

Topic – Employment and Retail

DM11 New Business Floorspace

Development proposals involving the provision of new B1a, b and c Use Class business floorspace, either in stand-alone commercial or mixed-use schemes, should provide for well-designed buildings and layouts suitable for incorporating a range of unit sizes and types that are flexible, with good natural light, suitable for sub-division and configuration for new B1 uses and activities; and for new B1c light industrial, B2 industrial and B8 storage and warehousing premises include adequate floor to ceiling heights; floor loading, power, servicing and loading facilities.

Redevelopment proposals on protected industrial estates will be supported where they provide an efficient use of the site/ premises to provide higher density and flexibly designed business premises for B1, B2 and/or B8 uses in accordance with City Plan Part 1 Policy CP3 Employment Land.

Supporting Text

2.96 New business floorspace needs to be designed to respond to changing economic conditions and support economic growth. It is important to ensure that new employment floorspace is ‘future proofed’ as far as possible allowing capacity and flexibility for add-on space to support enterprise growth or demand for move-on accommodation and larger footplate space⁴¹. Unless it is demonstrated that a commercial occupier has been identified to occupy the employment land/floorspace and has particular requirements for the premises or land being developed, proposals should incorporate flexible design features to provide future adaptability for a range of uses and occupants and business size, such as small and medium sized companies and ‘start up’ businesses as well as larger sized accommodation to support growing/ larger businesses. Premises should have good natural lighting (and avoid basement and windowless offices).

2.97 Flexible design features for new B1a office floorspace include:

- Adequate floor to ceiling heights (at least 3 metres of free space) with few supporting columns, if this can be avoided;
- Appropriate location of entrances, entry cores, lift cores, loading facilities and fire escapes, to allow mixing of uses within the building;
- Availability of a range of unit sizes and types suitable for occupation by small, medium and large businesses;
- Grouping of services, plumbing, electrics, cabling, communications infrastructure and circulation;
- Flexible ground floor access systems that can easily be adapted for goods delivery (e.g. through adaptable façade panels);

⁴¹ Productive, Inclusive, Transformative: An Economic Strategy for Brighton & Hove 2018

- Good standards of insulation to mitigate any overspill from future alternative uses in the building, and good natural daylight;
- Digital connections (see Policy DM25), meeting room facilities, flexible desk arrangements, service lifts, and flexible space for events;
- Charging points and other infrastructure to support the use of zero exhaust emission vehicles (see DM36)
- Design out waste - ensure that waste reduction is planned from project inception to completion including the consideration of standardised components, modular build and re-use of secondary products and materials (see City Plan Part One Policy CP8 Sustainable Buildings and Policy WMP3d of the East Sussex, Brighton & Hove and South Downs Waste and Minerals Plan).

2.98 Where new B1b or B1c units are proposed the council will seek flexible design features to allow the reconfiguration of internal space to suit new occupiers with different space requirements and/or allow the retention of existing businesses occupying the premises to expand in situ. This could also include, for example, at least 3 metres of free space but up to a minimum of 5 metres in B2 industrial buildings and B8 Storage and Warehousing uses to allow for the introduction of mezzanines; full height delivery doors, and being able to site additional delivery doors to enable subdivision of buildings and/or reallocation of space to meet the requirements of new users. Appropriate design features should include adequate floor to ceiling heights; floor loading, power, servicing and loading facilities suitable for industrial and/ or storage and warehousing use.

2.99 With speculative proposals, applicants must also demonstrate to the council's satisfaction that the business floorspace is appropriate to meet the likely needs of a range of potential end users and this may include details of the marketing strategy that will be employed to ensure the successful take up of the employment floorspace. New build business premises should be provided with an internal fit out to an appropriate standard to attract new occupiers. In implementing this policy the council, in consultation with the applicant, will give careful consideration to the needs of potential end users for the premises being provided as part of the development, and will take into account all relevant circumstances when assessing the level of fit-out that will need to be provided.

2.100 Proposals that provide mix of B use class employment uses must be designed to demonstrate there is adequate separation of uses, to ensure high standards of amenity.

2.101 Small businesses often seek premises that have flexible, layouts that can adapt as the business grows or changes and networking space to interact with other small business or to meet with clients. Innovative new employment floorspace in

developments that provide a range of facilities including: flexible occupancy terms; flexible layouts; a mix of offices, studios; workshop space; as well as networking, socialising and meeting space will be encouraged where it meets the needs of a range of business types and sizes. However the council also considers that co-working, micro space, maker space and creative space will not meet floorspace needs of all occupiers/ growth sectors in the city. Consideration should also be given to the provision of larger flexibly designed space to meet the needs of businesses in the middle stage of growth that need to expand.

