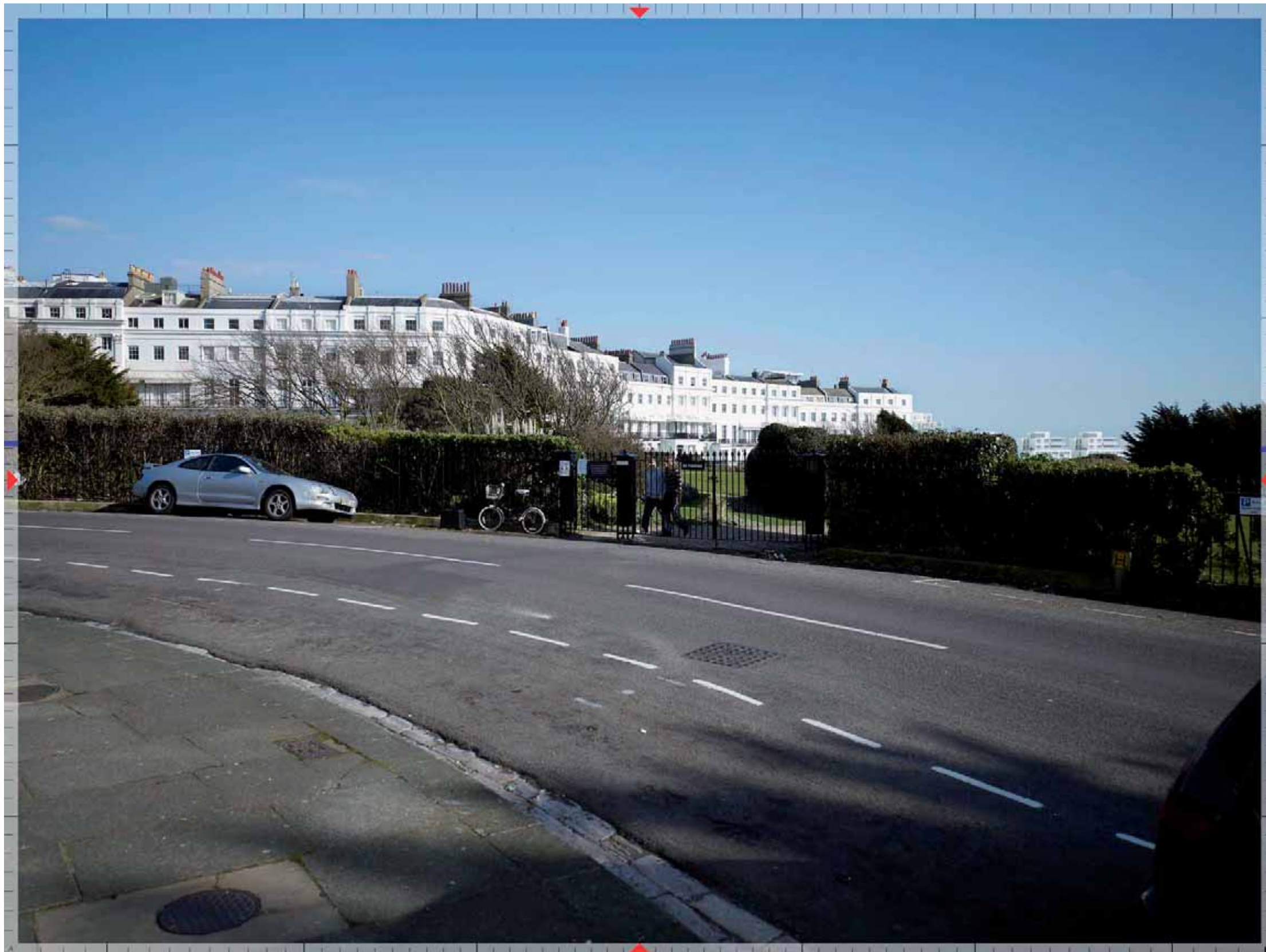


FIG. 32

Fig 32

VISUAL IMPACT VIEWS EXTRACT (CONTD.)
VIEW M43- WESTERN BREAKWATER ARM PROPOSED

FIG. 33

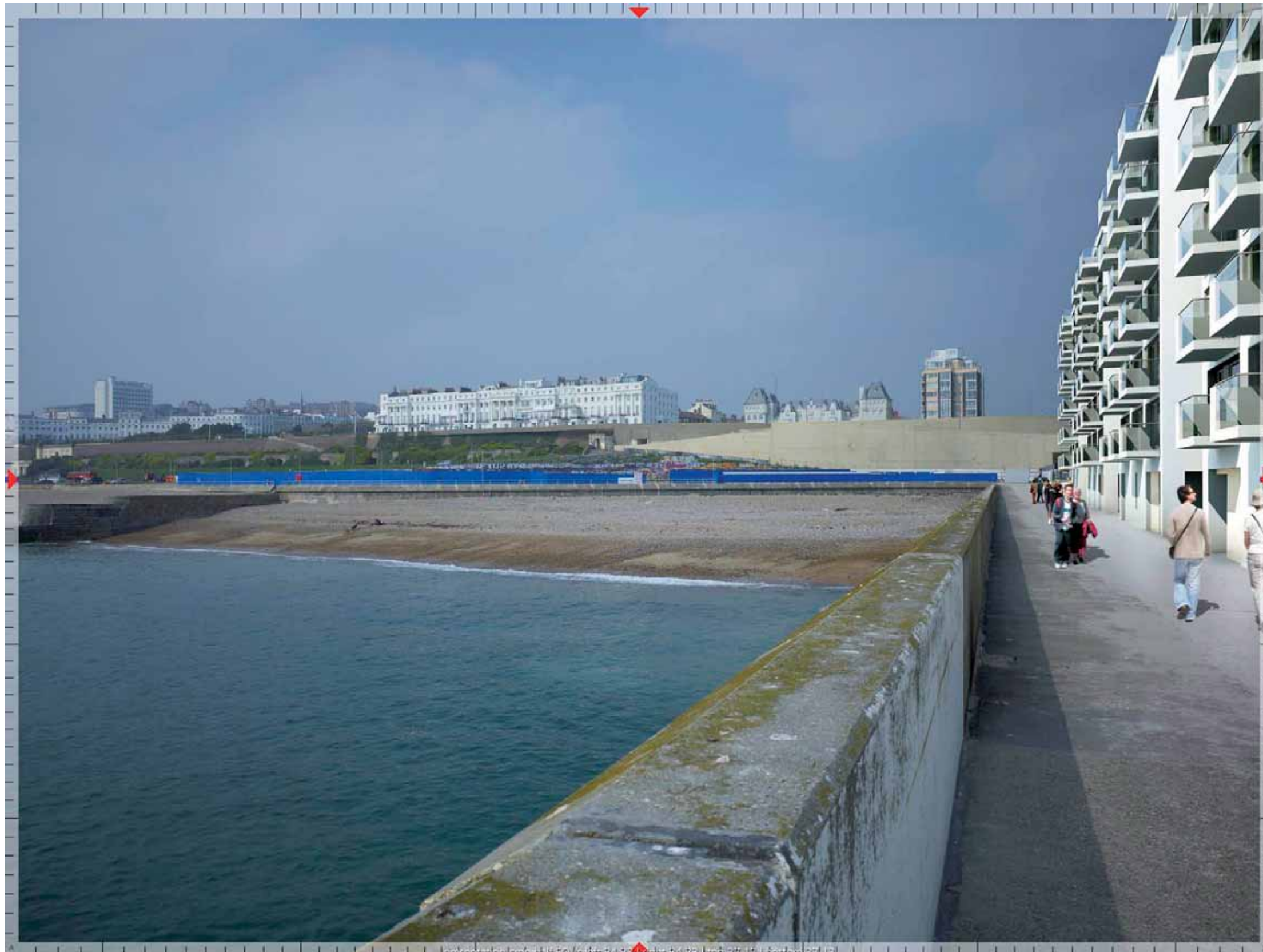


Fig 33

VISUAL IMPACT VIEWS EXTRACT (CONTD.)
ARUNDEL ROAD, OUTSIDE NO. 21



FIG. 34

Fig 34: Shows the north and west elevations of the listed French apartments on which a superimposition of the Brunswick scheme, accurately plotted.

MISCELLANEOUS PHOTOGRAPHS



Figs 35 and 36: View to north-east and south-west respectively, of the Grade I Brunswick Terrace (east) in conjunction with the substantially higher Grade II* Embassy Court, designed by Wells Coaches in 1934-36 .

MISCELLANEOUS PHOTOGRAPHS (CONTD.)



Fig 37: View of Arundel Terrace from Marina Parade where 'De Courcels' form a backdrop to the eastern end.



Fig 38: Detail of east end of Arundel Terrace showing the visual relationships with 'De Courcels'.



Fig 39: Detail of east end of Arundel Terrace showing maximum 'overlap' with Courcels. Note the modern roof addition to the Grade I listed house on the right hand corner of the white block.

FIG. 37-39

MISCELLANEOUS PHOTOGRAPHS (CONTD.)

FIG. 40
& 41



Fig 40: View from west side of crescent, with the Kemp Tower hospital forming a substantial backdrop to the Cubitt House (No.17).



Fig 41: View from Marine Parade with the hospital Kemp Tower forming a backdrop to the centre of the west quadrant of the Crescent.

MISCELLANEOUS PHOTOGRAPHS (CONTD.)



FIG. 42
& 43

Fig 42 and 43: Marine Gate Apartments from west and east respectively.

