

Brighton & Hove City Plan Part One

Brighton & Hove City Council's Development Plan

March 2016



Brighton & Hove
City Council

City Plan Part 1

Foreword

It is my pleasure to introduce the City Plan Part One as adopted by Brighton & Hove City Council on 24th March 2016.

The City Plan Part 1 strategy reflects the importance the Council places on protecting and enhancing the city's unique built and natural environment whilst ensuring needed homes and jobs are provided together with the right infrastructure and community facilities to support the city's residents, businesses and visitors.

The policies in the City Plan will help to make sure that there are better links for our communities and neighbourhoods to employment and skills opportunities and adequate housing provision whilst also meeting the demands of businesses and visitors. The Plan seeks to create genuinely sustainable communities through encouraging mixed use developments, high-quality and well-designed places; and developments that enable people to make better choices about their need for travel. The City Plan will also help to ensure that new development is supported by necessary infrastructure that protects and promotes communities, the city's economy and the environment.

The City Plan Part One will provide the overarching strategy for emerging Neighbourhood Plans and will be supported in due course by the City Plan Part Two which will contain the remaining site allocations and development management policies.

This Plan replaces a number of policies in the adopted Brighton & Hove Local Plan (2005), and this is set out in Annex 4 of the Plan.

I would like to express my thanks on behalf of Brighton & Hove City Council to all those who contributed to the preparation of this plan through its many stages and I look forward to its implementation.

Councillor Gill Mitchell
Deputy Leader Brighton & Hove City Council
Chair of the Environment, Transport & Sustainability Committee

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Section 1

Introduction

Introduction & Overview

What is the City Plan?

1.1 The purpose of the City Plan is to provide the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. It will help shape the future of the city and plays an important role in ensuring that other citywide plans and strategies achieve their objectives. The City Plan Part One is a Development Plan Document (DPD)¹.

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

1.3 The City Plan Part 1:

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

Other Development Plan Documents

1.4 The policies in all the other Development Plan Documents for Brighton & Hove have to be in line with the City Plan Part 1, so it is the most important Development Plan Document:

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

¹ Development Plan Documents (DPDs) are key statutory documents which set out the vision, strategy and policies for the area. They are subject to Sustainability Appraisal and to a formal examination in public.

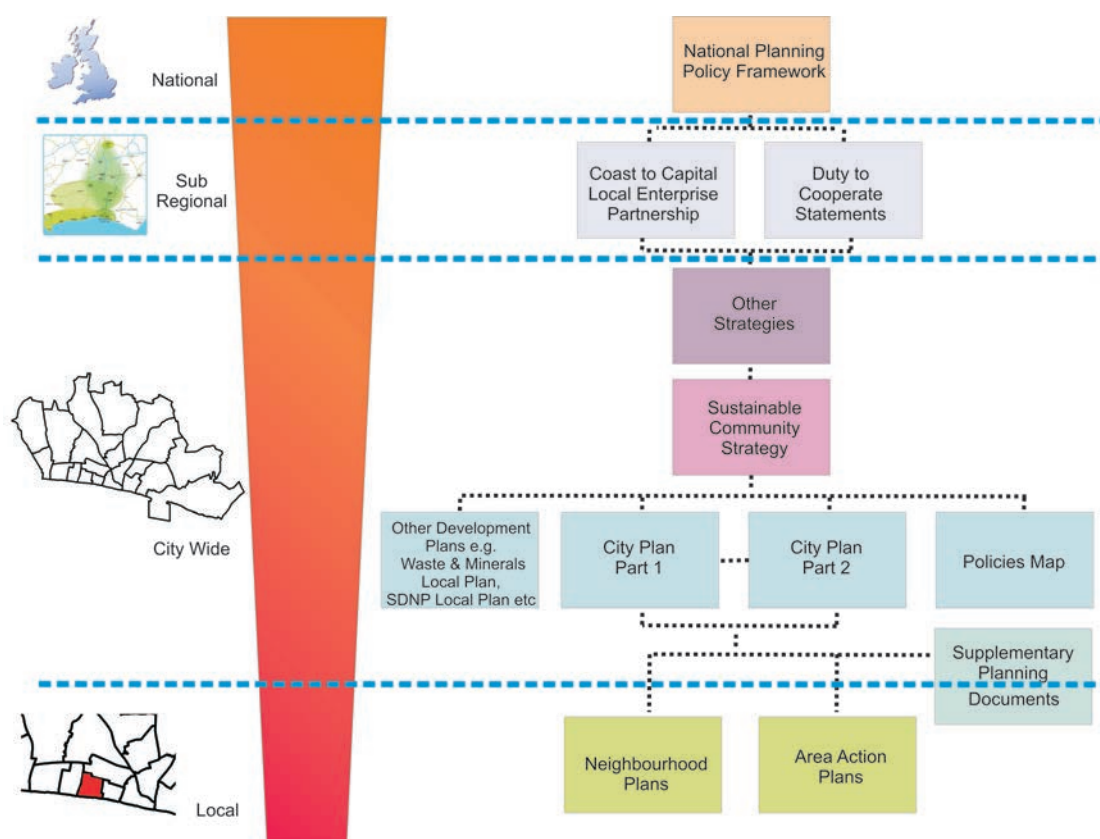
Authority, is preparing a Waste and Minerals Local Plan² that will provide planning policies to guide the management of waste and production of minerals in the plan area until 2026.

- The South Downs National Park was formally designated in 31 March 2010 and the National Park Authority brought into effect in April 2011. This is now the planning authority for the administrative area of Brighton & Hove that falls within the National Park. This area will no longer be covered by Brighton & Hove City Plan Part 1 policies but will be covered by the Local Plan for the National Park.

Relationship to other Strategies

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

Figure 1 Relationship of the City Plan to other Strategies



² The East Sussex South Downs and Brighton & Hove Waste & Minerals Plan was adopted 19 February 2013 and work has commenced on a waste and minerals sites plan.

Links to neighbouring areas

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

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

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

1.9 The council is working with South Downs National Park Authority, Adur District Council, Mid Sussex District Council, Lewes District Council and other local partners to achieve designation and then implementation of the city and surrounding area as a Biosphere Reserve, seeking to bring people and nature together across an area of chalk downland which extends from the River Adur in the west to the River Ouse in the east, the chalk 'scarp' to the north and the marine environment to the south and focussed on nature conservation, environmental knowledge and economic and social development which is culturally and ecologically sustainable. The 'Core Area' includes the internationally recognised Castle Hill and Lewes Downs.

1.10 The NPPF requires councils to work together to address strategic priorities across boundaries and development requirements which cannot be wholly met within their own areas³. The preparation of the City Plan has had regard to this duty to cooperate requirement and a Duty to Cooperate

³ Paragraph 179 of the NPPF 2012

Statement⁴ has been prepared alongside the City Plan setting out the strategic planning and duty to cooperate issues and the approach undertaken to address them. The council will continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters.

Annexes

1.11 The City Plan Part 1 is accompanied by 4 annexes:

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

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

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

Annex 4 - Local Plan Policies to be Replaced by the City Plan Part 1 – lists the 2005 Brighton & Hove Local Plan policies that have been replaced by the adopted City Plan Part 1 and those that are saved. This is published separately as Annex 4 to the City Plan part 1.

Supporting Documents

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

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

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

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

⁴ Brighton & Hove City Plan Part 1 Duty to Cooperate Compliance Statement June 2013

Appropriate Assessment - an assessment under the provisions of the Habitats Regulations to ensure the City Plan itself does not lead to any adverse effect on any European or international wildlife site. Published as a separate document.⁵.

Health & Equalities Impact Assessment- assesses the potential health and equalities outcomes of the City Plan. Published as a separate document.

Development Plan Documents Being Revised

Policies Map

The adoption of the City Plan part 1 will lead to changes to the Local Plan proposals map (2005) through new allocations, changes to boundaries and deleted allocations.

A Glossary of terms is included at Appendix 1.

⁵ The Brighton & Hove City Council administrative area includes the Castle Hill Special Area of Conservation, and a number of other European or Ramsar wildlife sites are located in the wider area. The City Plan has been assessed under the provisions of the Habitats regulations to ensure that it will not have an adverse effect on any European or Ramsar wildlife site and this assessment has been recorded. The City Plan does not support any project proposal where it cannot be demonstrated that the development would not have an adverse effect on the integrity of any European or Ramsar site. Any subsequent plan following this City Plan will similarly adhere to the requirements of the Habitat Regulations.

A profile of Brighton & Hove – context and challenges

1.13 Brighton & Hove is a tightly constrained, compact city situated between the South Downs National Park and the sea with a population of 271,952⁶. With a limited legacy of derelict or vacant sites these ‘natural boundaries’ define and limit the outward expansion of the city⁷. The built up area is roughly half of the city’s geographical area (8,267 ha).

1.14 Brighton & Hove is an attractive city of distinct urban and suburban neighbourhoods generally of low to medium rise, with some taller buildings in the city centre. Within the centre of the city, residential densities of between 60-200 dwellings per hectare are commonplace. Despite the recent downturn in the housing market, relatively high house prices⁸, particularly for smaller properties, have put home ownership beyond the reach of many households.

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

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

⁶ At 2010 based on 2011 Census data, Housing Requirement Study Update, 2012 GL Hearn.

⁷ Over the period 2004/5 – 2009/10, 100% of residential development and 100% of new employment floorspace were on brownfield land.

⁸ House prices tripled in the ten year period 1997 – 2007, Brighton & Hove Strategic Housing Market Assessment 2008. In 2011 Housing prices were 36 per cent above the national average, State of the City 2011.

15 years, and is part of an ongoing programme of coastal defence maintenance in response to erosion and climate change.

1.17 The city is a regional centre for shopping and employment within the south east and a sub-regional centre for health services. The economy has performed strongly over the past decade, with, until the recession, falls in unemployment⁹ and rises in average earnings¹⁰. In 2008, the local economy was estimated to be worth £4.2 billion¹¹. With the onset of global recession in autumn 2008 it is ever more important that the city builds upon its resilience and protects and provides for good quality jobs in the city. The city has a strong service sector economy, with public services, education, health and financial and business services being rich sources of local employment. Brighton & Hove is home to the biggest creative industries and digital media cluster in the south east outside London, currently providing over 10% of employment in the economy. The city is known as a profitable place for business with a strong entrepreneurial culture and a large proportion of residents working in higher grade professional occupations and the population as a whole is well-educated compared with the South East and national averages.

1.18 The city has a well-defined network of shopping centres, including Brighton Regional Centre and contains a significantly greater number of shops than other cities of similar size, with a strong reputation for specialist and independent traders. The two growing universities within the city host around 34,000 students¹² and with high graduate/ post-graduate retention they make a substantial contribution to the economic, social and cultural life of the city. A study in 2010¹³ concluded that the Universities inject more than £1bn into the UK economy and most (£976m) is spent in the city and South East. The Universities support 12,000 jobs (the majority of them in city) and provide 4,231 full time equivalent (FTE) jobs.

1.19 However, set against this success, the city is a net exporter of commuters; around 25,000 workers travel in to Brighton & Hove and around 28,000 people who live in the city travel outside Brighton & Hove for work¹⁴. This has implications for sustainable travel and also for the ability of local people to find local employment. There is also evidence that the city is developing a 'dual economy', with a high proportion of highly skilled jobs in knowledge-based occupations, supported by a growing number of lower paid workers in lower skilled, support services including care work and many of the

⁹ Falls from 7.5% in February 2000 to 5.8% in June 2008 but an increase to 7.6% in June 2011, ONS.

¹⁰ Average full-time pay increasing from £410.50 per week in 2002 to £480.00 per week in 2008 and continue to increase, in December 2010 £522.60 (The State of the City Report 2011).

¹¹ Sustainable Community Strategy, update 2009.

¹² 2008/09, estimated to be closer to 40,000 in 2011, State of the City report 2011

¹³ 'The economic impact of Brighton's universities' Ursula Kelly and Professor Iain McNicoll 2010

¹⁴ Brighton & Hove Strategic Housing Market Assessment 2008, Census 2001 Special Workplace Statistics.

hospitality and retail trades. There is a limited legacy of manufacturing industry in the city and, as a consequence, very few brownfield sites available for redevelopment.

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

1.21 The city has a relatively young population, with population growth over the last 20 years concentrated in the 15-44 age groups. Looking ahead over the next 20 years, the city's population will continue to be focussed on households aged in their 20s, 30s, and 40s¹⁵. This reflects the nature of Brighton as a destination for young people, and the presence of two universities and the many English Language schools, international business schools and University pathfinder colleges within the centre of the city. A high proportion of young working age adults provides the city with many advantages in terms of its potential labour pool. However, this population profile also has implications for a range of issues such as a sense of local community, potential for crime and disorder, the need for sustainable employment opportunities and the need to provide for a mix of housing units and tenures.

1.22 Brighton & Hove is a diverse city of neighbourhoods and communities. The proportion of our population who are from Black and minority ethnic backgrounds is increasing. In the 2001 census, 12 per cent of our residents were recorded as not being from White British backgrounds; in 2011 the proportion had increased to 19.5 per cent. It's estimated that at least 14 per cent (35,000) of Brighton & Hove's adult residents are lesbian, gay, bisexual or trans. Whilst the trans population is thought to be small, trans people face particularly acute issues. Nine per cent of adult residents (15,600) are thought to have a physical disability of some kind. Two per cent (5,033) are estimated to have a learning disability. 19 per cent of adults (28,000 people) aged 15-64 are estimated to have a common mental disorder such as anxiety or depression¹⁶.

¹⁵ Housing Requirements Study update, October 2011, GL Hearn.

¹⁶ State of the City 2011

Challenges

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

- A growing population. The city's population could be expected to grow by 10.2% to 299,777 by 2030. This represents growth in the population of around 27,759 people by 2030 if current trends continue¹⁷.
- With the onset of a global recession in autumn 2008, the city must protect and provide for good quality jobs.
- Although the city has a relatively young population, population growth over the next 20 years is likely to be strongest in those people aged 60 and over (growth of 30%)¹⁸.
- With an ageing population the city needs to ensure that the older population age well, through promoting physical and mental health and promoting age-friendly living environments and housing.
- The need to prioritise the provision of extra care housing to meet the needs of older and disabled people in the community.
- The working age population is projected to increase by 12, 650 over the next 10 years. If these projections prove accurate, the city may need to find work for an additional 6,000 residents by 2014 just to keep the employment rate at the current level of 71.1%.
- Access to suitable and affordable housing¹⁹ remains difficult for many households. Affordability of housing has serious implications for the recruitment and retention of staff and has also resulted in a high number of concealed households²⁰.
- The city also has a lack of affordable business premises and workspace.
- The city's unemployment rate remains higher than the South East average²¹. Despite the very high proportion of the city's adult residents who have higher level qualifications, GCSE attainment within the city's schools, whilst improving, is well below the national average.²²
- A number of the city's areas have been identified as facing high levels of disadvantage. 12 per cent of the city's local areas²³ are in the ten per cent most deprived in England. Two of the city's 164 local areas are in the most deprived one per cent of areas in England; one in East Brighton & one in Queen's Park.

¹⁷ this is an 'unconstrained' estimate of population growth. Brighton & Hove City Council Housing Requirements Study 2012 Update,

¹⁸ Housing Requirements Study Update, October 2012

¹⁹ The 2005 Housing Needs Survey identified a net annual affordable housing shortfall of 1,200.

²⁰ Adults living within another household because they cannot afford to enter the housing market (e.g. young adults living with parents).

²¹ Unemployment at September 2010 was 6.8% compared to the regional rate of 5.5%, State of the City Report 2011.

²² In 2010, 49% of pupils at local authority schools gained 5 or more GCSEs at A*-C; the national average was 55%.

²³ According to the 2010 Indices of Deprivation.

- Over the three years from 2007 to 2009 the percentage of children and young people in families living in poverty in Brighton and Hove has remained around 22% of all children. This is in line with the national average but significantly above the regional South East average²⁴.
- There are marked differences in physical and mental health and life expectancy between the most deprived and most affluent neighbourhoods in the city. Reducing the gap between deprived neighbourhoods and the rest of the city is a priority.
- Whilst community safety is improving in the city, many people still fear being victims of crime.
- There is a national trend towards increased car use. Accompanied by the anticipated future development in the city this will lead to worsening congestion and air quality by 2030 without a number of positive measures to mitigate this.
- Transport is the main cause of poor air and noise quality in certain parts of the city. In 2013 a new Air Quality Management Area was designated that is a quarter of the size of the previous one²⁵.
- There is a significant pressure for school places in the city at both primary and secondary level due to increased numbers of children entering the education system annually since 2000.
- The city's two universities are growing and the impacts of further growth and expansion including appropriate student accommodation provision will need to be addressed.
- The city faces competition from home and abroad as a tourist destination in both the leisure and business tourism market.
- With the recent rapid expansion of the hotel sector, there is a need to ensure that the supply of visitor accommodation in the city is more appropriately balanced.
- Brighton & Hove's ecological footprint has recently been calculated as 5.14 global hectares (gha) per person. This eco footprint is not sustainable and the city needs to shift towards a more resource efficient future. The Sustainable Community Strategy sets a challenging target reduction to 2.5 gha per person by 2020; and to 1.25 gha per person by 2050.
- There is an urgent need to move to a low carbon economy and city. The Climate Change Act sets out the government's target to reduce carbon emissions to 80% of the 1990 levels by 2050, The Sustainable Community Strategy sets a challenging target to reduce the city's carbon emissions by 42% by 2020 and by 80% by 2050 from the 2005 baseline of 5.7 tonnes per person.
- Investment in and delivery of energy efficiency improvements and energy infrastructure will be required to support target reductions in carbon emissions.
- There is a need to secure the sustainable management of water resources and meet the objectives of the Water Framework Directive.

²⁴ Brighton & Hove Child Poverty Commissioning Strategy 2012-2015

²⁵ The council declared a new air quality management area on 30 August 2013. The Air Quality Action Plan will be updated in 2014.

The city is within a 'highly water stressed' region with above regional average per capita water consumption

- There is a need to improve groundwater status. The city's groundwater system provides 100 per cent of the city's water supply and its current overall quality or status is "poor".
- Planning will need to anticipate sea level rises of 6mm a year in the South East and ensure that the city is resilient to the predicted impacts of climate change such as warmer, wetter winters, hotter, drier summers, sea level rise and more frequent extreme weather events.
- Available evidence suggests a continuing loss of species and habitats.
- Over 40 per cent of Brighton & Hove including the ancient woodland²⁶ at Stanmer Park is included within the boundary of the South Downs National Park.
- As the density of the city increases, demand and use of parks and open space has escalated. In the more central areas of the city, access to open space is limited. Despite good progress made in recent years, sports and recreation facilities are as yet inadequate for a city of its size and regional importance.
- The city contains an exceptional historic and architectural quality that needs to be appropriately conserved and enhanced.
- Continued investment is required in cultural provision for the city, maintaining and developing the quality, richness and uniqueness of content.

²⁶ An area which has had continuous woodland cover since at least 1600 AD.

Section 2

The Strategy

Section 2 – The Strategy

Vision and Objectives

The vision for Brighton & Hove in 2030

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

A Strong and Prosperous City

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

- Brighton & Hove will play a full role in the economic growth and development of the south east region through a coordinated partnership approach with neighbouring authorities and the Local Enterprise Partnership.
- The economic performance of the city will continue to improve and the city's long-term unemployment rate will have fallen with an increase in employment rates.
- Sustainable economic growth will be achieved by ensuring a range of suitable employment sites and premises; supporting the city's key and growing employment sectors with a well trained and suitably skilled local workforce and by securing training and support for local entrepreneurs and start-up businesses.
- Key growth sectors will be supported including the creative, digital and information technology and environmental technology sectors.
- Make appropriate provision for leisure, retail, cultural, tourism, health and education needs and support the appropriate growth of the city's two universities given their significant contribution to the local economy.
- Significant new development will be directed to areas of the city with good sustainable transport links and to those areas in need of regeneration and renewal.
- New housing, including affordable housing, will be delivered to help meet housing demand and need. This will help achieve more sustainable communities with a range of housing types and tenures, including family homes and homes to match lifetime needs as well as

extra care housing to meet the needs of older and disabled people in the community.

- To be England's favourite 'Creative City' through an expanded base and support for the arts and creative industries across the city, drawing on the local workforce, and a thriving creative and cultural quarter in the city centre.
- To be one of Europe's best meeting destinations; the city's tourism industry will have grown significantly but sustainably into a year-round profitable business.
- To be a world class cultural and heritage offer with a strong connection to the character of Brighton & Hove providing the best for residents and tourists.

Strategic Objectives:

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

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

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

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

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

SO6 Through joint working with Adur District Council, West Sussex County Council and the Shoreham Port Authority, maximise the potential of Shoreham Harbour for the benefit of existing and future residents, businesses, Port-users and visitors through a long term regeneration strategy.

A Sustainable City

2.3 By 2030 the city will have made significant progress towards becoming a resource-efficient, One Planet, Zero Carbon City²⁷ and a city that is adapting well to climate change. This will be achieved by:

- Working towards a reduction in the city's carbon emissions by 42% by 2020 and a reduction of 80% by 2050 from the 2005 baseline of 5.7 tonnes per person.
- Maximising opportunities to support major renewable and decentralised energy infrastructure
- Reducing the ecological footprint of the city and working towards a target reduction of 2.5 global hectares (gha) per person by 2020 and 1.25 gha per person by 2050.
- Raising the standard of sustainable design and construction of homes and buildings in the city to ensure that all new and existing developments contribute to radical reductions in greenhouse gas emissions and resource use, maximise the potential for sustainable construction methods and minimise demolition and construction waste.
- Delivering major developments in the city, to act as exemplars of modern design quality and sustainable building practice²⁸.
- Pioneering the drive towards a low carbon economy with a thriving environmental technology sector to support the development of renewable and low-carbon energy, recycling initiatives and reduced resource consumption.
- Achieving the objectives of UN Biosphere Reserve status through working towards making Brighton & Hove a high quality natural environment where a balanced relationship exists between people and nature.
- A reduction in car use of 10-20%, less air borne pollution, less traffic noise and far lower carbon emissions.
- Low carbon transport - achieving a flexible transport network incorporating transport interchanges and more sustainable transport corridors that can accommodate peaks of demand; a rapid/express transit system to move people more efficiently to and between major leisure, retail, tourism employment and residential developments; measures to enable people to move more easily, safely and effectively around the city on foot, by bicycle and on public transport.
- An integrated package of long term and short term measures to achieve significant change and improvement in local air quality.

²⁷ Work towards a city that achieves zero carbon emissions.

²⁸ For example One Brighton is one of the country's first environmentally and socially sustainable 'One Planet Living' communities.

Strategic Objectives:

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

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

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

SO10 To support the implementation of the objectives of the Biosphere Reserve Management Strategy²⁹, such as the creation of green links between open spaces and the surrounding downland, changes in the design and management of spaces to create a functioning Green Infrastructure Network. To conserve and enhance the priority areas for biodiversity and to ensure that everyone has good access to and opportunities to be engaged with natural open space. Nature conservation opportunities in open spaces and in new development should be maximised to contribute to Local Biodiversity Action Plan³⁰ objectives.

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

²⁹ Biosphere Reserves are areas nominated by national government and designated under UNESCO's Man and Biosphere (MAB) programme. They can encompass urban areas, forming sites of excellence to explore and demonstrate innovative approaches to conservation and sustainable development. They aim to reconcile the conservation of nature with socio-economic development. A Management Strategy sets out actions to conserve and enhance the natural environment under the global Biosphere accreditation.

³⁰ A plan prepared by the city council and nature conservation organisations to reverse the decline in the variety of species of animals and plants. The Local Biodiversity Action Plan is part of the Biosphere project and will be included in the submission to UNESCO.

An Attractive City

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

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

Strategic Objectives:

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

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

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

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

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

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

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

Healthy and Balanced Communities

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

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

Strategic Objectives:

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

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

SO21. Provide additional primary and secondary school places in response to growing demand and future increases in population by working with partners, including not for profit organisations, to build new schools and by expanding successful schools (where possible, with the consent of the school). Assist in the long term planning of higher and further education establishments, and ensure that they play a full part in the city's economic, social and environmental development.

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

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

A Spatial Strategy for Brighton & Hove

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

2.7 Recognising the need to plan positively to meet the needs of a growing city, the City Plan seeks to achieve a balanced and sustainable approach to accommodating growth over the plan period.

Presumption in favour of Sustainable Development

2.8 As a council we need to ensure that the city can grow and regenerate in a sustainable manner. Creating a more sustainable city is at the heart of the vision and strategy for the City Plan. A widely accepted definition of sustainable development is “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”³¹. The Government has set out a Strategy³² with five overall principles of sustainable development: living within environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; using sound science responsibly; and promoting good governance. The council is committed to using the One Planet³³ approach and guiding principles to move towards a more sustainable city and the policies in the City Plan will help deliver against the local targets under the One Planet Living principles as shown in Table 1.

³¹ ‘Our Common Future’ 1987 (the Bruntland Report)

³² UK Sustainable Development Strategy *Securing the Future* 2005

³³ The One Planet approach is a framework that helps address all major aspects of environmental, social and economic sustainability and is based on ten principles or areas of focus developed by sustainable development charity BioRegional with WWF to help people and organisations live and work within a fair share of the planet's resources.

Table 1 Delivering One Planet Principles of Sustainability

Principle	Description	Relevant City Plan policies and other plan documents
Zero Carbon	Making buildings more energy efficient and delivering all energy with renewable technologies	Spatial Strategy; Development Areas 1 -8 SA1 Seafront CP1 Housing Delivery CP2 Sustainable Economic Development CP3 Employment Land CP7 Infrastructure and developer contributions CP8 Sustainable Buildings CP9 Sustainable Transport
Zero Waste	Reducing waste arisings, reusing where possible, and ultimately sending zero waste to landfill	Spatial Strategy; Development Areas 1-8, SA1 CP8 Sustainable Building CP15 Heritage Waste and Minerals Plan SPD3 Construction and Demolition Waste guidance
Sustainable Transport	Encouraging low carbon modes of transport to reduce emissions, reducing the need to travel	Spatial Strategy Development Areas 1-8 Special Areas 1-6 CP4 Retail Provision CP7 Infrastructure and developer contributions CP9 Sustainable Transport
Sustainable Materials	Using sustainable products that have a low embodied energy	Spatial Strategy; Development Areas 1-8, SA1 SA6 Sustainable Neighbourhoods CP5 Culture and Tourism CP7 Infrastructure and developer contributions CP8 Sustainable Building CP15 Heritage Waste and Minerals Plan
Local and Sustainable Food	Choosing low impact, local, seasonal and organic diets and reducing food waste	Spatial Strategy; Development Areas 1-8, SA1 SA4 Urban Fringe SA5 South Downs SA6 Sustainable Neighbourhoods CP4 Retail Provision CP8 Sustainable Building CP16 Open Space CP18 Healthy City Food Growing Planning Advice Note
Sustainable Water	Using water more efficiently in buildings and in the products we buy; tackling	Spatial Strategy; Development Areas 1-8, SA1 SA1 The Seafront

	local flooding and water course pollution	SA4 Urban Fringe SA5 South Downs CP8 Sustainable Building CP11 Flood Risk
Land use and Wildlife	Protecting and expanding old habitats and creating new space for wildlife	Spatial Strategy, Development Areas 1- 8 SA1 The Seafront SA3 Valley Gardens SA4 Urban Fringe SA5 South Downs SA6 Sustainable Neighbourhoods CP8 Sustainable Building CP10 Biodiversity CP13 Public Street and Spaces CP14 Housing Density CP16 Open Space
Culture and Community	Reviving local identity and wisdom; support for, and participation in, the arts	Spatial Strategy, Development Areas 1-8 SA1 Seafront SA2 Central Brighton SA3 Valley Gardens SA6 Sustainable Neighbourhoods CP5 Culture and Tourism CP7 Infrastructure and Developer Contributions CP12 Urban Design CP13 Public Streets and Spaces CP15 Heritage
Equity and Local Economy	Inclusive, empowering workplaces with equitable pay; support for local communities and fair trade	Spatial Strategy; Development Areas 1-8 SA6 Sustainable Communities CP2 Sustainable Economic Development CP3 Employment Land CP4 Retail Provision CP7 Infrastructure and Developer Contributions
Health and Happiness	Encouraging active, sociable, meaningful lives to promote good health and well being	Development Areas 1-8 SA1 The Seafront SA6 Sustainable Neighbourhoods CP1 Housing Delivery CP8 Sustainable Building CP12 Urban Design CP13 Public Streets and Places CP16 Open Space CP17 Sports Provision CP18 Healthy City CP19 Housing Mix CP20 Affordable Housing CP22 Traveller Accommodation

2.9 The government has placed the presumption in favour of sustainable development at the heart of its approach to planning, and this is articulated in the National Planning Policy Framework, published in March 2012. The council is required by the government to include the following policy in the City Plan Part 1:

SS1 Presumption in Favour of Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- **Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- **Specific policies in that Framework indicate that development should be restricted³⁴.**

2.10 This policy aims to ensure that decisions are taken in line with the presumption in favour of sustainable development as set out in the National Planning Policy Framework (NPPF). The policies and proposals in the City Plan Part 1 reflect the presumption in favour of sustainable development set out in paragraphs 11 to 16 of the NPPF, and the inclusion of this policy avoids any doubt about whether the City Plan Part 1 complies with the presumption.

Strategy for the future of Brighton & Hove

2.11 Brighton & Hove is a tightly constrained, compact city situated between the South Downs National Park and the sea. With a limited legacy of derelict or vacant sites these 'natural boundaries' define and limit the outward expansion of the city. The spatial strategy needs to achieve a balance

³⁴ For example, those policies relating to land within a National Park, sites protected under the Birds and Habitats Directives and/or as Sites of Special Scientific Interest; designated heritage assets; and locations at risk of flooding or coastal erosion.

between accommodating the city's development needs, particularly for jobs and homes, with the continuing need to protect and enhance the city's high quality environments and the nationally designated landscape that surrounds the city.

2.12 The assessed housing requirements (demand and need for new homes) for the city over the plan period are much higher than the city can realistically accommodate. The plan sets a minimum housing target of 13,200 new homes to be achieved by 2030 and this reflects the capacity and availability of land/sites in the city; the need to provide for a mix of homes to support the growth and maintenance of sustainable communities; the need to provide land for other essential uses (such as employment, retail, health and education facilities and other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.

2.13 The City is expected to continue to function as an economic growth hub for the wider sub-region and the council with its partners share an ambition to improve the City's employment rate. Recent studies have consistently identified the shortage of employment premises and employment land supply as threats to business and employment growth in the city. The Employment Land Study Review 2012 forecasts employment land requirement of 112,240 sq m of office space (B1a and B1b) and 43,430 sq m industrial floorspace (B1c, B2 and B8) over the plan period to 2030. The spatial strategy therefore seeks to ensure that employment sites across the city are safeguarded and upgraded and through the regeneration of key sites new employment floorspace created. Without the industrial heritage of other cities, the supply of employment land and premises is limited in the city. In order to achieve the local housing target opportunities some employment sites have been identified to bring forward a mix of housing and employment floorspace. However further releases will harm the ability of the city to create new jobs for the growing population. Opportunities will be sought in City Plan Part 2 to address the potential shortfall in employment land supply alongside a coordinated approach to bringing forward development sites across the city region in order create new employment space.

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

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

2.16 There is a need to tackle the causes and effects of climate change through lower carbon lifestyles; limiting our use of increasingly scarce resources; reducing our dependency on fossil fuels especially in light of energy security and supply concerns; and making sure that the city is resilient to climate change. We will need to adopt environmentally friendly practices such as making buildings more energy efficient, increasing the use of renewable energy delivering significant changes in energy infrastructure, reducing car use and growing more local food. We will also need to ensure that the natural environment is maintained and enhanced to maximise opportunities for mitigation. This will enable us to contribute to meeting the local and national carbon reduction targets.

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

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

The Spatial Distribution of Development

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

2.20 Much of the land within the city's defined urban fringe forms part of the city's green infrastructure; either in terms of the city's open space framework (e.g. parks, recreation grounds, sports pitches and playing fields, allotments, cemeteries, natural/semi-natural space) or part of the city's biodiversity resource such as local nature reserves, sites of conservation importance or Nature Improvement Areas. However, in light of the significant scale of the city's housing need, objectively assessed as 30,120 new homes to 2030³⁵; the requirement of the government's National Planning Policy Framework to plan positively to meet housing needs in full and; the need to adequately

³⁵ Objectively Assessed Need for Housing: Brighton & Hove, June 2015, GL Hearn Limited

address the social dimension of sustainable development the potential for housing from the urban fringe has had to be reassessed³⁶. The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites but also includes the urban fringe as broad source of potential for housing development.

2.21 The eight development areas are:

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

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

2.23 The City Plan also encourages development to come forward across the rest of the city on suitable brownfield site opportunities (through, for example conversions, redevelopment and changes of use) in accessible locations and by promoting the efficient use and development of land/sites across the city including higher densities in appropriate locations. Such development will help to secure the growth of, or maintain, sustainable neighbourhoods and communities and can also help to protect valuable open spaces.

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

- SA1 - The Seafront
- SA2 - Central Brighton
- SA3 - Valley Gardens
- SA4 - Urban Fringe
- SA5 - The Setting of the South Downs National Park

³⁶ Urban Fringe Assessment Study June 2014

SA6 - Sustainable Neighbourhoods

Table 2 sets out the amount of development distributed across the city.

Table 2 Summary of Development proposals

	New Homes	New Employment Floorspace (sq m)	New Retail floorspace (sq m)
DA1 Brighton Centre and Churchill Square	20		Minimum 20,000 comparison goods
DA2 Brighton Marina	1940	2,000	5,000
DA3 Lewes Road	875	15,600	
DA4 New England Quarter and London Road	1130	20,000	
DA5 Eastern Road and Edward Street	515	18,200 – 23,200	
DA6 Hove Station	525	1,000	
DA7 Toad's Hole Valley	700	25,000	
DA8 Shoreham Harbour	300	7,500	
Rest of the City:			
a) Within the built up area	4130	11,257 ³⁷	
b) Within the urban fringe	1060		
Small site development ³⁸	2015		
Total	13210	100,500 to 105,500	25,000

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

³⁷ Includes extant planning permissions not included within Development Area floorspace figures and potential of 6,500 sq m of employment floorspace at Patcham Court Farm (see CP3)

³⁸ Development from small identified sites estimated to be 765 units pre-plan adoption and small windfall development across the plan period is 1,250 units

Section Three

Development and Special Area policies

DA1 Brighton Centre and Churchill Square Area



Context

3.1 The area around the Brighton Centre is in the heart of the cultural, retail and commercial core of the city and contains the key drivers of the local tourism, leisure and shopping economy. The development area encompasses the Churchill Square Shopping Centre and Western Road to the north; both of which form part of the Regional Shopping Centre, the Brighton Centre to the south and West Street to the east. The Brighton Centre, compared with other modern conference centres, is now thought to be outdated in terms of its design, specification and appearance. The long term aspiration of the council is to secure the redevelopment of the Brighton Centre as a successful, high profile and sustainable conference centre. West Street contains a concentration of bars and large nightclubs and is part of an area of the city experiencing high incidences of violent crime. The priority here is to improve community and public safety including improvements to West Street to ensure a balanced range of complementary evening and night-time economy uses. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

DA1 Brighton Centre and Churchill Square Area

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

A. The local priorities to achieve the strategy are:

- 1. The council will work in partnership with landowners to plan for a replacement facility for the existing Brighton Centre with a new state of the art convention facility incorporating the highest standard of environmental design;**
- 2. Ensure that the redevelopment benefits the surrounding area through high quality building design; significant improvements to townscape and heritage assets damaged by the 1970s redevelopment of the area; legibility, permeability, public realm and biodiversity improvements (in accordance with the adopted Brighton Centre SPD and Nature Conservation and Development SPD);**
- 3. Support the extension of the Churchill Square shopping centre to provide a minimum 20,000 sq m net of new retail comparison goods³⁹ floorspace and A2/A3 use floorspace;**
- 4. Improve community and public safety in the area, by ensuring replaced/ new leisure and cultural facilities promote a balanced and diversified range of complementary evening and night-time economy uses and address, where appropriate, community safety concerns, in particular along West Street and the lower seafront promenade (see SA2 Central Brighton).**
- 5. To ensure high quality public and sustainable transport facilities serve new development, in particular the need to improve the bus interchange facilities at Churchill Square;**
- 6. Improve pedestrian and cycle access through and around the area, particularly along Queens Road to Brighton Station, and reduce the severance between the northern side of the A259 and the seafront to accord with the Public Space Public Life Study;**
- 7. Ensure improvements to local air quality in the Western Road, Churchill Square and North Street transport corridor and along**

³⁹ Non-food items in shops

Queens Road / West Street⁴⁰ through the implementation of the council's Air Quality Action Plan. Ensure new development proposals take into account impact on local air quality and that improvements and/or mitigation are sought wherever possible.

8. Ensure that redevelopment proposals complement the priorities for the seafront in this area as set out in SA1 The Seafront.

9. Development within this area will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and to either connect where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network

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

1. New Brighton Centre and expansion of Churchill Square.

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

a) Securing improved legibility, permeability and connectivity within the area through high quality building design, townscape and public realm (see CP12 and CP13).

b) Proposals for new retail floorspace should promote strong linkages with the primary shopping frontages along Western Road. Edge of centre proposals will be determined in accordance with policy CP4⁴¹.

c) Appropriate transport infrastructure improvements will be required that provide and promote public and sustainable transport to support the redevelopment including the need for integrated links to rapid/express bus-based services on the A259 (see CP9 Sustainable Transport).

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

⁴⁰ See also SA2 Central Brighton part 7

⁴¹ Policy CP4 requires a retail impact assessment for all major edge and out of centre retail developments over 1,000 sqm net as a locally set threshold.

Supporting Text

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

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

3.3 A further priority will be to ensure that redevelopment of the Brighton Centre delivers new retail floorspace as an extension of Churchill Square to enhance and consolidate Brighton's role as a primary Regional Shopping Centre within the South East⁴¹. There is considerable potential to enhance the pedestrian environment, unit configuration, appearance and national multiple retailer representation within this primary retail area. In order to enable existing retailers to trade up, and to attract major new retailers to the centre, it is necessary to identify new opportunities for creating additional retail space, in addition to the ongoing redevelopment and modernisation of current stock.

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

3.5 Proposals should promote strong linkages with the primary shopping frontages, along Western Road in particular and connectivity through to the seafront to address the problem of pedestrian severance. Improvements should include an enhanced bus interchange and pedestrian environment around Churchill Square, a new gateway link through from Churchill Square Shopping Centre to the seafront, and improved junctions at West Street and Kings Road and at the Clock Tower (Western Road, North Street and Queens Road). On completion of the redevelopment the primary retail frontage of the regional centre will be extended to include any new retail elements of the scheme.⁴²

3.6 Current air quality assessments⁴³ indicate that the Western Road, Churchill Square and North Street transport corridor and Queens Road exceed the Government's Air Quality Objective for Nitrogen Dioxide and the

⁴¹ Agreement has been reached with the Council and owners of Churchill Square (Standard Life Investments) to explore with a selected architect the opportunities for extending the shopping centre, and providing a brand new conference centre for the city.

⁴² As advised in the Brighton & Hove City Council Retail Study Update 2011

⁴³ The 2011 Detailed Air Quality Assessment and subsequent updates

area is included within the declared Air Quality Management Area (AQMA)⁴⁴. Improvements to local air quality in these corridors are a priority for the area. The movement of freight within the city centre can be a contributor to airborne pollution. The potential to reduce, retime, reroute and/or revise the mode of transport will be assessed in order to look at measures to reduce the number of freight trips into the city centre AQMA. Measures will be developed that encourage lower emission urban freight distribution (see policy CP9 Sustainable Transport). New development proposals should take account of their impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible.

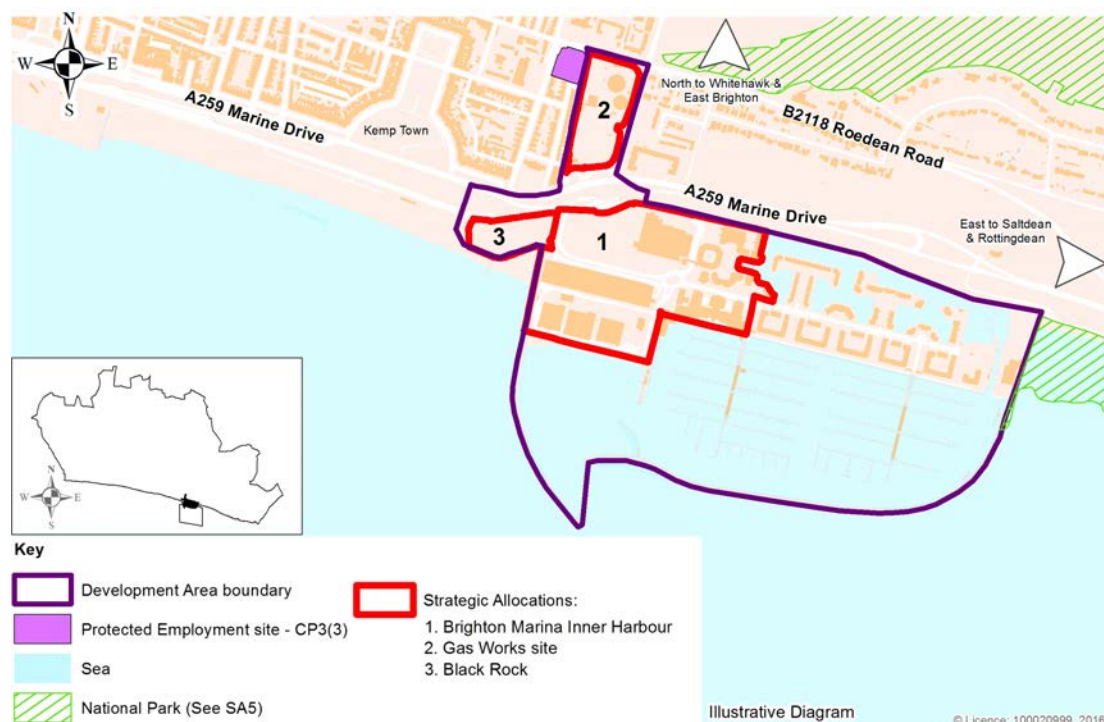
3.7 West Street contains a concentration of bars and large nightclubs and central Brighton and particularly the West Street area, continues to experience higher incidences of violent crime⁴⁵. A priority will therefore be to improve community and public safety including West Street improvements to ensure a balanced range of complementary evening and night-time economy uses and initiatives to reduce public place violence in partnership with the NHS and Police.

3.8 The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around this area within a long list of priority areas. Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network.

⁴⁴ 2013 Air Quality Management Area

⁴⁵ Brunswick & Regency Neighbourhood Action Plan 2007-2010

DA2 Brighton Marina, Gas Works and Black Rock Area



Context

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

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

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

3.12 The long term aspiration of the council is to address the deficiencies of the Marina and the wider area to facilitate the creation of a mixed use area of the city. This will be achieved through the generation of a sustainable high quality marina environment which creates easier and more attractive access for residents and visitors, extends the promenade environment up to and around the Marina and creates stronger pedestrian and visual links with the sea from the Marina.

DA2 Brighton Marina, Gas Works and Black Rock Area

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

- Secure a high quality of building design that takes account of the cliff height issues in and around the Marina, townscape and public realm while recognising the potential for higher density mixed development in accordance with the aims of the Spatial Strategy to optimise development on brownfield sites;
- Improve connectivity and legibility between the Marina, Black Rock and the former Gas Works site
- Enhance the transport infrastructure at the Marina, promote more sustainable forms of transport and maximise opportunities to reduce car ownership;
- Encourage opportunities for the sustainable production of heat and power for the district;
- Protect and enhance the ecological environment at the Marina, including improving linkages to green spaces and the existing Green Network;
- Secure a more balanced mix of retail, including support for independent retailers, and non retail uses such as leisure, tourism and commercial uses;
- Deliver a substantial amount of additional residential units including affordable housing, over the plan period; and
- Deliver the amounts of development as set out in part B below

A. The local priorities to achieve this strategy are:

1. The council will work in partnership with the different landowning interests to ensure that the regeneration of the Marina is comprehensive and conforms with an updated master plan (Supplementary Planning Document) for the Marina, to avoid further piecemeal development in the future.
2. Encouraging the development of housing, retail and employment floorspace and community facilities to increase opportunities for and to meet the needs of local communities.
3. Protecting and enhancing areas of marine character and the role for marine-related leisure, recreation and employment opportunities.
4. Securing improved legibility, permeability and connectivity for pedestrians within and to the Marina and the surrounding areas through high quality building design, townscape and public realm (see CP12 and CP13).
5. Enhancing the transport infrastructure at the Marina and promoting more sustainable forms of transport including enhanced bus services;

promoting smarter travel choices for people; minimising freight movements; improving pedestrian and cycle access; securing improved emergency vehicle access (see CP9); and provision of, and support for, emerging and advanced technologies.