2.102 There is a very limited supply of land for business class uses in the city. This places importance on making best use of existing business sites and premises that are suitably located and commercially attractive to business uses. Policy CP3.4 in the City Plan Part One is supportive of proposals for the upgrade and refurbishment of the identified and protected industrial estates and premises. Where opportunities for redevelopment of older/ poor quality/ lower density industrial premises come forward on safeguarded industrial estates/ business parks, in accordance with CPP1 Policy CP3 Employment Land, the council will seek a mix of flexibly designed unit sizes suitable for a range of B1, B2 and B8 uses making efficient use of the site or premises so these sites can continue to meet the needs of businesses in the city. Successful examples include the phased development of Woodingdean Business Park, and the mix of self-contained office and workshop units at Hove Technology Centre, Westergate House and English Close Business Centre.

DM12 Changes of Use within Regional, Town, District and Local Shopping Centres

To allow for diversification in shopping centres, change of use of an existing class A1 unit to non-A1 town centre uses within the following designated shopping centres and as shown on the Policies Map, will be permitted where the following criteria are met;

A) Regional, Town and District Shopping Centres

- i) Changes of use of a ground floor Class A1 unit in the primary shopping frontages will only be permitted where the proportion of Class A1 units would not fall below 75% in the Regional Centre, and 50% in Town and District Centres (as a proportion of total units measured across the total Primary Shopping Frontage), taking into account unimplemented planning permissions for changes of use;**
- ii) Changes of use of a ground floor Class A1 unit in the secondary shopping frontages will only be permitted where the proportion of Class A1 units would not fall below 35% in the Regional Centre and below 30% in the Town and District Centres (as a proportion of total units measured across the total Secondary Shopping Frontage), taking into account unimplemented planning permission for changes of use.**
- iii) Within the Lanes and North Laine areas the change of use should not result in a group of three or more adjoining units being in non-A1 use.**
- iv) The unit has been marketed for a minimum of 6 months, at an appropriate rent (providing three comparable shop rents within the centre) with the marketing information clearly demonstrating that there is no realistic prospect of the unit being used for A1 use in the foreseeable future; and**
- v) A shop front has been retained or provided;**

B) Local Shopping Centres

- i) The proportion of Class A1 units in the centre would not fall below 50% (as a proportion of total units in the whole centre) taking into account unimplemented planning permission for changes of use;**
- ii) The shop unit has been marketed for a minimum of 6 months, at an appropriate rent (providing three comparable shop rents within the centre) with the marketing information clearly demonstrating that there is no realistic prospect of the unit being used for A1 use in the foreseeable future; and**

iii) A shop front has been retained or provided.

Residential use may be appropriate above or to the rear of units in shopping centres provided the active frontage is not compromised and that satisfactory residential amenity can be achieved.

Temporary and ‘meanwhile’ use of vacant buildings and sites by start-up businesses as well as creative, cultural and community organisations will be considered particularly where they help activate and revitalise retail centres.

As an update to the hierarchy of shopping centres as set out in policy CP4 of the City Plan Part One, the secondary frontage of the Regional Centre has been amended to facilitate a new centre called Brunswick Town Local Centre. This centre is shown on the updated Policies Map.

Supporting Text

Review of and designation of shopping frontages

2.103 Primary and secondary frontages are defined within the Regional, Town and District Centres of the city in order to assist in the safeguarding and managing of retail uses and related facilities and services.

2.104 In 2017 a review was undertaken of the primary and secondary shopping frontages of the current hierarchy of shopping centres in the city. As part of the review some frontage designations have now changed between primary and secondary designation and a new Local Centre in Brunswick Town and some newly identified Important Local Parades have been included within the retail hierarchy. New developments adjacent to shopping frontages have also been designated where it was appropriate to do so. The review’s recommendations are now reflected in the updated Policies Map.

2.105 The review indicated that it is appropriate to continue the approach of controlling the amount of class A1 uses and non-A1 uses in each centre. This has proven to be a practical approach in the past and one that allows some flexibility for change of uses within the frontages and an achievement of a good mix of uses.