DIAGRAM ILLUSTRATING THE SETTING AND CHARACTERISTICS OF KEMP TOWN

FIG. 44

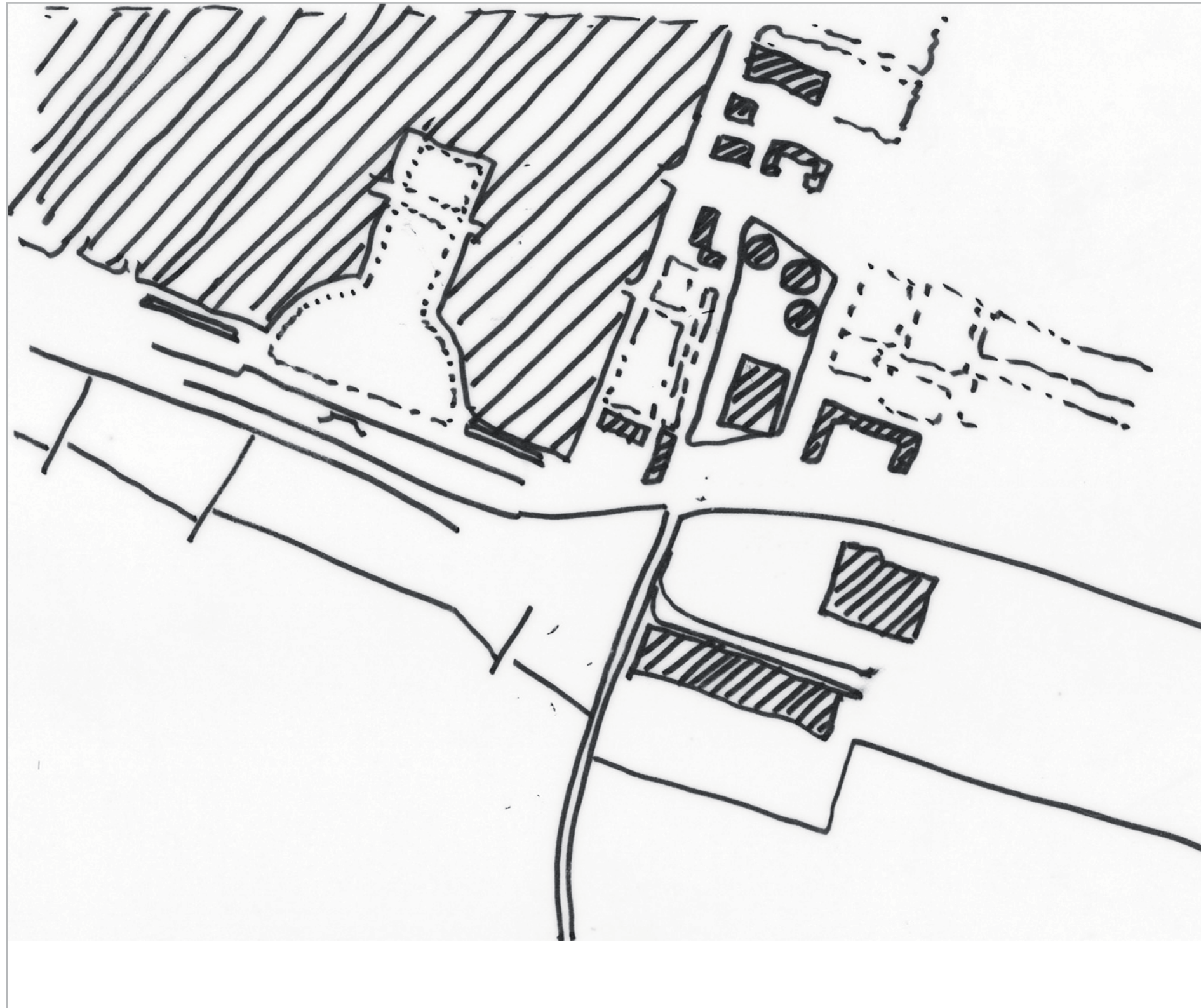


Fig 44: The diagram shows the contiguous urban form to the west and north of Kemp Town and the more open grain of individual object buildings.

PERAMBULATIONS ALONG KEMP TOWN TERRACES



Fig 45:



Fig 46:



Fig 47:



Fig 48:

FIG. 45-48

PERAMBULATIONS ALONG KEMP TOWN TERRACES (CONTD.)

FIG. 49-51



Fig 49:

5



Fig 50:

6



Fig 51:

7

**RELEVANT CABE CORRESPONDENCE
LETTER DATED 27TH NOVEMBER 2006**

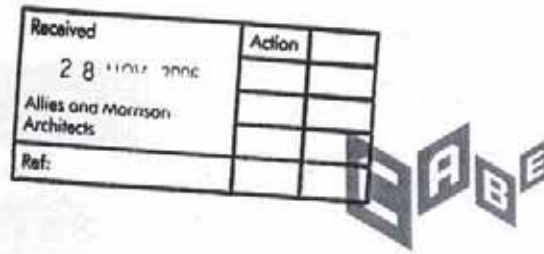
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27 November 2006

Bob Allies
Partner
Allies and Morrison Architects
85 Southwark Street
London
SE1 0HX

Our Ref: D33/4217

Dear *Bob*



BRIGHTON & HOVE: BRIGHTON MARINA REGENERATION

Thank you for coming to the meeting of CABE's design review panel on the 01 November 2006 in connection with this scheme. We are grateful for the trouble that was taken in preparing the presentation material and for the presentation itself. Having considered the scheme in the light of the presentation and the discussion which followed it, CABE's views are as follows.

The CABE design review panel members who attended the meeting were as follows: Louisa Hutton (Chair), Alan Leibowitz, Tom Lonsdale, Taryn Nixon, Martin Richman, Roger Stephenson, Alan Chatham, Jim Eyre.

This scheme strikes us as a skilful and thoughtful piece of design, particularly given the difficult site context. We welcome the mix of uses proposed and the intention to include a substantial amount of residential accommodation to support the marina's role as a district centre. We think the proposals represent a significant step forward in terms of stitching back together what is currently a fractured public realm. We offer the following comments in the hope that they can inform further development of the design.

The public realm

Given the existence of major constraints and the scattered nature of the five sites which will form this planning application, we think this scheme does an admirable job of improving public routes and spaces.

Marina Square is the major vehicular arrival point in the scheme and a key area for pedestrian movement. We are not convinced that the public square will work

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satisfactorily, given that it will still have traffic moving around it on all sides and in effect be a 'square roundabout'. We welcome the principle of humanising the space by creating ambiguity between pedestrians and vehicles, but great care will be needed to ensure the junction works well for all users.

The existing car park and ramp structures have a major negative impact on the quality of the pedestrian environment. We acknowledge that, in the short term at least, there is little prospect of their removal. Serious thought therefore needs to be given to mitigating their impact; major improvements works, including artistic and lighting interventions, should be considered for the areas underneath the ramps, the passageways beneath the car park, and the facades of the car park.

The roof of the car park is particularly important. It will be visible from the apartments located above ASDA, and could significantly compromise the quality of that accommodation if it continues to be an expanse of tarmac and parked cars. In our view, serious consideration should be given to ways of screening this, such as a green roof.

Ultimately, the use, form and appearance of each of the new buildings at ground level will be crucial in determining what it feels like to be a pedestrian in this area. While this forms the next level of design detail, we think it is worth flagging its importance now.

The ASDA block

In our view, this has the potential to be a very successful example of residential accommodation combined with a large retail building. We think the form and scale is appropriate, and we welcome the pedestrian route across the building, including the new bridge link with the cliff.

The entrance to the residential block seems to us to lack generosity. It would be a pity if the promise of the overall design is let down by lower quality in the communal parts of the building.

We were not wholly convinced by the proposal for a lagoon between the building and the cliff. We wonder if this area could be put to better use as a planted garden for residents. If the lagoon concept is to be pursued, careful thought will be required to avoid it becoming a stagnant pool. A strategy for maintenance will be essential.



RELEVANT CABE CORRESPONDENCE (CONTD.) LETTER DATED 27TH NOVEMBER 2006 (CONTD.)

We welcome the consideration given to energy efficiency, and particularly the proposal for a CHP plant.