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

7. Ensuring an appropriate mix of housing reflecting housing needs⁴⁶ within the city and which is accompanied by open space provision (see CP19 and CP16).

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

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

10. Conserving and enhancing the biodiversity and geodiversity of the area through the implementation of an ecological master plan which ensures wildlife habitats are integrated throughout and ensures that protected sites (RIGs⁴⁷, SSSI and SNCI) are protected in accordance with Biosphere principles and having regard to proximity to the National Park Boundary (see CP10).

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

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

13. Development within this area will be encouraged to consider low and zero carbon decentralised energy and heat networks in particular and to either connect where a suitable system is in place (or would be at the

⁴⁶ B&H Housing Requirements Study June 2011 or subsequent updates.

⁴⁷ Regionally important geological sites.

time of construction) or design systems so that they are compatible with future connection to a network.

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

1,938 residential units (including the 853 residential units already granted planning permission for the outer harbour, 1000 residential units allocated for the inner harbour and 85 residential units allocated for the Gas Works site);

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

2,000 sq m employment (B1a, B1c) floorspace;

10,500 sq m of leisure and recreation floor space;

A community building within the Marina;

A health facility within or in the vicinity of the Marina to be agreed with the relevant NHS organisation⁴⁸;

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

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

1. Brighton Marina Inner Harbour

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

a) Design – development should be of a high quality with excellent use of durable materials to reflect the unique location and surroundings of the Marina;

⁴⁸ Brighton and Hove GPs have worked together to establish a clinical commissioning group which covers the city, from Saltdean in the east to Portslade in the west. The clinical commissioning group became a statutory organisation in April 2013 when the PCT ceased to exist. Some PCT functions have passed to clinical commissioning groups, some to the new NHS Commissioning Board, and the responsibility for public health has transferred to local authorities.

- b) Townscape and public realm – development should improve the legibility and quality of the townscape and public realm and should demonstrate good connectivity between buildings and spaces within the Marina and wider area;**
- c) Housing mix – development should provide for a mix of dwelling type, tenure and size to cater for a range of housing requirements and to improve housing choice;**
- d) Flood risk - development should demonstrate that the most vulnerable land uses will be located in areas of lowest flood risk in accordance with Brighton & Hove’s Strategic Flood Risk Assessment;**
- e) Sewerage capacity – the development must connect to the sewerage system off-site at the nearest point of adequate capacity;**
- f) The developer will enter into a training place agreement to secure training for local people.**

2. Gas Works site

The Gas Works site has been identified for approximately 2,000 sq m of business floor space to the north of the site, a minimum of 85 residential units and some ancillary retail development. The key criteria against which proposals will be assessed are:

- a) Employment provision - development should provide an appropriate mix of employment floor space of varying sizes that cater for business uses ranging from office to light industrial, including small starter units or managed units (Use Classes B1);**
- b) Housing mix – development should provide for a mix of dwelling type, tenure and size to cater for a range of housing requirements and to improve housing choice;**
- c) Design – development proposals should demonstrate high quality design which positively contribute to the varying character of existing residential and commercial properties in the vicinity to create a cohesive and attractive urban environment;**
- d) Connectivity – development proposals should enhance existing links between the Marina, Gas Works and Black Rock and contribute to the creation of safe links and coherent integration between the Gas Works site and the surrounding neighbourhood;**
- e) Land contamination – development proposals should undertake and submit to the Local Planning Authority evidence to support uses where possible land contamination and remediation may prohibit the delivery of the above uses and amounts;**

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

3. Black Rock site

The Black Rock site has been allocated for 7,000 sq m of leisure and recreation use, in addition to ancillary retail and café uses associated with the primary leisure use. Proposals will be assessed against the citywide policies and the following specific criteria:

- a) Provision of a high quality leisure and recreation facility that caters for the needs of the city, complements Brighton Marina, enhances the seafront leisure function, draws tourism to the city and attracts visitors and residents to the seafront;**
- b) Proposals for development will need to fully demonstrate how this would enable conservation of the historic environment including the setting of nearby listed buildings and the Kemp Town Conservation Area, and complements allocated designations and uses at both the adjacent Inner Harbour and Gas Works sites (see CP15);**
- c) Creation of links between Black Rock and the Marina, including the provision of a pedestrian and cycle link from the west allowing the continuation of the seafront, which is part of the National Cycle Network, to promote stronger linkages through to the Inner Harbour area of the Marina, contributing towards the creation of coherent and safe public access between the seafront, Marina and the Gas Works site and;**
- d) Protect and enhance the vegetated shingle area which is a rare and important habitat for local and migrating species and provide opportunities for appreciating the special quality of the Site of Nature Conservation Importance (SNCI) designated Black Rock beach;**
- e) The developer will enter into a training place agreement to secure training for local people.**

Proposals for uses in addition to the recreation and leisure use will only be considered where it can be demonstrated that these uses support the delivery of a leisure and recreation facility and complement development at the Marina. Supporting or enabling uses should perpetuate informal leisure uses associated with the seafront, conserve the historic environment and enhance linkages between Black Rock, the Marina and the Gas Works site.

Supporting text

3.13 A holistic approach to the regeneration of the development area will be achieved through the preparation and adoption of a Supplementary Planning Document (SPD) for the Brighton Marina and wider area. The SPD will replace the existing Supplementary Planning Guidance (SPGBH20, 2003) and Planning Advice Note (PAN04, 2008) for Brighton Marina.

3.14 The SPD will be supported by a Public Realm Strategy for the Marina, providing comprehensive design guidance for developers and will form part of the citywide Urban Design Framework (CP12). It will contribute to improving the visual appearance of the area, focussing particularly on shop fronts and pedestrian routes and connections to key attractions both within and in the vicinity of the Marina. The strategy will also include guidance on how to improve the biodiversity of the area and access to areas of ecological importance e.g. the SSSI cliffs and SNCI beaches, which will make a significant contribution to improving the quality of life within the development area. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet Living approach, which is a strategic approach to enabling the city to live within environmental limits.

3.15 Fundamental to the strategy for the development area is the provision of mixed use development at a density that helps achieve a vibrant and sustainable place. However, proposed developments should ensure the preservation and/or enhancement of the setting of all listed buildings and conservation areas nearby, as well as the wider historic landscape and city skyline including views to and from the South Downs National Park. Applications for higher density development will be assessed in terms of their ability to meet the design and density considerations set out in CP12 and CP14. It is essential that any new development provides an attractive pedestrian environment, active retail and leisure frontages as well as easy access to the harbour, boardwalk, shoreline and other recreational areas within the Marina.

3.16 In recognition of the current impact of the economic downturn on the deliverability of major schemes, it is important to allow for reasonable flexibility, in the short term to promote successful regeneration and enable viable schemes to be delivered. Proposals which bring forward development amounts different to that proposed in the policy will need to be fully and robustly justified through clear commercial and financial viability assessments and demonstrable benefits for early delivery. Consideration will be given to the whether allowing a different scale or mix of development will secure particularly strong planning benefits and whether the proposed amount of development is appropriate in light of ongoing monitoring of housing and employment delivery. Enabling development for either the Black Rock or the Gas Works site should be used to support and deliver their respective leisure and recreation, and employment uses.

3.17 The majority of existing retail activity takes place in the Merchant's Quay and at the Asda superstore. Whilst Brighton Marina contains a range of bars,

restaurants and factory outlet stores related to its wider recreation and leisure role, it currently lacks the full range of shops and services, such as banks and post offices, to support the proposed expansion in residential population. The strategy for the development area is to enhance the choice and performance of retail activity in the Marina through the encouragement of mixed retail activity and improvements to the public realm. Retail development should accord with CP4 Retail Provision. A detailed policy regarding the appropriate type and mix of A1 and non A1 uses in the Marina will be set out in Part 2 of the City Plan.

3.18 The Gas Works site is allocated for 2,000 sq m of employment use at the northern part of the site. It is recognised that the current configuration of the site and land contamination issues will potentially influence the type and position of employment uses on this strategic allocation. Vehicular access to the north of the site is more appropriate for industrial and employment type uses. The adjacent Bell Tower Industrial estate to the west will be an attractive factor in locating complementary uses.

3.19 Improvements to the transport infrastructure, in particular to the cycle, pedestrian and bus routes will be implemented and funded through planning obligations. These improvements will be closely linked to other priorities for the area, especially those relating to enhancement of the public realm and ecology. There is currently relatively good bus access to the Marina but there is scope to further improve bus services as well as the infrastructure i.e. through the provision of a high quality bus interchange within the Marina, in response to the additional demands resulting from the implementation of major development schemes. There are plans for the provision of rapid/express bus-based services along the seafront to contribute to improved public transport provision to the Marina (see CP9 Sustainable Transport). Work will be undertaken with transport operators to secure improvements through both the Community Infrastructure Levy (CIL)⁴⁹ if introduced or planning obligations.

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

⁴⁹ CIL Regulations came into force in April 2010. Money raised from CIL can be used to fund a range of infrastructure needed as a result of development.

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

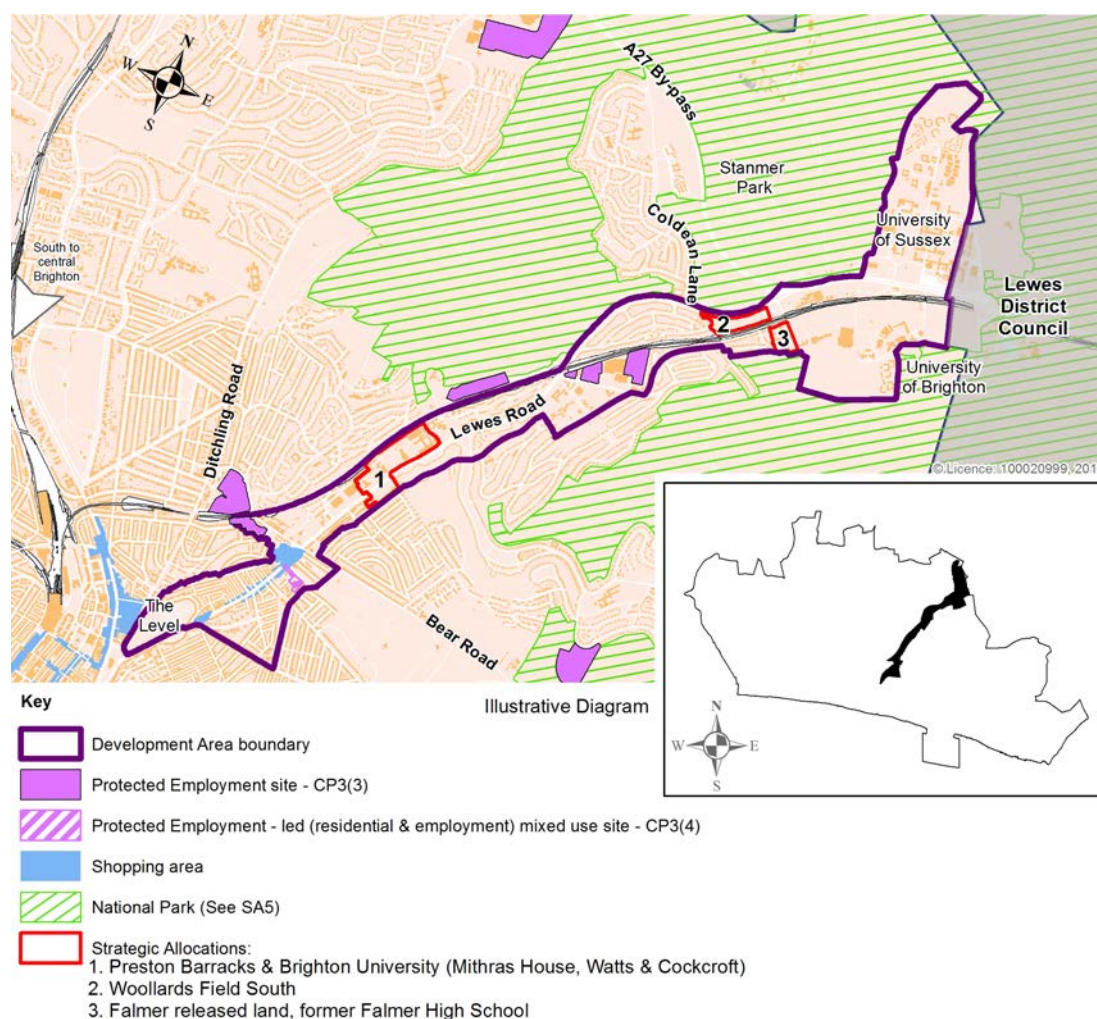
3.22 The council's 2008 Strategic Flood Risk Assessment (SFRA) and SFRA update (2012) has identified Brighton Marina and Black Rock as falling within an area of higher probability of flooding (Flood Risk Zone 3a). A Sequential Test has been carried out to demonstrate the appropriateness of development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

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

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

3.25 The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around this area within a long list of priority areas. Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network.

DA3 – Lewes Road Area



Context

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

3.27 The main thrust of the strategy for the Lewes Road Development Area is to promote and enhance the role of the area for higher education in Brighton & Hove. In addition there are a number of significant development sites within

the area, including three strategic allocations (the Preston Barracks site, Woollards Field South and the Falmer Released Land). The area will benefit from an improved public realm and townscape along with greening of the route.

DA3 Lewes Road

The strategy for the development area is to further develop and enhance the role of Lewes Road as the city's academic corridor⁵⁰ by supporting proposals which:

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

A. The local priorities to achieve this strategy are:

- 1. The council will work in partnership with the Universities to support the sustainable redevelopment and expansion of the University campuses avoiding adverse impact upon the setting of the South Downs National Park; deliver appropriate accommodation for students; and develop closer links between the Universities and local communities through sharing facilities and developing local opportunities for training and learning.**
- 2. Promoting and investing in improved bus, cycling and pedestrian routes along Lewes Road from The Level to the Universities in partnership with public transport operators in order to achieve a modal shift and thereby help reduce the impact of traffic, in particular on air and noise quality.**
- 3. Encouraging the development of housing, employment floorspace and community facilities to increase employment opportunities for and to meet other needs of local communities.**
- 4. Securing improvements to the public realm and townscape, including greening the route, through the adoption of comprehensive design guidance that will inform future planning decisions and**

⁵⁰ Academic Corridor: Concentration of three major higher and further education institutions (the Universities of Brighton and Sussex and City College) along the A27/A270 axis in the Brighton area, which together provide enhanced facilities for high-technology and knowledge-based businesses.

investment in the area and encourage more efficient use of underused sites (see CP12 Urban Design).

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

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

7. To ensure improvements to local air quality through implementation of the council's Air Quality Action Plan. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.

8. Development within this area will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and to either connect where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network.

9. The city council will work with East Sussex County Council, the Highways Agency, neighbouring authorities and developers to identify measures to improve the performance of the Falmer Interchange trunk road junction.

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

880 residential units;

15,600 sq m employment floorspace including an Innovation Centre;

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

Student Accommodation (1300 rooms); and

Community building at Bevendean.

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

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

The city council will work with the University of Brighton and other partners to provide a mixed use employment-led development comprising a new business school, 10,600sqm B1 employment floorspace, including an Innovation Centre; 750 rooms of student accommodation; 300 residential units and other ancillary supporting uses. Proposals will be assessed against the priorities for DA3 Lewes

Road, citywide policies, guidance in the adopted Planning Brief for the site and the following criteria:

- a) Proposals will be required to have a high standard of public realm, including a central square, and effective links across the Lewes Road and to Moulsecoomb Station in order to improve the quality and permeability of the area.**
- b) Residential development should provide for a mix of dwelling type, tenure and size to cater for a range of housing requirements and to improve housing choices.**
- c) The development should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements through creative landscaping solutions.**
- d) Sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact.**
- e) The development must connect to the water distribution and sewerage system off-site at the nearest point of adequate capacity.**
- f) The development must ensure that groundwater sources are protected, to the satisfaction of the Environment Agency.**
- g) The developer will be required to enter into a training place agreement to secure training for local people.**

2. Woollards Field South

Provision of 5,000 sqm of B1 business space or alternative employment generating development that helps to meet the city's infrastructure needs on land to the south of the new archive centre, known as The Keep. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies and the following criteria:

- a) The development will be required to achieve a high standard of design.**
- b) Sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact.**
- c) As a greenfield site, the development will be expected to be zero carbon⁵¹ and, through creative landscaping solutions (including features such as green walls), should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements.**

⁵¹ This will be subject to viability considerations and potential mitigation measures, as set out in policy CP8.

- d) Development should ensure that there will be no adverse impacts on the setting of the South Downs National Park or any locally or nationally designated landscape, historic or ecological sites.**
- e) Development will be required to contribute towards reducing the heat island effect and reduce surface water run-off and flood risk, with run-off being controlled to maintain greenfield run-off rates.**
- f) The developer will be required to enter into a training place agreement to secure training for local people.**
- g) The development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.**

3. Falmer Released Land, Former Falmer High School

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

- a) The development will be required to achieve a high standard of design.**
- b) Sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact.**
- c) Development should ensure that there will be no adverse impacts on the setting of the South Downs National Park or any locally or nationally designated landscape, historic or ecological sites.**
- d) The development should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements through creative landscaping solutions.**
- e) The developer will be required to enter into a training place agreement to secure training for local people.**
- f) The development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.**

Supporting Text

3.28 The strategy recognises the contribution made by the city's two universities, based on the Lewes Road, to the economic, social and cultural

life of Brighton & Hove and the wider region⁵². The Universities offer popular and respected courses and have plans for overall growth and for improvements to their campus facilities to meet student demand and rising expectations. This will require improvement and expansion of their campuses and the need for appropriate new student accommodation on and near the campuses. The Council is keen to work with the universities to secure these objectives, which align closely with council strategies, particularly on student housing.

3.29 The Council will work with the universities and other education providers, in conjunction with Policy CP21 on student housing, to address the need for dedicated purpose built student accommodation in the local area where there is increasing pressure to accommodate students within the existing housing stock. The council will seek to control the location of new small Houses in Multiple Occupation (C4 use class and mixed C3/C4 uses) within the Lewes Road corridor in order to avoid problems of overconcentration and to maintain healthy and inclusive communities.

3.30 In terms of providing benefits for and working with local communities, the Universities recognise that they have a role in forging closer links with local people by expanding learning opportunities and sharing education, community and sports facilities. There are also opportunities to encourage technology and innovation transfer from the Universities to existing businesses and to support new opportunities for suitable new business accommodation that further develop links. The universities also contribute positively to the community through student volunteering and other outreach work. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

3.31 Improving the sustainable transport corridor and access to the South Downs National Park via the Lewes Road, in particular the cycle and pedestrian routes, will be implemented and funded through the Local Transport Plan⁵³ and developer contributions. These improvements will be closely linked to the other priorities for the area, in particular better air and noise quality⁵⁴ and improving the public realm and community safety, and will

⁵² The universities have a combined annual revenue expenditure of approximately £350 million. They directly employ 5000 staff and support several thousand jobs in the wider area, predominantly in the city. The universities contribute to employment through initiatives such as the Sussex Innovation Centre at the University of Sussex which provides support for start-up businesses and the ProfitNet programme at the University of Brighton that has worked with over 1000 local small and medium sized businesses. Work with local community groups is sustained by the University of Brighton Community University Partnership Project (CUPP).

⁵³ LTP3, the city's current Local Transport Plan, was adopted in 2011 and sets out a fifteen year strategy for transport proposals and improvements. It is prepared in order to bid for Government funding for all forms of transport.

⁵⁴ The Noise Action Plan for the Brighton Agglomeration was produced by Defra in 2010. This identifies priority areas for action. The Defra mapping predicts that households most affected by traffic noise are those closest to major roads: London Road, Lewes Road & the seafront. Lewes Road from the University of Brighton to the Level is included in the 2013 Air Quality

be co-ordinated across boundaries with adjoining local authorities. There is currently relatively good bus and train access to the area, but there is scope to improve access to bus and rail services in response to the additional demands resulting from the implementation of major development schemes and to facilitate public transport access to the South Downs National Park. Work will be undertaken with Lewes District Council and bus and train operators to identify and secure improvements. New development proposals should take account of their impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/or mitigation will be sought wherever possible.

3.32 A holistic approach to improving the public realm and townscape will be achieved through the preparation and adoption of comprehensive design guidance for the area that will form part of the citywide Urban Design Framework (see policy CP12) and will be subject to community engagement. It will cover matters such as improving biodiversity and greening the corridor. This will make a significant contribution to improving quality of life within the area. It will also contribute to improving the appearance of the built environment, such as shopfronts, and to enhancing pedestrian routes and connections through the district centre. Development at the northern end of Lewes Road must take proper account of potential impact upon the setting of the nearby South Downs National Park.

3.33 Lewes Road District centre was identified in the 2011 Retail Study Update⁵⁵ as a potentially vulnerable shopping centre. Additionally the LR2 Regeneration Strategy⁵⁶ identified a number of opportunities to improve the local shopping environment. The comprehensive design guide will help to achieve this by influencing future development proposals and future Local Transport Plan proposals. Melbourne Street Industrial Area is located to the east of the Lewes Road District Centre and is in need of investment. It has been identified in policy CP3 for employment led (residential and employment) mixed use development.

Management Area as it exceeds the government's Air Quality Objective for annual Nitrogen Dioxides.

⁵⁵ The Brighton & Hove Retail Study Update 2011 provides an update to the earlier 2006 study, which identified current and future capacity for retail floorspace in Brighton & Hove. The studies assess the existing network of larger and smaller centres in the city and in the function and effectiveness of the current retail hierarchy. Whilst surrounded by a dense area of housing and containing a good range of everyday services, such as a post office, bank and pharmacy, there is a poor range and quality of comparison goods retailers in Lewes Road. Vacancy rates are high, pedestrian flows are low and the environment and pedestrian movements hampered by traffic congestion. The 2011 update recommended traffic management and improved pedestrian linkages in order to provide an upgraded shopping environment for the local catchment population.

⁵⁶ The LR2 Regeneration Strategy (London Road and Lewes Road Regeneration Strategy 2007) identifies options and opportunities for the regeneration of the London Road and Lewes Road area. The emphasis is on measures to improve the quality of urban design, streetscape and enhance the gateways to the city and to seek development opportunities in the area.

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

3.35 Lewes Road south of the Vogue Gyratory is identified as a community safety priority area⁵⁷. Public realm and park improvements will help to address this priority. In terms of community facilities, the need for a dedicated community building is identified in Bevendean (Audit of Community Level Infrastructure 2004⁵⁸) and for youth facilities.

3.36 Preston Barracks is a large mixed use site which has significant potential for high quality employment, training and academic floorspace and for a significant number of residential units and purpose built student accommodation, integrated with creative urban greening. It is a strategic allocation due to its potential to help meet targets for housing and employment floorspace in the city. Future development on the site will be employment-led and there is scope for it to provide an element of affordable managed workspace for local small businesses and education floorspace linked to the University. The council is signed up in principle to a shared vision for a wider development opportunity for Preston Barracks and the nearby University of Brighton sites. A planning brief for Preston Barracks and University of Brighton, adopted in September 2011, provides detailed guidance on the site.

3.37 Planning permission was granted in 2011 for an archive centre with related conference, education and research facilities on the Woollards Field site to the south of Falmer Station. The remainder of the site to the south is allocated for 5,000 square metres of business (B1) floorspace or other employment generating uses in connection with meeting the city's infrastructure needs. The site is earmarked in the Infrastructure Delivery Plan (Annex 2) as providing important infrastructure to meet the city's requirement for ambulance/paramedic rapid response points. This development will help provide local training and employment opportunities and could help to strengthen the Universities' positive role within the local economy. Land at the southern end of the former Falmer High School site is no longer required for educational purposes. The site has potential for redevelopment for a range of uses, including student accommodation, residential, offices and

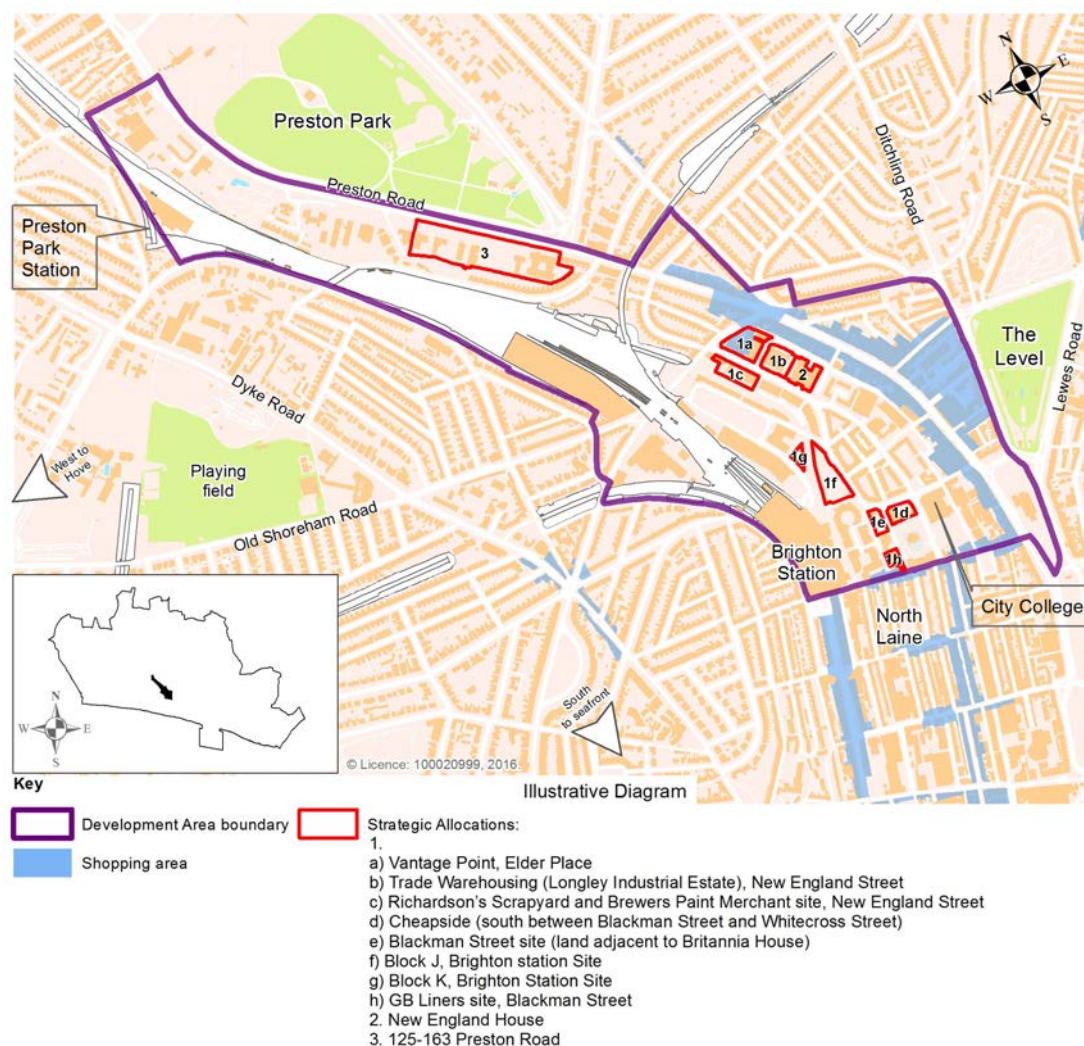
⁵⁷ The Community Safety, Crime and Drugs Audit 2004 identifies the Lewes Road as a community safety priority area and proposed measures for improving safety.

⁵⁸ The Audit of Community Level Infrastructure 2004 was commissioned by the Local Strategic Partnership to identify the level of community infrastructure in the 15 Neighbourhood Renewal areas across Brighton & Hove.

educational use. These uses could work in conjunction with car parking use for the nearby American Express Community Stadium. Permanent accommodation for the Bridge Community Education Centre and for Brighton Aldridge Community Academy's Pupil Referral Unit should also be provided, either on the Falmer Released Land or in an acceptable alternative location.

3.38 The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around this area within a long list of priority areas. Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network.

DA4 – New England Quarter and London Road



Context

3.39 The regeneration of the New England Quarter has been acting as a catalyst for the redevelopment of the surrounding area east of Brighton Station. Built to support the One Planet Living principles, One Brighton has been designed to help its residents reduce their ecological footprint and is an exemplar of Sustainable Living. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits. Opportunities for further development within this area arise from it being in close proximity to the retail and commercial core of the city and the area is well placed to capitalise on excellent transportation links provided by Brighton Station, London Road and Preston Road Stations. To the south, Trafalgar Street provides a link to the vibrant North Laine shopping and conservation area. There is real potential to invigorate this part of the city and create a high quality public realm which improves the arrival experience of those coming to the city by train.

3.40 London Road Town Centre serves as a community hub and key shopping centre for the surrounding residential areas and contains the city's only permanent Open Market. However its performance as a 'town centre' has been in decline and there is a great need for regeneration and improvement. A particular aim of the policy is to achieve greater integration and accessibility between the London Road Shopping centre and the Brighton Station/New England Quarter area.

3.41 London Road itself is the main entrance and exit route from the city and is designated a sustainable transport corridor and forms part of the National Cycle Network (Route 20) linking the city centre to the South Downs. It has the potential to become a strong and attractive gateway to the city. It is lined by mature trees and punctuated by large open green spaces (Withdean Park, Surrenden Field and Preston Park) as well as smaller green spaces such as Providence Place Gardens⁵⁹. The area west of Preston Road is currently characterised by high rise office blocks opposite Preston Park's western boundary along with a hotel and new GP practice and pharmacy. This is a secondary office location and provides the potential for high quality mixed use (employment/residential) future redevelopment.

DA4 – New England Quarter and London Road Area

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

A. The local priorities to achieve the strategy are:

1. Planning for a new business quarter for the city in the New England Quarter and London Road area to accommodate 20,000 sq m of additional new office floorspace post 2016.

2. Managing, enhancing and consolidating the existing retail provision within the defined prime frontage of London Road Town Centre, recognising the importance of retaining key retail sites to act as 'anchors' for the centre as well as recognising the role of small independent/local traders.

3. Working with landowners and traders to secure the redevelopment/refurbishment of key retail sites along London Road.

⁵⁹ Brighton & Hove City Council is working to transform the area around Ann Street and Providence Place Gardens into a lively, safe and successful public space.

4. Working with education providers and funding partners to support improvements in vocational training and further education within the area as an extension to the Academic Corridor⁶⁰.

5 Working with Southern Rail, Network Rail and partners to enhance the environment and maximise use of space around Brighton Rail Station (Brighton Station Gateway) recognising its important role as a gateway to the city, a public space, a major transport interchange and the need to improve links to and from the station.

6. Ensure improvements to local air and noise quality through the implementation of the council's Air Quality Action Plan, through improvements to bus, pedestrian and cycle routes to achieve a modal shift and help reduce the impact of traffic and through the implementation of the council's Air Quality Action Plan. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.

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

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

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

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

11. Development within this area will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability.

⁶⁰Academic Corridor: Concentration of three major higher and further education institutions (the Universities of Brighton and Sussex and City College) along the A27/A270 axis in the Brighton area, which together provide enhanced facilities for high-technology and knowledge-based businesses.

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

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

**1,130 residential units;
20,000sq m B1a B1b floorspace; and
300 bed space student housing (see CP21 Student Accommodation)**

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

1. Provision is made for 20,000 sq m net additional B1a, B1 b floorspace and 165 residential units through the implementation of extant commitments for B1 floorspace and the mixed use development of the following sites⁶¹:

- a) Vantage Point, Elder Place (including Circus Parade) - no net loss of B1a floorspace;**
- b) Trade Warehousing (Longley Industrial Estate) 4-6 New England Street - 3,000 sq m;**
- c) Richardson's Scrapyard and Brewers Paint Merchant Site, New England Street - 3,000 sq m;**
- d) Cheapside (south between Blackman Street and Whitecross Street) - 2,000 sq m;**
- e) Blackman Street Site (land adjacent to Britannia House) - 2,000 sq m.**

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

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

⁶¹ These sites fall within the Elder Place Development Zone or the Pelham Street Development Zone as identified in the London Road Central SPD 10 2009

- iv. Development will be expected to contribute to green infrastructure improvements to increase green space connectivity and enhance biodiversity;
- v. The developer will enter into a training place agreement to secure training for local people.

The following sites⁶² within the DA4 area with extant planning permission for B1a office uses will not be granted planning permission for alternative uses:

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

2. New England House, New England Road

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

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

3. 125-163 Preston Road

Provision is made for mixed use (office and residential) developments retaining as a minimum across the development sites 14,000 sq m of office floorspace and 450 residential units. Proposals will be assessed against the citywide policies and the following specific criteria:

- a) A high quality design which respects and enhances the local historic environment, the residential character of the area and the parkland setting;

⁶² The station sites are identified in the Masterplan for the regeneration of the New England Quarter and GB Liners site within the Pelham Street Development Zone as identified in the London Road Central SPD 10 2009

b) A development which contributes positively to the creation of a coherent cluster of tall buildings with a consistent building line and a strong street frontage;

c) A minimum office floorspace should be retained on each development site:

125-135 Preston Road (Telecom House) - 3,000 sq m

137-147 Preston Road - 3,000 sq m

149 -151, 153, 157-159, 161-163 Preston Road - 2,000 sq m each

d) Development should provide for a mix of dwelling type, tenure and size to cater for a range of housing requirements and to improve housing choice (see CP19);

e) The development must connect to the water distribution and sewerage system off-site at the nearest point of adequate capacity;

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

Supporting text

3.42 The London Road Corridor has the potential to become a strong and attractive gateway to the city (London Road and Lewes Road Regeneration Strategy 2007⁶³) and there are opportunities for regeneration in distinct areas (including the area east of Brighton Station, the London Road Shopping Centre and west of Preston Road) which would strengthen and enhance the overall character and diversity of the city.

3.43 With the success of the Brighton Station redevelopment, the area east of Brighton Station, is the preferred location for new office development needed in the city (see Employment Land Study Review 2012). This well established mixed use area is particularly well placed in terms of transport links, its close proximity to Brighton Station and the retail and commercial core of the city; and it already benefits from having an established office and creative industries cluster. The council, through the Station Gateway Project, is seeking to enhance the environment around Brighton Station, recognising the importance of Brighton Station in this area as a transport interchange, public space and important gateway into the city. These environmental improvements will also link with improvements planned for the station and outstanding developments planned to the north of the station.

3.44 A number of sites have been identified as offering particular redevelopment potential to bring forward the net additional office floorspace proposed in this area to meet the city's forecast need. Permitting a mix of uses to come forward on these sites alongside new office floorspace provision

⁶³ LR2 Study, London Road/Lewes Road Regeneration Strategy, 2007

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

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

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

3.47 The creative industries sector has been identified as a growing and dynamic sector in the city with a shortage of affordable and appropriate workspace⁶⁴. The Creative Industries Workspace Study 2008 highlighted the importance of the existing creative industries cluster in the city centre and New England House as a unique and successful example. Currently 60% of New England House is let as workshops and office units to a mix of

⁶⁴ Creative Industries Workspace Study 2008. The study indicated that affordable rents in the creative industries are generally at the lower end of the market range and in Brighton & Hove are in the region of £7.50 a square foot. However it should be noted that this average figure is higher than those generally considered affordable by some creative businesses and organisations.

businesses, many of which fall within the creative industries and, more particularly, the digital media industries, but also include others like food, retail and wholesale, construction and direct marketing. The building is largely divided into workshops and office units. Many businesses have formed into 'clusters' to promote joint working, synergy and bulk purchasing. In October 2010 the council agreed to work in partnership to pursue an option for the refurbishment of the building to provide affordable and flexible managed space.

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

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

3.50 The Brighton and Hove Retail Study Update (September 2011) indicates that London Road is not exploiting its full potential as a town centre shopping area. The priority for the shopping area is to enhance and consolidate the existing retail provision within London Road shopping centre and improve the physical environment. This will lead to an improved shopping experience which will be helped by effective management of the town centre. The council will look to enhance the retail provision, particularly for comparison (non-food) goods which are currently under represented by encouraging the re-use of vacant key retail units to new retail tenants. The £18m regeneration of the

Open Market will provide 44 new permanent market stalls offering an alternative retail provision for the city and small business opportunities, creative workshops, a large central square and 87 affordable homes and should provide a catalyst for the regeneration of London Road.

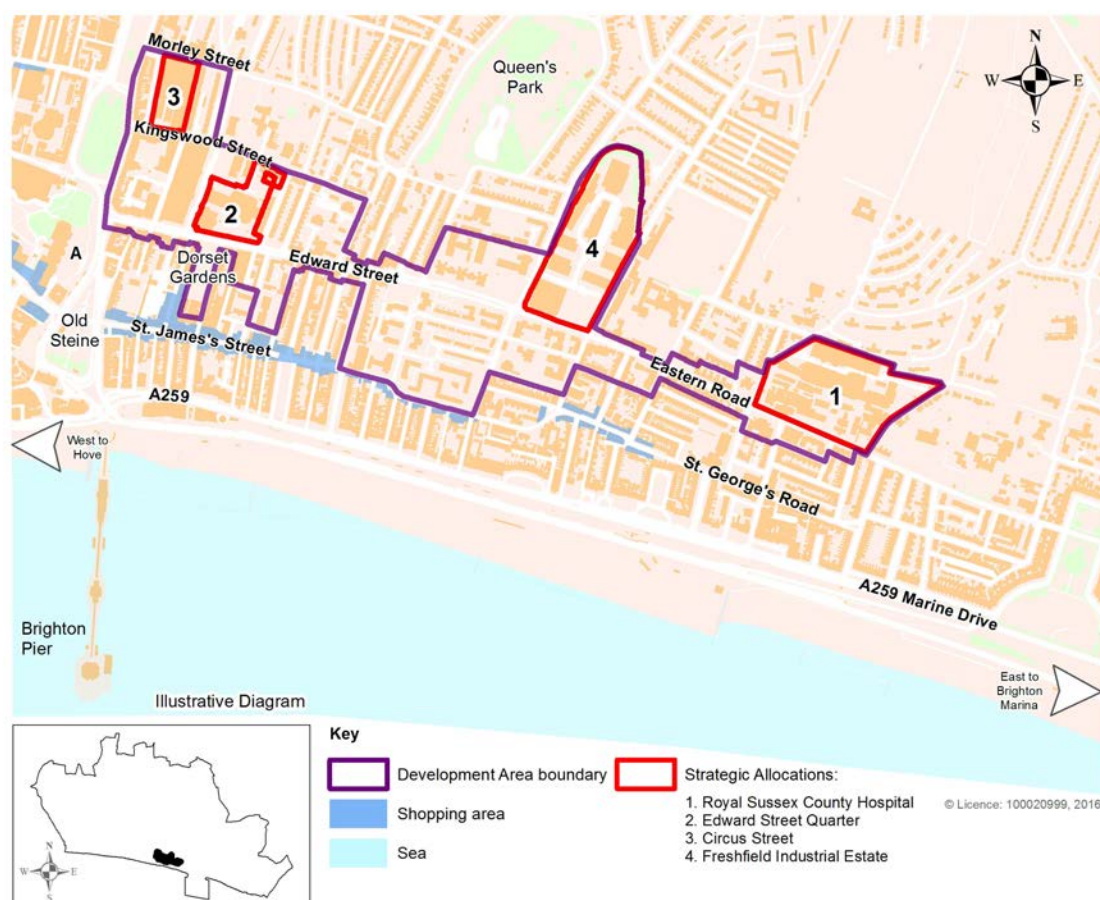
3.51 Environmental improvements should include a better pedestrian environment, better local air and noise quality, improved interconnected green infrastructure which maximises opportunities to integrate urban biodiversity and improved streetscape together with the need to create better walking and cycling links between London Road, the area east of Brighton Station, the Level, Valley Gardens and the Seafront.

3.52 London Road, either side of Preston Circus, has been designated as part of the 2013 declared Air Quality Management Area due to exceeding the government's Air Quality Objective for Nitrogen Dioxide. The council's new Air Quality Action Plan will set out measures to ensure improvement to air quality. New development proposals should take into account impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/or mitigation will be sought wherever possible. The massing of residential developments adjacent to particular roads in the area should be carefully designed so as not to increase the number of people exposed to poor air quality. Opportunities to improve streetscapes and the connection between the existing green spaces and greenways will help improve air quality, the ecology of this green network and better links between the open spaces. The Council's Local Transport Plan recognises the link between traffic levels on main roads such as London Road and the highest levels of transport noise in the city⁶⁵. Part of the Local Transport Plan vision and objective is to control and mitigate carbon emissions, air quality and noise effects of the city's transport systems, and this is reflected in CP9 Sustainable Transport.

3.53 The Brighton & Hove Energy Study has identified viability for District Heating networks in and around this area within a short list of priority areas. Development within the short list of priority areas will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability.

⁶⁵ The Noise Action Plan for the Brighton Agglomeration was produced by Defra in 2010. This identifies priority areas for action. The Defra mapping predicts that households most affected by traffic noise are those closest to major roads: London Road, Lewes Road & the seafront.

DA5– Eastern Road and Edward Street Area



Context

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

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

DA5 Eastern Road and Edward Street

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

A. The local priorities to achieve the strategy are:

- 1. Improving the public realm and townscape through the adoption of comprehensive design guidance that will inform future investment in the area and planning decisions (see CP12 Urban Design).**
- 2. Promoting and investing in safe and sustainable transport improvements in the area including the public realm to encourage walking, and to transfer road carriageway to sustainable transport measures (buses, bicycles and pedestrians).**
- 3. Ensuring that infrastructure is in place to enable the introduction of rapid bus-based services (see CP9 Sustainable Transport).**
- 4. Improving air quality.**
- 5. Development should incorporate the findings of the Strategic Flood Risk Assessment 2012 and any subsequent revisions.**
- 6. Undertaking measures to improve community safety, invest in open spaces, provide additional school places within existing schools, improve youth facilities and create employment opportunities for local communities.**
- 7. Making more efficient use of under-used sites that will be identified through the strategic allocations below and Part 2 of the City Plan.**
- 8 Development will need to provide connection to off-site water distribution and sewerage systems at the nearest point of adequate capacity.**
- 9. Enhancing urban biodiversity through investment in green infrastructure including substantially increasing tree planting and soft landscaping to ameliorate the existing poor public realm (see CP10 Biodiversity).**
- 10. Development within this area will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability.**
- 11. Support improvement to higher education teaching and library space in the Eastern Road and Edward Street Area.**

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

515 residential units;

18,200 - 23,200sqm employment floorspace;

74,000 sqm hospital floorspace;

400-bed student accommodation;

3,800sqm University education floorspace;

Dance Studio (D1);

a multi-practice GP's surgery for Kemptown;

a community building for Queens Park and Craven Vale;

ancillary supporting uses.

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

1. Royal Sussex County Hospital

Comprehensive redevelopment and enlargement of the hospital to provide 74,000sqm additional hospital (C2 use) floorspace, including the floorspace granted planning permission in 2012, which will be considered in the context of citywide policies and the following criteria:

a) Sustainable transport infrastructure improvements will be required including bus, walking and cycling improvements, and a comprehensive transport strategy will be required, including a feasibility study (see below) to support the enlargement of the hospital taking into account its wider sub regional role;

b) There will be a comprehensive and integrated approach to the redevelopment of the site that will be of a high standard of design and which will be sympathetic to the surrounding historic built environment; and

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

2. Edward Street Quarter

Employment-led redevelopment of the Edward Street Quarter (including former Amex House and the Job Centre) comprising demolition of the former Amex House and replacement with 15,000-20,000 sq m of high quality B1a office floorspace, a minimum of 65 residential units and

ancillary shops (A1) and cafes and restaurants (A3). The proposal will be considered in the context of citywide policies and the following criteria:

- a) A comprehensive approach to the redevelopment of the Edward Street Quarter will be required including the need to address relationship with existing buildings, massing, and the layout of the site and provide for a high quality of design;
- b) The proposal will contribute towards improving the existing townscape and public realm, including public art, in the surrounding area including improvements to Dorset Gardens;
- c) Sustainable transport infrastructure improvements that provide and promote public and sustainable transport will be required to support the scheme;
- d) The developer will enter into a training place agreement to secure training for local people; and
- e) A Planning Brief will be prepared for the site. An attractive and safer environment contributes toward improved mental health, well-being and community cohesion⁶⁶.