2.106 For a shopping centre to operate successfully it is necessary for shops to group together. Interruption of retail frontages by non-retail uses, such as a restaurant, pub or estate agent can be complementary to the centre’s primary shopping function because they can be considered as providing a local service but, the retail function will be adversely affected if the mix of uses is affected by the dilution of too many A1 units.

Primary Shopping Area

2.107 In the case of the Regional, Town and District Shopping Centres, the Primary Shopping Area is the extent of the identified primary and secondary frontages.

Primary and Secondary Frontages

2.108 In the Primary Frontages of each centre a higher percentage of A1 uses is set out in the policy to help to ensure that class A1 acts as the dominant use and core function of the centres and to reinforce the overall vitality and viability. The primary frontage sees the highest levels of activity and footfall; therefore it is also appropriate to locate uses to these areas which enhance the character and attractiveness of the centre as a place to visit.

2.109 Within the secondary frontages, a wider mix of uses is supported and consequently a lower minimum threshold for class A1 uses is appropriate. Although these areas do not form part of the primary shopping frontages they do still contribute to the overall vitality and viability of the centre offer. Therefore it would not be appropriate for clusters of non-retail uses to form in these locations either.

2.110 The percentage of class A1 uses required in the Regional Centre is the highest, in order to maintain its role as the principle shopping centre in East Sussex, which is of considerable importance to the economic and social life of Brighton and Hove.

2.111 In order to assist in maintaining the unique/niche/independent retailers in the Lanes and the North Laine, changes of use should not result in a group of three or more adjoining units being in non-A1 use in order to ensure that there are a range of retail premises to promote and encourage retailers in these areas of the city centre.

2.112 Community uses (e.g. doctors and dentists) which would draw people to the centre and may generate combined shopping visits will also be considered to be appropriate town centre uses where they are considered complementary to the town centre, and where they would maintain a window display and draw pedestrian activity into the centre.

Local Centres

2.113 Local centres are small groupings, usually comprising a newsagent and a general grocery store and occasionally a sub-post office, pharmacy, a hairdresser and other small shops of a local nature. As local centres tend to be small, they do not have primary and secondary frontages. A threshold of 50% A1 use is stipulated to ensure that these centres remain functional to the communities that they serve in providing top up shopping and local services.

Table 3 – Brighton & Hove’s Retail Hierarchy (adopted City Plan Part 1 Policy CP4 Retail Provision)

Centre Definition	Defined Centres	Linked City Plan Part 1 Policies
Regional Centre	Brighton	DA1, SA2, CP4
Town Centres	Hove	CP4
	London Road	DA4, CP4
District Centres	St James’s Street	CP4
	Lewes Road	DA3, CP4
	Boundary Road/Station Road	DA8, CP4
Local Centres	Mill Lane, Portslade Portland Road, Hove ‘The Grenadier’, Hangleton Road Richardson Road, Hove Eldred Avenue, Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George’s Road, Kempdown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell’s Vale, Saltdean Longridge Avenue, Saltdean Brunswick Town	SA6, CP4 (all centres)

Implementation and Monitoring

2.114 Implementation of the policy will be assisted by continuing to monitor numbers of retail units within defined shopping centres. The council will use retail survey data, the lawful use and unimplemented extant permissions to help calculate the proportion of units in A1 use. The council’s retail survey data will be updated at least bi-annually. The council will report on this in their Authority Monitoring Report. The performance of existing centres will be monitored by the Council. This might result in a centre being moved higher or lower in the hierarchy; an amendment to an existing centre boundary; or, in the larger centres, a change to the defined prime retail frontage within that boundary. Any forthcoming changes will be undertaken in any review of the City Plan Part One.

2.115 As part of the development management process, applicants may wish to conduct similar studies themselves to justify that proposals for changes of use would not result in the proportions of A1 units within the primary and secondary frontages falling below the threshold set out in the policy.

Evidence of Marketing

2.116 In demonstrating that marketing for at six months has been carried out, the council will expect the applicant to outline where and how marketing has been undertaken, with details provided to demonstrate that the asking rent has been at a realistic rate, evidence that a prominent advertisement was displayed during the marketing and submitting details of at least three comparable properties for rent. It would be expected that the site has been actively marketed nationally and locally on commercial property websites.

Permitted Development Rights

2.117 Several changes to the Permitted Development Rights affecting change of use to and from retail have been introduced in recent years. Where prior approval is needed, the Council will interpret 'key shopping areas' referred to in the General Permitted Development Order as being designated Primary and Secondary Shopping Frontages.