The petrol station site

In the context of the pattern of existing and proposed development across the marina, we think a tower in this location makes sense. However, we are concerned that the tower as proposed appears overly dominant in some views. We think there is further work to be done to resolve this building satisfactorily, and we would like to see further testing of its height, proportions and form in more detailed design work. This should include the production of short, middle and long distance views, in different weather and daylight conditions.



The McDonalds site

We are not fully convinced by the proposal for this site, and think further careful thought is required. We are concerned that the block reads as a single bulky form from a distance, despite attempts to break up its mass with higher elements. It is difficult to envisage exactly how the proposed mixture of block and tower typologies will work in practice, and we think this will need rigorous thought if it is to be successful.

The sea wall / 'needles' site, and the estates office site

We understand and accept the reasons for the sea wall buildings to have little fenestration on the side facing the marina. Thought will be needed about other ways to enliven and articulate these elevations, to avoid presenting a blank 'back' to the site.

We feel that there is currently not enough information at the moment to make any meaningful comment on the estates office site, but we would like to consider the proposal for this site again as it develops.

Future development

In effect, this scheme does a good job of 'retrofitting' the site to bring greater rationality to its layout and patterns of movement. The design of the five buildings has clearly been informed by thought about the form which future development in the marina might take. This is welcome, and in our view should be made explicit and consolidated in the form of a masterplan which would ensure the coherent

development of this emerging neighbourhood, particularly in terms of the configuration of its public realm. We urge the client and in particular the local authority to do what they can to support this process.

We would welcome further efforts to link this site with the consented Brunswick development to the south. In particular, there may be an opportunity for the route from Marine Square to the Brunswick site to be gradually raised, helping to increase visual and physical connection with the sea from within the site.



The proposed arena on the Black Rock site will clearly be a major change to the local context. Its potential implications for this scheme will also need to be taken into account as the design develops.

Conclusion

We applaud the aspirations of this scheme, and the quality of thinking that has gone into it so far. We are optimistic that it can be the basis for developing a high quality environment. If this ambition is to be extended across more of the marina site in future, we think the production of a masterplan now would be a very positive move. We are aware that many of the issues we have raised are already under active consideration by the architects, and we look forward to seeing the scheme again when it has evolved further.

If there is any point on which you would like clarification, please telephone me.

Yours sincerely

Selina Mason
Director of architecture and design review

Cc Roger Dowty Brighton & Hove City Council
Simon Leask English Partnerships

Declaration of interest

Bob Allies Partner at Allies and Morrison is a CABE panel member.

As this scheme is in the public domain, we will publish our views on our website, www.cabe.org.uk

RELEVANT CABE CORRESPONDENCE (CONTD.)
LETTER DATED 29 FEBRUARY 2008

29 February 2008

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Maria Seale
City Planning
Brighton & Hove City Council
Town hall, Norton Road
Hove, BN3 3BQ

Our ref: D33/4217

Received	Action
04 Feb 2008	
Allies and Morrison Architects	
Ref:	



Dear Maria Seale

**BRIGHTON & HOVE CITY COUNCIL: BRIGHTON MARINA REGENERATION
YOUR REF: BH2007/03454**

Thank you for consulting the Commission for Architecture and the Built Environment (CABE) about this proposal. Following a site visit, meetings with the design team and the local planning authority, and several panel discussions, the information provided (application drawings, design and access statement, and models) was considered by chair of the design review panel, MJ Long, panel members and design review staff. CABE's views, which supersede all views which may have been expressed previously, are set out below. This is our formal response to the planning application.

Public realm

We acknowledge the many challenges associated with creating a unified public realm in this context. This is a complex marina environment characterised by significant changes in levels, a variety of existing buildings, and a divisive road infrastructure, including the access ramp which we understand is to be retained for the foreseeable future. The proposal goes a long way to redressing this, to improve public routes and spaces across the site.

We welcome the decision to replace the roundabout south of the ASDA superstore with a public square. We recognise that it will be hard to create a legible space in an area loosely defined by buildings and dominated by road infrastructure. However, we think that proposing Harbour Square as a self-contained space defined by roads instead of buildings, to create in effect a 'square roundabout', fails to confront this challenge in a convincing way. The relationship between Harbour Square and those spaces adjacent to the Cliff block colonnade, the new petrol filling station and the area adjacent to the bridge link to the boardwalk (which will

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have a combined area of one and a half times that of the square) is particularly ambiguous. This is not helped by the offset north-south route through the square which does not appear to promote a natural desire line for pedestrians crossing the site.

In light of the above issues, there would be benefit in exploring a narrative that focuses on the experience of the pedestrian moving across the site. This would give a clearer idea of how one would feel, for example, entering Harbour Square from the Cliff block, walking south through the square and across the road into another space of comparable scale, climbing up to the boardwalk or crossing to Park Square. Such an analysis might suggest a way of rethinking the design of Harbour Square as part of the wider public space network, by extending it to encompass the currently ambiguous spaces on its periphery.

The existing car park and ramp structures have a negative impact on the quality of the pedestrian environment. We acknowledge that, in the short term at least, there is little prospect of their removal. The improvements works proposed for the areas underneath the ramps, the passageways beneath the car park, and the facades of the car park will need to be conditioned appropriately, by the local authority to ensure this environment is made more hospitable for those frequenting these areas.

The roof of the car park is also an important consideration. It will be visible from the apartments located above ASDA as well as Marina Point, and could significantly compromise the quality of the accommodation if it continues to be an expanse of tarmac and parked cars. We welcome the intention to screen this with a planted trellis structure and suggest it should be conditioned appropriately. We welcome the demolition of the eastern bay of the multi-storey car park to provide a replacement petrol filling station and new bridge link to the boardwalk. Close attention should be paid to the impact of the petrol station on the public realm, in terms of how it relates to the square and how the traffic is managed.

Cliff block

In our view, this has the potential to be a successful example of residential accommodation combined with a large retail building. We think the form and scale is appropriate - the 'hill town' quality of the building makes it an exciting prospect and fitting in this context. We welcome the pedestrian route across the building, including the new bridge link with the cliff.