3. Circus Street Site

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

- a) The new development will be of a high standard of design that is sympathetic to the surrounding historic townscape and adjacent residential properties;
- b) A minimum of 750sqm of the proposed 3200sqm office space will be provided in the form of B1 affordable managed workspace;
- c) Sustainable transport infrastructure improvements that provide and promote public and sustainable transport will be required to support the scheme;
- d) The scheme will deliver wider community benefits including new/improved play space and public realm including improved

⁶⁶ Improvements to the quality of the built environment, connectivity between neighbourhoods, access to employment and green space play a vital role in contributing to improved mental health, well-being and perceptions of community cohesion and safety.

links to the surrounding area and St James Street and a training place agreement to secure training for local people; and

- e) Ancillary supporting uses will be limited to small scale retail and café/restaurant uses linked to the development.

4. Freshfield Road Business Park and Gala Bingo Hall

Mixed use redevelopment of the Freshfield Road Business Park and Gala Bingo Hall sites comprising improvement to the provision of employment floorspace including B1 office/light industrial floorspace and B8 warehousing and provision of a minimum of 110 residential units. The proposals will be considered against citywide policies and the following criteria:

- a) **Provide modern employment space and residential development. Re-provision or retention of a community or leisure facility as part of the Gala Bingo Hall site scheme appropriate to the needs of the local community.**
- b) **Redevelopment across both parts of the site will be of a high standard of design, that is sympathetic to the surrounding historic built environment and will make efficient use of the site in terms of height of buildings and layout and re-introduce development along the frontage of Eastern Road.**
- c) **The developer will enter into a training place agreement to secure training for local people.**

Supporting Text

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

3.57 The main priority in helping to deliver the strategy will be through the adoption of a comprehensive design guide. This will be linked to an Urban Design Framework for the city (see policy CP12) that will take account of the need to protect and enhance the conservation areas (East Cliff, College, Queens Park, Carlton Hill and Valley Gardens). The guide will be subject to community and stakeholder consultation and address the concerns of local communities. The priority areas for improvement are Eastern Road and Edward Street (between Pavilion Gardens and Sutherland Road) and the Essex Street/Hereford Street Area. Issues to be addressed include creating a high quality, pedestrian friendly public realm, creating active frontages and boundaries, promoting public art and design, improving permeability through spaces and around buildings, improving Essex and Hereford Street Estate, greening the area and improving biodiversity. The design guide will be

implemented through future development schemes, developer contributions and city council strategies particularly for Housing and Transport. An attractive and safer environment contributes toward improved mental health, well-being and community cohesion⁶⁷. Funding has been secured to improve sustainable transport infrastructure on Edward Street (see policy CP9).

3.58 The Brighton & Hove Energy Study has identified viability for District Heating networks in and around this area within a short list of priority areas. Development within the short list of priority areas will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability.

3.59 A feasibility study will be carried out to consider the re-routing and reduction of through-traffic (with the exception of residents' vehicles, public transport including taxis, ambulances other hospital transport and vehicles directly accessing the hospital) along Eastern road in the immediate vicinity of the hospital with the aim of reducing congestion, improving air quality and ensuring adequate emergency access to the hospital. If approved, the scheme should be implemented prior to completion of the 3Ts development at the Royal Sussex County hospital. A bus-based rapid transport system is intended to extend along Edward Street and Eastern Road as part of an east-west link. The timing of implementation (after 2016) will be the subject of future bids for funding. Sustainable transport initiatives and improvements to the public realm⁶⁸ are a priority for the area.

3.60 Community infrastructure priorities for Eastern Road and Edward Street are based upon citywide strategies including Sustainable Community Strategy⁶⁹, Audit of Community Level Infrastructure⁷⁰, Parks and Green Spaces Strategy⁷¹ and Infrastructure Capacity Study⁷². Priorities extend beyond the area including to nearby disadvantaged residential areas to contribute towards the reduction of inequalities. Priorities for strategies and developer contributions include:

- Open space improvements – Turner, Dorset Gardens;
- Schools – additional primary school spaces required by 2026;

⁶⁷ Improvements to the quality of the built environment, connectivity between neighbourhoods, access to employment and green space play a vital role in contributing to improved mental health, well-being and perceptions of community cohesion and safety.

⁶⁸ The Eastern Road Edward Street transport corridor is within the 2013 Air Quality Management Area. Air Quality is a priority in the vicinity of the Royal Sussex County Hospital.

⁶⁹ Sustainable Community Strategy was refreshed and adopted by the 2020 Local Strategic Partnership in 2006. It sets out a long term plan to improve the economic, social and environmental well-being of the city and is based upon 8 priority themes.

⁷⁰ Audit of Community Level Infrastructure 2003 – the Audit was commissioned by the Local Strategic Partnership to identify levels of community infrastructure in the 15 neighbourhood Renewal Areas. It identified the need for a dedicated community building in Queens Park/Craven Vale.

⁷¹ Parks and Green Spaces Strategy 2006 sets out the council's plans for improving city's parks.

⁷² The Infrastructure Capacity Study assesses the city's future needs for physical and community infrastructure to 2026.

- Youth facilities –improvements needed in Turner and Queens Park/Craven Vale areas;
- Community Safety – Edward Street is identified as a environment improvement zone;
- Community Building – Queens Park and Craven Vale is a priority area;
- Employment Opportunities – apprenticeship opportunities for local people to be secured via legal agreements attached to major new development
- Multi-practice GPs Surgery – Kemptown – a priority of the Primary Care Trust
- Biodiversity improvements

Table 1 on page 26 sets out how this policy will help to deliver against the local targets under the One Planet principles, a strategic approach to enabling the city to live within environmental limits. Expansion and provision of additional teaching and library space for the universities, particularly the University of Brighton, at Circus Street and within the wider development area will be supported as an alternative use where other policy requirements are met (see paragraph 4.40 of CP3 Employment Land).

3.61 The Strategic Flood Risk Assessment (SFRA) 2012 shows that some sites within the Development Area such as around Circus Street and the Stevenson Road area are at risk of surface water flooding. Development proposals within these areas will need to demonstrate that they have been sequentially planned and the buildings built within surface water flood risk considered. Southern Water has identified the need for water and wastewater infrastructure to serve new development and that new developments will need to connect to water and sewerage systems off site. This will be determined when development comes forward and where appropriate, developer contributions will be sought towards meeting these priorities.

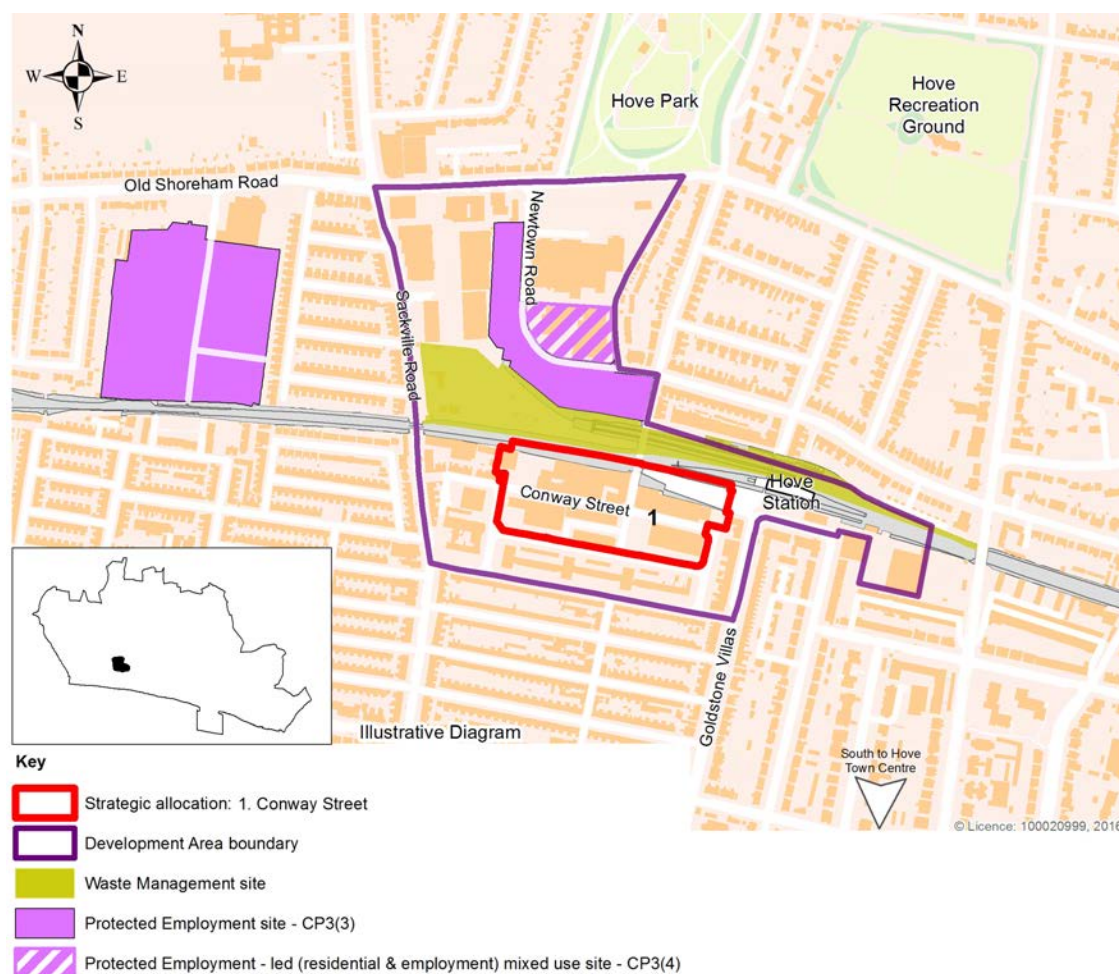
3.62 As part of the wider strategy for the sub-region, the Royal Sussex County Hospital has been identified as a centre for expansion of hospital healthcare provision in ‘teaching, trauma and tertiary’ sectors. As a result the Universities NHS Health Trust has planning permission to redevelop the site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

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

3.64 The Circus Street site provides the opportunity for an integrated modern mixed use development that will provide modern offices and workspace alongside student accommodation, a new University Library and a number of new residential units. As part of the scheme South East Dance will be provided with a studio. As part of the scheme some benefits will be provided to the wider area in terms of a better public realm and play spaces and training opportunities.

3.65 The final strategic allocation for the area, Freshfield Road Business Park and the Gala Bingo Hall and car park, has been identified as a development opportunity. The Freshfield Road Business Park element of the site is well occupied and only likely to come forward in the longer term (post 2024). The buildings within the Business Park are currently largely in storage and trade counter uses. Due to the accessible location of the site, which is on a sustainable transport corridor, and its topography (it is at a lower level than the surrounding area) it is considered there are major opportunities to use the site more effectively however it is recognised these units serve a useful function for the city. It is expected that the majority of residential development will be delivered on the Gala Bingo Hall and Car Park site, which can be delivered earlier in the plan period, with a leisure or community use retained or re-provided as part of the redevelopment.

DA6 Hove Station Area



Context

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

3.67 This development area is largely industrial in nature with residential on the periphery. It includes two Industrial Areas, a trading estate and retail park with a range of out-of centre bulky goods retail stores. It is near to Hove Town Centre, several residential areas, Hove Park and the seafront. There is a significant amount of employment floorspace within the area which should continue to be protected in order to help meet the employment needs of the city's increasing population. A number of sites have large areas of surface car parking and single-storey developments and have scope to be used more efficiently.

3.68 There is a poor public realm and poor quality streetscape in several areas due to a lack of defined street frontages particularly around the large retail sites. Within the area there is a lack of green infrastructure, including a shortage of all types of open space when compared to the city as a whole. Redevelopment of sites within the area could therefore help to increase the capacity of under-utilised sites and also to address townscape and public safety improvements. In particular the area includes part of the Portland Road and Clarendon Road Neighbourhood Renewal Area⁷³, which has been identified as a community safety hotspot. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

DA6 Hove Station Area

The strategy for the development area is to secure the long term regeneration opportunities around the Hove Station area and enable its development as an attractive and sustainable mixed-use area focussed on employment⁷⁴. The aim is to secure the creation of a high quality employment environment that will attract investment and new employment opportunities for the city and promote the efficient use of land through, predominantly employment and residential, mixed use developments.

A. The local priorities to achieve the strategy are:

- 1. The preparation of guidance to promote and coordinate employment focussed mixed-use regeneration of under-used land and buildings that offers flexible employment space and high quality design of an acceptable height, mass and scale that takes into account impacts on factors such as townscape, strategic views and infrastructure (see CP12 Urban Design);**
- 2. Ensure that development takes account of and improves the public realm and townscape particularly in the Conway Street area and the industrial/retail frontages along Sackville Road, Old Shoreham Road and Goldstone Lane;**
- 3. Ensure that development takes account of and contributes to the appropriate provision of public open space and essential community services and provides environmental, biodiversity, pedestrian and public safety improvements particularly around the Conway Street area.**

⁷³ A previous Government initiative aimed at bridging the gap between the most deprived neighbourhoods and the rest of England by tackling five key themes of: poor job prospects; high levels of crime; educational underachievement; poor health; and problems with housing and the physical environment.

⁷⁴ References to employment mean land and buildings that fall within B1, B2 or B8 Use Classes (eg office, research and development, industrial, storage or distribution).

- 4. Enhancing the sustainable transport interchange at Hove Station by improving the walking and cycling network in the wider area, improving permeability within the area, encouraging accessibility improvements over the railway at the station, strengthening north-south connections across the railway and beyond the area and east-west connections along Old Shoreham Road;**
- 5. Continuing to encourage more efficient use of under-used sites whilst retaining/replacing employment floorspace⁷⁵, protecting employment sites in accordance with CP3 Employment Land and undertaking measures to create employment opportunities for local communities;**
- 6. Maintaining and strengthening the creative industries business cluster in the area by seeking to ensure a range of appropriate workshops, office space, studios, storage and other premises remain affordable⁷⁶ and available for use by this business sector;**
- 7. Ensuring development connects to the water distribution and sewerage system off-site at the nearest point of adequate capacity. Development must address surface water flooding risks and incorporate appropriate surface water drainage measures (see CP11 Flood Risk);**
- 8. Protecting groundwater sources from pollution to the satisfaction of the Environment Agency;**
- 9. Creative use of development to integrate new green infrastructure including green space, accessible green roofs, green walls and other features which support Biosphere objectives;**
- 10. Development within this area will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and to either connect where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network.**

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

- 525 residential units;**

⁷⁵ Current employment floorspace within : Conway Street Industrial Area is detailed as 18,700m² (200,000 sq ft) in the Employment Land Study 2006; Newtown Road Industrial Area is detailed as 16,000 m² (171,000 sq ft) in the Employment Land Study 2006; Sackville Trading Estate is indicated to be 5,080m² B uses and 5,080m² restricted A1 retail within the planning report for BH2009/00761

⁷⁶ Creative Industries Workspace Study 2008. The study indicated that affordable rents in the creative industries are generally at the lower end of the market range and in Brighton & Hove are in the region of £7.50 a square foot. However it should be noted that this average figure is higher than those generally considered affordable by some creative businesses and organisations.

- **Within Conway Street Industrial Area - retention/replacement of 12,000sqm⁷⁷; employment floorspace**
- **Outside the Conway Street Industrial Area - retention/replacement of existing with an additional 1,000sqm⁷⁸ employment floorspace**

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

1. Conway Street Industrial Area

Comprehensive mixed use redevelopment to deliver more effective use of the under-used land and buildings, requiring the retention/replacement of 12,000sqm employment floorspace with a shift into high quality flexible office/business (B1) floorspace, the provision of 200 residential units and enhancements to the streetscape. This will be considered in the context of Development Plan policies and the following criteria:

- Proposals relating to individual buildings and/or sites within this area will need to demonstrate they will not prejudice the objectives of this allocation, seek to minimise the loss of employment floorspace and facilitate the delivery of the allocated employment floorspace and residential units;**
- All proposals, including changes in existing employment generating uses, will be expected to contribute to the provision of a range of office and flexible workspaces including larger floor plate offices and affordable business floorspace suitable for small business and the digital media/creative industries;**
- Measures to improve safe pedestrian and cyclist access through the site to Hove Station and across the railway will be expected;**
- Proposals within this area will be expected to pay particular attention to facilitating social inclusion, social integration and crime reduction measures;**
- The developer will enter into a training place agreement to secure training for local people.**

Supporting Text

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

⁷⁷ Current employment floorspace within Conway Street Industrial Area is detailed as 18,700m² (200,000 sq ft) in the Employment Land Study 2006. The policy therefore accepts a reduction from 18,700sqm to 12,000sqm employment floorspace where it shifts into employment uses with higher job densities.

⁷⁸ Due to the potential loss of employment space within the Conway Street Industrial Area a net gain in employment floorspace overall within DA6 area may not be achieved.

3.70 Growth that is based on utilising the sustainable transport connections, in particular Hove Railway Station, is a priority in order to facilitate development within the area. Part of the Hove Station Area lies within the 2013 declared Air Quality Management Area. Development proposals should pay particular regard to air quality, especially adjacent to the junction of Sackville Road and Old Shoreham Road. New development proposals should take into account impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/or mitigation will be sought wherever possible. Also several of the junctions in the area are at or near capacity so any additional traffic is likely to add to delays.

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

3.72 The area makes an important contribution to employment land provision in the city. Important uses in the area currently include creative industry businesses and workshops (Use Class B1), general industrial (B2) and warehousing (B8). Many of the units continue to be well-used, being relatively modern and still fit for their current purpose with few vacant units especially south of Newtown Road⁷⁹. It is therefore a priority to continue to protect and enhance the existing employment floorspace provision in the area in order to help maintain and strengthen the local economy. As part of future development proposals applicants should demonstrate that the needs of existing occupiers are being suitably addressed, for example, within the scheme or off-site and through phasing of development to allow for any relocation to avoid unwanted closure in business and to minimise local job losses. This policy also helps to secure replacement jobs in employment use for those lost via redevelopment of the other employment generating uses such as the retail warehouses and the sui generis uses (e.g. bus garage/depot). Over the lifespan of this plan employment floorspace loss within the Conway Street Industrial Area will be partially offset by mixed use employment with residential redevelopment in other parts of the Development Area. This will ensure a critical mass of employment space is created enhancing the attractiveness of the area to business and employment industries.

3.73 There is significant potential for the area in terms of higher density and higher value job opportunities which are needed within the city. The area therefore provides opportunities to deliver growth in relation to employment,

⁷⁹ Brighton & Hove Employment Land Study Review 2012

although these are likely to be in the latter part of the plan period. Mixed use redevelopment will facilitate regeneration and create a more vibrant area. This must not be at the expense of employment floorspace or, in respect of the Conway Street Industrial Area, net gains in jobs via a change from industrial and similar type uses to office/higher density employment uses. It is anticipated that the majority of the capacity would be for additional office uses (B1) but also for the intensification (more efficient and effective use) of existing warehouse and distribution uses (B8) particularly within the Newtown Road Industrial Area in accordance with CP3 Employment Land.

3.74 It is intended that the area will become increasingly important for accommodating creative industries during the plan period, particularly for businesses that either cannot afford to locate in the creative industry clusters in the city centre (see Policy SA2) or for those that cannot afford to remain in more central locations (see DA4). The Hove Station area offers the advantage of a slightly out-of centre location, an existing small cluster of creative industries, proximity to potential employees, and good sustainable transport links. Whilst overall high quality design is expected, it is accepted that in order for premises to be affordable to this sector respective units may need to be of a lower specification / functional in nature. The location and proportion of flexible employment space suitable for this business sector should therefore be considered at an early stage so that a cluster and critical mass is formed to aid attractiveness to this sector and to take account of potential impacts on streetscape.

3.75 The policy recognises high quality, new residential development could be accommodated on some sites through employment focussed mixed use development where it does not prejudice existing or future employment floorspace provision in the area. It relaxes the past protection for employment within the Conway Street and Newtown Road Industrial Areas. It does this by seeking an employment / residential mix within these Industrial Areas (excluding south of Newtown Road) in recognition that they have capacity to accommodate more development, are well located and the proposed shift into office use mixed with residential will help act as a catalyst for redevelopment. This policy approach is necessary to help address the city's needs in respect of employment and housing.

3.76 New development in the area must have regard to the community's need for school and public health provision. Proposals to appropriately accommodate such facilities will be supported. It is also recognised opportunities for sport and gym/health and fitness facilities may arise within the Conway Street Industrial Area from future residents, office workers and commuters and to meet on-site outdoor sports requirements generated by redevelopment in the area (see CP17 Sports Provision). Public realm and townscape improvements will be required and will help to attract high quality office development. There is currently poor public realm and streetscape within the development area due to a lack of defined street frontages on under-utilised sites and around the large retail sites which have large areas of surface car parking. Development will need to be carefully designed and managed to ensure residential and the other occupiers in the area have an

appropriate level of amenity, including improved access to green infrastructure.

3.77 Priorities for developer contributions in the area are therefore environmental enhancements, improvements in open space, sustainable transport and general public realm. Traffic calming measures and, in some areas, public safety improvements (as identified in the Portland Road and Clarendon Neighbourhood Action Plan⁸⁰) will also be required. If public health and school facilities are not delivered on site, contributions for the commensurate provision off-site will be necessary. Creating more active and accessible street frontages, a more attractive public realm and improved access to green infrastructure is interlinked with the priority to improve the environment for pedestrians. Redevelopment opportunities could therefore both help to increase the development capacity of under-utilised sites and also to address townscape, green infrastructure and public safety improvements. It will also be important for redevelopment opportunities to assist with the delivery of appropriate measures to improve wheelchair, pushchair and bicycle access over the railway at the station. Detailed design will be considered through preparation of guidance for the area.

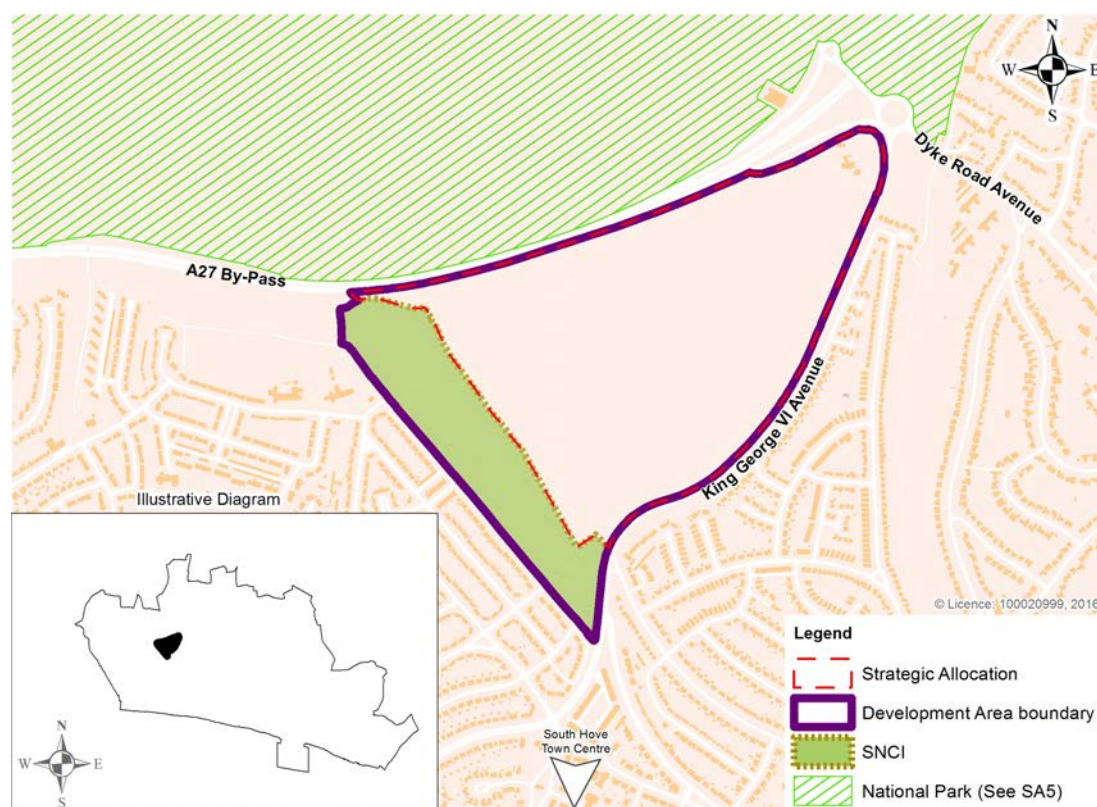
3.78 The out-of-centre bulky retail goods units at Goldstone Retail Park and Sackville Road Trading Estate do not represent a designated retail centre therefore any proposals for new retail floorspace would be considered against the impact tests set out in national guidance and local policy. This is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

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

3.80 The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around this area within a long list of priority areas. Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network.

⁸⁰ An action plan funded through the Neighbourhood Renewal scheme.

DA7 Toad's Hole Valley



Context

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

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

DA7 – Toad’s Hole Valley

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

A. The local priorities to achieve this strategy are:

- 1. That the site is used efficiently and effectively to assist in meeting the development and infrastructure requirements of the city.**
- 2. The development will aim to be an exemplary standard in terms of environmental, social and economic sustainability, achieving a One Planet approach and promoting the city’s UNESCO Biosphere objectives.**
- 3. Ensure that development respects the setting of the South Downs National Park and seeks to enhance links to the National Park for local residents and tourists.**
- 4. The development will provide the opportunity to benefit residents in terms of the mix of uses, an improved provision of community facilities, road safety improvements, training and job opportunities for local people and the provision of green infrastructure including public open space and natural green space.**
- 5. To improve sustainable transport links to the area.**
- 6. To incorporate appropriate landscaping and planting to maximise opportunities to increase biodiversity across the site.**
- 7. Conserve and enhance the designated Site of Nature Conservation Importance.**
- 8. Protect sensitive groundwater source protection zones from pollution and ensure no increase in surface water run-off and flood risk.**
- 9. Provide the necessary infrastructure for the development including water distribution and sewerage.**

B. The following key elements will be provided by 2030:

- A minimum of 700 residential units**
- B1 employment space – site area 3.5 – 4.5ha**
- Site reserved for a new secondary school – site area 5ha**
- Public open space with children’s play space and informal sports facilities – 2 ha**
- Provision of ancillary supporting uses – shops and cafes and multi-use community building**
- Food growing space – 0.5 ha**
- Green infrastructure integrated through the site to deliver Biosphere objectives and contribute to Biodiversity Action Plan targets**
-

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

1. Toad's Hole Valley east of the SNCI and south of the A27 embankment

Provision will be made for a high standard sustainable, mixed-use development across the site comprising a minimum of 700 residential units, B1 employment space, a new secondary school, a multi-use community facility and ancillary supporting uses.

The proposals will be assessed against the citywide policies and the following criteria:

- a) New development will be expected to make the best use of the site and residential densities should fall within a range of 50 - 75 dwellings per hectare.
- b) There will be a minimum of 50 per cent 3+ bedroom family sized dwellings provided as part of the residential scheme.
- c) The office element of the scheme will be high tech, modern office space that will provide a range of unit sizes to attract new businesses to the city and support growing business.
- d) Due regard will be given to the impact of development on the purposes and setting of the South Downs National Park⁸¹.
- e) Environmental sustainability will be central to the design and layout of the scheme which will be expected to meet the requirements of policy CP8.
- f) Development within this area will aim to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability and deliverability.
- g) The scheme will make provision for 5ha of land to accommodate a new secondary school to be developed by the city council or its nominee.
- h) Development will make contributions towards improved pedestrian and cycle links to the South Downs National Park.
- i) The provision of a new multi-use community facility to include a community meeting place, a doctor's surgery and a resource promoting links to the National Park.
- j) Development proposals will address the issues of highways safety on King George VI Avenue, noise and other traffic impacts from the A27 and provide improved links to adjacent residential areas.
- k) Improvements to public transport access and a good quality public realm that encourages healthy lifestyles (walking and cycling with connections to existing cycle infrastructure).
- l) Development will need to provide local infrastructure to the water and sewer system at the nearest point of adequate capacity.
- m) Provision of children's play facilities, public open space (2 ha.), contributions towards improved links to existing parks and food-growing space (0.5 ha.) and opportunities.

⁸¹ National Parks have two purposes under Section 62 of the Environment Act 1995:

- Conserve and enhance their natural beauty and cultural heritage; and
- promote public understanding and enjoyment of their special qualities.

- n) Developer contributions will be sought to secure the sustainable conservation and enhancement of the adjacent Site of Nature Conservation Importance.**
- o) The developer will enter into a training place agreement to secure training for local people.**
- p) The site will be the subject of detailed guidance provided in a future planning brief prepared in consultation with the landowners/developer and relevant stakeholders.**
- q) Work in partnership with the Highways Agency and developer to improve the operational performance of the trunk road network and links to local roads that will be set out in a future planning brief for the area.**

Supporting Text

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

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

3.85 In terms of design, care will be taken to ensure that future development will not adversely affect views to and from the South Downs National Park. A future planning brief for the area will provide guidance for the future development of the site.

High standards of sustainable development

3.86 Environmental sustainability will be central to the design and layout of development at Toad's Hole Valley which will be expected to meet the requirements set out in CP8 Sustainable Buildings. When it can be demonstrated that sustainable building standards cannot be met on site, mitigation measures will be sought in accordance with the national zero carbon policy unless exemptions apply and City Plan policy CP8 Sustainable Buildings and CP7 Infrastructure and Developer Contributions through Allowable Solutions or an agreed local offset mechanism. Development will

be expected to address the principles of a One Planet approach⁸² and incorporate measures to help mitigate or adapt to climate change, reduce greenhouse gas emissions, address fuel poverty and security and reduce the city's ecological footprint subject to viability and deliverability. Measures to help achieve the delivery of these objectives include:

- facilitating low ecological footprint lifestyles and practices, both on site and in the surrounding area;
- rationalising site layout, street and building orientation to maximise passive design;
- maximising the potential to generate energy renewably on the site;
- delivering a decentralised energy network;
- offering options to extend energy infrastructure to the surrounding built environment;
- surface water run-off being controlled to maintain Greenfield run-off rates; and
- tree-planting to help reduce the impact of urban heat island effect

3.87 The Brighton & Hove Energy Study has identified particular potential for networks for District Heating in and around this area as part of a long list of priority areas based upon straightforward installation opportunities and cost effectiveness. Development within the area will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability and deliverability.

Housing

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

3.89 The strategic allocation at Toad's Hole Valley will secure a significant amount of new housing provision of which a significant amount will be family-sized accommodation and affordable housing. Most of the city's urban sites are relatively small in terms of site area and more suited to flatted forms of development. The evidence base⁸³ indicates that over the course of the plan period, an estimated 53 per cent of overall housing need and demand is likely to be for larger (3 and 4 bedroom) properties and in terms of house types demand/need is likely to be greater for houses (68 per cent) than for flats (32 per cent)⁸⁴. In reality, the likelihood of delivering this mix of housing in the city is restricted by the types of sites likely to be brought forward for development. Planned development at Toad's Hole Valley allows for a better housing mix to

⁸² See table 1, page 26

⁸³ Implications of Demographic Change on Demand for Homes in Brighton & Hove, GL Hearn, March 2012.

⁸⁴ See Figure 11 and 12, Implications of Demographic Change on Demand for Homes in Brighton & Hove, March 2012.

be integrated within the overall development. For this reason the policy requires at least 50 per cent of the new housing to be family-sized. The specified density range should also enable the provision of a mix of housing types and sizes to achieve a choice in the range of housing at this location and ensure effective use of the site whilst recognising this is an area of lower densities compared to the other seven development areas.

Employment Floorspace

3.90 The allocation of 3.5 – 4.5 ha site area for employment use with the aim of accommodating 25,000 sq m B1 employment floorspace at Toad's Hole Valley that will support a key growth sector in the economy - the knowledge based economy. This will be done by providing the opportunity for high quality, sustainable and flexible business space offering move-on space for successful companies that need to expand and incubation space linked to the universities. The Employment Land Study Review 2012 indicated that in light of the identified needs for industrial floorspace over the plan period there was the potential for some of the B1a, B1b, employment floorspace to be substituted by B1c light industrial floorspace subject to appropriate masterplanning. Parking provided in connection with a future office use may be considered for informal weekend Park + Ride where the criteria set out in the supporting text of policy CP9 Sustainable Transport can be met. It is considered that the most appropriate location for the employment area is in close proximity to the trunk road network in terms of accessibility and amenity.

Secondary School and Infrastructure

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

3.92 Southern Water has identified the need for water and wastewater infrastructure to serve new development and new development will need to connect to water and sewerage systems off site. This will be determined when development comes forward and where appropriate, developer contributions will be sought towards meeting these priorities.

Phasing of Development

3.93 It is important that supporting, ancillary and community uses (including the school, ancillary shops and the multi-use community facility) are provided at the appropriate time so as not to place an unacceptable burden on existing facilities. Therefore careful consideration should be given to the phasing of development on the site. Additionally the new employment floorspace represents an important element of this mixed use scheme. The land should

be retained for employment purposes and development should be delivered to a phasing programme to be agreed. A minimum of a first phase of the employment land should be completed prior to completion of the housing element of the scheme to stimulate the market. This will ensure the site will contribute to the overall supply of office floorspace in the city (see CP3).

Transport

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

3.95 The site is bounded by King George VI Avenue which is a main route into Hove from the A27 Bypass. The redevelopment of Toad's Hole Valley represents an opportunity to improve safety on this steep and curving road. Redevelopment proposals should give consideration to slowing traffic, realigning the road, providing off-street parking in accordance with parking standards and improving the local environment. More details will be provided in the future planning brief.

3.96 The development is likely to have an effect on the operation of the Devils Dyke Junction with the A27. Work will be undertaken with the Highways Agency and developer, taking into account sustainable measures to reduce vehicular traffic, and mitigation measures will be identified to ensure the safe movement of traffic on the A27. Options will be developed as part of the future planning brief.

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

Public Open Space

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

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

Local Shops, Community facilities

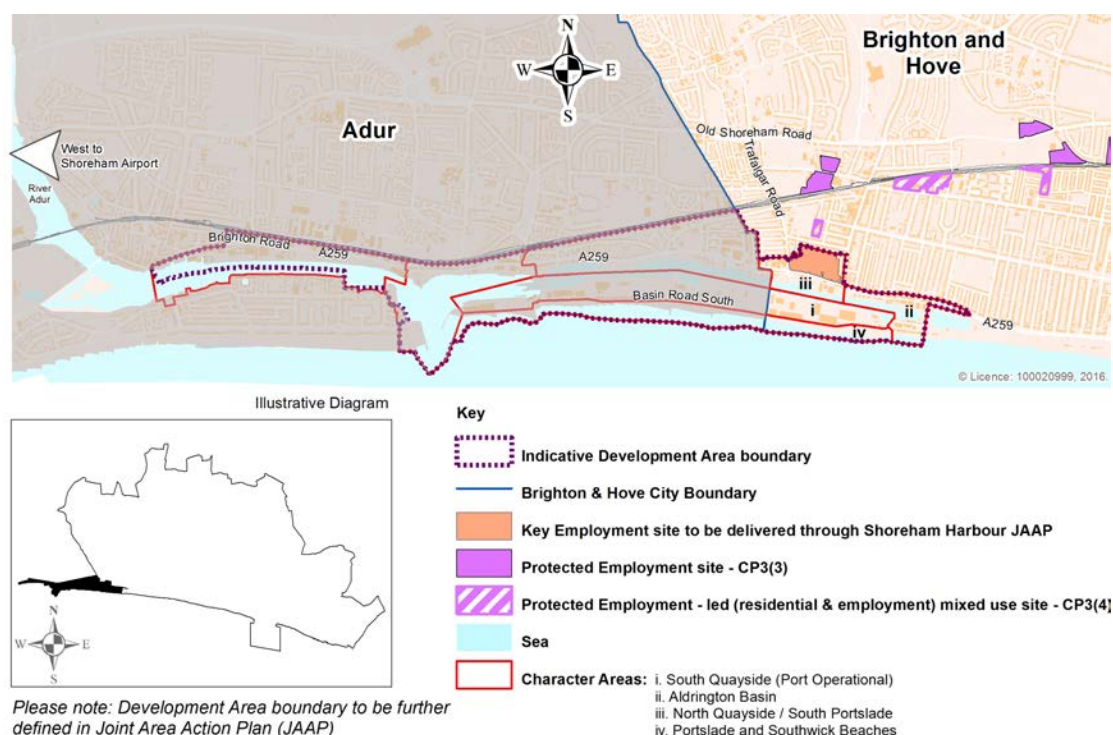
3.100 In addition to the land reserved for a new school, provision should be made for a multi-purpose community facility that may include a doctor's surgery, a community meeting place and National Park

Interpretation/education facility. Further facilities required as part of a balanced and sustainable community will be for local shops and services.

Site of Nature Conservation Importance (SNCI)

3.101 The western bank of Toad's Hole Valley is an identified SNCI and lies outside the strategic allocation for the area. As part of the proposed development measures will be expected to be undertaken to improve the quality and biodiversity of the SNCI and to improve walkways through the area and to the National Park.

DA8 – Shoreham Harbour



Context

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

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

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

- To maximise the potential of Shoreham Harbour for the benefit of existing and future residents, businesses, Port-users and visitors through a long term regeneration strategy.
- To deliver a series of appropriately located, high quality, sustainable, mixed-use developments including new housing, employment space, leisure opportunities, improved public realm and associated supporting infrastructure including flood defences and measures to encourage the use of sustainable transport.
- The consolidation and enhancement of the operations of Shoreham Port recognising the vital role it will continue to play in the local economy.
- Developments will be encouraged that are consistent with the Vision and Strategic Objectives for the area that will be set out in the Shoreham Harbour JAAP.
- This broad location policy identifies the areas within Shoreham Harbour that will be subject to changes of land use including new areas of housing and employment that will be further detailed in the JAAP.
- To maximise opportunities to support the City's sustainability objectives through large-scale zero and low-carbon energy technologies to serve the harbour and wider city, particularly those that take advantage of the harbour's coastal location. In particular the City Council will encourage any opportunities that arise to incorporate waste heat or other heat sources into the heat networks for the city.

DA8 – Shoreham Harbour

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

A. Development Capacity

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

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

7500 sq m net additional employment floorspace

B. The local priorities to achieve the strategy

The priorities for the Character Areas that fall within the Brighton & Hove part of the harbour are as follows.⁸⁵

i) South Quayside:

Area Priorities:

- a) To support Shoreham Port Authority in improving operational efficiencies, developing new trade and exploring opportunities for sustainable energy generation, in line with the adopted Port Masterplan.**
- b) To accommodate the relocation of existing port operators from elsewhere within the Port.**
- c) To identify and where appropriate, accommodate the future capacity requirements of the existing Waste Water Treatment Plant.**
- d) To improve Wharf Road and Basin Road South as a popular recreational route for walking and cycling providing access to the beaches.**
- e) With the exception of the existing Power Station, and the Waste Water Treatment Plant, uses not requiring a port location will not be permitted in this area.**

ii) Aldrington Basin:

Area Priorities:

- a) To designate Aldrington Basin as a Strategic Employment/Mixed-Use Area to accommodate a vibrant mix of new and improved port operational facilities as well as compatible non-port employment uses, including A and B use classes.**
- b) To maximise intensification and redevelopment opportunities of existing lower grade, vacant and under-used spaces.**
- c) To accommodate appropriately located mixed-use residential development.**

⁸⁵ An area vision and development proposals will be defined for each of the 7 character areas covering the Harbour within the Joint Area Action Plan. Note that Character Areas 1, and 4 fall across the boundary with Adur District Council while areas 5, 6, 7 fall entirely within Adur District.

- d) To secure improvements to legibility, permeability and connectivity through high quality building design, townscape and public realm, whilst respecting and enhancing the character and environment of surrounding areas.**
- e) To ensure that all development takes in to account the findings and recommendations of the current Flood Risk Assessments.**
- f) To ensure that new development proposals take into account impact on local air quality and noise and that improvements and/or mitigation are sought wherever possible⁸⁶**

iii) North Quayside / South Portslade

Area Priorities:

- a) To develop North Quayside as a new and improved Port operational area accommodating new and relocated port uses with limited land reclamation and a new access road (within the Port boundary) in line with the Port Masterplan.**
- b) To designate the South Portslade Industrial Area as a Strategic Employment/Mixed-use Area, including some appropriately located residential development.**
- c) To secure improvements to legibility, permeability and connectivity through high quality building design, townscape and public realm, whilst respecting and enhancing the character and environment of surrounding areas.**
- d) To improve connections and townscape around key linkages including the Boundary Road/Station Road (B2194) district retailing centre, Church Road (A293) and along the A259.**
- e) To ensure that all development takes into account the findings and recommendations of the current Flood Risk Assessment.**
- f) To ensure that new development proposals take into account impact on local air quality and noise and that improvements and/or mitigation are sought wherever possible.**

⁸⁶ Part of this character area lies within the 2013 Air Quality Management Area.

iv) Portslade and Southwick Beaches

Area Priorities:

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

Supporting Text

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

3.106 The aspirations for the Shoreham Harbour area were subsequently identified in the Regional Spatial Strategy (RSS) for the South East (May 2009). The South East Plan⁸⁷ indicated that the Sussex Coast was a priority area for regeneration and specifically identified Shoreham Harbour as a Growth Point. An interim figure of 10,000 dwellings was identified subject to detailed studies.

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

3.108 In October 2010 the Shoreham Port Authority adopted a Port Masterplan setting out the Port’s plans for future growth. The Masterplan has been subject to public consultation and was endorsed by the three local authorities. The activities of the Port represent a key economic advantage for the area, with direct and indirect economic benefits arising from its planned development. The delivery of the Port Masterplan is vital to the success of the wider regeneration of the area as the latter relies on the consolidation of port uses into the eastern part of the port. The local authorities will continue to

⁸⁷ The Regional Strategy for the South East (Part Revocation) Order 2013 came into force on 25 March 2013. Therefore, the South East Plan no longer forms part of the Development Plan for the Plan area.

work closely with the Port and with businesses based at the Port to ensure their future needs and aspirations are addressed through the JAAP process.

3.109 The successful delivery of the JAAP proposals will be dependent upon the ability of the local authorities to work closely with the existing site owners and business throughout the Harbour area. As well as addressing the needs of existing businesses, a central aim of the JAAP is to facilitate the reconfiguration of underused and vacant industrial and employment sites to provide new employment generating uses such as office space, restaurants, cafes, leisure, entertainment and tourism related uses.

3.110 The Port is important regionally for the landing, processing and handling of minerals and as such mineral wharf facilities are safeguarded under "Policy WMP15 - Safeguarding railheads and wharves" of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (adopted February 2013). As a result development proposals affecting minerals wharves are required to demonstrate that there is no net loss of capacity for handling minerals within the Port. A similar policy may be included within the emerging West Sussex Minerals Local Plan. The two mineral planning authorities (Brighton & Hove and West Sussex) are currently preparing guidance in liaison with the Port Authority to set out clearly what the implications of the policy are and what is required of applicants as part of the planning process. The mechanism for safeguarding minerals handling capacity within the Port is to be considered in detail in the JAAP.

3.111 The Shoreham Harbour Regeneration Partnership (comprising Adur District Council, Brighton & Hove City Council and West Sussex County Council) are in the process of preparing an Investment Strategy which will provide a work programme for delivering regeneration and will underpin the emerging JAAP. The infrastructure requirements for the Harbour area will be set out in the Infrastructure Delivery Plans (IDP) that underpins the City Plan and the Adur Local Plan.

3.112 The Partnership will work closely with Southern Water to ensure that the Waste Water Treatment infrastructure is fit for purpose. An assessment of the capacity of the existing Waste Water Treatment works (located in Adur District) at Shoreham Harbour has been undertaken concluding that the existing plant has sufficient capacity to accommodate the levels of development being proposed through the City Plan, Adur Local Plan and the Shoreham Harbour JAAP. However, proposed changes to environmental regulation requirements may have implications for future land take and an alternative site may need to be identified. The possible need for site expansion in the vicinity of Shoreham Harbour will be explored through the emerging JAAP in close liaison with Southern Water and Shoreham Port Authority.