2.118 Ongoing monitoring of the concentration of non-retail uses in shopping centres will be maintained in order to continue to examine the feasibility of implementing Article 4 Directions to remove permitted development rights where shopping areas are showing over- concentrations of particular non A1 uses.

New Development in Centres

2.119 The policy will be applied to new units that are constructed within designated frontages or where they form a logical extension to an existing frontage.

2.120 Residential development contributes to the overall health of centres and to meeting the city's housing target. There is scope to increase housing stock in the centres, by increasing densities or by introducing housing on upper floors, or to the rear of commercial properties, provided that this does not lead to amenity issues or an unacceptable loss of commercial space and that the commercial uses on the ground floor remain of a viable size.

2.121 From time to time, temporary uses are sought for vacant buildings or cleared sites that are awaiting redevelopment. Although temporary in nature and therefore often lacking the standards of design and finish that would usually be expected from permanent development, such uses can provide jobs and add much to the vitality and vibrancy of an area in the meantime.

DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

A) Important Local Parades

The following shopping areas are designated as Important Local Parades⁴² within the retail hierarchy as shown on the Policies Map;

- Cowley Drive, Woodingdean
- Goldstone Villas, Hove
- Hove Park Villas, Hove
- Islingword Road, Brighton
- Old Shoreham Road/Sackville Road, Hove
- Valley Road, Portslade
- Victoria Terrace, Hove
- Warren Road, Woodingdean
- Woodland Parade, Hove
- Preston Drove, Preston Park

In Important Local Parades, changes of use involving the loss of units in A1 Use Class, will be permitted where;

- a) the proposal would not result in the number of units in class A1 use falling below 50%; and
- b) the shop unit has been marketed for a minimum of one year;

Changes of use at ground floor to residential will be permitted to the rear or on upper floors in Important Local Parades.

Temporary and 'meanwhile' use of vacant buildings by start-up businesses as well as creative, cultural and community organisations will be considered particularly where they help activate and revitalise retail centres

B) Neighbourhood Parades and Individual Shop Units

Planning permission will be granted for change of use of shops (Use Classes A1 to A5) to non-A1-A5 uses outside of designated centres and Important Local Parades provided that;

- a) there are alternative shopping facilities within reasonable walking distance (300 metres);
- b) the shop unit has been marketed for a minimum of one year;

⁴² As designated on the Policies Map.

Supporting Text

2.122 The term 'Important Local Parades (ILPs)' as defined on the Policies Map refers to a group of shops (five or more). ILPS have a key role in contributing to sustainable development, providing access to day-to-day necessities such as a newsagent, convenience store off-licence, pharmacies and post offices, within walking distance from home.

2.123 The term 'Neighbourhood Parade' refers to a cluster of three or more units in class A1 use such as a newsagent, convenience store or off-licence, together with A2 uses, for example estate agents or A3, A4 or A5 uses, that function as a group and are capable of serving the convenience needs of a local residential catchment population particularly for older people, people with disabilities and the very young who cannot easily travel far, it is important that convenience retail needs can be met within an easy walking distance within their neighbourhood. In terms of sustainable development, it is important that people are not dependant on use of the car for their day to day retail needs. In areas not close to larger retail centres, parades and isolated shop units provide convenient access to goods and services which are needed on a day to day basis. To support sustainable communities the loss of retail and services will be resisted in under-served areas.

2.124 The function of parades has gradually changed over time, and in addition to shops that perform a local shopping function, many parades now provide more specialist retailers (for example, bridal wear or musical instruments) together with a range of non-retail uses such as takeaways. Whilst non-retail uses can provide an important local function, there is risk that the presence of too many can undermine the ability of the parade to meet local shopping needs and are still anchored by at least one convenience retailer. It is vital, therefore, that each neighbourhood parade continues to offer a good balance of shops and services to support residents' day-to-day needs, whilst providing flexibility to allow for other appropriate uses.

2.125 When determining applications for planning permission or prior approval for retail to residential permitted development, the council will not normally permit development resulting in the loss of local retail and service provision unless there is alternative equivalent provision within 300 metres. This is considered a reasonable walking distance (5 minutes for the average person) to access convenience shopping and local services. Provision will be considered equivalent where it provides a similar offer which meets the same need, such as the need for fresh food or a financial service.