However, we think the top level arrival space of the western section of this block would benefit from further thought. It is an unusual type of space and will need careful landscape signals to resolve the potential conflict between its public and



RELEVANT CABE CORRESPONDENCE (CONTD.)

LETTER DATED 29 FEBRUARY 2008 (CONTD.)

private characters. A revised approach will also need to consider how the uses, landscape, and built form framing this space are configured to delineate clear physical and visual boundaries between the apartments and the more public uses, and make it a comfortable environment and intuitive route for residents and people passing through it. For example, it may be that the community facility is better placed on the south western corner of the block and residential use located in its place. Similarly, consideration should be given to providing a more pronounced gap between the blocks to further open up views out to the sea. This could perhaps respond to the geometry and focus of the cascading street; the current radial cut is awkward and does not feel to be part of the route.

We are not convinced by the entrance strategy for the apartments at Harbour Square, which we feel lets down the promise of the overall design. The entrance as proposed, whilst just visible from the square, does not have the presence or generosity it deserves.

Marina Point

In the context of the pattern of existing and proposed development across the marina, we think a tower in this location makes sense. Its scale and proportions appear well judged and it has the potential to be an elegant building. Ultimately, the success of this building will be dependent on the quality of materials and detailing, which should be conditioned appropriately by the local authority.

Quayside building

We are unconvinced by the proposal for this site which fails to relate adequately to its context. As proposed, it comes across as a hybrid form, an amalgam of a courtyard block, podium block and tower that lacks the anatomical clarity of the other buildings proposed for Brighton Marina. It is further compromised by the upper level set backs to open views to the marina, which we feel exemplifies the unsatisfactory nature of this building. In our view, the Quayside building requires a fundamental rethink to produce a more self-assured block which sits more comfortably in its context.

Sea wall building

We understand and accept the reasons for the sea wall building to have little fenestration on the side facing the marina. We welcome the thought that has gone into enlivening and articulating the eastern elevation in particular, to avoid presenting a blank 'back' to the site. It is important that this followed through to the next design stage.

comm. def. colour
car pavilion
heart.



Inner harbour building

With regards the inner harbour building, whilst generally supportive, we find the least successful elements are the single aspect apartments directly facing onto the busy roundabout. The local authority should assure itself that these units offer a high enough quality of accommodation for residents.

Sustainability

We welcome the consideration given to energy efficiency, and particularly the proposal for a CHP plant which, combined with biomass and gas fired boilers, will satisfy most of the site's energy demand.

Materials

When the issues above have been addressed, the success of this development will be dependent on the quality of materials and detailing in the architecture and landscape which need to be of the highest quality to realise the aspirations of the scheme design. The local planning authority should condition materials and details to ensure design quality is maintained throughout the design process.

Conclusion

Ultimately, the use, form and appearance of each of the new buildings at ground level will be crucial in determining what it feels like to be a pedestrian in this area. In our view, the proposals for the public realm are not yet as convincing as those for the buildings which, with the exception of the Quayside block, are clear in their individual typologies and are generally successfully resolved. We have every confidence that the design team can address the concerns outlined above to produce an accomplished scheme worthy of the aspirations of Brighton and Hove.

Please keep us informed of the progress of this scheme. If there is any point that requires clarification, please telephone me.

Yours sincerely

Jonathan Freeman
Design review advisor

cc Bob Allies Allies and Morrison
Roger Dowty Brighton and Hove City Council
David Brock English Heritage



RELEVANT CABE CORRESPONDENCE (CONTD.) LETTER DATED 29 FEBRUARY 2008 (CONTD.)

Panel members

The CABE design review panel members who attended the meeting were as follows: Tim Stonor, Dominic Papa, Adrian Jones, Keith Bradley.

Declaration of interest

Bob Allies Partner at Allies and Morrison is a CABE panel member.

Diane Haigh is Director of architecture and design review at CABE; she was previously a Director of Allies and Morrison.

Piers Gough is a CABE commissioner and principal at CZWG Architects LLP, who are working with Parkridge Holdings on Brighton Marina

As this scheme is the subject of a planning application, we will publish our views on our website, www.cabe.org.uk.



RELEVANT CABE CORRESPONDENCE (CONTD.)
LETTER DATED 03 OCTOBER 2008



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03 October 2008

Sue Dubberley
City Planning
Brighton & Hove City Council
Town hall, Norton Road
Hove, BN3 3BQ

Our ref: D33/4217



Dear Sue Dubberley

BRIGHTON & HOVE CITY COUNCIL: BRIGHTON MARINA REGENERATION
YOUR REF: BH2007/03454

Thank you for consulting the Commission for Architecture and the Built Environment (CABE) about this proposal. Following a site visit, a meeting with the design team and local authority and several panel reviews, the information provided (A1 sheets and models) has been considered by chair of design review (MJ Long) and design review staff. CABE's views, which supersede all views which may have been expressed previously, are set out below. This is our formal response to the planning application.

Public realm

We acknowledge the many challenges associated with creating a unified public realm in this context. This is a complex marina environment characterised by significant changes in levels, a variety of existing buildings, and a divisive road infrastructure, including the access ramp which we understand is to be retained for the foreseeable future. The proposal goes a long way to redressing this, to improve public routes and spaces across the site.

We welcome the decision to replace the roundabout south of the ASDA superstore with a public square. We recognise that it will be hard to create a legible space in an area loosely defined by buildings and dominated by road infrastructure. However, we think that proposing Harbour Square as a self-

contained space defined by roads instead of buildings, to create in effect a 'square roundabout', is a limited response to this challenge.

The relationship between Harbour Square and spaces adjacent to the Cliff block colonnade, the new petrol filling station, the area adjacent to the hotel loading bay and areas fronting and to the north of Marina Point (which taken together exceed the area of the square) is also weak. Furthermore, the curvilinear geometry of the square could exacerbate, rather than diminish, the dominance of the car over pedestrians by encouraging higher traffic speeds than anticipated. This does not give us the confidence that pedestrians will be comfortable using it as the 'shared space' promoted by the design team. We think there remains scope to further develop the design of Harbour Square as part of the wider pedestrian-focussed public space network, by extending it to encompass these currently indistinct spaces on its periphery.