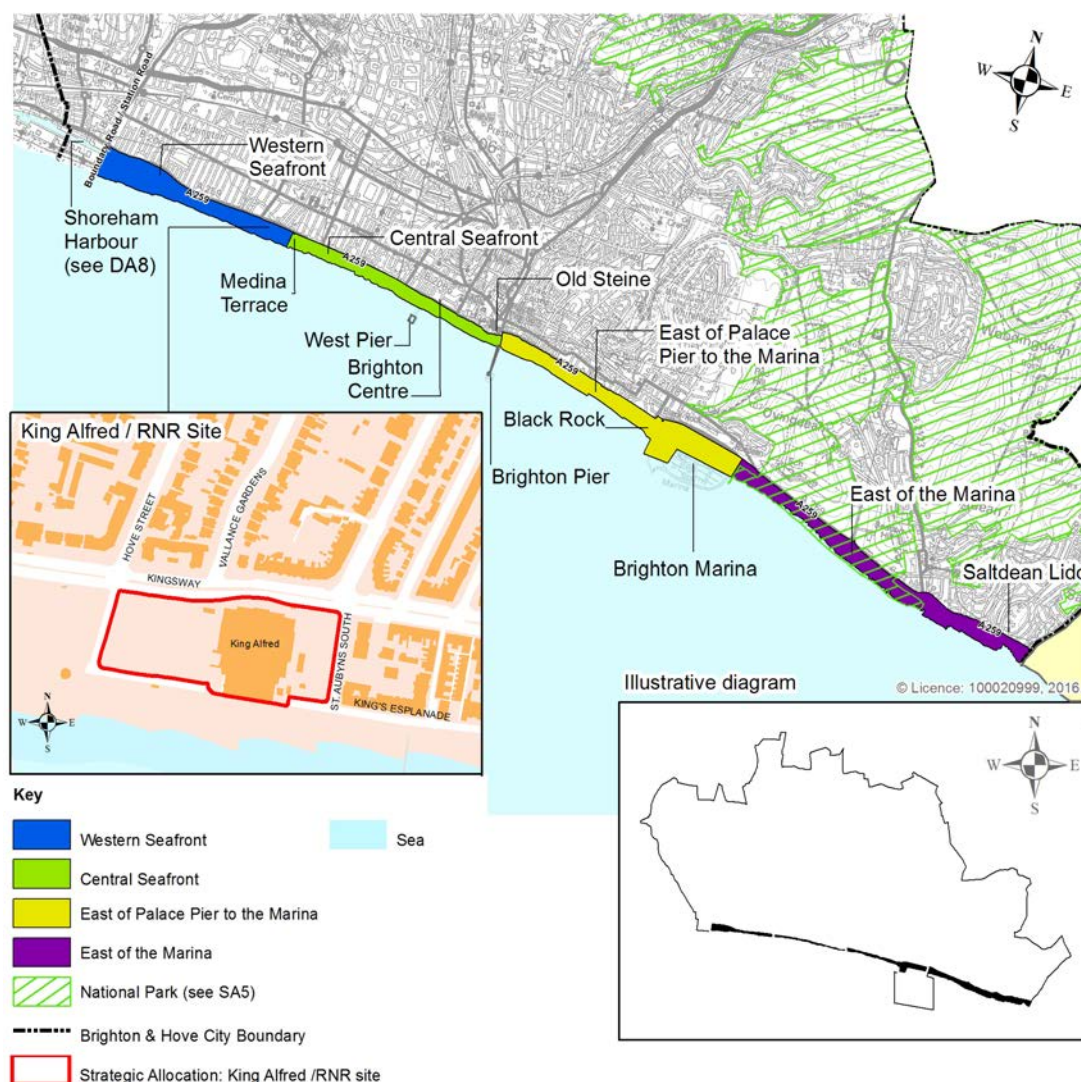
3.113 The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around Shoreham Harbour within a long list of priority areas. Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in

particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network. The potential will be further investigated during the preparation of the JAAP.

3.114 Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

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

SA1 - The Seafront



Context

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

3.117 In addition to recognising the significance of the coastline for leisure and recreational purposes, the importance of conserving coastal habitats and improving the marine environment, including sea water quality and coastal zone management, is also strongly recognised. Maximising the nature conservation potential of the seafront is an important part of the Biosphere Reserve initiative. The space along the seafront, the sea, the beach and the buildings behind the main road all offer important opportunities for further improvement and enhancement. Table 1 on page 26 sets out how this policy

will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

SA1 - The Seafront

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

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

A: Priorities for the whole seafront are to:

- **Enhance and improve the public realm and create a seafront for all; to ensure the seafront has adequate facilities for residents and visitors (including public toilets, waste disposal facilities, seating, signage, lighting and opportunities for shelter and shade) and continue to improve access to the beach and shoreline and ensure the seafront is accessible to everyone;**
- **Promote high quality architecture, urban design and public art which complements the natural heritage of the seafront and preserves and enhances the character and appearance of the Conservation Areas, and the historic squares and lawns that adjoin the seafront⁸⁸;**
- **Secure improvements to sustainable transport infrastructure along the A259, including a rapid/ express bus-based services (see CP9) and improve air and noise quality, pedestrian and cycle routes and crossing opportunities in order to achieve a modal shift and thereby reduce the impact of traffic;**
- **Monitor, conserve and expand designated coastal habitats and secure nature conservation enhancements to the marine and coastal environment;**
- **Work in partnership with Defra, the Environment Agency, Natural England and Southern Water to continue to maintain coastal defences and to ensure appropriate waste water treatment infrastructure.**

⁸⁸ Kemp Town; East Cliff; Valley Gardens; Old Town; Regency Square; Brunswick Town; The Avenues; Cliftonville; Old Hove; Pembroke & Princes and Sackville Gardens.

- Development will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and to either connect where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network

B: Priorities for specific parts of the seafront are:

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

- To enhance and improve the public realm and create a more coherent townscape, that respects its adjoining context, through greater consistency of scale, height and roofline along the north side of Kingsway.
- Opportunities for tree planting and coastal habitat creation north and west of the Lagoon should be explored to soften the appearance of the A259, improve microclimate⁸⁹ and provide shade and enhance biodiversity.
- The National Cycle Route 2 is of strategic importance and the council will review and seek to improve areas of the route that are below national standards.

Central Seafront (Medina Terrace to Palace Pier)

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

East of Palace Pier to the Marina

⁸⁹ Local climatic conditions.

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

East of the Marina

- Safeguard the important community and recreation facility at Saltdean Lido.
- The council will monitor the cliffs behind and to the east of the Marina and take appropriate measures to safeguard coastal communities, important infrastructure (A259 & trunk services) and coastal access in the longer term;
- Ensure the nationally important nature conservation and geological interest of the cliff top, cliff and foreshore is conserved and promoted;
- Adopt a risk-based approach to all new cliff top development and examine proposals rigorously in respect of cliff stability, nature conservation and impact on coastline views and Rottingdean Conservation Area; and
- Recognise that part of this area falls within the South Downs National Park and ensure there are no adverse impacts on the setting of the South Downs National Park.

C: Strategic allocation for the Western Seafront:

1. King Alfred/RNR site

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

Provision of a minimum 400 residential units.

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

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

- a) The development will be required to achieve a high quality of design and sustainability which preserves and where possible enhances the setting of the three adjacent Conservation Areas, adjacent Listed Buildings, the character of the seafront and strategic views;
 - b) Provide active ground floor uses and high quality, integrated and attractive landscaping and public realm which promotes biodiversity in accordance with Biosphere objectives and improves connectivity between Kingsway and the seafront;
 - c) Provide appropriate flood protection and mitigation measures in accordance with CP11;
 - d) Provide for sustainable means of transport to and from the site and demonstrate good linkages for pedestrians and cyclists;
 - e) The development must connect to the sewerage system off-site at the nearest point of adequate capacity;
 - f) The developer will enter into a training place agreement to secure training for local people,
- Development should accord with the council's sports and development briefs for this site and any subsequent amendments⁹⁰.

Supporting text

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

3.119 Since the early 1990s the central seafront area has been transformed through a mix of public and private investment much of which has been coordinated through the Brighton Seafront Development Initiative⁹¹. Through the emerging Seafront Strategy⁹², the council will continue to work towards achieving a seafront for all, and supports an integrated process of improvement and regeneration along the coastal strip. Regeneration will be

⁹⁰ King Alfred/RNR Planning Brief SPG (2002).

⁹¹ Brighton Strategic Seafront Development Initiative, 1992.

⁹² Seafront Strategy is planned to be adopted in 2015.

designed to protect and enhance biodiversity and the natural environment, to achieve quality in the planning and urban design of the built environment, to preserve its setting and heritage and to develop the recreational potential of the area for both active and passive pursuits. The identification of new sports and recreation facilities for people to be physically active on the seafront will help improve health and well-being.

3.120 Private development schemes have come forward for the i360 Observation Tower in the West Pier area and development of the Yellowwave beach sports facility (now open). A number of other major regeneration opportunities have been identified along the length of the seafront⁹³:

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

3.121 The council will continue to work towards a deliverable scheme for the redevelopment of the King Alfred/ RNR site⁹⁴ to deliver sport facilities which provide for the local Hove communities and to contribute to the wide mix of sports provision for the city. The council recognises that to secure the regeneration of the site to deliver new indoor public wet and dry sports facilities an appropriate mix of uses (of which housing is likely to be the predominant part) will be required. The overall development of the site needs to be of high quality which is sustainable and which positively enhances the seafront and surrounding area.

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

3.123 The need to enhance and improve the public realm along the length of the seafront is recognised. New opportunities should encourage people to extend the amount of time they spend at the seafront as well as exploring opportunities to provide shade and shelter⁹⁵. The popular cycle route which

⁹³ Brighton Centre SPD (2005); Brighton Marina SPG (2003) and PAN (2008)

⁹⁴ Planning permission was granted in 2007 for the redevelopment of the King Alfred/ RNR site. In November 2008, the council's agreement with the Developer for the Frank Gehry designed project on Hove seafront expired. The Agreement which was to have delivered a new sports centre, 751 flats and a new public realm is no longer to be delivered due to withdrawal of funding from the principal funders for the project.

⁹⁵ Opportunities should relate to the Parks and Green Spaces Strategy; the Public Space and Public Life Study and the Tourism Study.

runs along the seafront forms part of the 'National Cycle Network' and opportunities for its further improvement will also be encouraged and supported, in particular along the Western Seafront. Opportunities will also be sought to standardise road capacity along the length of the A259 and to reduce its severance effect with the seafront and improvements to sustainable transport infrastructure along the A259 will be secured supporting improvement to noise⁹⁶ and air quality. The Air Quality Further Review and Assessment (2010) and the Air Quality Action Plan (2011) identified certain junctions on the A259 as exceeding the annual nitrogen dioxide air quality objectives. Much of the A259 corridor is included within the 2013 Air Quality Management Area.

3.124 The importance of conserving coastal habitats and improving the marine environment including sea water quality and coastal zone management is also recognised. The beach, the shoreline and the marine environment are important natural assets providing valuable habitats that must be protected and enhanced for their biodiversity and geological value and because they have great potential to enhance the seafront experience for visitors, in accordance with Biosphere objectives. A stretch of the seafront east of the Marina falls within the South Downs National Park and will be covered by the Local Plan to be produced by the South Downs National Park Authority (See SA5). Almost half of the coastline of Brighton and Hove is of national nature conservation importance and there are also four sites of city-wide nature conservation importance between Brighton Marina and Shoreham. These smaller sites provide a reservoir from which to enhance and expand urban natural habitat as part of regeneration schemes throughout the Seafront. For this reason, there is a presumption against proposals involving an increase in hard surfacing of the seafront at or in the vicinity of the sites of city-wide nature conservation importance (refer to policy CP10 and DA2). The Marine Management Organisation will be preparing a marine plan for the south coast of England which will inform and guide marine users and regulators and seek to manage the sustainable development of marine industries such as wind farms, shipping, marine aggregates and fishing alongside the need to conserve and protect marine species, habitats and leisure uses. Where appropriate, regard will be had to the marine plan in Part 2 of the City Plan.

3.125 The coastal frontage of the city is considered to be at risk from tidal flooding⁹⁷. CP11 sets out the approach to managing flood risk. The defence of Brighton & Hove's coastline over the next 50 years is addressed by strategies prepared in partnership with the Environment Agency and adjacent authorities. The reconstruction of the defences between Ovingdean and the Marina, under the 'Brighton Marina to Ovingdean Coast Protection Scheme' is now complete. The 'Brighton Marina to River Adur Strategy' recommends the maintenance of existing coastal defences with some enlargement of groynes

⁹⁶ The Noise Action Plan for the Brighton Agglomeration was produced by Defra in 2010. This identifies priority areas for action. The Defra mapping predicts that households most affected by traffic noise are those closest to major roads: London Road, Lewes Road & the seafront

⁹⁷ Strategic Flood Risk Assessment – 2008, updated in 2011

and beaches in the King Alfred area and a scheme to upgrade defences between the western end of Hove Lagoon and the River Adur through Shoreham Port. The Strategy is being revised following advice and funding from Defra. In Brighton & Hove the long term management of coastal flood risk and erosion is set out within the Beachy Head to Selsey Bill Shoreline Management Plan (SMP).⁹⁸ The Shoreline Management Plan for the coastline west of the marina proposes to continue to 'hold the line' in terms of coastal defence.

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

3.127 The National Planning Policy Framework requires risk to be reduced from coastal change by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast. Should a coastal change management area⁹⁹ need to be identified for the stretch of the coastline east of the marina, this will be addressed in future development plan documents.

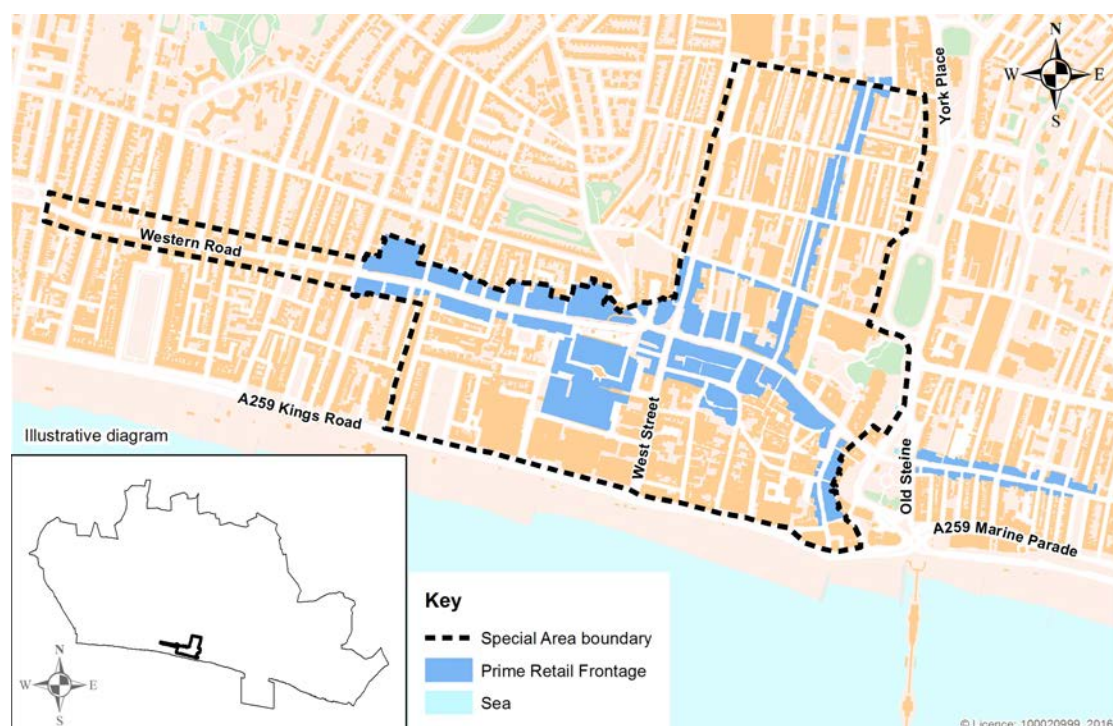
3.128 Southern Water has constructed a storm water storage tunnel along Brighton Seafront as a buffer to control outflows from the combined sewerage system. Storm water from this tunnel will eventually connect to a new wastewater treatment works at Peacehaven. The policy supports the provision of further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

3.129 There are opportunities to consider small scale renewable energy provision such as solar and wind energy technologies along the seafront. The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around the seafront within a long list of priority areas. Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network.

⁹⁸ The Seafront boundary has been informed by the Shoreline Management Plan.

⁹⁹ An area identified in Local Plans as likely to be affected by coastal change (physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion).

SA2 Central Brighton



Context

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

SA2 Central Brighton

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

1. The Council will strengthen the distinctiveness and legibility of the 'cultural quarter'¹⁰⁰ and ensure its long term success and viability

¹⁰⁰ 'Cultural Quarter': - the area centred on Church Street, Jubilee Square, the Royal Pavilion Estate and the Theatres

through ongoing improvements to the attractiveness of the physical environment and public realm; ensuring that historic buildings are maintained and enhanced and by requiring new development to support and maintain the vibrant mix of cultural activities, business, retail, leisure and tourism uses.

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

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

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

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

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

Partial loss of office floorspace will be permitted where the change of use enables the refurbishment and upgrade of the remaining office floorspace.

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

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

including residential.¹⁰¹ Where other key policy issues are addressed, the Council will welcome proposals to create flats over shops and commercial premises.

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

7. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible. The council will work with public transport providers, freight transport operators and secure road junction and urban realm improvements to reduce congestion and emissions, to improve air quality and encourage improved pedestrian and cycling movements within the city centre (See CP13).

8. Development within this area will be expected to incorporate infrastructure to support low and zero carbon decentralised energy in particular heat networks subject to viability.

Supporting Text

3.131 Within central Brighton, there is a concentration of nationally and internationally significant cultural businesses and buildings including the Royal Pavilion, the Brighton Museum and Art Gallery, the Brighton Dome, the Theatre Royal, the new Jubilee Library and the Komedia. At the heart of the area is the iconic and internationally famous Royal Pavilion without which little of the cultural and historic development of the city centre would have occurred. The wider area is described as the city's cultural quarter. Cultural and creative industries and the retail, tourism and hospitality sectors continue to innovate, strengthen and grow within this area and it is important to ensure that the cultural role of the area is promoted and supported¹⁰². Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

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

¹⁰¹ The National Planning Policy Framework March 2012 defines main town centres uses to include culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

¹⁰² Creative Industries Workspace Study 2008

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

3.134 The different but interconnecting shopping areas within the Regional Centre are identified and described in the Retail Study Update 2011¹⁰³ and there is active support for the protection of existing and provision of new small unit retail space, largely catering for local independent traders, located within The Lanes and North Laine. The balance and mix of uses in these areas will be carefully monitored and maintained (see CP4).

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

3.136 The City's prime office market is principally focussed within Central Brighton, located on the east and southern side of Brighton Station, within the New England Quarter and interspersed within the city centre. Much of the existing office stock is within older purpose built buildings or converted period buildings and offices above shops. Opportunities for significant new office floorspace within Central Brighton are limited and therefore DA3, DA4, DA5 and DA6 indicate the opportunities for new office floorspace on the edge or outside Central Brighton. Nevertheless over the timeframe of the City Plan, Central Brighton will continue to remain a location where high quality offices will be demanded for a variety of occupiers such as media, creative, financial, business and professional services and information communication industries. A good supply of high quality, modern and sustainable office accommodation is required to meet the needs of the city's commercial occupiers. Policy SA2 therefore safeguards office accommodation within Central Brighton and encourages improvements in quality to meet future business needs. Examples such as 1 Gloucester Place, Brighton demonstrate the trend of owners to refurbish and upgrade existing office accommodation to Grade A status with a BREEAM rating of Very Good to secure occupation and improved rental levels. Given the current economic climate which mitigates against speculative office development, the willingness of property owners to invest in their existing properties to bring them up to modern standards is supported by the council.

3.137 In considering proposals for the loss of office floorspace, the Council will require clear demonstration that the site is no longer suitable for office

¹⁰³ Retail Study Update 2011.

use. The type and scale of marketing should be commensurate with the scale of the office floorspace proposed to be lost. Therefore the council will require evidence that a marketing exercise has been carried out for at least 18 months for purpose built, large scale Grade 'A' accommodation and at least 12 months for other sites. Evidence is required that the marketing price is realistic and that the marketing has been appropriate and genuine. A record of all the required marketing will need to be presented with the application proposal. In all cases the marketing process requires as a minimum:

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

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

3.139 As well as new retail opportunities, mixed use developments within the North Laine area and the Air Street/ North Street Quadrant have included important employment floorspace from new high quality office accommodation to new creative industries workspace. The Creative Industries Workspace Study 2008 identified the attractiveness of central Brighton to creative businesses including evidence of a vibrant cluster in the North Laine and Old Steine area. However creative industries clusters are vulnerable to redevelopment pressure and the importance of their role requires reinforcement and protection. New development should strengthen the mix of uses in central Brighton and retain active ground floor uses. The valuable contribution of small premises and workshops in supporting creative arts, IT and media related businesses within the North Laine area will be safeguarded, as they support small scale industry and encourage new enterprises to set up and add vitality to the cultural quarter¹⁰⁴. The council will work with providers to ensure the provision of appropriate information and

¹⁰⁴ Creative Industries Workspace Study 2008.

communication technology (ICT) infrastructure; in particular ultra-fast broadband infrastructure within this area to support the creative industries and digital media sector (CP2 Sustainable Economic Development).

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

3.141 Central Brighton and particularly the West Street area has been identified as a violent crime hotspot¹⁰⁵. Through effective coordination of relevant strategies and policy areas (e.g. licensing, policing and public safety) and working with the police, health agencies and other partners, the council will seek to improve safety by encouraging a more balanced range of complementary evening and night-time economy uses which appeal to a wide range of age and social groups and managing existing late night uses within identified parts of central Brighton. Local work to reduce violent crime is coordinated through the Local Public Service Agreement/Violent Crime Action Plan. In addition, a 'Cumulative Impact Zone' and a 'Special Stress Area' have been adopted by the Council's Licensing Committee. These grant greater powers to control the number and operation of licensed premises in the city centre.

3.142 Central Brighton is designated within an Air Quality Management Area with North Street, Queen's Road and Western Road exceeding the annual nitrogen dioxide air quality objectives¹⁰⁶. New development proposals within the AQMA should take account of their impact on local air quality, be consistent with the council Air Quality Action Plan and minimise increased exposure to existing poor quality. Where appropriate improvements and/or mitigation measures will be sought. The council's Air Quality Action Plan sets out the priorities to improve local air quality and the Local Transport Plan and subsequent updates will address junction improvements and traffic management in the area. The council is investigating the development of a Low Emission Zone in the central city area. Supporting this, there will be a continuing programme of urban realm improvements¹⁰⁷ which will be informed, undertaken and developed as part of a consistent vision based on the findings of the Public Space, Public Life Study (2007).

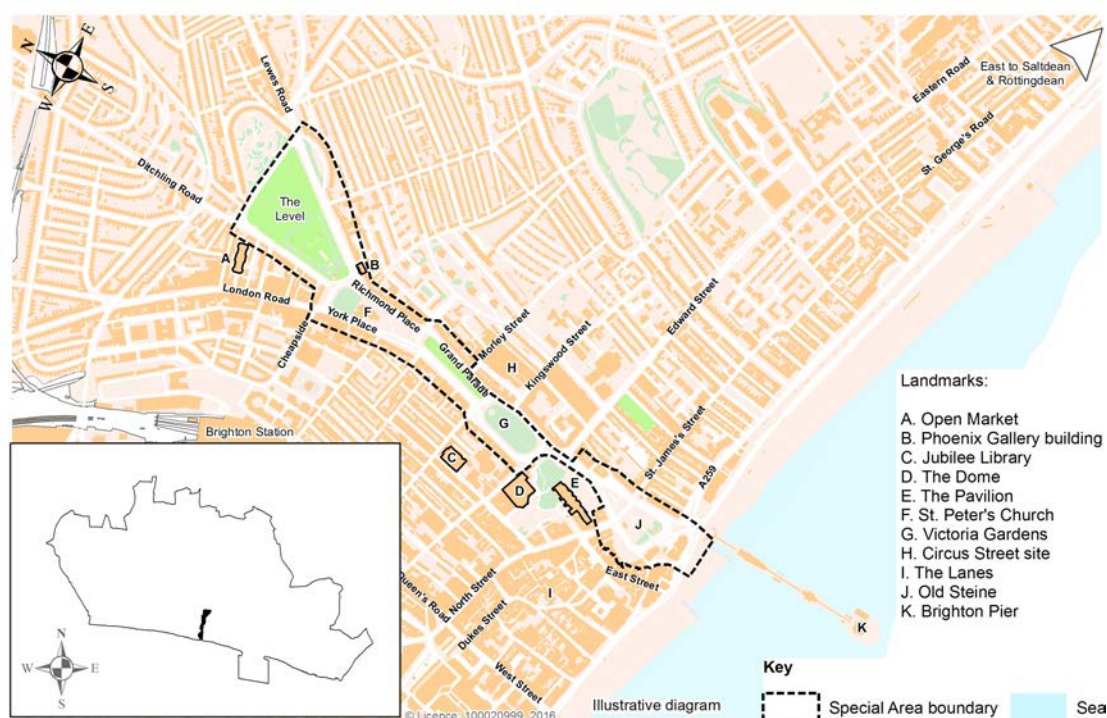
3.143 The Brighton & Hove Energy Study has identified viability for District Heating networks in and around this area within a short list of priority areas. Development within the short list of priority areas will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability.

¹⁰⁵ Community Safety, Crime Reduction and Drugs Strategy 2011-2014

¹⁰⁶ Air Quality Management Area 2013

¹⁰⁷ Local Transport Plan 3 (LTP3 2011-2014)

SA3 Valley Gardens



Context

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

SA3 Valley Gardens

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

The seven overall aims are:

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

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

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

Old Steine - the hub

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

Victoria Gardens - the cultural park

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

St Peter's - the historic landmark

- Enhance the setting of St Peter's Church through public realm improvements.
- Support proposals for refurbishment/enhancement of the facilities and appearance of the Phoenix Gallery building, possibly through a mixed use redevelopment.

- Enhance the retail environment through alterations to, or redevelopment of, the supermarket building on the corner of Cheapside and through shop front improvements to York Place.

The Level - the vibrant recreation and leisure space

- Improve the legibility and safety of key pedestrian and cycle links to London Road and the Open Market.
- Enhance the public realm to the south of The Level.

Development within the Valley Gardens area will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and to either connect where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network.

Supporting Text

3.145 The purpose of this policy is to ensure that the strategic potential of the Valley Gardens as public open space is fully realised and that future proposals for the regeneration of this historic area are considered within the context of an overall spatial framework. Two council studies, the Public Space Public Life Study and the LR2 Study¹⁰⁸, argue that Valley Gardens could become the grand civic route into the city and propose the creation of an attractive and inviting 'green lung', with each green space embodying a unique character and offering a different experience. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

3.146 The public open spaces of Valley Gardens have the potential to be linked together to create a single continuous public park, which would form a key connecting section of the 'green network' in the city. Accessibility to the open space will need to be improved, whilst new planted tree screening and water features, for example, can help towards improving local air quality and biodiversity as well as reducing the impact of traffic noise. Enhancing biodiversity should include provision for wildlife movement to and from other green space in the valley, including private gardens. New landscaping and planting must also reinforce existing local character and may include productive planting that contributes towards improving urban food productivity where appropriate. The Level was restored and landscaped in line with the master plan for the comprehensive improvement of the park and was re-opened in 2013.

3.147 Reducing the severance impact of vehicular traffic will involve redressing the balance between road space and other land uses. This may

¹⁰⁸ Public Space, Public Life Study, 2007 and London Road and Lewes Road Regeneration Strategy, 2007.

include rerouting traffic and would need to be accompanied by improvements to provision for sustainable transport. Valley Gardens has bus lanes serving key city routes and cycles lanes that, with enhancement, would form a direct link from the seafront to the north of the city. Any such scheme will be subject to detailed traffic modelling and will need to include improvements to the functionality and appearance of the Aquarium Roundabout, to improve the pedestrian and cycle links between the Old Steine and the seafront.

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

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

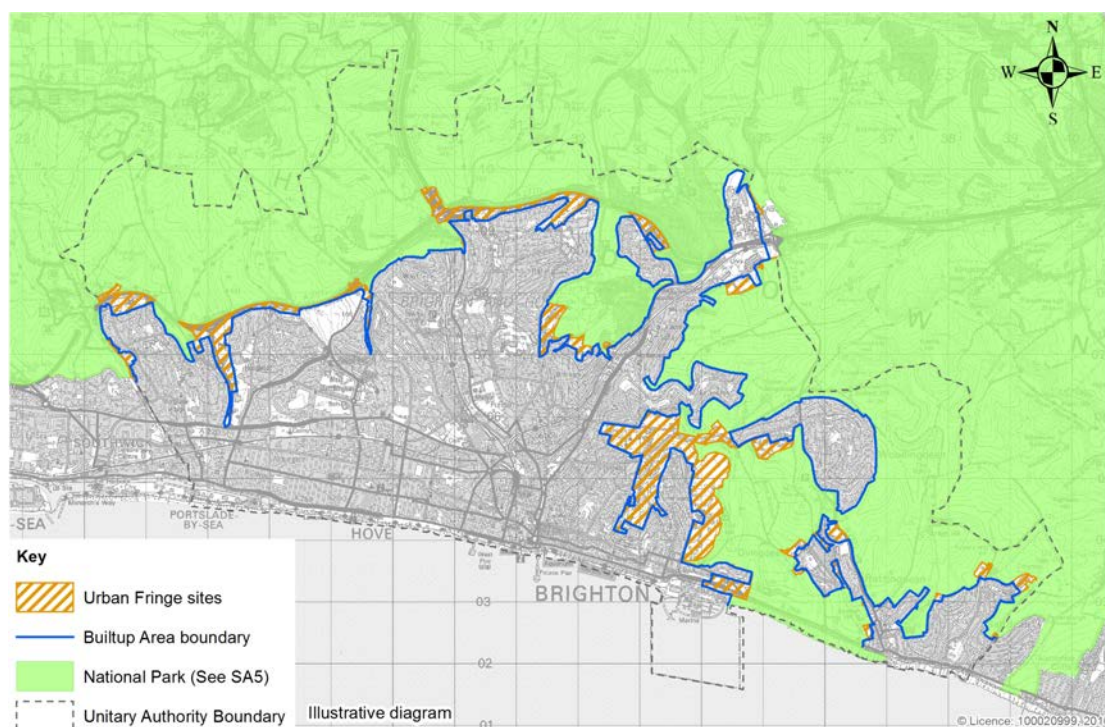
3.150 Parts of Valley Gardens, notably The Level and around St Peter's Church have a poor reputation in terms of crime and anti-social behaviour and these problems must be actively addressed in all proposals for new uses and the layout of buildings and public spaces.

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

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

3.153 The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around this area within a long list of priority areas. Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network.

SA4 – Urban Fringe



Context

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

3.155 In many instances the South Downs National Park boundary is contiguous with the built up urban edge of the city. The urban fringe is therefore now made up of 'pockets' of residual green space rather than any homogenous green 'belt' around the city. Much of the city's urban fringe meets the NPPF definition of existing open space and represents a significant proportion of the city's open space resource. The urban fringe is also important in terms of biodiversity and designations include the South Downs Way Ahead Nature Improvement Area, Local Nature Reserves (LNRs) and Sites of Nature Conservation Interest¹⁰⁹.

3.156 Within the urban fringe, there will be some opportunities for development to help citywide needs. The appropriate nature and form of any such development will need to reflect the need to retain the setting of the city in its downland landscape.

¹⁰⁹ SNCI's have been reviewed and will be renamed Local Wildlife Sites in Part 2 of the City Plan.

SA4 Urban Fringe

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

- 1. The protection and enhancement of the wider landscape role of land within the urban fringe, the setting of the South Downs National Park and the protection of strategic views into and out of the city.**
- 2. Securing better management of the urban fringe, environmental improvements and safe public access to the countryside through sustainable means.**
- 3. The promotion of urban fringe land as part of the city's green network and, where appropriate, encouraging opportunities for multi-functional uses such as, appropriate recreation and cultural experience, new allotments and local food production and biodiversity conservation and enhancements (see CP10 Biodiversity).**
- 4. The protection of sensitive groundwater source protection zones from pollution and encouraging land management practices that reduce rapid surface water runoff and soil erosion.**
- 5. The creation of 'gateway' facilities and interpretative facilities in connection with the South Downs National Park to support sustainable tourism.**

Development within the urban fringe will not be permitted except where:

- a) a site has been allocated for development in a development plan document; or**
- b) a countryside location can be justified;**

and where it can be clearly demonstrated that:

- c) the proposal has had regard to the downland landscape setting of the city;**
- d) any adverse impacts of development are minimised and appropriately mitigated and/or compensated for; and**
- e) where appropriate, the proposal helps to achieve the policy objectives set out above.**

Should proposals for development come forward prior to the adoption of Part 2 of the City Plan, the 2014 Urban Fringe Assessment will be a material planning consideration in the determination of applications for residential development within the urban fringe.

Supporting Text

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

3.158 There are however some uses for which sites are unlikely to be found within the built up area but are necessary to service the needs of the city. Such uses might include new forms of waste or water management, renewable energy generation, local food production and the facilitation of gateway and interpretative facilities in connection with the National Park. Sites for such uses may need to be identified in Part 2 of the City Plan.

3.159 Some land within the city's urban fringe has been identified as having potential to help meet the city's housing requirements (see Part B, Policy CP1 Housing Delivery). Sites identified through the 2014 Urban Fringe Assessment Study (or parts of sites where relevant) will be considered to have potential for housing in the Strategic Housing Land Availability Assessment exercise. Further consideration and a more detailed assessment of potential housing sites will be undertaken to inform allocations made in Part 2 of the City Plan with a particular emphasis on delivering housing to meet local needs. As part of this process, the City Council will consider how best to ensure that opportunities for community land trusts, community-led development, right to build, and housing co-operatives are brought forward/safeguarded in order to maximise housing opportunities that meet local housing needs. This will be taken forward through the City Plan Part 2. Sites coming forward for development ahead of the preparation of Part 2 of the City Plan will need to address criteria c) to e) set out in Policy SA4 above and satisfy detailed information requirements¹¹⁰ at the planning application stage.

3.160 Where appropriate, proposals for development within the urban fringe should help to achieve the five principal objectives as identified in the policy. These objectives reflect the key aims and objectives of other council strategies and plans and also reflect Biosphere Reserve principles and objectives which aim to bring people and nature together. For example, the council's 'Downland Initiative Strategy' and the city's 'Rights of Way Improvement Plan' seek to ensure that management of the downland estate achieves social, environmental and economic benefits and 'reconnects the people of Brighton & Hove to a more biodiverse downland with better education and improved access and a better sense of connection to the

¹¹⁰ This may include, for example, landscape assessment, ecology and archaeology surveys, traffic assessments and possibly Environmental Impact Assessment.

land¹¹¹. The council works with other landowners and DEFRA to seek sustainable management of the Downland not in its ownership and control.

3.161 Other types of development may also justify an urban fringe/countryside location. These might include, for example, householder extensions appropriate in scale and design to the parent building or farm diversification schemes which are necessary for the efficient operation of the farm and do not prejudice the agricultural use¹¹². Proposals for farm diversification within the urban fringe should accord with the council's adopted Planning Advice Note 01 Farm Diversification (October 2005) or subsequent revisions. The NPPF (March 2012) advises that local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances¹¹³.

3.162 The protection of water supply and water quality are also key responsibilities in the urban fringe because the chalk under the downland around the city is the aquifer or groundwater storage that supplies the city. The EU Water Framework Directive introduces a new concept of 'good status' that is far more rigorous than current water environment quality measures and it includes the protection of groundwater. This valuable resource needs to be protected from pollution and from land uses with a high risk of pollution. Towards this end, the city council has adopted a sustainable farming strategy for the management of its farmland to prevent soil erosion, flooding and pollution of the city's water supply. The River Basin Management Plan¹¹⁴ (South East River Basin Districts – including Adur and Ouse Catchment and prepared by the Environment Agency) looks to influence land management to reduce, or ensure no increase in, run-off rates and to encourage activities that may have the potential to reduce run-off rates from the South Downs and contribute to wider benefits (such as biodiversity, soil conservation and water quality improvements).

3.163 Table 1, section 2 of the Plan sets out how this policy will help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits.

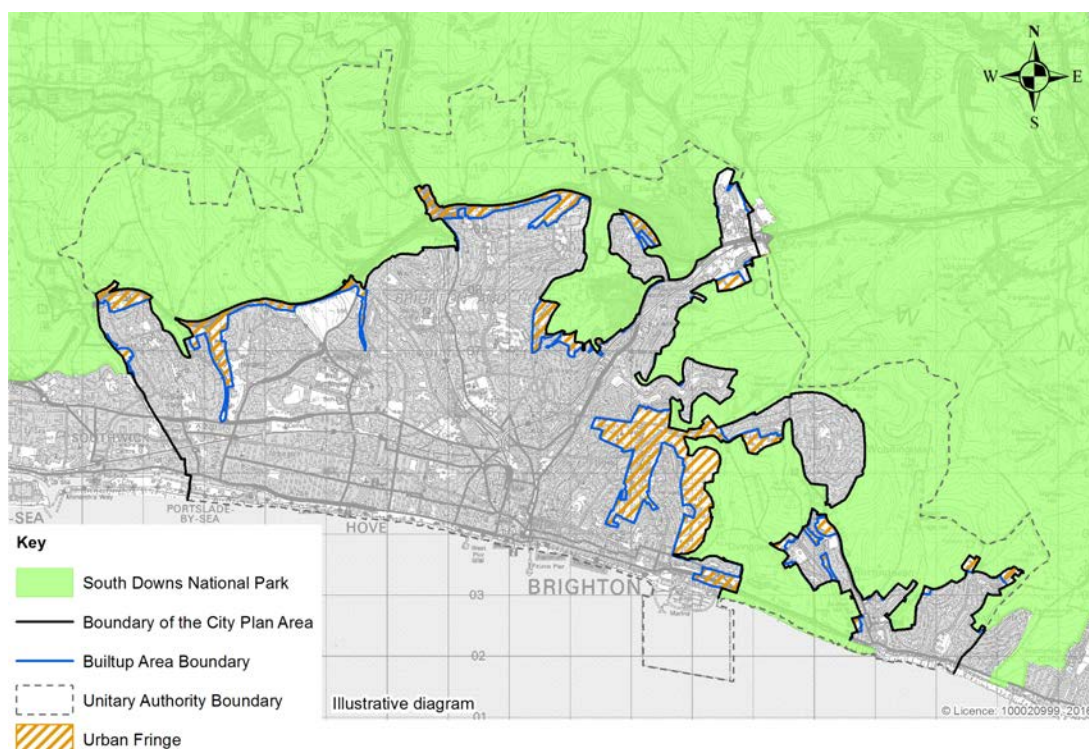
¹¹¹ Downland Initiative Policy was first developed in 2005.

¹¹² Minor development proposals will not necessarily be expected to contribute towards the achievement of the five primary objectives set out in SA4.

¹¹³ Paragraph 55, NPPF, March 2012.

¹¹⁴ River Basin Management Plan – South East River Basin Districts, Environment Agency, December 2009.

SA5 – The Setting of the South Downs National Park



Context

3.164 The South Downs National Park, covering the chalk landscapes of the South Downs stretching from Hampshire in the west to Beachy Head in East Sussex, came into being in 2010¹¹⁵. The National Park is administered by the South Downs National Park Authority (SDNPA), which has full planning responsibilities and a statutory duty to prepare development plans for the National Park. When making decisions in relation to the National Park area consideration must be given to the purposes of the National Park, which are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park and; provide opportunities for the understanding and enjoyment of its special qualities by the public. The National Park Authority also, when carrying out these purposes, has the duty to: seek to foster the economic and social well being of local communities within the National Park.

3.165 For the administrative area of Brighton & Hove the South Downs National Park boundary includes most of the land that was previously designated as part of the Sussex Downs AONB and also a major tract of land west of Woodingdean and Ovingdean, south of the race course and the cliffs and coast south of Beacon Hill. Much of the National Park boundary abuts the city's convoluted built up area boundary. Within the City Plan area the

¹¹⁵ The Secretary of State for the Environment, Food and Rural Affairs confirmed the creation of the South Downs National Park on the 12 November 2009. The South Downs National Park came into being on 31 March 2010. The South Downs National Park Authority was created on the 1 April 2010 and became fully operational on the 1 April 2011.

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

SA5 The Setting of the South Downs National Park

The council will work in partnership with the South Downs National Park Authority and adjoining authorities and landowners to protect and enhance the natural beauty of the South Downs National Park.

Proposals within the setting of the National Park must have regard to the impact on the National Park, in particular the purposes of the National Park and the ability of the South Downs National Park Authority to deliver its duty. Development within the setting of the National Park:

- a. Should be consistent with and not prejudice National Park purposes and where appropriate, the duty of the National Park Authority.**
- b. Must respect and not significantly harm the National Park and its setting, in accordance with Section 62 of the Environment Act 1995. Any adverse impacts must be minimised and appropriate mitigation or compensatory measures included. Such measures, including proposed enhancements, should have regard to landscape character and impacts; and**
- c. Should have due regard to the City Council's priorities for the South Downs where appropriate.**

Supporting Text

3.166 The South Downs National Park Authority is the planning authority for land within the National Park boundary and therefore responsible for producing a local development plan for the park area and the determination of planning applications within the National Park. However Brighton & Hove City Council owns land within the National Park and is the local planning authority for the land outside and adjacent to the National Park within the city's administrative boundary, which includes land within the setting of the National Park (See Key Diagram and Policies Map)¹¹⁶. Proposals within the National Park are governed by the two statutory purposes of the National Park. Proposals within the setting of the National Park must not undermine these purposes and will be expected to minimise any adverse impacts on the National Park which are being created by the proposal.

3.167 The purpose of this policy is to provide clear planning guidance for proposals within the setting of the National Park and also to set out the council's aspirations for the South Downs to inform planning proposals or future partnership working with the National Park Authority as appropriate. The majority of the countryside within the city's administrative boundary is owned and leased to tenants by the city council. The council is currently working towards a more sustainable approach to the land management of the

¹¹⁶ To facilitate partnership working the city council and the South Downs National Park Authority have signed a memorandum of understanding which sets out mutual expectations.

South Downs, by improving conservation, public access and recreation (as appropriate to the location) whilst maintaining financially viable farm businesses¹¹⁷. In order to conserve and enhance downland habitats and species, specific biodiversity management plans will be drawn up for various downland sites within the council's ownership. Further, in relation to the management of the chalk grassland, conservation mowing practices will be implemented to enhance and protect biodiversity. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

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

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

3.170 The council, which is not the planning authority for the National Park but is a key landowner, recognises the following priorities for the South Downs within the city's administrative area and will take them into account in future partnership working with the National Park Authority:

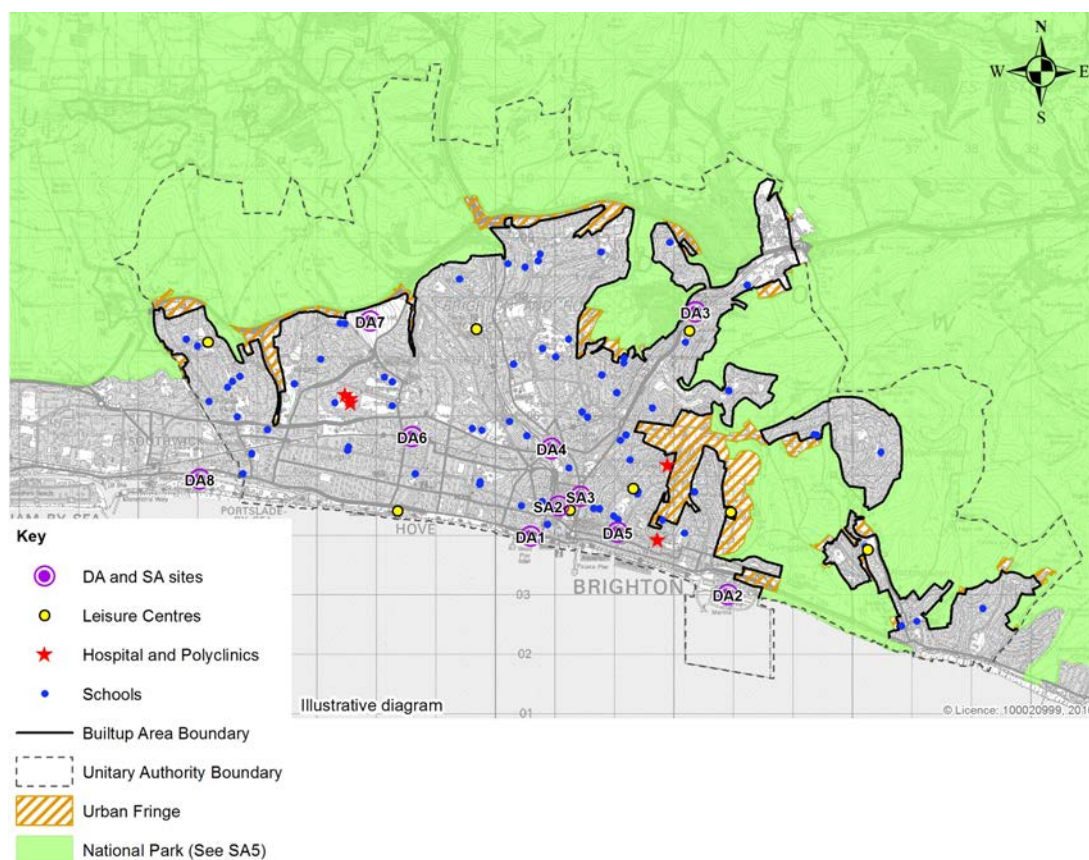
1. To promote Biosphere Reserve principles and objectives, bringing people and nature together;

¹¹⁷ Downland Initiative, 2005 - A programme of action compiled by the city council to deliver a sustainable downland landscape by integrating farming, recreation, biodiversity conservation and landscape objectives.