2.126 Where applications involve the loss of units in A1 use class, the council will require supporting evidence that retail use(s) are no longer economically viable. Applicants will be expected to demonstrate an active marketing campaign for a continuous period of at least a 12 months with evidence submitted showing that a

prominent advertisement was displayed during the marketing, whilst the premises was vacant or in 'meanwhile use', which has been shown to be unsuccessful. In addition, for neighbourhood parades and individual retail units where there is no equivalent alternative provision within 400 metres, it will also need to be demonstrated that Use Classes A2, A3 and laundrettes are not viable, before any other uses will be permitted. However, subject to the policy requirements, change of use to a community facility such as a community centre may be permitted where it can be demonstrated there is a need for such provision.

2.127 In all cases, demonstration of need must include evidence of consultation with service providers and the local community and an audit of existing provision within the local area.

2.128 Brighton and Hove has numerous small local shopping parades and individual shops located in local residential communities. It is important that these shopping facilities remain vibrant, attractive and accessible. Providing local shopping and related facilities within walking distance enables the less mobile, including the elderly and low-income groups, access to food and services close to where they live, and is important in achieving equality of opportunity and sustainable neighbourhoods.

2.129 From time to time, temporary uses are sought for vacant buildings or cleared sites that are awaiting redevelopment. Although temporary in nature and therefore often lacking the standards of design and finish that would usually be expected from permanent development, such uses can provide jobs and add much to the vitality and vibrancy of an area in the meantime.

DM14 Commercial and Leisure Uses at Brighton Marina

In order to maintain and enhance the special commercial and leisure offer within Brighton Marina, changes of use will be permitted provided that all of the following criteria are met;

- a) The proposed use would improve the vitality and viability of the Marina, by encouraging combined trips and attracting pedestrian activity; and**
- b) The development would not be materially detrimental to the amenities of occupiers of nearby properties or the general character of the Marina; and**
- c) A window display is provided to retain an active frontage.**

A change of use at ground floor level to residential in retail / commercial/ leisure frontages will not be permitted but may be considered appropriate on upper floors.

Supporting Text

2.130 Brighton Marina, functions as an independent component of the city's urban area. The Marina provides a mix of housing, shopping, commercial, leisure and recreational buildings in addition to being a working harbour. This creates a unique commercial and leisure environment.

2.131 The majority of existing retail activity takes place in the Merchant's Quay /Marina Square and at the Asda superstore. Brighton Marina contains a range of bars, restaurants and factory outlet stores related to its wider recreation and leisure role City Plan Part One Policy DA2 Brighton Marina, Gas Works and Black Rock Area). Brighton Marina is no longer designated as a shopping centre in the retail hierarchy therefore any proposals for additional retail development not allocated by policy DA2 in City Plan Part One will need to meet the tests of policy CP4 and the National Planning Policy Framework⁴³.

2.132 The purpose of this policy is to broaden and strengthen the choice and performance of commercial activity in the Marina by proposing a flexible approach to ensure that its vitality and viability is maintained and enhanced. Both retail and non-retail uses (including community facilities) should draw additional pedestrian activity to the Marina to strengthen its offer and provide other facilities required to support existing residents and visitors, as well the increased population that will be generated by the proposed additional residential developments.

⁴³National Planning Policy Framework (NPPF) (2019) paragraphs 89-90

DM15 Commercial and Leisure Uses on the Seafront

Development proposals including change of use for new shop, food and drink and drinking establishments (A1 – A5 Use Class) and galleries (D1 Use Class) and museums (D2 Use Class) on the lower promenade Madeira Drive and within the seafront arches, will be permitted provided that all of the following criteria are met;

- a) The existing diversity and mix of retail, sport, leisure, cultural and recreation uses along the seafront will be retained or enhanced;**
- b) The proposed development is of appropriate scale and design to complement the historic character and setting of the seafront (See City Plan Part One Policies SA1 and CP4);**
- c) The proposal will support the role of the seafront as recreation and tourist destination helping to extend footfall and reduce seasonality; and**
- d) The proposed development or uses will not have a harmful impact on the amenity of local residents, visitors and the seafront due to noise, odour, disturbance and light pollution.**

The council will encourage temporary uses which help animate and activate vacant buildings or sites before regeneration/ construction commences.

Provision of ancillary small-scale retail outlets will be permitted on identified seafront development sites or to support existing or proposed leisure/ tourism schemes (see SSA5 and SSA6).