The existing car park and ramp structures have a negative impact on the quality of the pedestrian environment. However, we acknowledge that, in the short term at least, there is little prospect of their removal. We think the public realm proposals for the spaces under the flyover have potential but there remains a risk that they will not be attractive to users. The improvement works proposed for these areas, the passageways beneath the car park, and the facades of the car park will need to be conditioned appropriately by the local authority to ensure this environment is made as hospitable as possible for those frequenting these areas.

The roof of the car park is also an important consideration. It will be visible from the apartments located above ASDA as well as Marina Point, and could compromise the quality of the accommodation if the onlooking aspect is not given due consideration. We welcome the intention to screen the car park roof with a planted trellis structure and suggest it should be conditioned appropriately. We also welcome the demolition of the eastern bay of the multi-storey car park to provide a replacement petrol filling station and new bridge link to the boardwalk. Close attention should be paid to the impact of the petrol station on the public realm.

Cliff block

In our view, this has the potential to be a successful example of residential accommodation combined with a large retail building. We think the form and

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LETTER DATED 03 OCTOBER 2008 (CONTD.)

scale is appropriate - the 'hill town' quality of the building makes it an exciting prospect and fitting in this context. We welcome the pedestrian route across the building, including the new bridge link with the cliff.

However, we think the top level arrival space of the western section of this block would benefit from further thought. It is an unusual type of space and will need careful landscape signals to resolve the potential conflict between its public and private characters. While the scheme skilfully handles the configuration of flats surrounding this space, we are unsure that the proposed path network gives sufficient direction to visitors in leading them directly past the residential units instead of reflecting natural desire lines. A revised approach will need to consider how the uses, landscape, and built form framing this space are configured to delineate clear physical and visual boundaries between the apartments and the more public uses, and make it a comfortable environment and intuitive route for residents and people passing through it.

We are not convinced by the entrance strategy for the apartments at Harbour Square, which we feel lets down the promise of the overall design. The entrance as proposed, while just visible from the square, does not have the presence or generosity it deserves.

Marina Point

In the context of the pattern of existing and proposed development across the marina, we think a tower in this location makes sense. Its scale and proportions appear well judged. However, in our view, the clarity of the design has been weakened by breaking the horizontal continuity of the balcony line. Ultimately, the success of this building will be dependent on the quality of materials and detailing, which should be conditioned appropriately by the local authority.

Quayside building

We are unconvinced by the proposal for this area of the site which fails to relate adequately to its context. As proposed, it appears as a hybrid form; an amalgam of a courtyard block, podium block and tower that lacks the typological clarity of the other buildings proposed for Brighton Marina. While the tower element is expressed more clearly than the previous iteration, the impression of the building as a whole is of a pragmatic response to the site's constraints (typified by the upper level set backs to open views to the marina) rather than an intelligible



piece of architecture in its own right. In our view, the Quayside building should be a more self-assured block which sits more comfortably in its context.

Sea wall building

We understand and accept the reasons for the sea wall building to have little fenestration on the side facing the marina. We welcome the thought that has gone into enlivening and articulating the eastern elevation in particular, to avoid presenting a blank 'back' to the site. It is important that this followed through to the next design stage.

Inner harbour building

With regard to the inner harbour building, while generally supportive, we find the least successful elements to be the single aspect apartments directly facing onto the busy roundabout although we acknowledge this is made up for in part by the views it affords for these units towards the marina. The local authority should assure itself that these units offer a high enough quality of accommodation for residents.

Sustainability

We welcome the consideration given to energy efficiency, and particularly the proposal for a CHP plant which, combined with biomass and gas fired boilers, will satisfy most of the site's energy demand.

Materials

When the issues above have been addressed, the success of this development will be dependent on the quality of materials and detailing in the architecture and landscape which need to be of the highest quality to realise the aspirations of the scheme design. The local planning authority should condition materials and details to ensure design quality is maintained throughout the design process.

Illustrative masterplan

We are pleased to note that the design team is considering the proposals in the context of a longer term masterplan for Brighton Marina to ensure the inner harbour development successfully integrates with the Brunswick development.

Conclusion

Ultimately, the use, form and appearance of each of the new buildings at ground level will be crucial in determining what it feels like to be a pedestrian in this



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LETTER DATED 03 OCTOBER 2008 (CONTD.)

area. In our view, the proposals for the public realm are not yet as convincing as those for the buildings which, with the exception of the Quayside block, are clear in their individual typologies and are generally successfully resolved. We have every confidence that the design team can address the concerns outlined above to produce an accomplished scheme worthy of the aspirations of Brighton and Hove.

Please keep CABE in touch with the progress of this scheme. If there is any point that requires clarification, please telephone me.



Yours sincerely

A handwritten signature in black ink, appearing to read 'Jonathan Freeman'.

Jonathan Freeman
Design review advisor

cc (by email)	Bob Allies	Allies + Morrison
	Roger Dowty	Brighton and Hove City Council
	David Brock	English Heritage

Declaration of interest
Bob Allies Partner at Allies and Morrison is a CABE panel member.

Diane Haigh is Director of architecture and design review at CABE; she was previously a Director of Allies and Morrison.

Piers Gough is a CABE commissioner and principal at CZWG Architects LLP, who are working with Parkridge Holdings on Brighton Marina

Public scheme
As this scheme is the subject of a planning application, we will publish our views on our website, www.cabe.org.uk.