2. To promote sustainable land use management systems on the Downs with greater emphasis on local healthy food production, diversification and farming practices that are sympathetic to wider downland objectives;
3. To conserve and enhance downland habitats and species to meet Biodiversity Action Plan (BAP) targets and recognise the role of the Downs in the city's Green Network/Nature Improvement Area/open space framework (see CP10 Biodiversity and CP16 Open Space);
4. To protect scheduled monuments¹¹⁸ and other downland features;
5. To protect sensitive aquifer protection zones and address catchment flood management issues;
6. To increase the amount of accessible land adjacent to the urban area and enhance access from the urban area to the Downs by sustainable transport including by walking, cycling and public transport modes (see CP9 Sustainable Transport and CP18 Healthy City); and
7. To promote a stronger visitor experience between the city and the South Downs, facilitate sustainable eco tourism in the South Downs and provide gateway facilities to the South Downs National Park. In particular, to recognise the role of Stanmer Park within the National Park and the need to manage parking and traffic in order to reduce the risk of degradation of gateway areas and facilitate improved sustainable transport links (See SA4 Urban Fringe, CP5 Culture and Tourism and CP9 Sustainable Transport).

¹¹⁸ A statutorily protected building, structure or feature of national importance because of its archaeological and historic interest.

SA6 Sustainable Neighbourhoods



Context

3.171 The policy provides a strategic policy framework for Neighbourhood Planning alongside the other policies in the City Plan. It relates to all residential areas and neighbourhoods in Brighton & Hove. The aim of the city council is to facilitate sustainable neighbourhoods by working in partnership with the voluntary, public and private sectors bringing together and delivering the priorities agreed in city's Sustainable Community Strategy¹¹⁹ and other citywide strategies.

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

¹¹⁹ Sustainable Community Strategy 2010, Creating a City of Opportunities sets out a long term plan to improve the economic, social and environmental well-being of the city. A number of the eight priority themes address the need to reduce inequality.

3.173 One of the biggest challenges for Brighton & Hove in creating a sustainable city is to reduce inequalities in health, employment, educational attainment, income, community safety and measures of child and family poverty¹²⁰. Research (Reducing Inequality Review 2008¹²¹) shows that though the majority of low income residents are spread throughout the city, the most disadvantaged areas in the city remain significantly more deprived than the city as a whole. Twelve per cent of the city's areas (19 out of 164) are in the 10 per cent most deprived in England.

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

SA6 Sustainable Neighbourhoods

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

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

- 1. Focus new development in neighbourhoods into local shopping centres and parades where proposals contribute to the range and viability of local facilities by maintaining and creating a focal point for community activities opening these up to disabled people through access improvements and encourage investment to improve sustainable transport.**
- 2. Ensure a good balance and mix of uses in existing defined local shopping centres is maintained and carefully monitored and encourage redevelopment of local centres where proposals contribute to local facilities (see CP4 Retail Provision).**
- 3. Support residents, stakeholders, equality groups and local businesses in defining Neighbourhoods Forums and support and advise them in preparing Neighbourhood Plans, Neighbourhood Development Orders and Community Rights to Build.**
- 4. Improve the quality of public services through joint working between public, private and community and voluntary sector partners and; carry out effective engagement, development and activities with residents and**

¹²⁰ Brighton & Hove Child Poverty Commissioning Strategy 2012-2015 (2012)

¹²¹ Reducing Inequality Review 2008 was commissioned by the Local Strategic Partnership to assess the effectiveness of the city's Neighbourhood Renewal Strategy, options for the future to reduce inequality and to provide measures for success that could be used as targets in the future.

neighbourhood groups ¹²² and equality groups. In particular, establish neighbourhood governance arrangements, measures and procedures that give communities the skills, confidence and power to shape and influence public services.

5. Work closely with public transport operators and improve cycle and walking links (see CP9 Sustainable Transport) with the aim of improving sustainable transport access to and from areas in outer locations, especially where car ownership levels are low.

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

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

8. Deliver balanced communities through the requirement for new residential development to provide an appropriate amount of affordable housing, mix of dwelling sizes and tenure types and through the City Plan Part 2 ensure new housing meets optional technical standards for access and the nationally described space standards. In areas where there is a concentration of social rented housing, a better choice of housing tenures will be sought (see CP1 Housing Delivery, CP19 Housing Mix and CP20 Affordable Housing).

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

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

B. Priorities to reduce inequalities between neighbourhoods are:

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

2. In areas identified with significant environmental, community safety and access concerns support improvements to the public realm,

¹²² Copy of the Community Engagement Framework www.brightonhove.gov.uk/index.cfm?request=c1189414

biodiversity and open space (see CP13 Public Streets and Places and CP7 Infrastructure and Developer Contributions).

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

Supporting Text

3.175 The purpose of the policy is to facilitate sustainable communities and to reduce inequalities within and between neighbourhoods working with partners from the private, public and voluntary sectors. The overall main aims are to:

- create balanced communities that meet the needs of all residents and reduce the inequalities between different areas;
- engage with and listen to local communities;
- increase the availability of jobs and training;
- encourage healthier lifestyles and lifetime communities;
- improve accessibility and make roads in residential areas safer;
- encourage environmental sustainability;
- build active and inclusive communities based on mutual respect; and
- improve access to public art
- ensure new residential development provides for an appropriate mix of dwelling types and tenures and meets the new national technical standards and through the City Plan Part 2 seek to apply the nationally described space standards and optional technical standards in respect to accessibility, adaptability and wheelchair standards.

Table 1 on page 26 sets out how this policy will help to deliver against local targets under the One Planet principles.

3.176 The policy requires joint working between partners, including other public agencies for example NHS commissioning organisations and health care providers, the police, education providers (schools, colleges and universities), community and community and voluntary sector organisations, transport providers, businesses, and residents. Brighton & Hove Connected¹²³ is the Local Strategic Partnership for the city. Brighton & Hove Connected and its 'family of partnerships'¹²⁴ will help to enable effective partnership working.

3.177 The policy provides a strategic policy framework for Neighbourhood Plans that are a tier of development plans introduced by the Localism Act

¹²³ Brighton & Hove Connected brings together representatives from the local statutory, voluntary, community and private sectors to address local problems, allocate funding, and discuss strategies and initiatives. The first Local Strategic Partnerships were set up in 2000. They are responsible for agreeing an overarching Sustainable Community Strategy for the area. They aim to encourage joint working, and community involvement with the general aim of ensuring resources are better allocated at a local level.

¹²⁴ The Family of Partnerships underpin the Local Strategic Partnership. It is made up of 12 partnerships including the Arts Commission, Economic Partnership, Crime and Disorder Reduction Partnership, Strategic Housing Partnership, Healthy City Partnership, Transport Partnership and the City Sustainability Partnership.

2011. Neighbourhood Plans can be prepared by Parish Councils or Neighbourhood Forums that are representative of the neighbourhood and have been agreed as being the plan-making forum by the Local Planning Authority (in accordance with the Neighbourhood Planning Regulations 2012). To be a forum a group must have at least 21 members that are representative of the residents, employees and businesses in the area. Neighbourhood Plans will determine local priorities (e.g. outdoor sports facilities, defining local green spaces¹²⁵, biodiversity, community safety improvements, safer streets measures); improve access including disabled access to local and community facilities and; and decide where new development in a neighbourhood should go. The city council has a commitment to support Neighbourhood Planning and information on becoming a neighbourhood forum and preparing plans is outlined on the Council's website under Neighbourhood Planning.

3.178 Good quality development in local centres and hubs will be allowed where it helps to strengthen the provision and viability of local services including shops and community facilities and where it represents a better use of land in the city (see CP14 Housing Densities). Significant development can help improve public transport services to a neighbourhood, e.g. increased frequency of buses. The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around the city. Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network.

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

3.180 A critical part of a sustainable community is robust and meaningful community engagement at all levels of participation and a thriving voluntary sector. This is a priority for all residential neighbourhoods in the city. A key action recommended in the Reducing Inequality Review, to achieve better outcomes for disadvantaged areas, is to improve engagement between services and local communities and empowering local communities. Neighbourhood governance arrangements will be set up to encourage all residents to engage in decisions on local services.

¹²⁵ Local Green Space as defined by the National Planning Policy Framework paragraph 77.

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

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

3.183 The strategy is directed at providing good quality community facilities where there is a shortfall within walking distance of neighbourhoods. These facilities include primary health care and community health facilities, education, training, youth facilities, children's and health centres and community buildings. In terms of schools, the Brighton & Hove School Organisation Plan (2012-2016) sets out a strategy to ensure the provision sufficient of primary and secondary school places across the city in response to growing school rolls and families moving into the city. Primary schools are generally located within and serve local neighbourhoods. Where there is an identified shortfall of school places the city council will work with partners, including not for profit organisations, to identify sites and build new schools and expand successful schools (where possible, with consent of the school) Where a need has been identified, work will be undertaken with partners to help identify and allocate sites through Part 2 of the City Plan. Where appropriate, developer contributions sought to meet a resulting shortfall in infrastructure (see CP7 Infrastructure and Planning Obligations).

3.184 Securing balanced communities includes providing for a better choice of housing type, size and tenure and affordability ranging from single households to larger families and including the needs of diverse groups such as older people, disabled people, the black and ethnic minority, LGBT¹²⁶ community and travellers (see policy CP22). In some disadvantaged areas of the city there is a concentration of social rented housing. Introducing a better balance of housing choice to these communities will be encouraged, for example, by allowing a higher proportion of intermediate housing as part of the affordable housing element of new developments (see policy CP20 Affordable Housing).

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

¹²⁶ Lesbian, Gay, Bisexual and Trans.

communal composting across the city (successful communal composting has been introduced in Brunswick and St Peters and North Laine wards).

3.186 Part A10 recognises the role that extending the use of existing sports and community facilities within schools, colleges and universities can have in facilitating and enabling community cohesion and healthy lifestyles (see also CP16). The shared use of school facilities is already formally stated within the governments extended schools programme. The Strategy seeks to widen this to include colleges and the universities to allow shared use of their facilities too. This work is being developed through the Sports Facilities Plan 2012. Opportunities to share existing community buildings and facilities, like churches, will be maximised.

3.187 Shortfalls in the quantity and quality of open space, recreation and sports facilities have been identified in the Open Space, Sport and Recreation Study¹²⁷ and the findings will be taken forward into Open Space Strategies for the city. This will be tied in with identifying community safety priorities for improving open spaces, providing children's play space and encouraging residents to use their parks. This will have associated health benefits for residents. Future strategies will be informed by Sport England's Active Design Guide¹²⁸ which sets out how environmental design can encourage sport and physical activity and National Institute for Health and Clinical Excellence (2008) Public Health guidance 8: Physical Activity and the Environment¹²⁹.

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

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

¹²⁷ Open Space, Sport and Recreation Study 2008 establishes a baseline of existing provision and proposes standards for quality, quantity and accessibility. It identifies priorities for future open space, recreation and sport provision.

¹²⁸ Active Design (2007) was commissioned by Sport England and provides guidance to assist with environmental design which encourages sport and physical activity taking principles of character, continuity, quality and legibility. The Guide uses 3 objectives to frame advice on positive design: improving accessibility, enhancing amenity and increasing awareness.

¹²⁹ To see NICE guidance go to <http://publications.nice.org.uk/physical-activity-and-the-environment-ph8>

that help reduce economic inequalities include access to affordable financial services and affordable childcare.

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

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

Section Four City Wide Policies

A Strong and Prosperous Economy

CP1 Housing Delivery

A: Scale of housing provision

The council will make provision for at least 13,200 new homes to be built over the plan period 2010 – 2030 (this equates to an annual average rate of provision of 660 dwellings).

This will be achieved by:

- a) Focussing new development in accessible areas of the city and those with the most capacity to accommodate new homes;
- b) Promoting the efficient use and development of land/sites across the city including higher densities in appropriate locations (see CP12 and CP14)
- c) Making strategic site allocations in this Plan for at least 3,635 additional new homes;
- d) Preparing Part 2 of the City Plan (Development Policies and Site Allocations) to allocate additional sites to help ensure housing delivery is maintained over the plan period; and
- e) Ensuring that all new housing development contributes to the creation and/or maintenance of mixed and sustainable communities (see SA6).

B: Distribution of new housing.

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

Area / Source of Supply	No. of new homes
Development Area	
DA1 – Brighton Centre and Churchill Square Area	20
DA2 – Brighton Marina, Gas Works and Black Rock Area	1940
DA3 – Lewes Road Area	875
DA4 – New England Quarter and London Road Area	1130
DA5 – Eastern Road and Edward Street Area	515
DA6 – Hove Station Area	525
DA7 – Toad's Hole Valley	700
DA8 – Shoreham Harbour	300
Development Area Total	6005
Development Across Rest of City:	

a) Within the built up area	4130
b) Within the urban fringe¹³⁰	1060
Small identified sites	765
Small Windfall Development	1250¹³¹
Total	13,210

C: Managing the rate of housing delivery

The release of land/sites for new housing will be managed so that it delivers the broad amount and distribution of housing as set out above. The adequacy of housing delivery (in terms of a five year supply of housing and in meeting planned housing delivery targets over the full plan period) will be assessed regularly in accordance with the Housing Implementation Strategy¹³² and through annual reviews of the Strategic Housing Land Availability Assessment. Progress will be reported through the council's Authority Monitoring Report.

Supporting text

4.1 A key objective of the City Plan is to provide people with a choice of decent quality housing to meet their needs for a stable home at a cost they can afford. There is a need to plan for the future scale of new residential development required (the overall amount of new housing), for the location of new housing and for a variety or mix of new housing (in terms of housing type, size and tenure see CP19 and CP20) to ensure that new development meets a range of local housing requirements and contributes to the creation of mixed and sustainable communities. This policy will also help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits (see Table 1 on page 26).

Scale and location of new housing development

4.2 To meet in full the city's 'objectively assessed housing need' (housing demand and need) over the plan period to 2030 could mean needing to build 1,506 dwellings per annum or 30,120 dwellings to 2030¹³³.

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

¹³⁰ As defined in policy SA4 of the City Plan Part 1

¹³¹ An allowance for small windfall development has been made across the plan period. See 2014 SHLAA.

¹³² A Housing Implementation Strategy is set out as a separate annex to the Plan.

¹³³ Objectively Assessed Need for Housing; Brighton & Hove, June 2015, GL Hearn Limited.

4.4 The City Plan housing target for a minimum of 13,200 new homes reflects the capacity and availability of land/sites in the city, the need to provide for a mix of homes to support the growth and maintenance of sustainable communities, the need to make provision in the city for other essential development (for employment, retail, health and education facilities, other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.

4.5 The fact that the city's housing delivery target does not match the objectively assessed full housing requirement means that there is a 'duty to cooperate' with the city's neighbouring local authorities. Brighton & Hove's strategic housing market and travel to work area extends westwards incorporating Adur District and parts of Worthing District; eastwards incorporating parts of Lewes and northwards to Mid Sussex, Horsham and Crawley. Many of these areas also face similar challenges in meeting housing requirements. Within Brighton & Hove, the council acknowledges that there is a significant housing shortfall¹³⁴ against the objectively assessed housing requirement of 30,120 dwellings to 2030. In accordance with government guidance, the council will therefore continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas. This will include seeking commitment from neighbouring authorities to participate in further sub-regional work such as building upon the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area and the sub-regional work of the Greater Brighton Economic Board. This will allow long-term opportunities to be explored for meeting unmet housing needs and the identification of delivery mechanisms including local plan reviews.

4.6 The spatial strategy for the city is set out earlier in this Plan (see Spatial Strategy, Section 2). In broad terms, the strategy seeks to direct a significant amount of new development to eight identified Development Areas (see Policies DA1-8) which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration and renewal will secure substantial benefits for the city. The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites within the built up area but it also acknowledges that some housing development will come forward from some of the city's urban fringe sites. This is reflected in part B of Policy CP1.

4.7 The eight Development Areas account for 45% of the planned amount of new housing for the city. Within the Development Areas, the City Plan makes strategic allocations to secure the delivery of 3235 new dwellings (see spatial policies DA2 – DA8). In other parts of the city, there are also a significant range of opportunities for new residential development (through, for example conversions, redevelopment and changes of use) and such development will

¹³⁴ Equivalent to 16,920 units over the plan period to 2030.

help to promote and secure the establishment of sustainable communities. Residential development will be required to respect the local character and distinctiveness of neighbourhoods (see also SA6, CP12 and CP14).

Housing trajectory

4.8 Over the last 15 years¹³⁵ the average rate of new housing development in Brighton & Hove has been around 540 dwellings per annum. More recently, annual rates of housing delivery have been far lower than this reflecting the impacts of global economic recession¹³⁶.

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

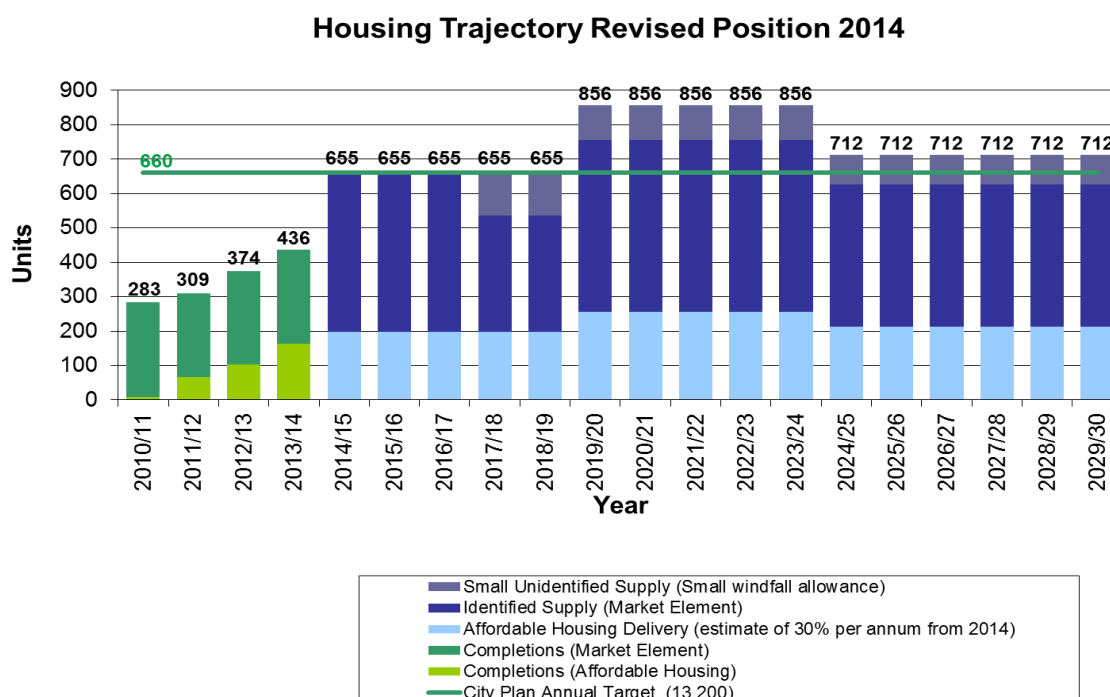
4.10 The city's housing target implies an annual average rate of 660 dwellings per annum over the plan period as a whole. Based on the 2014 SHLAA update, the housing trajectory¹³⁷ demonstrates that housing delivery in the city has been well below this in the first four years of the plan period (2010-2014), reflecting the impacts of economic recession. The trajectory anticipates that housing delivery will increase in the (post adoption) five year supply period 2014-2019 and looks likely to achieve the planned average delivery rate of 660 units per annum. In the following six to ten year supply period (2019-2024), housing delivery rates are anticipated to increase significantly with delivery coming through from a number of the city's larger strategic development sites. For the post 2024 period, the trajectory indicates that housing delivery is again likely to exceed the planned average delivery rate. The council's Housing Implementation Strategy (HIS) identifies a range of positive planning actions and measures to ensure that housing delivery is achieved across the plan period in accordance with guidance in the NPPF for maintaining a five year supply of deliverable housing. The HIS also identifies that further site allocations will be made through the preparation of Part 2 of the City Plan.

¹³⁵ 1999/00 - 2013/14 Residential Completions Data.

¹³⁶ Initiated by the credit crunch financial crisis of 2007/8. Housing completions 2010/11 at 283 units were the lowest recorded for 20 years.

¹³⁷ As informed by the 2014 Revised Trajectory.

Figure 2: Housing Trajectory 2010 – 2030 (Based on 2014 SHLAA Update)



Components of housing land supply

4.11 Table 3 indicates the components of housing land supply for the period 2010 - 2030. It draws upon the council's latest Strategic Housing Land Availability Assessment (SHLAA) exercise¹³⁸.

4.12 The table below illustrates that approximately 3,740 dwellings have either already been built since 2010 or are currently 'committed' for development in terms of either sites having an extant planning permission or an allocation in the 2005 Brighton & Hove Local Plan. This plan makes strategic site allocations to achieve a further 3635 dwellings. Further capacity is identified for an additional 4585 dwellings and appropriate site allocations will need to be made in Part 2 of the City Plan. These 'identified' sources comprise 90% of the overall housing target to 2030.

¹³⁸ SHLAA 2014 Update.

Table 3: Housing Delivery, Supply Breakdown 2010 – 2030 (Based on 2014 SHLAA)

Spatial Area	Already Built or Committed	Strategic Allocations	Broad Location s/ Source	Further Capacity Identified in SHLAA	Allowance For windfall	Total
DAs						
DA1	13	0		7		20
DA2	855	1085		0		1940
DA3	126	300		449		875
DA4	380	615		135		1130
DA5	10	335		170		515
DA6	90	200		235		525
DA7	0	700		0		700
DA8	52		248			300
DA Total	1525	3235	250	1000		6005
Rest of City						
a) Built up area	1450	400	390	1890		4130
b) Urban fringe				1060		1060
Small id. Sites	765					765
Small Windfall					1250	1250
Total	3740	3635	640	3945	1250	13,210

Maximising development of previously developed land

4.13 Brighton & Hove is a tightly constrained city. In many instances, the boundaries of the South Downs National Park are contiguous with the built up area of the city. As a consequence, the majority (87%) of new residential development will take place on previously developed land or 'brownfield' sites. The Plan does however make a strategic allocation for the development of land at Toad's Hole Valley to the north of the city which is a large greenfield site falling outside the boundaries of the National Park (see DA7). Development at this location will contribute a significant amount of new housing development for the city and, as part of a mixed use comprehensive development, will secure many other benefits for the city (see DA7). Part B of Policy CP1 also indicates that some sites within the city's wider urban fringe will contribute to housing land supply. Sites will be taken forward for further consideration and detailed assessment as site allocations through Part 2 of the City Plan. The 2014 Urban Fringe Assessment Study will be a material consideration in the determination of any applications for residential development on urban fringe sites that come forward prior to the adoption of Part 2 of the City Plan (see Policy SA4 Urban Fringe).

Small site development

4.14 A significant proportion of residential development across the city takes place on smaller development sites (5 or less units)¹³⁹. The nature of this type of development (typically comprising small scale residential intensification, conversion activity and small scale changes of use) means that it is very difficult to identify the emergence of such sites. For this reason, the Brighton & Hove SHLAA does not attempt to specifically identify and assess such sites. Where small sites have the benefit of a planning permission at the SHLAA study base date, they are counted.

4.15 National planning policy requires sufficient specific sites and/or broad locations to be identified to meet planned housing targets for at least the first ten years of the plan¹⁴⁰. In reality, small 'windfall' site development (as described above) will come forward throughout the plan period and will contribute towards meeting the planned housing requirements for the city and ongoing five year supply requirements. The potential supply from small windfall site development is reflected in the planned housing target for the city (see Part B of Policy CP1).

Management of housing land supply

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

¹³⁹ Small site development has accounted for approximately 35% of total residential development across the city over the last 10 years.

¹⁴⁰ NPPF, paragraph 47.

CP2 Planning for Sustainable Economic Development

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

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

Supporting Text

4.17 Brighton and Hove has one of the largest concentrations of employment in the South East region. The City is expected to continue to function as an economic growth hub for the wider sub-region. Brighton & Hove has become part of the Coast to Capital Local Enterprise Partnership area. The Coast to Capital LEP aims to support the development of 100,000 private sector jobs; promote entrepreneurship in schools and colleges and focus on supporting the growth of internationally trading businesses. The city needs to ensure a

step-change in economic performance, reducing the gap with South East regional economic performance. In this context, attracting new inward investment is an explicit priority, although given the existing economic climate this is recognised as a long term priority for the council.¹⁴¹ A City Prospectus has been launched by the council to promote and publicise inward investment opportunities and the council will work with businesses, both major established employers and new start up companies, to weather the downturn and take advantage of new opportunities as they arise to build resilience and versatility in the economy.

4.18 The Employment Land Study Review 2012 noted that the city has recorded significant job growth over the last 15 years (16.8%) outperforming both regional and national trends and has proved relatively resilient through the recession. The City Plan is a long-term plan and needs to ensure that, when the economy recovers, local conditions are conducive to enabling forecast business and jobs growth to be realised. This will be addressed by supporting local businesses in the city's core sectors such as retail, tourism and hospitality; (retaining and enhancing jobs in business & financial services, diversifying the local economy, focusing on growth sectors (the knowledge based economy, creative industries, including digital media, and environmental technologies) supporting social enterprises¹⁴²; and securing training places, apprenticeships and jobs for local people as part of redevelopment schemes. The need to continue to grow the economic base with higher value services and to fully utilise the city's workforce assets are local priorities¹⁴³.

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

4.20 The two Universities and City College make the city well-placed to encourage higher level business growth through knowledge transfer partnerships within the city¹⁴⁴. It is therefore important that additional start-up office space offering small units on flexible terms and at affordable rates is provided for in the city to support the growing role of the two universities in the local economy as well as addressing the needs of the city's small medium

¹⁴¹ Business Renewal Investment Initiative (2009)

¹⁴² Social enterprise is a business with primarily social objectives whose surpluses are principally reinvested for that purpose in the business or in the community, rather than being driven by the need to maximise profit for shareholders and owners (Department for Business, Enterprise and Regulatory Reform)

¹⁴³ See The City Employment and Skills Plan 2011-14, Sustainable Community Strategy (2009 Refresh), The Brighton & Hove Economic Strategy (2009), Business Renewal Investment Initiative (2009) and the Employment Land Study Review 2012

¹⁴⁴ The Economic Strategy 2008-2016 cites the following successful examples: ProfitNet and the Collaborative Training Centre at the University of Brighton; the Innovation Centre (SInC) and the £1.35m collaboration with Animazoo at Sussex University and the SOLD project at City College

sized enterprises.¹⁴⁵ The City Plan through DA3 Lewes Road and DA7 Toad's Hole Valley will encourage the creation of flexible incubation space for university spin out businesses and move-on space in the city. Lewes Road is a priority development area forming an important gateway to the city for visitors and businesses. The vision is for it to become a neighbourhood of knowledge and enterprise focused around the universities. The availability of development sites and the connections with the two university campuses and the Sussex Innovation Centre make its development a key priority.

4.21 The growing digital and creative industries are seen as having a key role in reviving and sustaining the city's economy. The sector is characterised as innovative, knowledge-based and future-proofed providing high value, highly paid jobs. Already Brighton & Hove is home to a cluster of around 1500 media-related companies employing 10,000 people, plus another 5000 freelance individuals¹⁴⁶. The council will support the further innovation, growth and maturity of the creative industries sector to become globally relevant especially digital media, recognising the cities burgeoning success in the convergence of the creative, digital and information and technology sector (CDIT). A recent study¹⁴⁷ indicated that whilst there is a reasonable amount of provision for micro and small businesses up to around 20 people there is a shortage of workspace in central Brighton of a suitable size and configuration for premises suitable for medium and larger scale sector businesses. Therefore through policies SA2 Central Brighton and DA4 New England Quarter the City Plan safeguards existing office accommodation, allocates sites suitable for new office accommodation and in particular safeguards New England House to support further growth in this sector. The council will work with providers to ensure the delivery of ultrafast broadband to further support growth in this sector.

4.22 Environmental industries¹⁴⁸ are a growing sector in the city and provide an important enterprise and employment opportunity for the city. The sector contains organisations of varying sizes, ranging from large companies to micro businesses. In 2009 around 75 businesses fell within the definition of environmental technologies¹⁴⁹. There is further potential for local jobs to be created through a move towards decentralised and renewable energy provision in the city, including the Rampion offshore wind farm and through council initiatives and events the role of the environmental technology sector

¹⁴⁵ Employment Land Study Review 2012

¹⁴⁶ Wired Sussex 2010

¹⁴⁷ New England House, Brighton Digital Media Innovation & Enterprise Hub Joint Vehicle Business Case, DCA, October 2010. The study also indicates that businesses are looking for workspace with competitive rents, big capacity data connectivity, easy in easy out terms and flexibility to expand. Other important considerations were on site bike parking, good public transport links and a central Brighton location.

¹⁴⁸ Locally defined as "...businesses operating in the broad disciplines of energy efficiency, recycling and waste, renewable energy, sustainable construction and maintenance, consultancy and other services". A report of the Culture, Tourism and Enterprise Overview and Scrutiny Committee Ad Hoc Panel October 2009

¹⁴⁹ Business Renewal Investment Initiative (2009)

will be promoted¹⁵⁰. Brighton & Hove has many of the key attributes needed to attract environmental industries. These include research specialisms connected to both the universities, the range of education and employment opportunities, the city's reputation as a sustainable city and its enterprise culture. There is a need to support this sector as it grows¹⁵¹. Through the City Plan the council will support the development of an environmental technology cluster at Shoreham Harbour (DA8) and incubator space at Preston Barracks and Toad's Hole Valley (DA3 and DA7) and through policies safeguarding and promoting new office accommodation (SA2, DA4 and CP3).

4.23 Achieving a sustainable economy is one of the overall principles of sustainable development (see paragraph 2.8). Supporting the development of a globally competitive environmental industries sector will support the Council's One Planet approach to improve quality of life, the environment and the economy of the city and move towards a low carbon economy¹⁵². A low carbon economy can provide opportunities for a wide range of businesses, not just the 'traditional' environmental sector. Businesses can benefit from a low carbon economy in two ways: diversify into new low carbon products or become more efficient in the way they work. The Brighton & Hove Economic Strategy¹⁵³ sets clear aspirations for the City that will help to demonstrate how it can move towards becoming a low carbon economy.

4.24 The council also encourages the growth of employment in socially focused businesses¹⁵⁴ and has signed up to the 2008 Social Enterprise Strategy. Brighton & Hove's Third Sector (Voluntary & Community sector) is well developed. It's estimated 1,600 organisations generate £96m for the local economy and employ 8,000 people with over 19,000 volunteers, but it is often under-appreciated. It has an important part to play in delivering economic prosperity and should be supported to ensure its potential is realised.

4.25 The council has prepared an ICT Strategy¹⁵⁵ and is working with partners to tackle a number of areas around digital inclusion and economic development including broadband upgrades, connectivity and shared infrastructure. Brighton & Hove is a unique digital media hub, and the council will work with providers to ensure the provision of appropriate infrastructure to equip the city with access to affordable, competitive broadband access meeting the needs of enterprises and individuals.

¹⁵⁰ Alongside the successful Eco Technology Show 2012, there are plans to run an 'Invest in Sussex' conference that will focus on growth post recession and how this can be done in a sustainable way.

¹⁵¹ A report of the Culture, Tourism and Enterprise Overview and Scrutiny Committee Ad Hoc Panel October 2009

¹⁵² Brighton & Hove's Climate Change Strategy 2011

¹⁵³ Adopted June 2013.

¹⁵⁴ A social enterprise is a business with primarily social objectives whose surpluses are principally reinvested for that purpose in the business or in the community, rather than being driven by the need to maximise profit and shareholders and owners" Dept of Trade & Industry July 2002

¹⁵⁵ Brighton & Hove City Council ICT Strategy 2011-2016

4.26 The city contains a number of major employment generators including the two universities and the Royal Sussex County Hospital and the council will work with the higher and further education sector, Sussex University Hospital NHS Trusts and NHS Brighton & Hove to support appropriate expansion (see DA3 Lewes Road Area, DA5 Eastern Road and Edward Street Area and CP18 Healthy City). Non-B Class uses are estimated to account for approximately 71% of all jobs in Brighton & Hove. This is expected to remain broadly consistent over the plan period to 2030. Development Area proposals, SA2 Central Brighton, CP4 Retail Provision and CP6 Culture and Tourism set out how the City Plan addresses retail, culture, leisure and tourism needs to 2030. Appropriate allocations for employment-generating non-B Class uses will be included in the City Plan Part 2.

4.27 The Brighton & Hove labour market is highly competitive with globally recognised companies attracting talent from an international labour pool. In the context of continued economic uncertainty it is therefore more important than ever to equip local residents with the means to compete and access jobs. Two key priorities for intervention in the city are to increase the number of graduate positions in the city by supporting conditions for growth in key knowledge and innovation focussed growth sectors and to equip local residents to be able to better access employment opportunities in the city through addressing key barriers, and providing skills, training and apprenticeships¹⁵⁶. The Brighton & Hove Local Employment Scheme originates from the City Employment & Skills Plan¹⁵⁷ and seeks to contribute towards reducing inequalities by securing training and job opportunities for unemployed and underemployed residents of Brighton & Hove¹⁵⁸. Contributions will be sought from new major development schemes towards training in building and construction skills with a minimum 20% target requirement.

¹⁵⁶ Brighton & Hove City Employment & Skills Plan 2011 (CESP)

¹⁵⁷ The Brighton & Hove City Employment and Skills Plan 2011-2014 indicates that the working age population is projected to increase by 12,650 over the next 10 years. If these projections prove accurate, the city may need to find work for an additional 6,000 residents by 2014 just to keep the employment rate at the current level of 71.1%. However these need to be quality jobs that allow people to progress and to earn incomes that will enable them to live successfully and sustainably.

¹⁵⁸ At the start of 2011, 7.5 per cent of our young people aged 16 to 18 (between 400 & 500 young people) were not in education, employment or training (NEET), down from nine per cent in 2010. The highest numbers of NEET young people are found in Moulsecoomb & Bevendean, Whitehawk & Queen's Park & Cravendale.

CP3 Employment Land

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

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

2. The identification of Central Brighton as the city's prime office location where B1a offices will be protected (see SA2 Central Brighton). The council will support proposals for the upgrade and refurbishment of existing office accommodation so that they meet modern standards required by business; are more resource efficient and improve the environment and townscape of the site or premises.

3. Protection of the following primary industrial estates and business parks for business, manufacturing and warehouse (B1, B2 and B8) use:
Centenary Industrial Estate
English Close Industrial Area, Old Shoreham Road
Home Farm Industrial Area
Hove Technology Park, St Josephs Close, Old Shoreham Road
Moulsecomb & Fairways Industrial Estate
Sussex House (including BT depot)
Woodingdean Business Park
Hyde Business Park, Bevendean
Bell Tower Industrial Estate
Hollingbury Industrial Estate
Hollingdean Industrial Estate
Victoria Road Industrial Estate
Newtown Road Industrial Estate

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

Sui generis uses, including waste management facilities, appropriate in nature to an industrial estate location will also be acceptable, provided that they generate employment which is quantitatively and qualitatively comparable to uses within B1- B8 Use Classes¹⁵⁹; do not harm the

¹⁵⁹ Employment generation is compared with average employment densities as set out in Table 3 of the HCA/Offpat Employment Densities Guide, 2010 or subsequent updates.

continuation of existing uses within those Classes and comply with other City Plan policies and for waste management facilities the Waste and Minerals Plan.

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

Franklin Road Industrial Estate

School Road, Hove

Melbourne Street Industrial Area

Portland Road Trading Estate (including EDF and Martello House)

Land North of Newtown Road

There should be no net loss in employment floorspace unless this can be justified. Paragraph 4.36 sets out the factors that will be taken into consideration.

5. Loss of unallocated sites or premises in, or whose last use was, employment use (Use Classes B1-B8) will only be permitted where the site or premises can be demonstrated to be redundant and incapable of meeting the needs of alternative employment uses (Use Classes B1-B8). Where loss is permitted the priority for re-use will be for alternative employment generating uses or housing (in accordance with CP20 Affordable Housing).

6. Preparing Part 2 of the City Plan to allocate additional employment sites and mixed use allocations to help ensure employment land delivery is maintained over the plan period.

Supporting Text

4.28 A number of recent studies¹⁶⁰ have identified the need for new business space to meet the needs of businesses currently located in the city and to attract businesses considering Brighton as a business location to allow the city to grow as an economic base for the wider economic area.

Employment Land Requirements

4.29. The Employment Land Study Review 2012 recommended that the City Plan be guided by forecast growth requirements of 112,240 sq m of office floorspace (B1a, B1b) to 2030 and 43,430 sq m of industrial floorspace (B1c, B2 and B8) over the plan period. To ensure that there are sufficient employment sites and premises to meet this forecast requirement and to facilitate economic growth, Development Area proposals identify strategic allocations to bring forward new high quality employment floorspace (DA2-DA8).

¹⁶⁰ Employment Land Study Review 2012, City Employment and Skills Plan 2011- 14, the Business Retention and Inward Investment Strategy (2009), and the Creative Industries Workspace Study (2007)

4.30 The table below summarises how the employment floorspace requirements will be met in Brighton & Hove through the Development Area proposals. Reflecting the city's role as a regional employment centre, the forecast figures indicate positive employment growth over the plan period. Compared with previous employment land studies¹⁶¹ this includes a positive requirement for industrial floorspace. Opportunities to increase the industrial floorspace capacity in allocations identified for industrial activities have been considered alongside whether opportunities exist for industrial floorspace to be brought forward on other strategic allocations; however this does not address all the forecast requirements. In terms of meeting office needs, the priority is to manage a greater delivery of office floorspace in the city; particularly in Central Brighton but also the phasing of supply in other development areas over the plan period. The Employment Land Supply Trajectory 2013 indicates the potential delivery of new employment floorspace over the short, medium and long-term. Opportunities for additional B use class employment / mixed use allocations to meet outstanding requirements will be addressed through the City Plan Part 2 and through a coordinated partnership approach with neighbouring authorities and the Local Enterprise Partnership. Upgrading and renewal of the City's existing office and industrial stock will also be important to ensure that this space is better utilised, remains competitive and attractive to the market. As CP2 indicates there is also a need to deliver small scale, managed and affordable works space to encourage and retain indigenous business growth within the city.

Table 4 City Plan Employment Floorspace Provision

Employment Floorspace Requirements¹⁶² and Supply (sq m)	
B1a, B1b Office Requirements	112,240
DA3 Lewes Road	15,600
DA4 London Road and New England Street	20,000
DA5 Eastern Road and Edward Street	18,200 – 23,200
DA6 Hove Station	1,000 ¹⁶³
DA7 Toad's Hole Valley	25,000
Patcham Court Farm	6,500
Extant Planning Permission (not included within DA supply figures)	4,757
Total:	91,000 - 96,000 (rounded)
B1c, B2, B8 Industrial	43,430

¹⁶¹ Employment Land Study Review 2006 and update 2009.

¹⁶² Employment Land Study Review 2012 based on job-growth scenario of demand for B class employment space in Brighton & Hove to 2030.

¹⁶³ May not result in a total net gain in employment floorspace within DA6 area due to potential loss of employment space within the Conway Street Industrial Area.

Requirements	
DA2 Brighton Marina	2,000
DA7 Toad's Hole Valley	¹⁶⁴
DA8 Shoreham Harbour	7,500 ¹⁶⁵
Total:	9,500

4.31 In light of the Employment Land Study Review 2012 identifying a qualitative and quantitative need for additional employment land over the plan period it is important that the strategic allocations set out in the Development Areas bring forward high quality employment floorspace as indicated in Table 4 to meet the council's priorities regarding high quality job creation and to support its growth potential over the next 20 years. The Employment Land Supply Trajectory indicates the need for close monitoring of the office developments identified to come forward in 2014-2019 to ensure they are delivered. However, it is also important to allow for reasonable flexibility, in the short term to promote successful regeneration and enable viable schemes to be delivered. Therefore proposals which bring forward employment floorspace less than proposed on sites identified in Table 4 will be considered, taking into account whether:

1. There is demonstrable benefit for early redevelopment and clear commercial and financial viability evidence that the figures in Table 4 are unlikely to be delivered within the next 5 years;
2. Allowing a different scale or mix of development will secure particularly strong planning benefits;
3. It is appropriate in light of ongoing monitoring of delivery of new employment floorspace against the 2013 Employment Land Supply Trajectory and subsequent updates.

Industrial Estates and Premises

4.32 The Employment Land Study Review 2012 assessed the city's stock of industrial estates/ business parks for their suitability for continued protection for employment use. The study found that these established areas remain popular, as demonstrated by high occupancy and low vacancy levels. With limited spare capacity in existing industrial floorspace supply it is therefore important to continue to protect these employment sites whilst encouraging new business investment and opportunities in order to facilitate renewal and growth.

4.33. Better utilisation of space on these estates could be achieved by wholesale redevelopment opportunities/ the gradual redevelopment of individual plots (whereby one large older unit is redeveloped for modern small

¹⁶⁴ Potential for B1a, B1b employment floorspace to be substituted by B1c light industrial floorspace subject to appropriate masterplanning.

¹⁶⁵ This figure also includes B1a as part of the mix of employment uses ongoing masterplan work indicates potential capacity for net additional floorspace within Aldrington Basin, although this will need to be offset against potential floorspace losses associated with the redevelopment of South Portslade Industrial Estate.

units) or the sub-division of larger units. The council will consider how it can use its ownership of some these estates to help facilitate this and also continue to explore different funding sources to enable improvement works. The council will support proposals which:

- refurbish and upgrade the employment floorspace;
- makes more efficient and effective use of the site/premises delivering new floor space;
- delivers significant environmental improvements in terms of the public realm and landscaping of industrial estates and premises;
- improves the quality of the employment offer in terms of the type of employment and density of jobs, and;
- improves the environmental performance of buildings including improvements that will bring about reductions in water or energy consumption and improve resource efficiency.

4.34 These industrial estates/ premises are also considered suitable for certain “sui generis” uses, that is, those with industrial characteristics which are not included within the Use Classes Order. For example, car breaking, or metal recycling which could potentially harm residential amenity are thus likely to be considered most suited to an industrial estate. With modern design and operation techniques, waste management facilities can increasingly be accommodated in general industrial areas as a B2 use¹⁶⁶. Whether or not a new sui generis use is judged to be acceptable will be considered against the comparability and the extent of the employment it would create and the impact of the use on existing employment uses. A sui generis use would not be acceptable, for example, if it harmed the continuation of the employment uses which the policy protects. Similarly new uses should not be introduced into an industrial estate/ premise that would preclude industrial and/or warehousing type uses.

Employment-Led Mixed Use Sites

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

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

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

¹⁶⁶ See Policy WMP 7 of the Waste and Minerals Plan for East Sussex, South Downs and Brighton & Hove, adopted February 2013.

- The quality of the employment offer in terms of the type of employment and density of jobs.
- Viability

Developments will need to be carefully designed and managed to ensure that residential and other occupiers of the sites will have an appropriate level of amenity. An appropriate mix of housing and provision of affordable housing will be required to comply with CP19 Housing Mix and CP20 Affordable Housing.

Safeguarding Employment Sites

4.37 Alongside Central Brighton as the primary office location where existing office accommodation will be protected (SA2), office accommodation can also be found in clusters elsewhere in the city (such as at City Park and along Preston Road) and scattered across the city. This office accommodation can be found within older purpose built buildings or converted period buildings, upper floor accommodation above shops, mews or modern flexible managed office space/ business centres. In the context of the delivery challenges for new office space in the short term, and the quantitative shortfall of supply a test of redundancy is required.