Supporting Text

2.133 The City's seafront arches are occupied by a variety of tenants and provide an eclectic offer to visitors and residents alike. The seafront traders occupy the length of the arches loosely by 'zone', such as sport, outdoor leisure, artist quarter leisure, restaurants and bars, as well as recreation. Opportunities exist for additional shops and food and drink facilities to cater for visitors from small kiosks to small scale shops, cafes or restaurants in certain areas. There is the potential to enhance the range of uses in order to increase activity in the evening, reduce seasonality and extend footfall along the seafront to the east. Policy CP17 Sports Provision will apply to new sport or leisure proposals.

2.134 Any use extending for more than 28 days (consecutively or in a single year) requires planning permission. Interim or 'meanwhile' uses such as pop-up cafés, performance space/ community uses shops and temporary uses of empty property and land can help to animate and activate vacant buildings/ sites before regeneration or development begins. This can have the benefit of providing an interim income stream whilst also enhancing the attractiveness of a site or location for potential future tenants.

DM16 Markets

Proposals for new or improved markets and market stalls will be permitted within defined shopping centres where they would not cause individual or cumulative harm to the local area in terms of residential amenity, pedestrian and highway safety, parking congestion, impact on cycle routes or the free flow of traffic, especially public transport.

Planning permission will be refused for development which would result in the permanent loss of markets or pitches unless appropriate comparable replacement provision is made subject to the impact on existing shopping facilities and markets.

The council will ensure the appropriate control of hours of operation and that adequate arrangement is made for storage and disposal of litter and refuse, parking, including cycle parking and servicing.

Temporary permissions and/or planning conditions may be used to assess or regulate the impact of markets, including proposals for farmers markets, temporary markets or car boot sales.

Supporting Text

2.135 It is recognised that street markets make an important contribution to the variety and attraction of shopping in the city and to the character of local areas, particularly where the character of the street markets contributes to enhancing the available retail offer and providing opportunities to support access to local produce and healthier food. The city has a variety of markets operating weekly and monthly as well as those that visit on a seasonal basis.

2.136 The Open Market at Marshall's Row, London Road is the city's permanent indoor market operating on a daily basis. The council will support improvements to the market's environment and management where appropriate. The policy sets out that markets should be located within the city's defined Shopping Centres to complement these centres, and add to their vitality and viability, ensuring a diverse offer of goods to the shopper. Markets located outside the Shopping Centres would detract from their role. The council will resist development proposals that would result in the loss of markets and pitches, unless appropriate comparable re-provision is made.

2.137 Street markets are also important for the establishment of new entrepreneurial business by Brighton & Hove residents. Additional or expanded markets are encouraged and will be supported within defined shopping centres subject to the criteria listed.

2.138 The council will use conditions and/or obligations to ensure that the operation of markets do not have harmful impacts, and will require detailed layout plans as part of an application to allow consideration as to whether these matters have been properly addressed. In addition to planning controls, the council manages proposals for new markets through its role in determining applications for street trading licenses.

DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities

The following City Plan Part 1 Strategic Allocations/ Development Areas are identified as search areas for new hotel development:

1. DA1.B.1 New Brighton Centre and Expansion of Churchill Square
2. DA2.C.1 Brighton Inner Harbour
3. DA2.C.3 Black Rock Site
4. DA4.C.1 New England Street Area
5. DA6 Hove Station Area

Proposals will be assessed against Policy CP6 Visitor Accommodation, and should not compromise the priorities and aspirations set out in the adopted Development Area proposals and delivery of the allocated mix of permitted uses set out in the Strategic Allocations.

Safeguarding Conference Facilities

In order to maintain the city's role as a conference destination existing large capacity conference facilities will be maintained and enhanced.

Proposals for loss of these facilities would need to demonstrate:

- a) availability of adequate provision elsewhere in the city; and
- b) that the existing use was no longer viable or could no longer be sustained on a long-term basis; or
- c) partial loss enables the upgrade of remaining conference and banqueting provision; or
- d) Re-provision within a new development in accordance with City Plan policies or in accordance with a Strategic Allocation set out in City Plan Part One.