RELEVANT ENGLISH HERITAGE CORRESPONDENCE

LETTER DATED 24 OCTOBER 2008

Sue Dubberly - Development projects
Environment Directorate
Brighton and Hove City Council
Town Hall
Norton Road
Brighton
BN 3 3BQ

Direct dial: 01483 252040

Your ref : BH 07/03454

Our ref: P00054804/
Appn September amendments

24 October 2008

Dear Sue

**Land at Brighton Marina - Regeneration Project.
Demolition of Asda Store and surrounding buildings and Re-
development. Proposals for residential led mixed uses development .
AMENDED Plans.**

Thank you for the consultation received 1st October 2008 regarding the above scheme's amendments. We last commented in detail on the application on 9th June this year. We note the changes set out accompanying your letter but these do not seem to be major changes in relation to our principal locus for comment on this site. The revised Visual Impact (VIA) study and DAS we have considered further.

As indicated, English Heritage believes this is a most important regeneration opportunity for the eastern part of the city, and for the public spaces in particular. We reiterate the scheme should endeavour to enhance the setting of the important Kemp Town terraces and the Conservation Area nearby. Proposals should aspire to a quality of design and execution which may be valued now and in the future.

Summary of views.

As indicated earlier English Heritage's principal remaining concern lies with some adverse impacts of the Marina Point block on the kinetic views of and from the Grade I Listed Kemp Town terraces. We set out our views in our letter of 9th June 2008 and referred also to our previous letter. Ostensibly our views remain unchanged and still apply.

The scheme shows promise for regenerating the Marina site, but the Marina Point tower design still has some remaining adverse impact on the setting of the Kemp Town terraces. It should only be accepted if there is a clear and demonstrable overall public benefit.

Detailed Advice

Marina Point.

Views from within Kemp Town terraces.

We previously indicated that from the information supplied, the issue of height and massing seen from inside Sussex Square and within Lewes Crescent had been resolved satisfactorily. From Lewes Crescent and Sussex Square, views indicated that the rectangular block profile of the Point tower is not seen rising above the roofs of the Crescent or Sussex Square including from the NW corner of the Square. The reduction in height addressed this aspect to our satisfaction, but an increase in height would trigger concerns. It is not clear in the revision if the height has increased slightly over that previously commented in June but the service lift plant appears to have increased as a result of the re-shaping of the top floor. We consider proposed G.floor. slab levels will need to be accurately set out. But views supplied regarding Lewes Crescent and Sussex Square do not appear to have changed.

We refer to our previous 9th June 2008 letter, although the upper service lift seems unfortunately rather more prominent. As indicated the loss of the visually deep floor slabs and balcony changes assist the building's overall fenestration context to better reference those of Brighton's terraces. While the changes give the building more vertical emphasis, it never the less, remains that it is the views at close quarters within the scheme that provides the building with tangible interest.

Kinetic views from in front of the Kemp Town terraces

The Kemp Town terraces make a major contribution to the seafront set pieces. They are also a significant part of the overall seafront assemblage that sets Brighton apart from any other seaside town.

We previously set out the significance of the Grade I listed Kemp Town Terraces - our letters 15 January 08 and recently in June. The background to our assessment is set out in our earlier letter, so I do not repeat this but ask you to refer to that letter. We consider that there remains adverse impact upon the setting of the terraces as part of the perambulation we identified. Some earlier wire diagrams have in some viewpoints been replaced by AVR montages and there is some change to the impact statements as part of the matrix, but this has not significantly changed our view.

- The applicants walk through perambulation and stop views show a rectangular block silhouette viewed from Chichester terrace (T42). In our judgement this will distract the eye from the terraces. Given the significance of the terrace, the Townscape VIA matrix we consider is incorrect the impact is adverse not beneficial.
- At Arundel Terrace (T30) the detail is mostly apparent but here the rectangular block is clearly at distance, detached from the terraces. Unfortunately, information shows the sea horizon is only just seen between the gap in development here, essentially removing the existing visual sea connection.
- We set out our views in comparison with the Brunswick tower in our previous letter. We have acknowledged the need for a focal point of the

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scheme from the entrance within the scheme, but the proposal, partly due to a restricted site configuration and accommodation needs, presents a rectangular wide face east, rather than a narrow elevation. A narrow, elegant but less tall building would still provide a focal point in the scheme.

There are some small changes in the submitted impact assessment commentary. The method says it is based on the LI and IEMA guidance in the revised chap 9.RT-VIA. P 2.32 shows the impacts matrix - adverse/ moderate/neutral. One assumes the impacts of the scheme are being tested against the significances of the townscape – in this clear case primarily Kemp Town Terraces and their setting. However significance seems only partly set out in the paras 'Existing' part of the VIA. We did, as indicated earlier, use the draft EH *History in the View* guidance as a basis for considering the scheme impacts on The Kemp Town terraces. We observe that the VIA matrix, used in assessing views from the west-eastward towards the Point gives much weight to the design details of the Point building rather than its location and shape in the townscape viewed in the marina site approaches. For example T30, T27 where the buildings detail appears referenced in mitigation (as beneficial) to adverse impacts.

It was also noted that the apparent shape of the proposed Brighton International Arena is depicted in images from the west towards the proposed marina scheme (yellow wire diagram). The height however seems to be shown as rising above the cliff, whereas all our previous informal discussions on this site with B&HCC indicate that the scheme should not rise above the cliff, we support this view.

As we previously indicated, the Point building will have some adverse impact on the kinetic views of the Kemp Town terraces and therein their setting. The applicants have reiterated that this building is essential to satisfy the necessary economics for the whole scheme to work. English Heritage do not intend to examine the financial aspects of the scheme but consider that this matter should be rigorously tested by the City Council planning team.

Quayside building.

We previously noted that the revised views might require verification, given the clear views now shown in the VIA, the block would benefit from the uppermost section being located further south with more varied elevations and preferably reduced height. We understand this could require changes to the roof garden space.

Other design matters.

We slightly revise the points of our previous letter.

The Public Realm proposals have further improved but the space around the Point is still constrained and the pedestrian routes around the square seem less friendly to people movement than the earlier design – we also encouraged tree planting previously (see earlier comments) including activity under the ramps but these areas seem unchanged – views supplied show this as a potentially dour space.

We have noted an addition of the sea wall view to the visual assessments and this public space does look rather bleak in treatment between the wall and the residential western façade.