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

4.39 Redundancy and unsuitability for modern employment uses of unallocated sites or premises in employment use (Use Classes B1-B8) will be determined by considering the following criteria:

- a) location of the site;
- b) quality of the buildings;
- c) site or floor layout;
- d) accessibility;
- e) proximity to public transport/ trunk routes;
- f) other uses in the neighbourhood
- g) cost of demolition/ refurbishment sets against its future value for employment uses;
- h) the length of time the site has been vacant
- i) documented evidence of the marketing strategy adopted, particularly whether it has been marketed at a price that reflects local market prices and attempts to make the building attractive to different business or employment uses (the length of marketing will need to reflect the size and nature of the site or premise and therefore whilst a year is considered a

reasonable marketing period for small sites/ premises a longer period may be required for larger sites/ premises).

j) for office uses the prevailing vacancy rate for the size and type of office in Brighton & Hove should also be considered;

k) for an office building whether change of use is the only practicable way of preserving a building of architectural or historic interest.

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

CP4 Retail Provision

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

Centre Definition	Defined Centres	Linked Policies
Regional Centre	Brighton	DA1, SA2
Town Centres	Hove	
	London Road	DA4
District Centres	St James's Street	
	Lewes Road	DA3
	Boundary Road/Station Road	DA8
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, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell's Vale, Saltdean Longridge Avenue, Saltdean	SA6 (all centres)

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

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

Brighton Regional Shopping Centre should be the focus for future significant retail development (see policy DA1 and SA2). Consistent with the 'Character Areas' defined in policy SA2, major retail developments in Brighton Regional Centre should provide for a mix of small and large

unit retail floorspace to cater for both national retail occupiers and the demands of smaller independent and local traders.

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

Applications for all new edge and out of centre retail development will be required to address the tests set out in national policy¹⁶⁷.

Applications will be required to complete an impact assessment at a locally set threshold¹⁶⁸ of 1,000 sqm (net) floorspace or more.

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

Supporting text

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

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

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

¹⁶⁷ The National Planning Policy Framework March 2012

¹⁶⁸ The NPPF states that local authorities can set their own locally set floorspace threshold for the requirement of impact assessments

addressed in DA1 Brighton Centre, and Churchill Square and policy SA2 Central Brighton.

4.44 The Brighton & Hove Retail Study Update (2011)¹⁶⁹ has reviewed the vitality and viability of each of the shopping centres. The Study does not recommend that any new centres need to be designated but recommends that the District Centre designation for Brighton Marina should be removed. The Council's approach for Brighton Marina is to enhance the choice and performance of retail activity through the encouragement of mixed retail activity and improvements to the public realm, and to continue to address the development and future uses at this location using site specific policy DA2. A detailed policy regarding the appropriate type and mix of A1 and non A1 uses in the Marina will be set out in Part 2 of the City Plan.

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

4.46 The Retail Study identifies capacity for new food and non-food retail floorspace to the period 2030¹⁷⁰. In accordance with Government policy the council will prefer to direct retail applications to the town centre in the first instance and then edge of centre locations. Only if suitable sites are not available will out of centre sites be considered. Impact assessments will be required as a locally set threshold for proposals of 1,000 sq m net or more not within the town centre.

Table 5 Estimated Retail Need

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

Retail Study Update 2011: Capacity identified 2011-2030 (Comparison floorspace based on improved market share from 60.9% to 70%)

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

4.48 The defined shopping centres will be regularly monitored to ensure that the hierarchy remains balanced, appropriate and representative. Regular monitoring will also determine whether it is appropriate to alter the boundaries

¹⁶⁹ Brighton & Hove Retail Study Update 2011

¹⁷⁰ Brighton & Hove Retail Study Update 2011, Table 4.1 and 4.2

of the centre, depending on changing retail characteristics and demand. Monitoring should include regular updates of the Brighton & Hove Retail Study, and annual audits of the defined shopping centres. On completion of the redevelopment of the Brighton Centre and Churchill Square the council will extend the designation of the prime retail frontage to include the retail elements of the scheme.

4.49 Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

CP5 Culture and Tourism

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

1. New visitor attractions, arts and festival events will be expected, where appropriate to comply with the requirements of national planning policy¹⁷¹ and:

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

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

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

3. The provision of affordable¹⁷² and appropriate arts and creative industries work space and creation, storage, performance, showing and rehearsal space will be promoted in regeneration schemes and in major mixed use developments across the city;

4. Existing arts and performance venues including; museums, art galleries, cinemas, live music venues, theatres and exhibition space will

¹⁷¹ The National Planning Policy Framework defines main town centres uses to include culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

¹⁷² Creative Industries Workspace Study 2008. The study indicated that affordable rents in the creative industries are generally at the lower end of the market range and in Brighton & Hove are in the region of £7.50 a square foot. However it should be noted that this average figure is higher than those generally considered affordable by some creative businesses and organisations.

be protected and enhanced to maintain the city's cultural infrastructure. Proposals for change of use would need to demonstrate:

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

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

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

Supporting Text

4.50 Tourism is inextricably linked to the cultural life of the city and the historic built environment and contributes to the prosperity of the local economy and region. Brighton & Hove is one of Britain's leading and established visitor destinations with an approximate 8m tourist visitors per year and an estimated £732 m visitor spend in 2009¹⁷³. The city has a strong cultural and creative industries sector and is home to several arts and creative industries organisations of regional and national importance¹⁷⁴. The city has a reputation as a 'producing' city where innovative and quality new works and products are exported worldwide and it serves as a cultural hub for the region. It hosts the largest arts festival in England (which brings £20m into the local economy each year¹⁷⁵) as well as many other major arts festivals and community festivals. Regency Brighton is regarded as a nationally significant historic built environment.

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

¹⁷³ The State of the City Report 2011.

¹⁷⁴ Creative Industries Workspace Study 2008

¹⁷⁵ Tourism Strategy 2008: A refreshed strategy for the visitor economy 2008/2018. (page 10)

for the city's tourism industry as set out in the Tourism Strategy¹⁷⁶ and its four guiding principles¹⁷⁷ and any subsequent tourism strategy.

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

4.53 As well as enjoying the seafront, leisure visitors come to the city to shop, eat out, and enjoy culture, the built heritage, entertainment and nightlife. The city has tapped into the growing short break and cultural tourism markets, still mainly at weekends, but this extends beyond the summer into the spring and autumn. It is also important to recognise the importance of the city's natural environment, particularly the South Downs National Park as a tourism asset and other areas of the city attractive to visitors. The Tourism Strategy identifies six tourism places across the city with a specific character and role when visitors come to the city¹⁷⁸ and this has been addressed in the City Plan Part 1 through DA1- 5 and SA1- SA5. With only three miles between the sea and the South Downs at the widest point there is the potential for the city to become one of the UK's leading destinations for eco-tourism, reflecting the growing maturity of the city as a tourist destination and the need to create a stronger visitor experience between the city and the South Downs. Table 1 on page 26 sets out how this policy will help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits.

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

¹⁷⁶ The Refreshed Tourism Strategy 2008 has set out a vision that by 2018, Brighton & Hove will be a destination where the needs of the visitor, the tourism industry, the community and the environment are in complete balance and consequently will make a significant contribution to improving the quality of life for local people.

¹⁷⁷ The Tourism Strategy 2008 sets out four guiding principles to take the vision forward: investment in infrastructure & physical environment; sustainable & responsible tourism; improving quality & raising standards and partnership & consultation.

¹⁷⁸ They are gateways to the city (in particular railway and coach stations but also the Lewes Road, London Road); the Seafront; Neighbourhoods (Kempton, central Hove and Brunswick); The Downs & Villages (South Downs and Stanmer, Rottingdean); Central Brighton Retail areas (The Lanes & North Laine); Parks & Open Spaces (Preston Park, The Level, Pavilion Gardens)

4.55 Brighton & Hove is the creative powerhouse of the region and has the potential to become a national cultural leader¹⁷⁹. It is important that the city's existing cultural infrastructure (arts, performance and creation space) is protected and enhanced and that new proposals complement and contribute to the city's unique tourism offer. Examples include the Old Market in Hove and the Hippodrome in Brighton. To maintain the potential for a wide variety of arts and cultural uses existing venues (including stand-alone venues, those that are part of other facilities, or are contained within educational or community buildings) will be protected for their existing use or potential for such use. Proposals for change of use would need supporting documentation to demonstrate availability of adequate provision, equally as accessible by the community, elsewhere in the city and that the existing use was no longer viable or could no longer be sustained on a long-term basis (through marketing information, a business case, and information on the availability of funding).

4.56 Opportunities for continued investment in cultural provision for the city and new creative industries workspace have been identified, where appropriate, in Development Area and Special Area proposals to ensure the spatial distribution of artistic and cultural venues. This will help meet the significant forecast demands for new workspace over the next ten years¹⁸⁰ and support the commitments in the council's Cultural Strategy¹⁸¹. Demand remains for arts and creative industries workspace that is affordable in comparison with market rents, as well as flexible. Opportunities will be sought through site allocations in the City Plan Part 2, through Developer Contributions, SPDs or development briefs in preparation for regeneration schemes and major mixed use developments across the city.

4.57 The role of iconic buildings such as the Royal Pavilion to the attractiveness of the city as a visitor destination is recognised and the importance of culture to the city's environment, image and prosperity is reflected in many of the City Plan policies. These include CP12, CP13 and CP15 relating to high quality design and improving the public realm and heritage, seafront regeneration proposals (see SA1 The Seafront), regenerating the Valley Gardens (see SA3 Valley Gardens), maintaining and enhancing the role of central Brighton including supporting the Cultural Quarter (see SA2 Central Brighton) and through the major development opportunities identified at Brighton Marina, Gas Works and Black Rock (DA2) and the Brighton Centre and Churchill Square redevelopment (DA1).

¹⁷⁹ Brighton & Hove City Council Cultural Strategy 2009

¹⁸⁰ Creative Industries Workspace Study 2008

¹⁸¹ See footnote 10.

CP6 Visitor Accommodation

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

- 1. Proposals for new hotel accommodation¹⁸² will be assessed in line with the national planning policy framework and the sequential approach¹⁸³ to site selection with proposals for new hotel development directed firstly to central Brighton (SA2).**
- 2. Proposals for new hotel accommodation should be accompanied by an impact assessment to identify how the proposal would add to and impact on the current supply and offer of accommodation; whether it has the ability to create new demand and how it might meet needs currently unsatisfied in the city.**
- 3. The council will work with the hotel industry to encourage the creation of apprenticeship schemes/ local jobs.**
- 4. Proposed extensions to existing hotels will be supported where this is required to upgrade existing accommodation to meet changing consumer demands.**
- 5. Partial conversion of a hotel will be considered where there is adequate demonstration of the need to enable investment in the remaining hotel.**
- 6. Within the Hotel Core Zone, loss of hotels/ guest houses (serviced accommodation) will be considered where it can be demonstrated that:**
 - a) The premises has limited potential to upgrade and position itself viably in the market; and**
 - b) The loss of the premises would not set an unacceptable precedent in relation to the concentration and role of nearby/ adjacent serviced accommodation; and**
 - c) The new use would be compatible with the character and other uses in the area.**

The Hotel Core Zone shown on the policies map indicates the area where the main accommodation clusters and drivers of accommodation demand can be found.

Supporting text

4.58 It is vital that Brighton & Hove is able to support its tourism and business conference economy by providing a sufficient and wide ranging type of

¹⁸² Good Practice Guide on Planning for Tourism (2006) identifies several types of hotel accommodation: major hotels, other hotels, budget hotels, motels and travel lodges

¹⁸³ As set out in NPP4 paragraph 24.

accommodation to cater for visitors. The Tourism Strategy (2008) recognises that good quality hotels help support a strong conference business offer for the city.

4.59 The city has a significant stock of hotel and guest accommodation; a total of 160 hotels and guest accommodation predominantly located in central Brighton and along the seafront. The council undertook a capacity and needs analysis of hotel bedrooms in the city to understand the future capacity of the city to absorb new hotel accommodation (2007 Hotel Futures Study). Since the study was completed 3 new hotels have come into operation (Jury's Inn, MyHotel and Royal York hotel) adding 365 bedrooms (although the latter is now operating as a 151 bed youth hostel). Furthermore there is the potential for an additional 372 bedrooms through recent outstanding planning commitments¹⁸⁴.

4.60 The hotel sector is currently facing a challenging time with a drop back in the market linked to the current recession which has impacted on occupancies, achieved room rates and revpar¹⁸⁵ across the UK and locally. With the recent considerable increase in supply of new hotel accommodation in the city it is important that Brighton & Hove's hotel sector is allowed a period of consolidation and recovery to help demand and supply get back into balance, and restore confidence in the market place and amongst investors.

4.61 So whilst there remains continued interest in new hotel development in the city, the 2007 Hotel Futures Study projections for future requirements for hotel development indicate that the council does not need to identify additional hotel sites over and above that which were already proposed/ planned to 2016 nor does it need to prioritise specific types and standards of hotel in terms of hotel investment marketing. The Study indicated that much of the long term future growth in demand for the additional accommodation is likely to relate to a redevelopment of the Brighton Centre. The importance of the continued development of the leisure break product through the implementation of planned major leisure development major projects such as the i360 Observation Tower and Black Rock is a recognised priority for the council which have the potential to secure further growth in the city's hotel market.

4.62 New hotel proposals will be directed firstly to the central Brighton area. This approach is the most sustainable in planning terms, since it allows greater access by public transport and will allow visitors to easily access other facilities and attractions in central Brighton. It is important that Brighton & Hove's hotel sector is allowed a period of consolidation and recovery to help demand and supply get back into balance, and restore confidence in the market place and amongst investors. Therefore the council will require an impact assessment to be undertaken to support applications for new hotel

¹⁸⁴ at the Block J site, Brighton Station, 88-92 Queens Road, Former Ice Rink, Queens Square and Mitre House).

¹⁸⁵ The net amount of rooms revenue that hotels achieve per available room

accommodation to ensure that the city is able to support additional bed spaces without a significant impact in existing hotels and guest houses. Ongoing monitoring of hotel developments and prevailing economic conditions will inform the implementation of Part 2 of this policy.

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

4.64 The council will continue to protect existing hotel and guest accommodation within a defined area of the city unless non-viability can be demonstrated. It is recognised that with a net increase in hotel stock of that has occurred in the last 5 years, a period of consolidation and recovery is required to help demand and supply get back into balance. A more flexible approach is introduced to allow those premises that have become poorly located in relation to the main generators of demand and with limited potential to re-position themselves viably to exit the market. The implementation of this policy will be through regular monitoring of losses and gains and impact on overall supply.

4.65 The central Brighton seafront and streets and squares running immediately off it account for the majority of the city's current supply of hotel and guest accommodation. There is relatively little accommodation outside the city centre. Hotels and guesthouses are more widely spread in Hove, with no concentrations of establishments. The Hotel Core Zone shown on the policies map is focussed around the main accommodation clusters and drivers of accommodation demand. However it is acknowledged that over the life time of the plan that new drivers of accommodation could emerge impacting on the attractiveness of certain areas of the Hotel Core Zone and the boundary of the Hotel Core Zone will be kept under review. The key objective is to support the tourism sector by ensuring that there is a sufficient range of types and quality of visitor accommodation to meet the needs of the city's visitors

4.66 With regard to meeting CP6.6b applications for change of use will need to be accompanied by:

- **Proof of marketing for sale** – as a going concern for a minimum period of 12 months at a competitive price taking account of current trading performance and condition;
- **Evidence of business performance** – details of occupancy and achieved occupancy rate data for the last 18 months along with accounts to explain how the business is performing in line with levels of occupancy typical of industry/ destination norms; and
- **Evidence of professional management** – this includes details of marketing and business plans for the last 18 months to demonstrate investment plans and attempts to attract business.

4.67 The council will be flexible in its approach and have regard to all material considerations at the time of the application including being responsive to the changes in the market, the economy, and visitor accommodation supply. It is recognised that for smaller 'lifestyle' businesses, commercial viability arguments are often more difficult to test as the performance of such businesses varies so much depending on the business objectives, aspirations of owners and how the purchase of the business has been financed. In such cases proof of marketing for sale with specialist and local agents at a realistic price may be sufficient on its own. Whilst those premises that are well-located or have something special to offer as a building and have potential to up-grade will need to be accompanied by evidence of attempts to save the business – for example, details of schemes to up-grade and re-position the business, partially convert to an alternative use in return for investment in the remaining rooms, and conversion to self-catering/ other forms of serviced accommodation as appropriate, with costs and performance forecasts and advice sought from by business support agencies and hotel advisors.

4.68 Consideration will be given to the appropriateness of the proposed alternative use in a given locality and whether it enhances the role of the visitor/tourist economy and adds vitality. For those premises that have become poorly located in relation to the main generators of demand, with limited potential to re-position themselves viably in the market, change of use to residential would be acceptable.

4.69 The policy also supports the up-grading of existing accommodation, including the addition of appropriate facilities such as spas and health clubs. It is also recognised that there may be some circumstances where there may be a case to be made for the partial conversion of a hotel to, for example, residential/ apartments, to enable investment in the remaining hotel. Applications will need to be accompanied by a clear evidence of the case for investment, the need for enabling development and the on-going viability of the accommodation. As a minimum 50 per cent of the hotel rooms/ floorspace should remain. The council will work with the hotel industry and City College Brighton & Hove to encourage the creation of apprenticeship schemes/ local jobs in the visitor accommodation sector.

CP7 Infrastructure and Developer Contributions

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

- 1. Preparing, regularly updating and facilitating the implementation of an Infrastructure Delivery Plan¹⁸⁶ for the city that will set out the infrastructure to be provided in the city by infrastructure partners including the public sector and utilities, to meet future needs.**
- 2. Investigation into the possible implementation of a locally adopted Community Infrastructure Levy (CIL)¹⁸⁷ to provide for infrastructure with contributions that will deliver strategic infrastructure to support wider area development. The cumulative impact of all development and differing needs for infrastructure provision will be reflected in the CIL tariff.**
- 3. To make development acceptable and enable the granting of planning permission, inadequacies in infrastructure arising from proposed development will be required to be mitigated through s.106 Planning Obligations via a legal agreement and will be sought where they meet the statutory tests of being:**
 - necessary to make the development acceptable in planning terms;**
 - directly related to the development; and**
 - fairly and reasonably related in scale and kind to the development.**

Supporting Text

4.70 To ensure the best for the city from all development, the council will ensure the provision of adequate physical, social and environmental infrastructure. Contributions will be required towards such adequate and effective provision that may provide for new or upgraded infrastructure provision to ensure that development functions appropriately in its surroundings.

4.71 Subject to further evidence gathering and government guidance it is the longer term intention to investigate implementing a Community Infrastructure Levy (CIL). Future development that is liable to contribute to CIL will provide for strategic city wide general infrastructure as identified in the Infrastructure Delivery Plan.

¹⁸⁶¹⁸⁶ See Annex 2, Infrastructure Delivery Plan.

¹⁸⁷ If progressed a Community Infrastructure Levy (CIL) will be adopted after 2014

4.72 To mitigate site specific circumstances, contributions secured through s.106 Planning Obligations legal agreements at the time of granting planning permission will provide appropriate contributions to ensure that the impact of new development is minimised as well as improving the quality of the built environment. Planning Obligations will remain for provision of affordable housing, site impacts and infrastructure requirements to directly mitigate the impact of a development as prioritised in the Infrastructure Delivery Plan for creating sustainable neighbourhoods as a whole.

4.73 The policy as set out above accords with current Government guidance in the Community Infrastructure Levy Regulations 6 April 2010 (as amended). Local Authorities are not required to charge a CIL but there are restrictions on how Planning Obligations can be sought. The policy tests for Planning Obligations have been made statutory in the CIL Regulations and require that development that is capable of being charged CIL must meet all of the policy tests set out in the CIL Regulations. Upon adoption of CIL or after 6 April 2014 pooled contributions can only be sought from up to 5 separate planning obligations for an item of infrastructure. The restriction for pooling funding for such an item of infrastructure will also need to be considered for those agreements that have been entered into since 6 April 2010 when the CIL Regulations were introduced.

4.74 The requirement for development to contribute towards necessary physical and social infrastructure and environmental benefits is also highlighted in the detailed proposals for each of the City Plan Development Areas. It is important that all priorities in the relevant areas are adequately considered so necessary infrastructure is timely provided to support the needs of new development. The timely connection to provision of utilities, including wastewater infrastructure and sewerage systems will be required by developer's liaising directly with service/utility providers. Priorities will also derive from other relevant policies, key strategic objectives or key local needs identified in other strategies, plans and commissioned studies. Table 1 on page 26 sets out how this policy will help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits.

4.75 The range of infrastructure and service provision that may potentially be supported by a future CIL or where s106 Planning Obligation contributions may be sought will include:

- Affordable housing, including accessible and adaptable homes
- Sustainable transport measures that will include initiatives to encourage use of public transport, walking and cycling
- Employment and regeneration initiatives including securing local employment, training and apprenticeship to include young people who are not in employment, education and training (NEET)
- Biodiversity, countryside and open space including access and interpretation facilities
- Sustainable development initiatives including renewable and low carbon decentralised energy systems, schemes and installations,

carbon reduction and energy efficiency measures, and air quality management measures

- Sports, recreation, youth facilities, play space and amenity space
- Highways infrastructure and access provision
- Utility infrastructure, including water provision, wastewater treatment and drainage
- Education and learning including schools and libraries
- Flood-risk prevention measures
- New/replacement community rooms and mixed use facilities
- Tourism, culture and heritage
- Reducing crime, policing and community safety
- Public Art including public realm, and environmental improvements
- Social services, health and well being
- Design & conservation of historic buildings.

4.76 Further detail on the main types of contributions that are commonly sought is provided in the adopted Developer Contributions Technical Guidance document. If required a Planning Obligations Supplementary Planning Document (SPD) will be produced that will provide further guidance on all the necessary contributions that may be required to support new development.

Section Four City Wide Policies

A Sustainable City

CP8 Sustainable Buildings

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

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

1. All development will be required to achieve the minimum standards as set out below unless superseded by national policy or legislation;

<u>Residential (New Build)</u>		
Energy Performance	19% carbon reduction improvement against Part L 2013 ¹⁸⁸	
Water performance	Water efficiency 'optional' standard ¹⁸⁹	
<u>Non - residential</u>	<u>Development Size</u>	
	Non-major	Major and Greenfield
BREEAM	Very Good	Excellent

2. All development proposals including conversions, extensions and changes of use will be expected to demonstrate how the development:

- a. addresses climate change mitigation and adaptation;
- b. contributes to a reduction in the city's current level of greenhouse gas emissions by delivering significant reductions in fuel use and greenhouse gas emissions via: passive design and orientation; fabric performance; energy efficiency measures; and low carbon solutions;
- c. facilitates on-site low or zero carbon technologies, in particular renewable energy technologies¹⁹⁰;

¹⁸⁸ This standard is equivalent to Code for Sustainable Homes level 4 in energy use. See paragraph 4.85-4.87 for guidance on demonstrating this standard.

¹⁸⁹ The 'optional' enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency' March 2015, page 15, G2(3). At 2015 this is defined as consumption 110 litres per person per day to be demonstrated http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD_G_2015.pdf

¹⁹⁰ Zero carbon technologies are those that harness renewable non fossil fuel energy to create heat or generate electricity. They are called zero carbon because they produce no carbon dioxide (CO₂) emissions when producing heat or power. These technologies are sometimes referred to as micro generation, producing heat or energy locally on a small scale. Low carbon technologies are those that use fossil fuels in a highly efficient way.

- d. connects, makes contributions to low and zero carbon energy schemes and/or incorporates provision to enable future connection to existing or potential decentralised energy schemes;
- e. aspires towards water neutrality¹⁹¹ by meeting high water efficiency standards and incorporating facilities to recycle, harvest and conserve water resources;
- f. improves the sustainability of existing buildings, makes the most effective use of land and re-uses existing buildings;
- g. protects occupant health and the wider environment by making the best use of site orientation, building form, layout, landscaping and materials to maximise natural light and heat, whilst avoiding internal overheating by providing passive cooling and ventilation;
- h. reduces 'heat island effect'¹⁹² and surface water run-off;
- i. uses materials that are sustainable and have low embodied carbon¹⁹³;
- j. enhances biodiversity;
- k. minimises waste and facilitates recycling, composting and re-use;
- l. reduces air, land and water pollution and safeguards water supplies if development is within groundwater Source Protection Zones;
- m. maximises operational efficiency through ongoing evaluation, monitoring and improvement of building performance especially in relation to energy and water use;
- n. introduces means to encourage users, tenants and householders to reduce their ecological footprint;
- o. is adaptable to respond to changing needs; and
- p. encourages food growing.

Technical guidance and clarification will be produced to help planning applicants address this policy.

The Sustainability Checklist and the Authority Monitoring Report (AMR) will be used to assess planning applications, and monitor the effectiveness of the policy.

Supporting text

4.77 The way in which buildings are designed, constructed, operated and decommissioned have significant impacts on the built and natural environment and require major resource inputs such as energy, water and

¹⁹¹ See Environment Agency 'Water Neutrality; An improved and expanded water resource management definition'. Water neutrality is where 'for every new development, total water use ... after the development [is] equal to or less than total water use ... before the development'.

¹⁹² On hot days urban areas can have temperatures 20 to 60% higher than the surrounding countryside. This is due to a phenomenon called the urban heat island effect that causes air temperatures in large cities to be warmer than in neighbouring suburbs and rural areas. Warmer air temperatures can impact on air quality, public health and the demand for energy. Heat island effect can be mitigated by the greening of buildings via for instance green roofs, green walls and tree planting.

¹⁹³ These include materials that are produced locally where possible, procuring materials sustainably and ethically, and seeking to avoid materials which are polluting or with high embodied carbon and energy inputs;

materials. Designing and constructing buildings that help to reduce or avoid adverse impacts can reduce not only resource inputs and the city's ecological footprint but also costs for developers and occupants. As such, encouraging high standards of sustainable building design and construction in new and existing buildings is an essential part of the City Plan's response to the challenges of climate change, natural resource depletion, energy security, habitat loss, and wider environmental issues.

4.78 Brighton & Hove is particularly vulnerable to the impacts of present and future climate change. Opportunities for growth and expansion are constrained by the South Downs to the north of the city and the sea to the south. The city also contains a high proportion of protected and/or old buildings¹⁹⁴. Within this context, the need to secure improvement in the environmental performance of the existing stock as well as more resource efficient and low carbon development whilst delivering homes and jobs through development is challenging. Energy, water and waste have been identified as key resource issues of particular concern in relation to growth in the city¹⁹⁵.

4.79 The City Plan reflects the council's and the city's commitment towards achieving excellence in sustainable building design. The purpose of this policy is to ensure development in Brighton & Hove fulfils this commitment whilst helping deliver European, national and Sustainable Community Strategy targets¹⁹⁶. As such, all development will be encouraged to contribute to the City Plan's vision for energy, water and waste neutral, high-standard, cost-effective, resource-efficient future and the development of a low carbon economy for the city.

4.80 The council's approach to deliver low carbon growth is through highly energy efficient buildings and connections to existing or planned local energy infrastructure. Energy efficient design is an essential element of the excellence in design envisioned in the City Plan being the most cost-effective,

¹⁹⁴ 17.4% of the city's built up area is within conservation areas. The proportion of stock built before 1919 and during the inter-war period is 43.4% for England and 65.7% for Brighton & Hove (Brighton and East Sussex Together House Condition Surveys – Overview Report October 2008).

¹⁹⁵ The latest data (2009) indicates that activities in Brighton & Hove emit about 1,230 kilo tonnes (1.2m tonnes) million tonnes of CO2 every year, with the domestic sector alone accounting for 42% of total direct emissions (mostly from energy use), significantly higher than 31% regionally and 30% nationally. The city is within a 'highly water stressed' region (Environment Agency) with above regional average per capita consumption (South East average 150-160 litres per person per day (l/p/d); Brighton & Hove's is 169 l/p/d – Audit Commission). The adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan identifies a need for additional waste recycling and recovery capacity to support further increases in the diversion of waste from landfill.

¹⁹⁶ The Brighton & Hove Sustainable Community Strategy commits to reducing the city's carbon emissions by 42% by 2020 and by 80% by 2050 from the 2005 baseline of 5.7 tonnes per person reflecting the national commitment via the Climate Change Act. It also commits to: 'from a starting point of no increase in 2012/13 on the 2006 per capita City Ecological Footprint baseline of 5.72 global hectares (gha) per person, achieve a reduction to: 2.5 gha per person by 2020; and 1.25 gha per person by 2050'. Commitment to delivering these targets are further detailed in the city's Climate Change Strategy.

efficient way of reducing carbon emissions from buildings (focusing on building fabric, orientation, layout, insulation, natural light, solar gains and shading, and passive ventilation). Once the demand for energy has been reduced to a minimum in a building the next step is to supply energy efficiently via renewable and low carbon energy and connection to decentralised heat and energy networks¹⁹⁷.

4.81. A Renewable and Sustainable Energy Study has been undertaken for Brighton & Hove assessing opportunities for carbon reduction in the city. The study informs planning policies around low and zero carbon energy particularly for Development Plan and Supplementary Planning Documents. Any wind turbine proposals will be considered against the Written Ministerial Statement (HCWS42) published on the 18th June 2015 or the latest government guidance thereafter.

4.82. The Study recognises that to deliver significant carbon savings during the Plan period emissions associated with the existing building stock must be addressed in addition to setting standards for new development. A combination of approaches will be required. This includes: retrofit improvements to the existing building stock; supplying low carbon decentralised energy solutions such as district heating; and installing renewable energy technologies.

4.83. The Study explores opportunities for district heating in the city and identifies areas with enhanced potential to implement district heating solutions and decentralised energy schemes. Where appropriate new development and retrofit projects will be required to connect to and/or make contributions to low or zero carbon energy schemes and/or to incorporate provision to enable future connection to any existing / potential decentralized energy schemes.¹⁹⁸. The energy study also provides an energy opportunities map which identifies particular areas of opportunity for different low and zero carbon technologies.

4.84 The Building Research Establishment Environmental Assessment Method (BREEAM) is a widely recognised, accredited, independent method for assessing environmental performance of non-residential buildings. Until superseded by nationally prescribed standards, the BREEAM standards for non-residential buildings will be required. Equivalent standards for non-residential buildings by nationally recognised certification bodies may also be accepted¹⁹⁹. Any changes to nationally described standards and or revised Building Regulations will be addressed through Part 2 of the City Plan or a review of this Policy.

4.85 An assessment of the energy demand and carbon dioxide emissions will be expected from all residential and proposed major developments, which

¹⁹⁷ Decentralised energy generation is a series of local systems generating heat and power, at or near the point of use, connected to local distribution networks.

¹⁹⁸ See Brighton & Hove Renewable and Sustainable Energy Study. This includes maps identifying opportunities for renewables and priority areas with enhanced potential for district heat networks.

¹⁹⁹ Such as Passivhaus or AECB standards.

should demonstrate the expected energy and carbon dioxide emission savings from energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP and community heating systems. The assessment should include:

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

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

4.87 Rather than an inflexible blanket policy for all development, standards are set by development size, see Table 6 below.

Table 6 - Definition of Development Size

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

4.88 The council will consider site constraints, technical restrictions; financial viability and the delivery of additional benefits to the city where requirements of the policy cannot be met. Given the contextual nature of these issues, the council will expect developers to make a case on a site by site basis.

4.89 The challenge to reduce the ecological footprint of the city means that there is a need to for the council and planning applicants to identify opportunities for improving standards in retrofitting the existing stock. Measures should be implemented which lower the environmental impact from the existing stock through reuse and refurbishment of buildings, reducing carbon dioxide emissions and fossil energy use, increasing thermal efficiency, reducing waste and noise impacts, and conserving water, materials and other resources.

4.90 Developments will, where appropriate, be required to demonstrate how sustainability has been addressed by submitting a completed Sustainability Checklist. An Energy Statement and other relevant information may also be needed as part of an application.

4.91 This policy has important links with CP12 Urban Design.

CP9 Sustainable Transport

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

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

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

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

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

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

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

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

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

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

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

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

1. Bus, Coaches and Taxis

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

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

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

2. Rail

Work with partners to:

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

3. Cars and Freight

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

- **traffic management measures including Intelligent Transport Systems that will improve traffic flow and reduce congestion;**
- **prepare and implement a Highways Asset Management Plan;**
- **car clubs;**
- **20mph zones in residential areas;**
- **promote use of alternative fuels and provide associated equipment, e.g. electric charging points; and**
- **specialised drop-off areas and appropriately located disabled parking bays for people with mobility difficulties.**

Prepare and implement a Freight Strategy for the city.

4. Walking and Cycling

Improve the public realm in key areas, and the routes leading to them, to encourage and enable walking (including wheelchair access) and

cycling. Measures will be undertaken in a number of areas including the following:

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

Implement an integrated cycle network by 2030.

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

Improve Rights of Way and access to open spaces and the National Park, including wheelchair friendly provision.

5. Travel Plans

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

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

6. Parking

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

Prepare new guidance on parking and servicing requirements for new developments that will put a priority on minimising off-street car parking provision in accessible locations; cycle parking standards; establish clear criteria for car-free housing; allow provision of disabled parking bays and incorporate new technologies e.g electric vehicle charging points or parking management.

Prepare and implement a strategy to manage coach parking.

Supporting Text

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

4.93 To ensure that Brighton & Hove continues to be attractive and thrive in the context of a growing population, more development and jobs it is important to maintain and improve travel and access into and within the city whilst providing a safe, clean and healthy environment. To help achieve this, the Transport Strategy for the city, adopted in May 2011 within the council's third Local Transport Plan [LTP3], has the following priorities:

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

4.94 The LTP3 provides a long-term policy and short-term delivery framework for capital investment in schemes and measures to maintain roads, pavements, street lights and street furniture; manage and provide increased transport choices; and improve access, infrastructure and the environment, with a focus on reducing pollution and carbon emissions. The LTP3 sets out a 15 year Strategy to 2026 and a Delivery Plan for investment covering the period from 2011-14.

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

4.96 Transport technology will play an important role in managing movement and travel and therefore reducing carbon emissions. Local measures can also make a difference, including:

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

4.97 By informing and influencing journey patterns, promoting and encouraging the use of more sustainable transport options, and providing

measures that increase people's travel options, the council and city can help tackle climate change and reduce carbon emissions.

4.98 Addressing air quality issues caused by road transport is a key priority, following the designation of an Air Quality Management Area [AQMA]. The associated Air Quality Action Plan (2010) identifies the need for successful transport planning and associated measures and initiatives to achieve a significant improvement in air quality, and therefore people's health. The development of a Sussex Low Emission Strategy (2011) seeks to promote measures through planning to reduce emissions. These include locating development in accessible locations and promoting clean technologies such as installing electricity charging points. These measures are included in part B of the policy. Significant health benefits will also arise from more sustainable travel as it encourages more active lifestyles and helps to reduce air and noise pollution from transport.

4.99 Brighton & Hove has a significant role as a regional transport 'hub' (an area with a high level of accessibility and interchange) which will be supported and implemented through partnership working with adjacent authorities, the Highways Agency and public transport operators (including bus, coach and rail) to provide alternative transport choices for some journeys and improve movement and access along the 'spokes' (A/M23, A27 and adjacent rail corridors). Bus services that provide cross-links with adjacent authorities have improved and have become increasingly important in providing reliable choices and reducing the need to travel by car. Measures introduced on the A259 between Rottingdean and Peacehaven are a good example of this. Joint working between authorities and transport operators will continue to ensure such opportunities are identified and developed through ongoing work on transport schemes affecting or that adjoin boundaries. The city has concentrations of land uses and high level economic, cultural and service activities that will benefit from improved connections. The need for rail service capacity and line improvements between the Sussex Coast and London, including the reinstatement of the rail line between Lewes and Uckfield, are supported.

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

- safe and easy access to the site from the main road network;
- associated priority measures on routes that link the informal park + ride service to the central area;

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

4.101 Part A2 of the policy addresses matters relating to reducing the number of car journeys within the city. The main part of the strategy is to locate major new development in accessible locations or in places which can be made sustainable through investment in walking, cycling and public transport improvements. These are identified as Development Areas. The exception is DA7 Toad's Hole Valley which is a greenfield site. It will be expected to meet high levels of sustainability and safety in terms of transport and access. Increased development in some areas, particularly neighbourhoods, may provide the opportunity to improve access to the transport network and important services such as employment, education, health and leisure. Developer contributions will be secured from new major development to mitigate travel impacts of a development that will be assessed through a transport assessment.

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

4.103 Local shopping centres are a focus for many communities and provide a variety of facilities and services that can help to reduce the need to make a number of separate journeys. Enabling these locations to be more accessible and attractive to everybody and function practically e.g. deliveries and servicing, provides the opportunity for them to thrive as part of the local economy.

4.104 Improving accessibility, safety and the environment of residential areas is a priority and will include measures to create safer communities and shared spaces and reduce the impact of traffic, especially driver speeds. It is expected that local priorities for improving neighbourhood roads can be brought forward through Neighbourhood Planning (see SA6 Sustainable Neighbourhoods).

Measures

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

Buses, Coaches and Taxis

4.106 Between 2001 and 2010 Brighton & Hove has experienced a significant increase in bus patronage by 11 million journeys per year from 30.2 million in 2001 to 41.1million in 2010. This success has been due to excellent partnership working with bus operators and by securing infrastructure investment like real time bus information and bus priority lanes. The city council aims to carry this work forward and has a priority to invest in the sustainable transport corridors set out in part B1 of the policy. These measures include providing bus and taxi lanes, bus stop improvements and real time bus information. Funding has been secured to improve the Lewes Road and Eastern Road/Edward Street corridors in terms of bus priority as well as walking and cycling by 2016 (see part B4). Pro-active measures will be undertaken to secure funding for the other priority corridors to deliver improvements by 2030. Expansion of the bus passenger information system on the corridor from Peacehaven, Newhaven and Eastbourne will be implemented jointly with East Sussex County Council.

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

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

Rail

4.109 The city council will work with Network Rail and train operators to minimise the disruption to rail services at weekends arising from essential rail improvement works. The aim is to increase the quality and use of the north-south and east-west rail services to the city and encourage car users to park at stations and visit Brighton & Hove by train. Car use should be minimised and car sharing promoted as well as other sustainable means to travel to train stations. This will involve close working with rail providers and adjoining authorities

4.110 Further work will be undertaken with rail companies, including joint funded projects, to encourage increases in train patronage, capacity and improve interchanges between sustainable forms of transport. Measures to improve access and safety in and around all eight stations in the city will be a priority. This will include improving real time rail information both in and around stations and through the councils 'journey on' website and other media.

Cars and Freight

4.111 Managing road travel and congestion in the city is a critical issue in the context of a growing population and the levels of development expected over the life of the City Plan.

4.112 The council will continue to develop and implement Intelligent Transport Systems which will improve the way the highway network is managed in real time to reduce congestion. This will be achieved by enhancing the current network of traffic signals, expansion of CCTV, ANPR cameras and updating and extending the city's existing Urban Traffic Management and Control System (UTMC).

4.113 The council is currently developing a Highways Asset Management Plan (HAMP) that will involve identifying and account for the city's highway assets that will be used to prepare medium and long-term programmes of works to maintain the highway asset.

4.114 Car clubs provide people with access to car without having to own one. The council will continue to work in partnership with the Car Club providers to ensure that on street provision is located across the city to encourage use of car clubs as an alternative to car ownership.

4.115 The council will introduce a city wide speed limit of 20 mph within neighbourhoods and near schools. The aim will be to improve road safety while encouraging more people to walk and cycle.

4.116 The council has installed eight electric vehicle charging points across the city and will continue to work with providers to explore further opportunities to expand the network. This will include potential provision in council and private car parks, and working with car club operators, to encourage the use of electric vehicles.

4.117 In terms of freight, the council will establish a Freight Strategy that will create an efficient system and network for delivery vehicles that supports economic growth particularly with local business and assists in reducing the impact of goods vehicles on the city's environment particularly air quality.

Walking and Cycling

4.118 Cycling and walking are the best ways of exploring Brighton & Hove and can benefit personal health and wellbeing. The city council is committed to secure funding for, and implementing, improvements to the public realm to encourage cycling and walking in the areas specified in the policy. The Brighton Station Gateway Project is being developed in partnership with Southern Rail and Network Rail to create:

- a safe and accessible environment;
- a better walking and cycling environment;
- an environment that encourages businesses;
- better use of routes to the east of the Station;
- a high quality northern, as well as southern, station entrance.

4.119 Funding has been secured for improvements to walking and cycle facilities on Lewes Road. The council's Public Space Public Life Strategy sets the importance of negotiating the city from a pedestrian and cyclists perspective and emphasises the need for improved legibility and the importance of the public realm in relation to the 'liveability' of Brighton & Hove.

4.120 A coherent pedestrian and cycle network is vital to the legibility and overall quality of the city. An audit has been undertaken of the existing network of cycle routes in the city with a view to linking routes to create a comprehensive network within the life of the City Plan. There is an aim to contribute 10% of the Transport budget towards promoting walking and cycling.

4.121 As well as establishing a core cycling network, additional improvements will include:

- one-way 'except cycles' networks;
- toucan crossings;
- on-street Cycle Parking;
- cycle provision in pedestrian priority streets;
- improve junctions for cyclists; and
- continue to invest in Bikeability training for children.

4.122 The council will continue to develop a coherent walking network and reduce the physical and mental barriers to walking and improve the links between key locations in the city such as the seafront and the city centre. Measures will include:

- ensuring provision is pedestrian and wheelchair friendly;
- introduction of more pedestrian priority routes;
- better crossing facilities;
- continue to introduce raised crossings & dropped kerbs;
- decluttering streets and improving Way Finding signs;
- continue to introduce drop kerbs;
- maintain and improve footways; and
- provide informal crossing points

4.123 There will also be continued investment in Rights of Way and access to open spaces and the South Downs National Park, reflecting priorities in the Rights of Way Improvement Plan [ROWIP] and Downland Initiative.

Travel Plans

4.124 Other measures that make a significant contribution towards promoting and improving the use of sustainable transport travel management measures are known as 'smarter choices' initiatives. These include travel plans for

residential developments, schools and businesses to enable people to make more informed and active sustainable choices. This will involve sustained partnership working to develop measures which will help reduce car journeys into the city and within the city.

4.125 There will also be a sustained Personalised Travel Planning project targeting large areas on the city. This will involve working closely with individuals and community groups to assist them in making more informed travel choices with particular emphasis on more active travel to improve health and wellbeing.

Parking

4.126 Car parking can have a significant role in generating traffic. It is important that the city council has an integrated approach to parking in the city including setting parking charges, improving car parks²⁰⁰; encouraging better use of out of centre car parks and implementing controlled parking zones (CPZs). The aim of this parking strategy will be to ease congestion in the city centre. A programme of CPZs will be prepared in consultation with residents and stakeholders and be considered alongside the wider parking issues of the city. A key measure to tackle congestion will be to ensure there is no enlargement of public parking provision in central Brighton alongside measures to encourage the transfer of car journeys onto sustainable modes. It is recognised that there will be the need for some disabled people to use private cars for travel and therefore the associated parking need.

4.127 In terms of new development, it will be a priority to review and prepare an up to date Supplementary Planning Document (SPD) setting out parking and servicing standards for new development. Car parking standards will accord with the NPPF and the SPD will also include standards for cycle, disabled driver and motorcycle parking. Standards and requirements for meeting the needs for new technologies including electric vehicle charging points and opportunities for 'car free' housing proposals will also be addressed in the SPD.

4.128 Coach parking is an important matter for the city, especially in relation to the regeneration and development of the seafront, and a strategy will be developed and implemented to manage this issue.

²⁰⁰ The council has an on-going refurbishment programme of its eleven off street car parks and will work towards achieving the industry standard 'Park Mark' for all its car parks (administered jointly by the Police and British Parking association) which is awarded to car parks that have good physical design and a high standard information management systems.

CP10 Biodiversity

The council will develop programmes and strategies which aim to conserve, restore and enhance biodiversity and promote improved access to it through the following:

1. Working with neighbouring local authorities, contribute to the delivery of biodiversity improvements within the South Downs Way Ahead Nature Improvement Area (NIA), which incorporates parts of the urban area, the urban fringe, the seafront and surrounding downland. Within the NIA, a strategic approach to nature conservation enhancement will be taken, with the objectives of:

- **linking and repairing habitats and nature conservation sites to achieve landscape scale improvements to biodiversity;**
- **conserving, restoring, recreating and managing priority habitats and protecting and recovering priority species populations to contribute to Local Biodiversity Action Plan targets;**
- **enabling people to have improved access to and understanding of local habitats and species; and**
- **ensuring development delivers measurable biodiversity improvements.**

2. Ensure that all development proposals:

a) Provide adequate up-to-date information about the biodiversity which may be affected;

b) Conserve existing biodiversity, protecting it from the negative indirect effects of development, including noise and light pollution;

c) Provide net gains for biodiversity wherever possible, taking account of the wider ecological context of the development and of local Biosphere objectives; and

d) Contribute positively to ecosystem services, by minimising any negative impacts and seeking to improve the delivery of ecosystem services by a development.