Supporting Text

2.139 Brighton and Hove has one of the strongest hotel markets in the UK. An updated Visitor Accommodation Study⁴⁴ has identified a greater requirement for additional hotel provision over the Plan period than was projected in the 2006 Brighton & Hove Hotel Future Study, as a result of much stronger than anticipated growth in the city's hotel market and significantly improved hotel performance since 2006. A range of indicators suggests continuing growth for all forms of visitor accommodation particularly from the leisure tourist market over the next five years⁴⁵.

⁴⁴ Visitor Accommodation Study Update April 2018.

⁴⁵ The Brighton & Hove Visitor Accommodation Study Update 2018 estimated that visitor accommodation demand in the city could grow by 2-4% over the next 5 years.

2.140 As a tourist destination, the city cannot grow staying tourism without additional hotel accommodation because currently the city's hotels are full and are turning business away for much of the time at weekends and during the peak holiday season but also during peak conference months. The city is also under-represented in terms of international hotel brands which can help drive new business to the city and can help it remain competitive as a destination. New contemporary hotel products and brands can also attract new tourist markets to the city as identified in the council's Visitor Economy Strategy 2018-2023. The Brighton & Hove Visitor Accommodation Study Update 2018 emphasises the need to attract hotel products and brands to Brighton that will help to attract new markets to the city and strengthen its competitive position as a business and leisure tourism destination in terms of:

- International hotel brands that will bring new business to the city through their customer base, national and international marketing, brand strength, loyalty programmes and distribution channels.
- Lifestyle and budget boutique hotels and aparthotels, to attract the pre-family couples, business traveller and leisure guest.
- London-based hotel brands that are looking to expand beyond the capital that can bring their customers to Brighton.

2.141 The Brighton & Hove Visitor Accommodation Study Update 2018 forecast a need for a further two new hotels⁴⁶ in Brighton by 2022 in addition to the planned pipeline hotels that are set to open in the next 2-3 years⁴⁷ and longer-term forecasts (2023-2030) indicate a potential for further 4-8 hotels in the city. Given the sensitivity of the longer term forecasts the City Plan is guided by the low-growth forecast requirement of up to 5 new hotels over the plan period.

2.142 City Plan Part One Policy CP6 Visitor Accommodation directs new hotels firstly to the central Brighton area in accordance with the NPPF. Whilst a number of windfall hotel sites have come forward within SA2 Central Brighton, and more may do so over the Plan period, there are limited future site opportunities in central Brighton to accommodate the potential need.

2.143 New hotels could also be delivered through extensions to existing hotels or through the re-positioning and redevelopment of existing hotels. The following suitable search areas for new hotels are identified to guide future planning applications:

- **DA1 Brighton Centre and Churchill Square Area** - allows for new hotel as part of the redevelopment opportunities for the strategic allocation. This would allow for the re-provision of existing hotels and additional seafront hotels for the leisure market

⁴⁶ Assuming an average size of hotel of 150 bedrooms

⁴⁷ Including Hotel Indigo and the Premier Inn West Street.

- **DA4 New England Quarter and London Road Area** – the primary purpose is employment-led redevelopment of sites in the New England Street Area to create a new business quarter for the city. Policy allocations also require a minimum amount of residential development to be delivered. Where masterplanning indicates the capacity for a hotel to be delivered alongside the net additional allocation requirements for new office floorspace and housing this will be considered.
- **DA2 Brighton Marina, Gas Works and Black Rock Area** – to support the emerging Brighton Waterfront Proposals and the ongoing regeneration of the seafront the capacity for new hotel at the Black Rock site should be considered and the potential for a hotel as part of the mix of permitted uses for the Inner Harbour site at Brighton Marina;
- **DA6 Hove Station Area** – sustainable transport hub with links to Hove town centre and seafront but not considered a significant hotel location. Potential for a budget hotel alongside other uses if there is sufficient capacity.

2.144 This planned approach and locational strategy to securing hotel development could both create the capacity to underpin the desired growth in the visitor economy and support the city as a visitor destination.

2.145 The City Plan Part One through Policies DA1 and DA2 supports a council priority to position Brighton as one of Europe's leading conference and meeting destinations through the development of a new state-of-the-art conference centre in a landmark building. The council is progressing with the Waterfront Project proposals for a replacement world class conference and events venue, including an entertainment venue. There are a number of established large-capacity conference facilities in the city. These facilities play an important role in attracting major conferences to the city and facilities within hotels attract large scale residential conferences. In order to maintain the city's competitive position as a conference destination the policy resists the substantial loss of conference facilities unless the exceptions set out in the policy are met.