We consider CABI are better placed to consider the public realm and spatial relationships to the cliff and the detailing of elevations and amenity. But, maximising light into the space between the Cliff and the scheme will be important, including innovative and well managed lighting at night. (Views appear to be not shown)

Previous comments regarding green roofs and the route from BIA Black Rock and the RTS has been mentioned in earlier letters, in terms of the need for continuous landscape interest and high maintenance levels through to the cliff side. The use of high quality detailing and materials throughout the public realm, as indicated in the revisions, will be important in this scheme and these show positive signs in the revised submission. However the loss of 'connective' sea views from parts of Arundel Terrace across the scheme remains.

Recommendation.

In conclusion, English Heritage consider the amended proposal has not significantly changed in respect of our key concerns. Our views therefore remain unchanged.

There remains some adverse impact upon the experience of the West - East perambulation in front of the Kemp Town set piece terraces. These arise from the height, form and location of the Marina Point building and are not likely to be resolved without further significant revision to this element. As a building of the type proposed is stated by the applicants to be essential to the viability of the project, we recommend that you should satisfy yourselves that this is indeed the case. With such information your council will then be better placed to weigh the overall public benefits of regeneration at the marina with the remaining impacts of a tall building that will be experienced as part of some views from the Kemp Town terraces.

Next steps.

We welcome the opportunity of advising further. Please consult us again if additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity. Please send us a copy of any decision notice regarding this application in due course. This will help us monitor actions related to changes to historic places.

Yours sincerely,

GRAHAM STEAGGLES
Historic Areas Adviser.
 South East

CC
 Roger Dowty – Conservation/ Design Manager.

RELEVANT ENGLISH HERITAGE CORRESPONDANCE (CONTD.)
 LETTER DATED 16TH JANUARY 2007



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SOUTH EAST REGION

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Direct dial: 01483 252040

Your ref : 466
 brighton marina
 Our ref: - P00017542 – add'l pre
 app

16 January 2007

**Preliminary application comments Brighton Marina – Asda site area/
 Merchants Quay.
 BRIGHTON & HOVE.**

Dear Mr Allies,

I write further to the meeting in this office between Graham Steaggles, Bob Allies and your clients Explore Living. Thank you for providing the montages and photos of the model too, I indicated I would write to you following our regional Important Applications Review (IAR) session, immediately prior to the Christmas and New Year break. I apologise for the slight delay in getting back to you. I can now confirm some of the points and issues raised at our meeting.

As I indicated earlier, one of our major concerns lies with the possible impacts on views of major set pieces in Kemp Town, particularly of the Lewes Crescent area, and in relation to our previous comments on the outer harbour (Wilkinson Eyre/ Brunswick scheme). As you will recall I raised issues regarding the tall building elements of your clients proposals, we noted and supported the reduction and subsequent loss of the tall ('needles' type) elements at the western edge of the scheme and were supportive of the improvements indicated to the public realm, pedestrian movement and ramp road/ street ideas which had been further developed in conjunction with Ben Hamilton Baillie Associates. The pedestrian route from the cliff through the project, thence alongside the ASDA space needs further 'fleshing out' but we felt too that this was promising.

The key area of our concern rests with the tall buildings parts in the scheme and impact on the historic environment. Unfortunately, we are concerned that both of the proposed buildings for the Marina Square and the Point site will have an adverse affect on the Lewes Crescent area and views along the seafront. In dealing with Brunswick/ Wilkinson Eyre's Outer Harbour proposals, we considered carefully the

visual proximity of the tall outer harbour building to both Lewes Crescent and the Marine Parade promenade and the relationship between these and the long and medium distance views eastward along the seafront. We have looked at your current proposals from the Chichester Terraces area/ western side - Lewes Crescent, Marine Parade and similarly views eastward and examined your wire diagrams in doing so. We consider that the proposed Point site will be particularly intrusive in its visual proximity to views of Lewes Crescent and that the inclusion of the taller Square proposals would also only serve to create a sense of a continuous build between the proposed outer harbour scheme tower and the Kemp Town Crescents and terraces - to the Conservation Area's detriment. We believe the marina area should remain clearly and visually distinct from the Kemp Town terraces.

In our view, there will be an uncomfortable visual proximity of the proposals with Lewes Crescent. Unlike the outer harbour, we do not consider the taller building impact can be mitigated by being read as a distant component of the wider panorama as viewed from the Terraces and Marine Parade.

The proposals also brings tall buildings much closer to the cliff, we do not consider that there is a need to create a cluster at the marina, and the outer harbour scheme will already 'signpost' the eastern entrance to Brighton, another tall building does not, we believe, add to that sense of entrance, nor will the form and silhouette add positively to the skyline when viewed from key areas along the seafront.

On a more positive note, it is considered the proposals for the western Sea Wall area have potential to create an attractive and positive edge to the scheme, although we would encourage a variation in elevation treatment, particularly to the northernmost block of the four, to reduce the height but add to and create a interesting vista through the scheme when viewed from the Arena site approach. We also consider the cliff site (over Asda) to be a potentially creative addition to the views looking down into the marina but would suggest this would benefit from more varied roof forms in the overall articulation - for example, to the four blocks end onto the cliff.

Finally, at our meeting I mentioned the problems of possible increases in traffic from this site, the issues raised around the GEHL study for the city needs to be factored into the effects of the scheme and proposals to deal with the effects of any (more) traffic movements along the A259 seafront. Pedestrian connectivity between the core of the city and the seafront is most important and we have consistently raised this issue in respect of other proposed schemes along the A259 corridor.

While clearly we could currently not recommend that the proposals move forward positively without the above concerns being resolved satisfactorily, I hope the comments assist. We would of course be willing to meet to discuss the above further but suggest that this should include appropriate officers of the City Council. You



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will be aware that I have briefly already commented to Jo Beasley regarding the scoping for the EIA in late October last.

Yours sincerely,



GRAHAM STEAGGLES
Historic Areas Adviser.
South East

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Cc Roger Dowty/ Martin Randall BHHCC
Cc. Peter Kendall