3. Establish criteria-based policies against which development proposals affecting designated sites of international, national and local importance; protected species; and biodiversity in the wider environment will be judged. Such policies will distinguish between the relative importance of each of these nature conservation features to provide clarity about when development may be permitted and about any mitigation, conservation and enhancement which may be required.

4. Monitor progress with the delivery of biodiversity objectives through suitably devised indicators.

Supporting Text

4.129 Biodiversity is the variety of life on earth, and includes all species of plants and animals and the natural systems that support them. Through 'ecosystem services', such as air and water purification and the amelioration of the effects of Climate Change, biodiversity is a core component of sustainable development, underpinning economic development and prosperity. It also has an essential role in maintaining and improving quality of life, particularly in urban areas, and contributes to developing locally distinctive and sustainable communities.

4.130 All local authorities have a duty under the Natural Environment and Rural Communities Act 2006 to have regard to the conservation of biodiversity in exercising all their functions. The duty aims to make biodiversity conservation an integral part of policy and decision making.

4.131 Brighton & Hove has a strong foundation for biodiversity conservation, having two Sites of Special Scientific Interest (including one Special Area of Conservation), eight Local Nature Reserves (either proposed or declared) and a suite of Sites of Nature Conservation Importance.

4.132 Working in partnership with the Sussex Environment Partnership and the Sussex Wildlife Trust, the council has defined a Green Network for the city. The Green Network takes a landscape-scale approach, connecting the urban area, urban fringe and downland. Areas of new natural green space within it will contribute to the requirement for additional natural green space and new habitat identified in the council's Open Space Study and the Local Biodiversity Action Plan.²⁰¹

4.133 The South Downs Way Ahead Nature Improvement Area (NIA) includes all of the city's Green Network and much of the surrounding downland. The boundary of the NIA / Green Network is shown on the policies map. This landscape scale designation was announced by the Government in February 2012 to deliver significant improvements for wildlife and people through the sustainable use of natural resources, restoring and creating wildlife habitats, connecting local sites and joining up local action. Within the setting of the NIA, development will be particularly encouraged to incorporate innovative approaches to nature conservation enhancement, such as the inclusion of biodiverse roofs and walls on buildings.

4.134 Brighton & Hove is working with local partners to achieve designation and then implementation of the city and surrounding area as a Biosphere Reserve. Biosphere Reserves are designated by the United Nations Educational, Scientific and Cultural Organisation as 'centres of excellence' to

²⁰¹ The Green Network addresses the citywide need for additional natural green space identified in the Open Space Sport and Recreation Study (October 2008) and Local Biodiversity Action Plan, but it does not address areas of deficiency in natural green space within the city. This requirement is addressed by Policy CP16.

demonstrate conservation and sustainable development in practice, by bringing nature and people closer together. They aim to deliver three objectives, through an integrated management strategy and spatial zonation of the environment:

Conservation - of landscapes, ecosystems, species and genetic diversity.

Development - economic and social development which is culturally and ecologically sustainable.

Knowledge – environmental education, research and training to test and demonstrate innovative approaches to nature conservation and sustainable development.

4.135 Local opinion and national policy all strongly support the need for biodiversity enhancements, including those which extend habitats, reduce the isolation of existing areas of habitat and improve 'local biodiversity' close to where people can appreciate it on a daily basis. The priority habitats and species for conservation action in Brighton and Hove are described in the City Biodiversity Action Plan which also sets specific targets for their recovery and describes the actions needed to achieve them. Involving local communities in delivering Action Plan objectives will be critically important to success. The role of local community and wildlife groups, schools, arts and culture (including the city's museums) in promoting, raising awareness in delivering Biodiversity Action Plan objectives is recognised.

4.136 Working with the Sussex Biodiversity Record Centre, Brighton & Hove Council has carried out a detailed audit of the habitats of value to the city. This has established a baseline for monitoring the achievement of priority habitat and species targets. The audit highlights fragments of isolated habitat and identifies strategic opportunities for their reconnection as part of the Nature Improvement Area / Green Network.

4.137 Supplementary Planning Document 11 'Nature Conservation and Development' includes a clear procedure for identifying existing nature conservation features which may be affected by a development and for quantifying the amount of new nature conservation features which should be delivered, either on or off site. Off site provision will be directed to the Green Network / NIA wherever possible. The SPD will also be used to quantify the amount of developer contributions which will be required from development proposals which do not deliver adequate nature conservation benefits. These contributions will also be used by the council to deliver pre-defined objectives within the Green Network / NIA.

4.138 Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

CP11 Managing Flood Risk

The council will seek to manage and reduce flood risk and any potential adverse effects on people or property in Brighton & Hove, in accordance with the findings of the Strategic Flood Risk Assessment (SFRA).

Development proposals in locations that have been subject to previous localised flooding events (including, surface water/muddy floods, groundwater, or sewer floods) will need to demonstrate that the issue has been taken into account and appropriate mitigation measures²⁰² incorporated. Where a risk is identified then planning applications must be accompanied by a site specific flood risk assessment identifying how flood risk will be mitigated and minimised.

Where site-specific flood risk assessments are required they must be consistent with the latest guidance in the SFRA, national planning policy framework and technical guidance, and any supplementary information from the Environment Agency. In particular development should include appropriate sustainable drainage systems²⁰³ in order to avoid any increase in flood risk and to ideally reduce flood risk.

Where flood risk management or mitigation measures are required, the opportunity to simultaneously achieve wider sustainability and biodiversity objectives for the city (as identified in CP8 and CP10) should be investigated and will be encouraged.

The council is producing a Surface Water Management Plan²⁰⁴ to manage surface water flood risk and help mitigate the effects of climate change on the city.

Supporting Text

4.139 The city's position on the coast and the potential for flooding and coastal erosion means that homes, buildings and infrastructure require protection and that the city is adapting well to climate change. In order to help appraise, manage and reduce flood risk in relation to the location of new development in the city the council commissioned a Strategic Flood Risk Assessment (SFRA²⁰⁵), to assess the nature and extent of the flood risk. The SFRA identifies the current and potential future risks from different forms of

²⁰² Actions to prevent, avoid or minimise the actual or potential adverse effects of a plan, policy, development, project, etc.

²⁰³ SUDS - An approach to drainage which seeks to decrease the amount of surface runoff, decrease the velocity of surface runoff, or divert it for other useful purposes, thereby reducing the contribution it makes to sewer discharge and flooding.

²⁰⁴ A SWMP is a framework through which key local partners with responsibility for surface water and drainage in their area work together to understand the causes of surface water flooding and agree the most cost effective way of managing surface water flood risk.

²⁰⁵ Brighton & Hove Strategic Flood Risk Assessment produced in April 2008, updated in 2011

flooding across the city, including taking into account climate change and likely associated rises in sea levels. The SFRA will be regularly reviewed to ensure that it contains the latest data and reflects the latest national planning policy, technical guidance²⁰⁶ and legislation. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits.

4.140 There are no surface water courses in the city so there is limited risk of flooding from main rivers or ordinary watercourses ('fluvial flooding') identified in the SFRA. However the SFRA identifies risks from other sources of flooding. As a coastal city, there is a risk of tidal flooding in some areas along the coastal frontage which lie within Flood Zones 2 (medium probability) and 3 (high probability/functional floodplain). Surface water flooding is a particular risk because of the highly urbanised nature of the city and in particular "muddy" flooding in suburbs of the city when surface water runs off the agricultural land on the South Downs during periods of high rainfall. Groundwater flooding is also a potential risk for the whole city due to the high permeability of the underlying chalk South Downs, and linked to this is the potential for sewer flooding if infrastructure becomes inundated with groundwater.

4.141 The proposed approach to accommodating growth in the city has been screened against all types of flood risk and the SFRA has informed the spatial strategy and the identification of Development Areas, whereby development has been steered to the areas of lowest flood risk first.²⁰⁷

4.142 It has not been possible, consistent with wider sustainability objectives for the city, for all the proposed Development Areas to be located wholly within Flood Zone 1 (low probability of flooding). Two of the proposed development areas: DA2 Brighton Marina, Gas Works and Black Rock Area and DA7 Shoreham Harbour Area are both in Flood Risk Zone 3 and were therefore considered in a more-detailed flood risk assessment (a Level 2 SFRA). This provided consideration of the flood hazards in more detail and for sets out a framework for managing flood risk whilst still allowing necessary development to occur²⁰⁸ subject to further, more detailed, flood risk assessments for specific sites in those areas. Nonetheless the more vulnerable land uses, such as residential development, should be directed to the parts of the Development Areas that lie in the areas of least flood risk. The risk of tidal flooding along the coastal frontage and specific requirements to manage that flood risk are addressed in DA2 Brighton Marina, Gas Works and Black Rock Area, DA7 Shoreham Harbour Area, and SA1 The Seafront.

²⁰⁶ Technical guidance on flood risk has been published alongside the National Planning Policy Framework March 2012

²⁰⁷ Sequential Test 2008

²⁰⁸ Exception Test 2008 for Brighton Marina, and 2011 for Shoreham Harbour

4.143 Where flood risk management or mitigation measures are required, there is often scope to simultaneously achieve wider sustainability and biodiversity objectives for the city as identified in CP8 and CP10. For example green roofs can offer multiple benefits of helping to reduce surface water run-off, making buildings more sustainable, and enhancing biodiversity and the green network. Sustainable Drainage Systems (SUDS) can offer a similar range of sustainability benefits in addition to managing surface water. Solutions that offer multiple sustainability benefits will be encouraged.

4.144 Surface Water Management Plans (SWMPs) are identified as a tool to manage surface water flood risk on a local basis by improving and optimising coordination between relevant stakeholders by working together to understand the causes and effects of surface water flooding and agree the most cost effective way of managing surface water flood risk for the long term. Background work is underway to develop a Surface Water Management Plan for the city, and a Preliminary Flood Risk Assessment has been completed and a Phase 2 (Detailed risk assessment) is underway and is due to be completed in 2013. The council has a new role as Lead Local Flood Authority with a responsibility for surface and groundwater flooding, SuDS approval and other responsibilities derived from the Flood and Water Management Act 2010 and is a source of information and technical assistance.

Section Four City Wide Policies

An Attractive City

CP12 Urban Design

A city-wide Urban Design Framework will identify and set out areas of the city which should largely be conserved; areas of the city suitable for localised, incremental development and enhancement; and areas of the city where positive and pro-active measures are required to secure major enhancement. Where appropriate, density will be raised through predominantly low-to-medium rise development but making most effective use of those identified areas which have the potential for taller developments, defined as 18 metres or more in height (approximately 6 storeys). The areas with such potential are:

- Brighton Marina
- Brighton Station / New England area
- Central Seafront
- Eastern Road / Edward Street
- Hove Station area
- Lewes Road corridor
- London Road / Preston Road corridor
- Western Seafront / Kingsway
- Shoreham Harbour

All new development will be expected to:

1. Raise the standard of architecture and design in the city;
2. Establish a strong sense of place by respecting the diverse character and urban grain²⁰⁹ of the city's identified neighbourhoods;
3. Achieve excellence in sustainable building design and construction;
4. Conserve or enhance the city's built and archaeological heritage and its settings;
5. Have regard to impact on the purposes of the National Park, where within the setting of the National Park;
6. Protect or enhance strategic views into, out of and within the city;
7. Be inclusive, adaptable and accessible;
8. Ensure that the design of the external spaces is an integral element of the overall design approach, in a manner which provides a legible distinction between public and private realm; and
9. Incorporate design features which deter crime or disorder and the fear of crime;

Supporting Text

4.145 The purpose of this policy is to provide a statutory basis for the proposed Urban Design Framework and to enable as much certainty and clarity as possible about where the city will broadly accommodate any taller development. The Urban Design Framework will set out priorities for

²⁰⁹ General layout, pattern and footprint of buildings and streets as viewed overhead in plan form.

preparing planning briefs and supplementary planning documents for development areas and other areas requiring positive enhancement. It will include identification of the key strategic views into, out of and within the city which require protection or which may benefit from development that would enhance them.

4.146 Given the city's physical constraints there is a need to increase density on existing brownfield land in a sustainable manner. Taller buildings (in the context of the city's prevailing built form) offer one potential way of achieving this in appropriate locations. This policy seeks to ensure that such proposals are directed towards those broad areas where such potential has been identified. The areas are described in greater detail as follows:

- Brighton Marina – is a node²¹⁰ limited to the boundaries formed by the eastern and western breakwaters and the undercliff walk to the north.
- Brighton Station / New England area – is a node situated to the east of Brighton Station, to the north of Trafalgar Street and along New England Street.
- Central Seafront – is a node comprising a small area to the east of Sussex Heights that includes Churchill Square, the Brighton Centre and the Odeon Cinema complex.
- Eastern Road / Edward Street – is a linear corridor broadly stretching from William Street in the west to Bristol Gate in the east and which focuses on the opportunities around existing tall buildings, particularly those at the County Hospital.
- Hove Station area – is a node situated on both sides of the rail corridor, extending westward to include the existing group of tall residential buildings to the north of Clarendon Road, together with the adjoining industrial areas.
- Lewes Road corridor – is a linear area centred on the University of Brighton's Moulsecoomb campus and the former Preston Barracks site.
- London Road / Preston Road corridor – is a linear area focused around existing 'mid rise' tall buildings that front the western edges of Preston Park, Surrenden Field and Withdean Park.
- Western Seafront / Kingsway – is a linear corridor along the stretch of Kingsway that directly overlooks Hove's Western Lawns as far west as Wish Road.
- Shoreham Harbour – is a node focused on the eastern-most area of the harbour within the Brighton & Hove City boundary, including both the docksides and the commercial area immediately north of Wellington Road.

4.147 Further detail on the boundaries of the tall building areas and guidance on appropriate height ranges will be provided in the Urban Design Framework. It should be noted that inclusion of a particular site within one of the tall building areas does not warrant certainty that a taller building would be acceptable on that site and particular regard must be had to any potential

²¹⁰ Node: A place where activity and routes are concentrated.

impact on heritage assets and their settings, in accordance with Policy CP15. The identified tall building areas are generally outside of conservation areas (with the exception of part of the Western Seafront/Kingsway corridor) but some are adjacent to conservation areas or may include other heritage assets or their settings.

4.148 All applications that fall within the definition of a tall building will be required to be accompanied by a Tall Building Statement, as currently set out in the adopted Tall Buildings Supplementary Planning Guidance (SPG 15), which will be superseded by the Urban Design Framework.

4.149 This policy also sets out the general strategic design criteria expected of new development. Innovative contemporary architecture, which enhances the reputation of the city, and mixed use schemes which add distinctiveness to local neighbourhoods, will be actively encouraged. The function and design of the spaces and routes between and around new buildings should be considered from the outset of the design process to ensure that they are fully integrated into the development as a whole and that they link positively to the wider urban or suburban context. Planted green spaces may provide areas for relaxation that also aid urban cooling. Developers of major housing schemes will be encouraged to demonstrate, as part of their Design and Access Statement, how the development would meet the Building for Life²¹¹ criteria.

4.150 The Urban Characterisation Study provides a comprehensive understanding of the diversity and quality of the city's urban character, its sensitivity to change and the development trends and pressures that affect Brighton & Hove. It has identified distinct landscape character types within the city and, within those, distinct neighbourhoods, in addition to the central conservation areas. Each of the neighbourhoods are studied in detail and this will assist in judging which areas are best able to accommodate, or might merit, positive changes in density and/or built form. The central conservation areas are partly covered by the Historic Character Assessment report for Brighton & Hove carried out as part of the Sussex Extensive Urban Survey. Both documents will inform the proposed Urban Design Framework.

4.151 Until that is adopted²¹², the Urban Characterisation Study will be used to guide consideration of backland or infill developments and more detail will be set out in the City Plan Part 2. The council will aim to ensure that high quality is maintained through the rigorous enforcement of planning permissions.

4.152 Inclusive design includes removing physical barriers and exclusions imposed on people by poor design of buildings and their surroundings and ensuring that it reflects the needs and aspirations of minority groups. The council will therefore critically examine proposals to ensure accessibility to and between buildings and the adjoining private and public realm, to meet the

²¹¹ A national standard for well-designed homes and neighbourhoods produced by the Commission for Architecture and the Built Environment (now part of the Design Council).

²¹² The anticipated adoption date for the Urban Design Framework is January 2017.

needs of all sections of the community. With regard to adaptability, the government has introduced national technical standards related to accessibility, adaptability and wheelchair standards. Through the City Plan Part 2 the council will provide evidence and seek to introduce a policy to provide enhanced accessibility or adaptability.²¹³

4.153 This policy will also help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits (see Table 1 on page 26). This policy complements policy CP14 Housing Density and has important links with CP8 Sustainable Buildings, CP13 Public Streets and Spaces and CP18 Healthy City.

²¹³ Optional, enhanced accessibility requirements are set out in Part M of the Building Regulations.

CP13 Public Streets and Spaces

The quality, legibility and accessibility of the city's public urban realm will be improved in a comprehensive manner, in conjunction with other partners, through new development schemes, transport schemes and regeneration schemes. Such improvements will be required to produce attractive and adaptable streets and public spaces that enrich people's quality of life and provide for the needs of all users by:

1. Positively contributing to the network of public streets and spaces in the city;
2. Enhancing the local distinctiveness of the city's neighbourhoods;
3. Conserving or enhancing the setting of the city's built heritage;
4. Reducing the adverse impact of vehicular traffic and car parking;
5. Utilising high quality, robust and sustainable materials for all elements of the street scene;
6. Incorporating street trees and biodiversity wherever possible;
7. Encouraging active living and healthier lifestyles;
8. Helping to create safe and inclusive public spaces;
9. Incorporating an appropriate and integral public art element; and
10. Reducing the clutter of street furniture and signage.

In appropriate cases new developments will be expected to make a contribution to achieving these requirements (see CP7).

Supporting Text

4.154 Brighton and Hove's streets and public urban spaces do not always do the city justice. The pedestrian and cycle links between the areas that people want to get to are not as good as they could be, streets can be cluttered, materials are inconsistent and there may be too few places to rest. An opportunity exists to create a simpler but high quality urban realm that is pedestrian and cycle-friendly but accommodates the needs of all people. This may be in conjunction with improvements to sustainable transport (see policy CP9). The purpose of this policy is to ensure that new development contributes towards the implementation of public urban realm improvements proposed by the Public Space Public Life Study (2007), where appropriate, and that all public realm works (whether publicly or privately funded) are designed to achieve consistent aims and standards and use locally sourced materials where possible. The council's Streetscape Design Guidelines (2010) set out the appropriate street furniture etc. for use in the city.

4.155 The Public Space Public Life Study introduced to Brighton & Hove the concept of a public realm network which operates across the city. The principle underpinning this is that a distinctive hierarchy of routes should be developed and that the experience of moving through the city should be continuous and consistent. The award winning re-design of New Road in Brighton was the first project to be implemented using the approach advocated by this Study. The council will actively explore with local communities the potential for further pedestrian priority and shared space

treatment, as part of the wider public realm network. New and improved public urban realm will be expected to make a positive contribution towards Lifetime Neighbourhoods. This will include ensuring that it meets people's whole lifetime needs: children; parents with pushchairs; people with mobility difficulties or visual impairment; those with temporary or permanent disabilities; and the elderly. The aim is to make it easier for everyone to move around the city, including clear signage, shade from the sun, removing obstacles and the provision of public seating to allow regular opportunity to stop and rest. In this respect schemes will be expected to do more than simply meet minimum accessibility standards.

4.156 Tree and other planting should be incorporated into schemes in a manner that is integral to their design and will contribute to enhancing the city's 'green network' and to the city's Biosphere Reserve objectives as set out in policy CP10 Biodiversity. Where appropriate this may include productive planting that contributes towards improving urban food productivity.

4.157 The artistic tradition of Brighton & Hove is an important part of its identity. The provision of public art can create and enhance local distinctiveness in the public realm and help develop a desirable sense of place as well as improving legibility (e.g. the Aids Memorial in New Steine). Public art schemes will provide important opportunities to involve the local community and all will offer work opportunities to artists, many of whom will be local. Public art may take many forms and, in relation to the public realm, can include construction details, landscape schemes, sculpture, water features, street furniture and lighting effects. Planning guidance on the implementation of public art will be produced to support this policy.

4.158 Public spaces often have a temporary function for outdoor events and community uses and good design can facilitate this (with removable street furniture for example).

4.159 Priority for implementation will be given to those urban areas set out in policy CP9 Sustainable Transport, namely Valley Gardens, Station Gateway, Lewes Road, London Road, Edward Street/Eastern Road, Old Shoreham Road, A259 Seafront, Seven Dials, Hove Station, Pool Valley and local shopping areas. Developer contributions for improvements to the public realm will be required where they relate to the development and meet the tests in the National Planning Policy Framework (see CP9). This policy will also help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits (see Table 1 on page 26).

4.160 This policy complements policy CP12 Urban Design and has important links with CP18 Healthy City and CP9 Sustainable Transport.

CP14 Housing Density

Residential development should be of a density that is appropriate to the identified positive character of the neighbourhood and be determined on a case by case basis. Development will be permitted at higher densities than those typically found in the locality where it can be adequately demonstrated that the proposal:

- 1. Would be of a high standard of design and would help to maintain or create a coherent townscape;**
- 2. Would respect, reinforce or repair the character of the neighbourhood and contribute positively to its sense of place;**
- 3. Would include a mix of dwelling types, tenures and sizes that reflect identified local needs;**
- 4. Is easily accessible by sustainable transport or has the potential to be easily accessible;**
- 5. Is well served by local services and community facilities; and**
- 6. Provides for outdoor recreation space appropriate to the demand it would generate and contributes towards the 'green network' where an identified gap exists.**

To make full, efficient and sustainable use of the land available, new residential development in Brighton & Hove will be expected to achieve a minimum net density of 50 dwellings per hectare (dph), provided it contributes positively to creating or maintaining sustainable neighbourhoods and that all of the above criteria can be satisfactorily met.

Within the Development Areas covered by policies DA1 to DA6 and DA8, the density of new residential development will be expected to achieve a minimum of 100 dph on major development sites, provided that all of the above criteria can be satisfactorily met. Where any site-specific policy is in place for the site, the density level in that policy should be met.

Where a proposed development is below 50dph, a lower density will be accepted where it can be adequately demonstrated that the development would reflect the neighbourhood's positive characteristics, would meet the housing needs of a particular group or groups within the community and would better contribute towards creating a sustainable neighbourhood.

Supporting Text

4.161 In order to boost significantly the supply of housing, national planning policy²¹⁴ encourages local planning authorities to set out their own approach to housing density. The purpose of this policy is to ensure that the city, which is compact and constrained, makes the most efficient use of the limited brownfield land available whilst ensuring that sustainable neighbourhoods are achieved.

4.162 Net dwelling density is calculated by including only those site areas developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided. National statistics show that in 2010 new dwellings were built at an average density of 43 dwellings per hectare (dph), whilst on brownfield land this figure was 48 dph.²¹⁵

4.163 The council's Urban Characterisation Study (2007) has shown that the 19th century terraced development that typifies much of the existing urban core of the city now supports net density levels ranging between around 60 and over 200 dph. The upper range of these figures is comparable to some of the city's purpose built tall blocks of flats. Semi-detached dwellings in the urban core range between 25 and 80 dph, depending upon size and the degree of conversion to flats. In some outer 20th century suburbs the figure falls below 20 dph.

4.164 Over the three year period 2006 – 2009, 85 per cent of new dwellings completed in the city (including conversions and change of use) were built at over 50 dph, with a further 15 per cent built at between 30 – 50 dph²¹⁶. Densities of at least 100 dph were frequently achieved in central areas of the city and over 300 dph in some cases. The minimum density requirements set out in this policy are therefore considered to be realistic and achievable.

4.165 Successful higher density development will depend upon a 'design-led' approach that respects its local context and minimises impacts on its surroundings. Higher density housing should also include measures that enable residents to make more informed and sustainable choices on transport, as set out in Policy CP9 Sustainable Transport. The Urban Characterisation Study will be used to guide consideration of backland or infill developments until more detailed policies are set out in the City Wide Plan Part 2 and the Urban Design Framework SPD.

4.166 Higher densities may not be achievable in those parts of suburban and village neighbourhoods where existing low density development contributes to a positive sense of place and community. Density may also be constrained by

²¹⁴ National Planning Policy Framework (2012) – part 6.

²¹⁵ Land Use Change Statistics (England) 2010 – provisional estimates (July 2011)

²¹⁶ Calculations based on schemes of 10 or more dwellings.

the need to retain key heritage assets in their settings and/or important landscape features.

4.167 In the case of mixed use schemes, the residential site area should be calculated using total net site area apportioned between the various uses, on a pro rata basis (i.e. reducing the site area by the same ratio as that of the residential to non-residential floor space). However, in assessing density on mixed use sites, the council will be mindful of the overall benefits of the proposals.

4.168 This policy will also help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits (see Table 1 on page 26). This policy is complemented by city wide policy CP12 Urban Design and will assist in the implementation of Development Area policies (DA1 - 8) and in creating and maintaining sustainable neighbourhoods (SA6). The council's approach to achieving an appropriate mix of housing type, tenure and size is set out in policy CP1 Housing Delivery and CP19 Housing Mix.

CP15 Heritage

The council will work with partners to promote the city's heritage and to ensure that the historic environment plays an integral part in the wider social, cultural, economic and environmental future of the city through the following aims:

1. The city's historic environment will be conserved and enhanced in accordance with its identified significance, giving the greatest weight to designated heritage assets and their settings and prioritising positive action for those assets at risk through, neglect, decay, vacancy or other threats. The council will further ensure that the city's built heritage guides local distinctiveness for new development in historic areas and heritage settings;

2. Where proposals are promoted for their contribution to mitigating climate change, the public benefit of this will be weighed against any harm which may be caused to the significance of the heritage asset or its setting; and

3. The Conservation Strategy²¹⁷ will be taken forward and reviewed as a framework for future conservation area management proposals; to provide criteria for future conservation area designations and other local designations, controls and priorities; and to set out the council's approach to dealing with heritage at risk.

Supporting Text

4.169 The city's rich architectural heritage encompasses the internationally renowned Royal Pavilion and nearly 3,400 other listed buildings as well as 15 scheduled monuments, six registered parks or gardens of special historic interest, 34 conservation areas, numerous locally listed heritage assets and over 80 Archaeological Notification Areas²¹⁸. The council will promote better understanding of the extent and significance of all the city's heritage assets and their settings in order to ensure a well informed and proportionate approach to their conservation. Undesignated heritage assets will be identified by means of a comprehensive review of the current Local List, through early discussions with applicants and, in the case of archaeological sites such as downland features, through partnership working with the County Archaeologist.

4.170 A requirement to conserve the identified special character of conservation areas, and the settings of other heritage assets, will be reflected

²¹⁷ The Strategy for the Conservation of Brighton & Hove's Historic Built Environment (2003) (and subsequent revisions)

²¹⁸ These are sites that have been compiled by the County Archaeologist as part of the Sites and Monuments Record. These areas are judged to have county and city wide importance and are known to have archaeological remains or features. Some might on further detailed investigation merit designation as a Scheduled Monument.

in Planning Briefs and area-based Supplementary Planning Documents where appropriate and will inform the Urban Design Framework proposed under Policy CP12. New development in conservation areas, and within the setting of heritage assets, should take the opportunity to enhance the significance of those areas or settings wherever possible. Some of the city's conservation areas are very cohesive and would often be best enhanced through careful infill buildings that authentically reflect historic precedents. Other areas are more diverse in appearance and are very capable of accepting bold and innovative contemporary designs as long as, for example, rhythm and proportion respect the prevailing historic context.

4.171 The council will continue to maintain a register of those listed buildings considered to be 'at risk' or 'vulnerable' through neglect, decay, vacancy or other threats and will actively seek to bring such buildings back into appropriate use and/or a good state of repair. Conservation areas and other assets 'at risk' will also be monitored and action identified that would remove or mitigate the threats to their special interest. Such action may include the introduction of Article 4 Directions to control permitted development rights where such rights are undermining the aims for the historic environment.

4.172 Keeping heritage assets in use is inherently sustainable as it avoids the consumption of building materials and energy and the generation of waste from the construction of replacement buildings. Where proposals that are promoted for their contribution to climate change objectives have a potentially negative effect on a heritage asset, the council will wherever possible help the applicant to identify feasible solutions that deliver similar climate change objectives but with less or no harm to the heritage asset and its setting. This policy will also help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits (see Table 1 on page 26).

4.173 The council's Conservation Strategy (2003) seeks to actively manage change within the historic environment and to ensure that available resources are put to the best possible use. It will be reviewed and revised in respect of any changes in legislation and governmental policy advice and, subject to public consultation, to reflect future local priorities. A Historic Character Assessment report for Brighton & Hove (2007), carried out as part of the Sussex Extensive Urban Survey, provides an assessment of the city's historic core and will inform relevant conservation area character statements and management plans.

4.174 CP5 Culture and Tourism recognises the relationship of the wealth and importance of the city's historic environment with tourism and cultural industries in the city. This policy also has important links to CP13 Public Streets and Spaces.

CP16 Open Space

The council will work collaboratively to safeguard, improve, expand and promote access to Brighton & Hove's open spaces (public and private) and the diverse range of experiences offered by these spaces. This will be achieved through the following:

Retaining and enhancing open space

1. The council will require the retention of and seek better, more effective and appropriate use of all existing open space, as shown on the policies map, having regard to the Open Space, Sports and Recreation Study and the Open Space Update Study²¹⁹.

Planning permission resulting in the loss of open space, including the beach, will only be granted where:

a) The loss results from a development allocation in a development plan and regard has been given to maintaining some open space (physically and visually); or

b) The site is not part of a playing field (current or historical) and the loss is necessary to bring about significant and demonstrable long term enhancements to the city's public open space offer as a whole; or

c) The proposed development is ancillary to the use of the open space and will result in only a small loss of open space, provides improvements to and better use of the remaining space and optimises public access; or;

d) The site is:

- physically incapable of meeting the city's wider open space needs;**
- is not part of the beach or a playing field (current or historical); and,**
- in accordance with the Open Space Study Update 2011 (or subsequent approved revisions), is of a poor quality without potential for improvement (current and potential) and there is an identified surplus (current and future) in all types of open space within the locality (ward and sub area). In order to test the importance of the site to the local community the site must be actively marketed at a price that reflects its use, condition and local market prices for at least a year with no success before alternative proposals can be considered.**

e) The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications of residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.

²¹⁹ And any subsequent revisions, audits and strategies.

New development and requirements for new open space

2. New development will be required to contribute to the provision of and improve the quality, quantity, variety and accessibility of public open space to meet the needs it generates in accordance with the criteria and local standards set out below²²⁰.

a) Developments will be required to optimise the provision of safe on-site public open space with good passive surveillance and accord with Biosphere Reserve principles and objectives. Where it is not practicable for all or part of the open space requirements to be provided on site, an appropriate alternative agreed provision and/or contributions towards off-site provision will be required; and

b) Developments, especially those located in an area with open space deficiencies, will be expected to help improve sustainable means of access to open space and facilitate appropriate links to the city's open space framework (which comprises the open spaces shown on the policies map, the Nature Improvement Area, beaches, the countryside and new open space allocations and links). The provision of public open space will be in addition to incidental amenity and landscaped areas. (See also CP7 and CP9)

c) All new provision should optimise accessibility to all users (including the local community and visitors), reflect the open space requirements, facilitate sustainable means of access, provide measures to improve public safety within and around the respective spaces and seek to improve the variety and quality of safe provision in the city.

d) The community use of private and schools open spaces will be sought when considering proposals affecting these sites including the temporary use of redundant or undeveloped sites. The council will seek to allocate new open space in the City Plan Part 2.

e) Where appropriate, help to secure investment in poor quality, under-used open spaces, particularly in disadvantaged areas (see SA6) and areas with open space deficiencies to bring about enhancements in quality and public use.

f) Seek proactive and appropriate management of open spaces including the enforcement of by-laws and seek the enhancement and improvement of open spaces and features. All open space proposals will be expected to have an agreed funded maintenance plan for the space. Lighting proposals, including floodlighting, will be required to minimise light pollution, help reduce crime and not cause significant harm.

²²⁰ Or subsequent approved revisions or open space strategies

Open Space Standards*		
	Quantity Standard (hectare / 1,000 pop)	Accessibility Standards**
Parks and Gardens	0.92	15 minute walk time (720m)
Natural Semi-Natural	2.8	15 minute walk time (720m)
Amenity Greenspace	0.582	10 minute walk time (480m)
Allotments	0.23	15 minute walk time (720m)
Children & Young People (equipped play)	0.055	15 minute walk time (720m)
Outdoor Sport	See CP17	See CP17
Total –excl. outdoor sport (brackets show total inc. outdoor sport).	4.587 hectares/1,000 pop (5.057 ha/1,000 pop)	

* The 2008 Open Space, Sport and Recreation Study contains detailed information on Quality Standards expected.

** The accessibility standards for the city provide the maximum distance a person would normally walk from their home and/or work to get to the respective type of open space (existing physical constraints limit how this is met in practice so innovative solutions will be sought which may include consideration of accessibility by bus/bicycle etc). They help to show open space catchment areas and thus help in the assessment of locational deficiencies. They also help in the assessment of open space priorities when considering development proposals.

Supporting Text

4.175 Brighton & Hove's green and open spaces play an essential role in maintaining and improving quality of life and also contribute to developing locally distinctive and sustainable communities. They are also important in aiding movement around the city and enabling physical activity. Green open spaces contribute to physical, mental, and emotional well-being and can offer lasting economic, social, cultural and environmental benefits. They act as heat sinks, help to cool urban environments and offer visual relief from the urban character of the city. Parks, outdoor sports areas, play areas, cemeteries, natural/semi-natural areas, school grounds, amenity spaces within housing estates and allotments are all part of this rich mix. Public consultation always highlights the importance of open spaces to both residents of and visitors to Brighton & Hove.

4.176 National policy and research recognises the importance of open space. It is therefore appropriate, in view of the competing pressures within the city, that the Council takes a proactive strategic approach to open space. The Open Space, Sport and Recreation Study 2008; which assesses the current and future open space needs and then recommends the local open space standards for accessibility, quality and quantity has not identified any open space to be surplus to the city's open space requirements (current or in the future). It demonstrates that the city will need to retain and use all existing (both public and private) open space more effectively and create additional areas of open space in order to meet the needs of an increasing population.

4.177 Due to the city's housing requirements a review of the capacity and need for open space was required and the findings of the Open Space, Sport and Recreation Study 2008 were further assessed through the Open Space Study Update 2011. The Update Study endorsed the local open space standards and the approach taken in the 2008 study. It devised a scoring system to assess open space which was applied to private open spaces and used to inform the 2010 Strategic Housing Land Availability Assessment. However the factors that produce a low open space offer (a combined assessment of 'quantity', 'accessibility' and 'quality' including potential) also limit a site's suitability for housing and no additional open space sites were identified through the study as suitable for housing. However through the 2014 Urban Fringe Site Assessment Study some open spaces within the city's urban fringe have been identified as having potential to help meet the city's housing requirements (see policies SA4 and CP1). Unlike other urban open spaces the loss of these sites can more readily be mitigated through the provision of new publically accessible space, enhancement to existing space or by alternative provision within the National Park and/ or compensated for by the National Park's open space offer.

4.178 When the open space standards are applied, a significant increase in open space will be required by 2030 (an additional 293 hectares should be provided when ONS population projections are applied, however when the City Plan housing target of 13,200 is taken into account the generated demand equates to approximately 167 hectares ²²¹). It is therefore important new developments seek to provide the open space requirements generated respectively. However due to the city's physical constraints, between the sea and the South Downs National Park, it is recognised that the future open space requirements are unlikely to be met in full. To compensate, more intensive use of existing open space will be needed in an attempt to maintain current quality of life including the opening up of school grounds to the community/public and an expectation that owners should endeavour to enable better open space use of under-used private spaces. There will also be a need to better connect green spaces together to improve accessibility and to improve access for quiet recreation to the South Downs National Park.

4.179 The Open Space Update Study undertook further analysis of open space at both a sub area and ward level having regard to open space offer. A significant variation in access to open space was found. Innovative solutions therefore need to be explored to overcome accessibility, improve quality and to enable people in areas with deficiency to access the open spaces in the areas with sufficient supply. The openness and offer of the city's beach is recognised. It is important to protect the intrinsic geological and aesthetic

²²¹ ONS stands for Office for National Statistics. The 2030 population figure applied is 310,900 based on ONS 2012-based Subnational Population Projections. The indicative generated demand of 13,200 residential units is calculated using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in open space arising since the base year of 2006 and also the potential of the housing target to restrict growth in population.

interest of this expanse of shingle stones which forms such a major open space between the land and the sea. The offer of the beach and sea was taken into account when the open space standards were devised so proximity to the seafront will not reduce future development open space requirements. However the provision of storage facilities for the drying and storing of water recreation equipment can help developments increase the opportunities offered by the sea and can help address some of the needs.

4.180 A strategic approach therefore needs to be applied when considering local open space issues. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits. It is widely recognised that the closer the open space, the greater the likelihood that people will use it or pass through and therefore gain from the health and well being benefits. However, some compensation can be provided for the lack of offer within areas of deficiency by improving the ease of access to other city spaces. Such an approach would not, however, justify the loss of an existing open space within the urban area and/or serving a local community.

4.181 The retention of open space within the city is therefore important in view of the finite nature of the open space that serves the compact urban area. It is not sustainable to assume a reduction in open space can meet the needs of the city's increasing population. There is no statutory duty on a council to provide open space (except cemeteries and allotments) the policy approach to open space therefore applies to public and private open space. A clear approach of retention helps to set realistic open space land values, minimises land being left vacant by land owners seeking development opportunities in preference to open space uses and makes it more viable for local communities to purchase spaces in order to meet their open space requirements.

4.182 Whilst the open space standards are set for different recreational uses (such as children's play areas or parks) regard will also be given to the multi-use of open spaces and take account of the existing and potential recreational, historical, visual, biodiversity, educational, cultural, sporting and community site value. Particular value can be attached to community gardens and community open space initiatives which help provide access to nature, local food growing and well being benefits as well as social cohesion. It may be appropriate to reclassify and redistribute open space within the city to make the spread in type more even, to facilitate the opening up of private sites to community/public use and to address disputes and changes made by private owners.

4.183 The policy, however, does reflect that there may be instances when the loss of some open space could achieve overriding open space benefits and/or be justified due to open space surpluses in a localised area combined with a low quality offer so that it is unable to meet wider open space needs and/or citywide requirements. For example, the site is too small, steep or its configuration significantly limits its use that people in the areas with open

space deficiencies cannot be encouraged to use the site even if its offer is maximised and accessibility improvements are made and/or services included enabling visits to be longer (eg toilets, refreshment kiosk etc). Any such loss should not conflict with other environmental objectives.

4.184 A priority is placed on retaining existing playing fields (including historical playing fields that currently lay vacant and unused or in an alternative open space use). In comparison with other authorities the provision of outdoor sports space is low and in view of the compact, dense and hilly nature of the city the delivery of additional outdoor sports facilities, which require large level spaces, is considered less likely than other types of open space. People are prepared to travel into and across the city to use formal outdoor sports facilities and to participate in matches. These factors therefore place a priority on retaining playing fields. The retention of current and historical playing fields helps to protect them as an asset for outdoor sports but, due to their potential multifunctional nature, does not preclude their use for alternative open space uses to meet changes in trends. In addition to this the Sports Facilities Plan 2012-2022 identifies a demand for artificial grass pitches, the suitability of spaces for such a use should therefore be explored.

4.185 The provision and enhancement of well-designed green spaces that meet identified local needs should be planned positively and is the aim of open space and sport strategies or plans. New development will be expected to contribute towards open space provision by optimising additional on-site/off-site good quality open space provision in accordance with the local standards and, where there are shortfalls, to financially contribute towards existing open spaces and/or open space co-ordinators or similar in order to meet the needs generated by the development. On-site food growing initiatives and outdoor play opportunities will be required and should be designed to provide flexibility in use to reflect changes in trends. Proposals will be expected to accord with Biosphere Reserve principles, which seek to bring together people and nature, and should therefore aim to provide greener living and working environments. Innovative solutions will be explored to increase accessibility and for the pooling of funds to enable the best solutions for this compact city. The maintenance and consequent funding of open space is key to providing good quality provision and will be sought as part of the provision of open space.

4.186 Where possible, new open space sites will be allocated in the City Plan Part 2. The designation of Local Green Space will also be considered through the City Plan Part 2 and the Neighbourhood Planning process. The protection and enhancement of quiet open spaces will be explored and where appropriate a criteria based policy will be included within the City Plan Part 2. All existing and new open space, the urban fringe, the National Park, seafront/beaches and the Green Network/Nature Improvement Area form the open space framework. Improvements to the links between these spaces will be investigated. The council will actively work with tenant farmers to create more Open Access trails.

4.187 It should be noted that whilst outdoor sport facilities are included within the term 'open space' they are covered in more detail by policy CP17.

CP17 Sports Provision

To facilitate the council's aspiration to increase participation in sports and physical activity, the council will safeguard, expand, enhance and promote access to Brighton & Hove's sports services, facilities and spaces through the following:

- 1. Support for the delivery of the replacement and enhancement of sports provision currently provided at the King Alfred (see SA1).**
- 2. Require the retention, seek the enhancement and more effective use of existing indoor and outdoor sports facilities and spaces in accordance with the Sports Facilities Plan and the Open Space, Sport and Recreation Study and subsequent approved revisions, audits and strategies recognising the importance of major sporting venues such as the American Express Community Stadium, County Cricket Ground, Withdean Sports Complex and Brighton Racecourse. Planning permission resulting in the loss of indoor and outdoor sports facilities and spaces will not be granted except where:**

In respect of buildings:

- The building has been demonstrated to be redundant for a sports use and marketed for at least 18 months at a price that reflects its condition and market value, any loss in the surrounding space is minimised and necessary to provide improvements to and better use of the remaining space in accordance with the Open Space policy (CP16); or,**
- the facilities are to be replaced by improved facilities that help meet the sporting needs of the city and optimises access by sustainable transport modes.**

In respect of outdoor sports facilities and spaces

- The land has been marketed as detailed above and the proposal complies with the Open Space policy (CP16).**

The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.

3. Develop sports strategies and plans to guide the future provision of sports services, facilities and spaces and to inform the City Plan Part 2. The council will also investigate the potential for a new indoor multi-sports wet and dryside leisure centre, additional pool space and indoor sports halls.

4. Work with partners to secure investment in poor quality, under-used sports services, facilities and spaces particularly in disadvantaged areas (see SA6) to bring about enhancements in quality and public use.

5. Require new development to contribute to the provision and improvement of the quality, quantity and accessibility of sports services, facilities and spaces to meet the needs it generates in accordance with the local standards set out below (or subsequent approved revisions and / or approved assessments/ strategies) (See also CP7 Infrastructure and Developer Contributions).

6. New sports services, facilities and spaces (including extensions to existing provision) will be encouraged especially those that meet identified needs. All new provision should meet quality standards, optimise their accessibility and affordability to all users, including the local community and visitors. Proposals should seek to improve the variety of provision in the city and increase participation in sport and physical activity, especially from sectors of the community currently under represented.

7. Proposals seeking to improve regional/sub-regional or tourist sport provision will be supported where they also address local needs, are of high quality, have an agreed and funded maintenance plan and add to Brighton & Hove's vibrancy.

8. The council will seek the opening up for community use of private and school sports facilities and spaces.

Standard for Indoor and Outdoor Sports Facilities	
Indoor Sports	
Quantity (indoor sport)	
Modelling undertaken in line with Sport England parameters. Standards to comply with national best practice.	The Open Space, Sport and Recreation Study recommends the council should aim to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice rink (See also the Sports Facility Plan for further recommendations).
Accessibility (indoor sport)	
Standards to comply with national best practice.	
Quality (indoor sport)	
All facilities should be built or provided in accordance with national best practice	
Outdoor Sports	
Quantity (outdoor sport)	

Current Provision	Current Provision (Ha/1,000 pop)	Proposed Standard (Ha/1,000 pop)	Additional Space required by 2030 ²²²
Approx 118.5 Hectares	0.47	0.47	Approx 15.5 to 28 hectares
Accessibility (outdoor sport)			
20 minute walk time (960 metres)			
Quality (outdoor sport)			
Clean, litter-free sports facilities should be provided with appropriate, welldrained, well maintained surfaces. Ancillary accommodation should include toilets, changing facilities, dog waste bins and litter bins and appropriate amenity and sports lighting.			
Standard for Indoor and Outdoor Sports Facilities			
All sites should meet the minimum specifications of the appropriate National Governing Body of sport and meet Equality Act 2010 guidance.			

Supporting text

4.188 The city is a major tourist destination and is of regional sporting importance. The city also helps to support the surrounding villages and towns, offering a wider range of facilities than those that can reasonably be provided within smaller urban areas. The city therefore needs to ensure it provides appropriate sports and recreational facilities to reflect its regional status and aspirations. Existing facilities such as the American Express Community Stadium, Sussex County Cricket Ground, Brighton Racecourse and Withdean Sports Complex should be retained and where possible improved with greater public access and uses provided to promote physical activity and sport. The replacement and enhancement of the King Alfred sports provision (see SA1) will all help to ensure Brighton & Hove provides the type and quality of facilities expected from a regional centre.

4.189 The London 2012 Olympic Games and Paralympic Games legacy is an increased interest in sport that will be both encouraged and facilitated. The legacy of the Olympics can generate opportunities for the city of not just sporting benefit but also cultural, health, educational, tourist, business and economic benefit for generations to come.

4.190 As well as providing fun, exercise and a sense of achievement, participation in sport and active recreation helps to create sustainable communities, improve health and well being, supports social inclusion and

²²² Applying a 2030 population figure of 310,900, based on ONS 2012-based Subnational Population Projections, an additional 27.6 hectares of outdoor sport space will be required. However, when the indicative generated demand of the City Plan's housing target of 13,200 residential units is calculated (using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms) an additional 15.5 hectares is required. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in outdoor sport arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. ONS stands for Office for National Statistics.

educational attainment and helps to reduce crime. A varied choice of activities helps to appeal and engage more people in physical activity and helps in the adoption of a 'lifetime habit' of participation in sport and to bring about the associated wider benefits.

4.191 The Open Space, Sport and Recreation Study (2008/9) provides a robust evidence base to support the need to retain and effectively use existing (both public and private) sports services, facilities and space. It also suggests the need for additional sports space provision and facilities to meet the needs of an increasing population. The study evaluates indoor and outdoor sports provision and recommends standards for accessibility, quality and quantity. The city's outdoor sports space provision is low compared to other local authorities. However the compact and dense nature of the city means the delivery of additional outdoor sports facilities and spaces will be challenging. The study recognises that qualitative improvements can increase capacity within existing outdoor sports spaces and takes a pragmatic approach by recommending a local quantity standard based on current provision. Not surprisingly when the study applies the standard across the city no surplus outdoor sports space is identified.

4.192 Whilst the study indicates localised deficiencies it again recognises the likely problems in finding new space and recommends innovative solutions. Some of these might include multi-use sports areas (MUSAs), other flexible sports facilities including synthetic turf pitches (STPs) and a need to explore community/public use of educational sports space where the full space requirement cannot be found. Whilst formal outdoor sport primarily takes place on pitches, wickets, courts etc, casual and informal recreational activities can take place in virtually all types of open space and therefore the multifunctional use of such space is and should continue to be recognised. The special regard to retaining playing fields is addressed in the Open Space policy, it is considered reasonable to expect their loss to be considered through the plan making process rather than an ad hoc basis. The restrictions on the loss of premises in sports use reflect the identified needs. The marketing period is considered reasonable and necessary because the decision to leave a premises would be taken in advance of vacating and a period of time is needed to ensure the use is genuinely redundant in view of the city's sports needs and fluctuations in market conditions.

4.193 The study also suggests that the council should explore the provision of additional adrenaline or less conventional sports facilities, such as climbing/bouldering, ultimate Frisbee and skating. Improvements in services such as the provision of sports co-ordinators can also help promote and intensify the use of existing provision. In 2011 an Open Space Update was completed. The study verified the appropriateness of all the local open space standards, devised a scoring system to assess 'open space offer' and undertook further analysis of the supply of all open space at both a sub area and ward level. It provides an additional level of information to assist in the consideration of existing and future outdoor sports provision.

4.194 In April 2012 the council adopted a Sports Facilities Plan 2012 -2022. The plan is based on the current and future demands of residents from 2012 through to 2022 and builds on the findings of the Open Space, Sport and Recreation Study. It concentrated primarily upon council provided indoor facilities but it also assessed the provision of athletic tracks and artificial turf pitches. It identified a need to expand and improve public facilities especially swimming pools, sports halls, health and fitness suites, artificial grass pitches and noted that many respondents felt a new major flagship centre was needed. It also identified a demand for specialist sport facilities such as a gymnastics centre, ice rink and large climbing centre and an improvement in the geographical spread in facilities.

4.195 The council will consider existing and prepare further sports strategies and plans to provide more detailed assessments of the need for specific facility types across the city which will inform the City Plan Part 2. The council will also explore partnership arrangements with schools, through secured community access and initiatives, to meet the future demand for outdoor and indoor sports. The provision of additional indoor facilities will be investigated. Where new sites can be found these will be identified in the City Plan Part 2. The council will work with Sport England and, where appropriate, neighbouring authorities to develop sports hubs and clusters or centres of excellence that benefit the local community and wider public. In view of the range of sporting facilities in close proximity to Falmer, the respective area acts as an existing sports hub (eg University of Sussex's indoor sports centre and outdoor playing fields, American Express Community Stadium, the health and racquet club, Stanmer Park). The council will identify a rolling programme of maintenance works to the city council's existing outdoor sports pavilions.

4.196 With the demand for additional housing and commercial development and the move towards increased residential densities it is important that new development is accompanied by appropriate amounts of sports services, facilities and space (both outdoor and indoor). This should be provided on-site where appropriate. Any shortfalls should be addressed via off-site provision and/or financial contributions towards enhancement of existing, sports co-ordinators and/or similar in order to meet the needs generated by the development (see CP7). The maintenance and consequent funding of sports facilities and spaces is key to providing good quality provision and will be sought as part of any new provision. Table 1 on page 26 sets out how this policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits

Section Four City Wide Policies

Healthy and Balanced Communities

CP18 Healthy City

Planning will support programmes and strategies which aim to reduce health inequalities and promote healthier lifestyles through the following:

- 1. Carry out health impact assessments (HIA or incorporated into a sustainability appraisal) on all planning policy documents.**
- 2. Require HIA on all strategic developments in the city.**
- 3. Require larger developments to demonstrate how they minimise negative impacts and maximise positive impacts on health within the development or in adjoining areas (where the benefits of new development can be maximised).**
- 4. Encourage development that works towards Lifetime Neighbourhood²²³ principles; promotes health, safety and active living for all age groups, including healthy living options for older people (see also CP12 and CP13), active space for children and encourages physically active modes of transport.**
- 5. Recognise, safeguard and encourage the role of allotments; garden plots within developments; small scale agriculture and farmers markets in providing access to healthy, affordable locally produced food options.**
- 6. Joint working with health providers to help deliver and protect a sub regional network of critical care hospitals and a citywide integrated network of health facilities that is within reasonable walking distance of public transport.**
- 7. Through the City Plan Part 2 appropriate sites for health use with good access will be identified and safeguarded taking into account future growth and demand for health services in the city.**

Supporting Text

4.197 Brighton & Hove is a member of the World Health Organisation's Healthy Cities Network, whose healthy urban environment principles include:

- human health as a key element of sustainable development;
- co-operation between planning and health agencies;
- integrating health considerations into plans, strategies and policies.

²²³ The CLG (Lifetime Neighbourhoods - December 2011) has recognised the importance of neighbourhood as a determinant of well-being in later life and its crucial role in supporting older people's independence. The main components that make up a lifetime neighbourhood includes: supporting residents to develop lifetime neighbourhoods – especially resident empowerment; access, services and amenities, built and natural environments, social networks/well-being and housing.

4.198 Healthy urban environments aim to positively influence the determinants of health particularly by the encouragement of healthy lifestyles and through the design and provision of infrastructure which supports active and healthy living including access to safe open space (see CP16). This encompasses a need to facilitate access to healthy housing, sport facilities, recreation, cultural and community facilities, healthy food, care and health facilities. There are strong links between this policy and the City Plan policies on Urban Design (CP12); Public Streets and spaces (CP13); and Open space (CP16) where urban design, the provision, design of and access to open space (including natural green space) and the design of the public realm can encourage more active lifestyles and adaptations that facilitate this. Furthermore, the council is working with partners to achieve designation of the city as a Biosphere Reserve (see CP10). Healthy lifestyles can be promoted by good engagement with the natural world including access to natural green space close to home. This policy will also help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits (see Table 1 on page 26).

4.199 The geographical inequalities in health in Brighton & Hove are such that there are marked differences in physical and mental health and life expectancy between the most deprived and most affluent neighbourhoods in the city. The purpose of this policy is to help reduce these inequalities (see also SA6 - Sustainable Neighbourhoods). It is also recognised that alongside this geographical inequality; health issues affect different communities differently. The determinants of health are closely linked to quality of life factors such as the ability to earn a reasonable wage, access to healthy housing, open space, an active lifestyle, cultural and community facilities, healthy food, care and health facilities together with the impact of noise and air quality. Environmental factors and constraints in the public realm are increasingly being recognised in national guidance as having a significant impact on health. The council will investigate the possibility of establishing a 'Care Farms'²²⁴ programme with tenant farmers that encourage farms to develop opportunities for respite care, 'Farm to Fork' activities, mind exercise and nutrition.

4.200 Planning can have a real influence on these factors. This can be particularly relevant to achieving healthy weight and reducing obesity. The policy promotes access to healthy lifestyles including access to healthy food, facilitating healthy transport options including the potential for walking and cycling in new developments. It promotes access to community and cultural facilities that affect mental health especially in older people, ensuring a range of services that are responsive to the diverse needs of the city's residents, and an integrated network of primary and secondary care. Poor air quality can cause serious health problems and reduces the quality of life and life expectancy. Development proposals will be expected to protect and improve

²²⁴ The National Care Farming Initiative involves commercial farms working with health and social care agencies to provide farming activities to improve physical and mental health and wellbeing of clients with various educational and mental health needs.

local air quality and should be appropriately and sensitively designed to mitigate negative impacts on air quality.

4.201 The policy aims to ensure that developments and policies are tested to ensure that they reduce adverse impacts (through HIA; parts 1 and 2 of the policy) and maximise positive impacts on health. A HIA best practice guidance or Planning advice note will be prepared to assist developers undertaking HIA. Developers are asked²²⁵ to demonstrate that they have made provision for accessing green space, cultural facilities, transport options, exercise, and healthy food (parts 3 – 5 of the policy). Developers should consider the whole lifetime needs of occupiers and overcome barriers to access to facilities both within and beyond the development. Strategic developments are defined as all developments requiring an EIA and developments covered by the Development Area proposals in this document or of an equivalent size. HIA's should pay special regard to sensitive communities that the HEQIA has identified as having a potential for adverse impacts. The type of health facilities referred to in part 6 include walk-in polyclinics, health centres, multipractice GPs surgeries, substance misuse clinics, ambulance facilities and similar health facilities as well as critical care facilities including extension of the Royal Sussex County Hospital. The council will continue to engage with the relevant NHS organisation for the area²²⁶ and other health care trusts and providers in identifying health care service provision requirements attributable to new development or the growing population.

²²⁵ Also through the council's Sustainability Checklist.

²²⁶ Brighton and Hove GPs have worked together to establish an emerging clinical commissioning group which covers the city, from Saltdean in the east to Portslade in the west. The clinical commissioning group will become a statutory organisation in April 2013 when the PCT ceases to exist. Until that date it is working as a formal sub-committee of the NHS Sussex Board. Some PCT functions will be passed to clinical commissioning groups, some to the new NHS Commissioning Board, and the responsibility for public health is transferring to local authorities.

CP19 Housing Mix

To improve housing choice and ensure that an appropriate mix of housing (in terms of housing type, size and tenure) is achieved across the city, the council's approach to housing delivery (CP1) will be further developed as follows:

a. The City Plan (Parts 1 and 2) will set out policies and site allocations responding to key objectives set out in the council's Housing Strategy²²⁷. Policies will seek to respond to:

- i) the accommodation requirements of specific groups within the City, for example, families with children; older and disabled people; extra care housing; housing for smaller household types; the accommodation needs of travellers and the city's need for purpose built student accommodation (see also CP18, CP20, CP21 and CP22);**
- ii) the need to retain residential uses in the city and to make the best use of the existing housing stock.**
- iii) Seek to apply the requirements of the nationally described space standard in Part 2 of the plan to secure the quality and sustainability in new residential development.**

b. At site level, a housing mix (in terms of housing type, size and tenure) may be set for individual sites identified in Parts 1 and 2 of the City Plan; Action Area Plans; Supplementary Planning Documents and Site Planning Briefs.

c. Sites coming forward as 'windfall' development will be required to demonstrate that proposals have had regard to housing mix considerations and have been informed by local assessments of housing demand and need.

d. All new residential development will have regard to the characteristics of existing neighbourhoods and communities to ensure that development makes a positive contribution to the achievement of mixed and sustainable communities (see also SA6 and CP14).

Supporting text:

4.202 As well as achieving an appropriate scale of new housing development (in terms of the overall amount and location of new housing to be delivered in the city), the council gives a high priority to the importance of achieving a good housing mix and a choice of housing (in terms of types and sizes of accommodation) in order to meet the diverse accommodation needs of the local community over the plan period. Table 1 on page 26 sets out how this

²²⁷ Housing Strategy 2009 – 2014, Healthy homes, healthy lives, healthy city.

policy will help to deliver against the principles and local targets under the One Planet approach, which is a strategic approach to enabling the city to live within environmental limits

4.203 In this respect, planning policies will be further developed within the wider context of the council's Housing Strategy²²⁸ which sets out three key priorities for housing provision. These are:

- To improve housing supply to make sure that the city has the right type of housing to meet the needs of the residents;
- To improve the quality of housing so that residents are able to live in decent homes suitable for their needs; and
- To improve housing support to make sure residents are supported to maintain and increase their independence.

4.204 Government guidance encourages local planning authorities to plan for a mix of housing on the basis of current and future demographic trends; market trends and the needs of different groups in the community²²⁹.

4.205 In doing this, the council will have regard to the diverse range of accommodation requirements across the city including the city's need for more affordable housing; the need for more family sized housing; a range of housing options suitable for the elderly and disabled, housing for smaller household types, for student housing and also the need to address the accommodation requirements of travellers (see also policies CP20 Affordable Housing, CP21 Student Housing, CP22 Gypsy and Traveller Accommodation and SA6 Sustainable Neighbourhoods). The need to encourage active living for all age groups including healthy living options for older people is addressed in CP18 Healthy City and the need for developments to be inclusive, adaptable and accessible is addressed in CP12 Urban Design. Part 2 of the plan will, subject to evidence of need and impact of viability, include a development management policy relating to requiring the nationally described space standard.

4.206 The city's Strategic Housing Market Assessment (SHMA, 2008)²³⁰ and subsequent Housing Requirements Studies (2011 and 2012 Update)²³¹ indicate that a range of factors are likely to influence both the demand and need for different housing types and sizes. These include the profile of the existing housing stock; housing affordability within the city; demographic changes (the scale of population and household growth and changes to the age structure); the quality of place; the local economy in terms of its influence

²²⁸ Housing Strategy 2009 – 2014, Healthy homes, healthy lives and healthy city and subsequent revisions.

²²⁹ National Planning Policy Framework, March 2012, para.50

²³⁰ Brighton & Hove Strategic Housing Market Assessment SHMA, DTZ April 2008.

²³¹ Brighton & Hove Housing Requirements Study June 2011, Supplementary Papers: Implications of Demographic Change on Demand for Homes in Brighton & Hove (March 2012) and Demographic Implications of the Housing Trajectory (March 2012) and Housing Requirements Study Update October 2012.

on income and labour demand and the general accessibility of the city in terms of its relationship to other employment locations.

4.207 In terms of the city's current housing offer, 83% of the housing stock is in private ownership (approximately 53% owner occupation and 30% private rented) with the affordable housing stock accounting for around 16% which while below the national average (18.5%) is slightly above the South East average (15%)²³².

4.208 The city has a particular concentration of flats, maisonettes and apartments which account for 50% of the total housing stock (compared to 21% for the South East) and a low proportion of detached (10%) and semi-detached (19%) housing (compared to the South East average of 28% detached and 28% semi-detached)²³³. Terraced homes account for 21% of the city's housing stock.

4.209 The bias towards smaller flats and terraced homes is not dissimilar to that found in many other cities and urban areas. In Brighton and Hove it is likely to reflect the historic pattern of development that has taken place in the city in terms of the many large seafront terraces that lend themselves to conversion; the city's constrained land supply and, in more recent times, the impact of higher house prices, intense affordability pressures and a lack of available large development sites. Taken together, these factors have encouraged the development of higher density housing in more recent years²³⁴.

4.210 In terms of the local population, demographic information indicates that the city has a relatively young population, with population growth over the last 20 years concentrated in the 15-44 age groups²³⁵. Average household size is relatively small (2.25)²³⁶ and there are significant levels of single person (single pensioner and other single adults) households (36%). Family-type households with dependent children comprise about 25% of the city's households. Couple households comprise 17 % of the city's households²³⁷.

4.211 Looking ahead over the next 20 years, the city's population will continue to be focused on households aged in their 20s, 30s and 40s. Changes in the population structure will also occur as the population ages. Population growth is likely to be strongest in those people aged 50-69 (as the current population aged in their 30s, and 40s gets older). The school age population is expected to grow (reflecting current high levels of births) and the population over retirement age will increase but with the largest increases affecting those people in their late 60s.²³⁸

²³² 2011 Census ONS Table KS402EW Tenure.

²³³ 2011 Census ONS Table KS401EW Dwellings

²³⁴ See 2008 SHMA, Section 6, para. 6.5 and Housing Requirements Study Update, para. 4.36

²³⁵ 2008 SHMA, para. 4.9 and Housing Requirements Study 2011 Executive Summary,

²³⁶ Housing Requirements Study Update, October 2012, para. 2.52

²³⁷ Based on 2011 Census data. Table KS105EW. Other household types account for 12%.

²³⁸ Para. 1.13, Figure 1.6, Demographic Implications of the Housing Trajectory, GL Hearn, March 2012 and Housing Requirements Update, Figures 3.4 and 3.5, October 2012.

4.212 The relationship between household type and size and dwelling size is not a straightforward one. The profile of households in an area does not necessarily translate directly into the types and sizes of property to be provided. In the market sector, for example, households are able to buy or rent any size or type of property subject to what they can afford. Therefore the size of housing which households occupy relates more to their wealth and age rather than the number of people which they contain. Whilst 1 and 2 bed dwellings are almost exclusively lived in by small households, significant numbers of larger properties accommodate just one or two person households which indicates significant levels of 'under-occupancy',²³⁹.

4.213 A demographic analysis of the demand/ need for homes in the city over the plan period²⁴⁰ indicates that an estimated 65% of the overall need/demand (for both market and affordable homes) will be for two and three bedroom properties (34% and 31% respectively); 24% for 1 bedroom properties and 11% for four-plus bedroom properties. In terms of the demand for market housing, the greatest demand is likely to be for 2 and 3 bedroom properties (35% and 36% respectively); while for affordable housing the majority of the requirement is likely to be for one and two bedroom homes (46% and 33% respectively) although there is also likely to be a considerable requirement for three or more bedroom sized properties²⁴¹.

4.214 As noted above, within the city's existing housing stock there is clear evidence of a 'bias' towards smaller dwelling types. This has also been the case in terms of the pattern of recent residential development in the city. This points towards a lack of 'choice' across the housing market in terms of property types and sizes available to current and future households and this is particularly so in terms of the availability of larger family sized types of dwellings. In practice, the city's land availability constraints are likely to restrict the provision of larger properties. It will be important therefore to maximise opportunities to secure additional family sized housing on suitable sites

4.215 Where appropriate (in terms of site suitability and with reference to the characteristics of existing communities/neighbourhoods), the intention will be to secure, through new development, a wider variety of housing types and sizes to meet the accommodation requirements of particular groups within the city. For larger sites, where new development will make an important contribution to existing communities in terms of regeneration and/or helping to make them more sustainable places to live, site allocations may set a required housing mix (in terms of housing type, size and tenure) to be achieved. Similarly, where there are problems with particular neighbourhoods which might (in part) be tackled through changes to the types and sizes of dwellings

²³⁹ Nationally, about 36% of households under-occupy with slightly higher figures in the South East, see para. 4.9 HRS Update October 2012

²⁴⁰ HRS Update, para. 4.35 – 4.36

²⁴¹ See Figures 4.9 and 4.11, Housing Requirements Update Study, October 2012 and subsequent updates.

available then the mix of any new housing development will be an important consideration (see Policy SA6).

4.216 Policy CP20 Affordable Housing is clearly linked to housing mix considerations and sets out further information regarding the city's requirements for affordable housing.

CP20 Affordable Housing

The Council will require the provision of affordable housing²⁴² on all sites of 5 or more dwellings (net) and will negotiate to achieve the following affordable housing targets:

- a) 40% onsite affordable housing provision on sites of 15 or more (net) dwellings;
- b) 30% onsite affordable housing provision on sites of between 10 and 14 (net) dwellings or as an equivalent financial contribution;
- c) 20% affordable housing as an equivalent financial contribution on sites of between 5 and 9 (net) dwellings.

This policy will apply to all types of residential development including conversions and changes of use. Where feasible, the affordable housing units should be appropriately integrated throughout the development.

The targets set out above may be applied more flexibly where the council considers this to be justified. In assessing the appropriate level and type of affordable housing provision, consideration will be given to:

- i. local need in respect of the mix of dwelling types and sizes including the city's need to provide more family-sized affordable housing;
- ii. the accessibility of the site to local services and facilities and public transport;
- iii. the costs relating to the development; in particular the financial viability of developing the site (using an approved viability model);
- iv. the extent to which the provision of affordable housing would prejudice the realisation of other planning objectives; and
- v. the need to achieve a successful housing development

Affordable housing provision should incorporate a mix of tenures. The exact tenure split on each site will be a matter for negotiation and should be informed by up to date assessments of local housing need and individual site and/or neighbourhood characteristics.

In terms of the affordable housing unit size mix, the preferred mix to be achieved across the city is 30% one bedroom units; 45% two bedroom units and 25% 3+ bedroom units. On individual sites, the preferred affordable housing mix (in terms of unit size and type of dwelling) will be determined through negotiation and informed by up to date assessments of local housing needs and site/neighbourhood characteristics.

NB: Enabling residential development on identified employment sites will be subject to the same requirements for affordable housing as set out in the above preferred option (see CP2 and CP3).

²⁴² The definition of affordable housing is that as set out in the National Planning Policy Framework.

Supporting text

4.217 Housing affordability is a major issue for many residents within the city, particularly for many families and for newly forming households. The council is committed to enabling the provision of high quality affordable housing for people who are unable to access or afford market housing as well as helping people make the step from social or affordable-rented housing to home ownership. It will be essential to tailor the provision of affordable housing to the local housing needs of particular household groups including families, the elderly, key workers²⁴³ and groups with particular support needs.

4.218 In the period 1997–2007, average house prices in Brighton & Hove almost tripled. Although there has been some decrease in house prices since their peak in 2007, prices remain relatively high in relation to local incomes²⁴⁴. Current (as at 2012) house price data suggests that a 1-bedroom flat would be unaffordable to those households with average household incomes²⁴⁵. To purchase an average priced one bedroom flat in the city would require an annual household income of around £40,000. To purchase an average priced 3-bedroom house would require a household income of approximately £72,500²⁴⁶. New households wishing to enter the market face difficulties not only in having sufficient income to finance a mortgage but also in raising the finance for a deposit and many family households wishing to move to larger properties will face difficulties in financing the additional mortgage needed to purchase a larger family home.

4.219 There is also evidence of affordability problems within the private rented sector²⁴⁷. To rent a 1-bedroom flat in the city costs an average of £767 per month (equivalent to the repayments on a mortgage of £131,000) and requires a household income of £40,000. To rent a 3-bedroom house costs an average of £1,358 per month (equivalent to the repayments on a £232,000 mortgage) and requires a household income of £71,500. In addition, many households who are in receipt of housing benefit find that a proportion of private rental market properties are unaffordable due to the cost to rent exceeding the local housing allowance limits. This becomes more acute for households needing to rent family homes with the shortfall between housing allowance limits and rental costs increasing as the size of the property needed becomes larger.

4.220 The council's 2012 'Assessment of Affordable Housing Need' considers the need for affordable housing within Brighton & Hove over the period 2012 –

²⁴³ A worker whose services are essential to local communities, who need to live close to those communities and the people they serve. Government guidance targets specific workforce groups such as teachers, nurses, social workers, fire and rescue officers, probation officers and the police.

²⁴⁴ Median income estimated to be £28,240 with a mean income of around £37,000. Paragraph 8.2. Assessment of Affordable Housing Need, GL Hearn. December 2012.

²⁴⁵ Housing Costs Update April to June 2012.

²⁴⁶ Housing Costs Update: April to June 2012 - average purchase price 1-bed flat £174,647 and 3-bed house £314,207

²⁴⁷ Housing Costs Update: April to June 2012

2017. It draws upon data from the council's Joint Housing Register, demographic projections and income information. On the basis of assuming no more than 25% of households' gross income is spent on housing costs, the study concludes there is likely to be a net housing need for 17,400 affordable homes over the 2012 – 2017 period²⁴⁸. Given the city's high housing costs, an alternative analysis (based on the assumption that, in practice, many households may spend up to 35% gross household income on housing costs) indicates a net need for 12,550 affordable homes for the same period²⁴⁹. The needs evidence suggests a significant need for affordable housing. Given the current stock of affordable housing in the city, the uncertainties regarding future funding mechanisms for the delivery of new affordable housing and the city's constrained housing land supply it is unrealistic to assume that all housing need can be met through the provision of new affordable homes. In practice, it is likely that the private rented sector will continue to play an important role in meeting the housing needs of the city.

4.221 When setting targets for the delivery of affordable housing from new development, the city council considers that the most pragmatic approach is to require that all new suitable residential development (as defined with reference to the site size thresholds set out in the policy) provide a viable and deliverable proportion of affordable housing or (where appropriate) an equivalent financial contribution in lieu of onsite provision which can be used to help enable the further provision of affordable housing elsewhere in the city.

4.222 Drawing on the findings of the council's most recent Affordable Housing Development Viability Study²⁵⁰ and taking account of a number of considerations (for example, the city's housing land supply, housing market trends, local needs and affordability, together with wider planning obligations) the council will aim to achieve onsite provision of affordable housing on all suitable larger development sites (40% on sites of 15 units or more and, where practicable, 30% on sites of between 10 and 14 units) and a financial contribution equivalent to a lower target quota of 20% on smaller development sites of between 5 and 9 units.

4.223 The council will seek the maximum reasonable amount of affordable housing when negotiating on individual schemes and the appropriate proportion and type of affordable housing will be assessed against the criteria i-iv as set out in the policy.

4.224 Only in exceptional circumstances, will the council accept a commuted sum or free serviced land in lieu of onsite provision on larger sites²⁵¹. These circumstances might include, for example, where the Registered Provider finds it uneconomic or impractical to provide the units agreed. Any financial

²⁴⁸ Assessment of Affordable Housing Need, GL Hearn, December 2012. See Section 9 and subsequent updates.

²⁴⁹ Both estimates take account of future affordable housing supply from re-lets and affordable housing in the pipeline.

²⁵⁰ Affordable Housing Development viability Study, March 2012.

²⁵¹ As set out in the Council's Developer Contributions Guidance.

contributions will be pooled and used to enable affordable housing provision within the City.

4.225 In terms of the preferred affordable housing mix (including dwelling type and tenure balance), ongoing monitoring of local housing needs together with individual site and neighbourhood characteristics will inform the approach to the application of the policy to individual sites. Affordable housing achieved across the city should reflect the distinct needs of different sections of the community including provision for the elderly, specialist groups in need of supported housing, families and key workers. City wide policy CP22 addresses the accommodation needs of Gypsies and Travellers²⁵². In accordance with policy SA6 Sustainable Neighbourhoods, it may be appropriate to allow higher proportions of intermediate housing in disadvantaged areas to help facilitate regeneration in those areas and achieve mixed and sustainable communities. Such an approach is supported by the 2008 SHMA.

4.226 In terms of the unit size of affordable housing required, the Housing Register indicates that amongst those households identified as in the highest priority need (Bands A and B), approximately 50% need a 2 bedroom or larger property²⁵³ often because they are young families with children. The SHMA also identifies that although the greatest need (in numerical terms) is for smaller (one/two bedroom) properties there are also significant pressures on the availability of larger family homes which results in an ongoing priority for a number of three/four bedroom properties²⁵⁴. These findings are confirmed by more recent work regarding the city's housing requirements²⁵⁵. The need for family sized affordable housing will be a specific consideration when assessing the overall amount and type of affordable housing that is required to be provided by suitable development proposals.

4.227 Table 1, page 26 of the Plan sets out how this policy will help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city to live within environmental limits.

²⁵² Publicly funded Gypsy and Traveller pitches count as affordable housing provision.

²⁵³ Brighton & Hove City Council, Housing Register, July 2012

²⁵⁴ Strategic Housing Market Assessment (April 2008), Section 11.

²⁵⁵ Housing Requirements Study Update, GL Hearn October 2012.

Policy CP21 Student Accommodation and Houses in Multiple Occupation

To meet increasing accommodation demands from students and to create mixed, healthy and inclusive communities, the Council will support the provision of additional purpose built accommodation and actively manage the location of new Houses in Multiple Occupation. The Council will continue to work closely with the two universities and other education providers to achieve these goals.

i) Purpose Built Student Accommodation

A. The council will encourage the provision of purpose built accommodation to help meet the housing needs of the city's students. Proposals for new purpose built student accommodation will need to demonstrate that the following criteria have been addressed:

- 1. Proposals should demonstrate that there will be no unacceptable impact upon residential amenity in the surrounding area through issues such as increased noise and disturbance;**
- 2. High density developments will be encouraged but only in locations where they are compatible with the existing townscape (see CP12 Urban Design);**
- 3. Sites should be located along sustainable transport corridors where accommodation is easily accessible to the university campuses or other educational establishments by walking, cycling and existing or proposed bus routes;**
- 4. Proposals should demonstrate that they would not lead to an unacceptable increase in on-street parking in the surrounding area;**
- 5. Proposals should be designed to be safe and secure for their occupants whilst respecting the character and permeability of the surrounding area;**
- 6. Schemes should demonstrate that they have entered into a formal agreement with one of the city's two Universities or other existing educational establishments within Brighton and Hove. The council will seek appropriate controls to ensure that approved schemes are occupied solely as student accommodation and managed effectively;**
- 7. Permanent purpose built student accommodation will not be supported on sites allocated for housing or with either an extant planning permission for residential development or sites identified as potential housing sites.²⁵⁶**

²⁵⁶ Sites identified as potential housing sites will include those identified in other City Plan policies and those listed in the Strategic Housing Land Availability Assessment.

B) Strategic Allocations for Purpose Built Student Housing

In conjunction with the Universities and City College, the council will allocate the following sites for purpose-built student accommodation:

- 1. Varley Halls, Coldean Lane, Brighton**
 - **Redevelopment of the remaining parts of the site wholly for student accommodation**
 - **150 bedspaces**
- 2. Preston Barracks and the University of Brighton, Lewes Road, Brighton (See DA3 Lewes Road Area)**
 - **Delivery of this site as part of a wider mixed use scheme**
 - **750 bedspaces²⁵⁷**
- 3. Pelham Street, Brighton (See DA4 New England Quarter and London Road Area)**
 - **Delivery of this site as part of a wider mixed use scheme**
 - **300 bedspaces**
- 4. Circus Street, Brighton (See DA5 Eastern Road and Edward Street Area)**
 - **Delivery of this site as part of a wider mixed use scheme**
 - **400 bedspaces**
- 5. East Slope and land adjoining to the east, University of Sussex, Brighton (See DA3 Lewes Road Area)**
 - **Redevelopment of existing accommodation and development of adjoining land for student accommodation providing a net increase over the existing 592 bedspaces in the East Slope Residences, subject to positive enhancement of the visual appearance of this part of the campus within the surrounding landscape**

ii) Houses in Multiple Occupation (HMO's)

In order to support mixed and balanced communities and to ensure that a range of housing needs continue to be accommodated throughout the city, applications for new build HMO, and applications for the change of use to a Class C4 (Houses in multiple occupation) use, a mixed C3/C4 use or to a sui generis House in Multiple Occupation use (more than six people sharing) will not be permitted where:

- **More than 10 per cent of dwellings within a radius of 50 metres of the application site are already in use as Class C4, mixed C3/C4 or other types of HMO in a sui generis use.**

²⁵⁷ Lewes Road (Preston Barracks and University of Brighton) Planning Brief – September 2011

Supporting Text

4.228 The city's educational establishments and their students make an important contribution to the economic and cultural life of the city. There are approximately 35,200 students at the Universities of Brighton and Sussex, which includes 4,000 students from non EU countries²⁵⁸. Many students also attend other educational establishments, such as City College, the language schools and Brighton Institute of Modern Music. The Council will work with students and their education providers to ensure that the accommodation needs of the students are met in a sustainable way and that healthy and inclusive communities²⁵⁹ are maintained and developed in the future.

4.229 Brighton & Hove City Council's 'Student Housing Strategy 2009-2014' identified a number of key issues associated with the large student population that need to be addressed in partnership with the city's two universities, other educational establishments, students, landlords and developers. The Strategy sets out several objectives, one of which is to promote and enable the appropriate development of purpose built student accommodation at suitable locations within the city. The council will continue to work closely with education providers to identify and seek to address the housing requirements of their students. Where appropriate, the council will liaise with partners, such as the police and health agencies, to address issues affecting the student population.

4.230 Over recent years the City Council has received an increasing number of speculative enquiries from developers regarding purpose built student accommodation. Assessing proposals for new purpose built accommodation against the above criteria will ensure that schemes are developed to a high standard and in appropriate locations which meet council, residents, students and educational institutions' priorities. In considering the effect of new development on residential amenity, this will include an assessment of the cumulative impact of other existing and proposed purpose-built student housing schemes close to the application site. When planning permission is granted for new student accommodation, a planning agreement or condition will be used to robustly secure that use.

4.231 Five sites are specifically allocated for new purpose built student accommodation. Redevelopment of part of the Varley Halls site by the University of Brighton is underway. Although proposals must address the significant constraints imposed by the site's sensitive location in terms of landscape, ecology and archaeology, further redevelopment will create 150 net additional bedspaces. The Lewes Road (Preston Barracks and University of Brighton) planning brief adopted in September 2011 sets out three possible development scenarios. Each scenario includes 750 student bedspaces, as part of the wider proposed mixed use development. In 2009, the City Council resolved to grant planning permission for a mixed use development at City

²⁵⁸ HESA 2011/12

²⁵⁹ As stipulated in the National Planning Policy Framework

College's Pelham Street campus incorporating 300 bedspaces for students. That development did not proceed, but the City Council will work with City College and its partners to secure the redevelopment and improvement of the campus, including the provision of purpose built student accommodation. Circus Street is allocated for mixed use development, including 400 student bedspaces catering for the adjacent university site. Finally, the University of Sussex propose to redevelop their existing East Slope Residences and to develop adjoining land to the east. East Slope Residences currently has a significant negative impact upon views within the campus and upon the sensitive landscape setting. The setting includes the South Downs National Park and Stanmer historic park. The Council supports the principle of developing this land to allow the University to better meet accommodation demands, provided that the scheme significantly improves the visual appearance and setting of the campus and surrounding landscape.

4.232 The provision of additional bed spaces in purpose built student accommodation will also assist in encouraging students to choose managed accommodation over HMO's, which is particularly important for first year students.

4.233 The city has a high number of HMOs, partly as the supply of purpose-built accommodation has not matched the expansion of the student population and partly due to housing prices and availability within the city. The private sector has responded positively to the increasing demand for student housing and there has been a significant conversion of family housing to student occupied HMOs in many neighbourhoods. Another aim of the Student Housing Strategy is to support and enhance the quality and management of housing and residential environments within HMO dominated neighbourhoods.

4.234 In 2010 a new C4 use class for Houses in Multiple Occupation was created. The council already had concerns about the over-concentration of HMOs in certain parts of Brighton & Hove, as expressed through the Student Housing Strategy, and felt that these areas had the exceptional circumstances necessary to warrant an article 4 direction. An article 4 direction was subsequently made, meaning that planning permission is required for changes of use to small HMO (C4) uses in five of the city's electoral wards.

4.235 This policy will be used to control future changes of use to small (C4), mixed C3/C4 uses and large (sui generis) Houses in Multiple Occupation to address the potential impact of concentrations of HMOs upon their surroundings and to ensure that healthy and inclusive communities are maintained across the city.

4.236 To aid implementation of this policy, the Council will maintain a database of properties in HMO use. It will include properties in small HMO (C4) use, mixed C3/C4 uses and larger, sui generis HMO uses. The database will use a variety of information sources including planning records, details of HMOs licensed by the council and those properties identified as student housing through Council Tax records.

4.237 In assessing planning applications for new Houses in Multiple Occupation, a circle with a radius of 50 metres will be drawn from the centre point of the application site's front curtilage boundary. Residential properties partly or wholly within the circle will be checked to identify which are in HMO use (including C4, mixed C3/C4 or sui generis uses). Planning permission for the change of use will not be granted where more than 10 per cent of these neighbouring properties are already in HMO use. The assessment will include only residential properties and will exclude commercial uses, such as retail or office units.

4.238 The 10 per cent threshold contained in the policy above will be reviewed regularly to ensure that it continues to provide opportunities for a balance of household types. The baseline data of the current distribution of HMO's will be regularly kept up to date.

CP22 Traveller Accommodation

Provision will be made to meet the city's needs for permanent and transit traveller accommodation²⁶⁰.

- a) The council will seek to deliver 18 permanent pitches to meet assessed requirements to 2019²⁶¹.**
- b) Traveller accommodation needs will be reviewed to cover the remaining plan period to 2030;**
- c) Additional or outstanding pitch requirements will be facilitated through site allocations in Part 2 of the City Plan or through joint Development Plan working with adjacent local planning authorities²⁶².**
- d) An early review of this policy may be required to incorporate pitch requirements over the full plan period.**

In assessing the suitability of new traveller sites (or extensions to existing sites), the local planning authority will have regard to the following planning considerations and will need to be satisfied that:

- i) there is safe and convenient access to the road network;**
- ii) there is satisfactory access to local services and facilities (including health services, GPs, schools, shops);**
- iii) the potential for noise and other disturbance from the movement of vehicles to and from the site and any on-site business activities is not detrimental to the character and appearance of surrounding areas;**
- iv) there is scope for appropriate landscaping and planting to help give structure and privacy and to maintain visual amenity;**
- v) there is capacity to provide the necessary physical and social infrastructure (water, electricity, drainage, sanitation, play areas); and**
- vi) the location of sites will not compromise the essential features of designated areas of landscape, historical or nature conservation protection including the South Downs National Park.**

The following locations should be avoided:

- Sites on or near to significantly contaminated land, industrial processes or other hazards where there would be a detrimental effect on the general health and well-being of residents;**
- Sites in areas of high flood risk; and**
- SACs, SPAs, Ramsar Sites and other areas with internationally recognised designations.**

²⁶⁰ The definition of traveller accords with the definition of Gypsies and Travellers as set out in government guidance 'Planning Policy for Traveller sites', March 2012.

²⁶¹ Or an updated target identified through a revised assessment of traveller accommodation needs.

²⁶² In accordance with pitch targets resulting from a revised assessment of traveller accommodation needs.

Existing traveller sites will be safeguarded. Proposals that would result in the loss of all or part of an existing site will be refused unless:
a) the local planning authority is satisfied that the need for the provision of the site no longer exists; or
b) the proposal complies with the policies in the development plan and a replacement site is to be provided in a suitable location.

Supporting text

4.239 The council's Traveller Commissioning Strategy (March 2012) aims to promote community cohesion and to protect the rights and needs of both the settled and travelling communities. The Strategy acknowledges that traveller communities have a right to a nomadic lifestyle, to equal access to services (such as education, health and accommodation) and to protection from discrimination and harassment. The city's Traveller Commissioning Strategy, national policy and the local evidence base²⁶³ provide the appropriate context for planning to meet the accommodation requirements of travellers either living in or passing through the city.

2.240 The city's local need for permanent (residential) pitch provision to 2016 was established through the Partial Review of the South East Plan process (2007 – 2010). Technical work undertaken as part of that process provides a robust evidence base and establishes a need for 16 pitches to be provided in Brighton & Hove by 2016. This is additional to the short term transit site provision²⁶⁴ that the council currently makes at the Horsdean site just north of the A27. There is no local evidence of any need for Travelling Showpeople plots in the city²⁶⁵. Goal 4 within the city's 2012 Traveller Strategy is to consider the need for future site provision which includes a commitment to carry out a new Traveller accommodation needs assessment to cover the period post 2016.

4.241 In addition to setting pitch targets to meet locally assessed accommodation need, national policy '*Planning for traveller sites*'²⁶⁶ also requires local planning authorities to identify sufficient sites to meet those needs over a reasonable timescale. In terms of the first five years of the City Plan (post adoption 2014 – 2019); the council has assessed that permanent pitch requirements to 2019 are likely to be for a minimum of 18 pitches.

²⁶³ Local evidence base consists of the East Sussex and Brighton & Hove Gypsy and Traveller Study as benchmarked, audited and amended through the Partial Review of the South East Plan process (2007 – 2010) and further needs assessment exercises. A summary of the partial review process is provided in the paper 'Joint Evidence Paper – Provision for Gypsies and Travellers in East Sussex' April 2011 produced by ESCC, East Sussex District and BHCC officers.

²⁶⁴ Transit site provision – Horsdean provides 23 pitches for temporary accommodation for up to 3 months.

²⁶⁵ Draft Panel Report, Examination in Public of Partial Review of the South East Plan, 2010.

²⁶⁶ Communities and Local Government, March 2012.

Permanent pitch requirements to 2019

Year to	3% Pitch need growth	Total Requirement	Total Requirement (rounded)	Needs over City Plan first 5 years.
March 2016	-	16.00	16	5 years 2014 – 2019: 16 +2 pitches
March 2017	+0.48	16.48	17	
March 2018	+0.49	16.97	17	
March 2019	+0.51	17.48	18	

4.242 Over the longer term, levels of need for both permanent and transit site provision²⁶⁷ will clearly need to be kept under review and updated through further local assessments of the need for traveller accommodation. The council will work with its adjacent local planning authorities to secure the provision of suitable sites should it not prove to be possible to identify sufficient sites within the City.

4.243 In terms of identifying and bringing forward site provision, the council has undertaken a comprehensive site search exercise and has identified sites with potential to accommodate its permanent need requirements to 2019²⁶⁸.

4.244 Government planning guidance also advises that plans should set out the relevant planning criteria and considerations to guide the allocation of new traveller sites and to assess any planning applications that may come forward. These criteria can be used to meet unexpected demand for sites and to assist the city council in granting planning consent for suitable applications in advance of the formal adoption of Local Plan Documents.

4.245 There is a need to ensure that all sites (whether new or existing/improved):

- are sustainable, easy to manage and maintain;
- are of a decent standard, equitable to that which would be expected for affordable housing in the settled community; and
- support harmonious relations between gypsies and travellers and the settled community.

4.246 Any sites considered for allocation in Part 2 of the City Plan will be subject to consultation and have their social, environmental and economic impacts assessed in accordance with the requirements of the sustainability appraisal. Table 1 on page 26 of the Plan sets out how this policy will help to deliver against the local targets under the One Planet principles, which is a strategic approach to enabling the city live within environmental limits.

²⁶⁷ Transit site provision relates to temporary provision and may include stopping places rather than additional formal transit provision

²⁶⁸ Site Search exercise and the selection of a preferred site was reported to the Council's Cabinet Meeting, 15th March 2012.

Appendix 1: Glossary of terms

This glossary provides a brief explanation of some terms used in this document.

Term	Definition
Affordable Housing	<p>Affordable housing includes social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p> <p>Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.</p> <p>Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).</p> <p>Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.</p> <p>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.</p>
Air Quality Management Area (AQMA)	Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.
Aquifer	Rock that provides a natural underground store for water. In Brighton & Hove aquifers are used to provide drinking water.

Biodiversity (Biological Diversity)	The range and variety of life (including plants, animals and micro-organisms), ecosystems and ecological processes.
Biosphere Reserve	These are designated by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as centres of excellence to demonstrate conservation and sustainable practice by bringing nature and people together.
BREEAM	Building Research Establishment Environmental Assessment Method - the most widely used means of reviewing and improving the environmental performance of buildings
Brownfield or 'previously developed land'	<p>Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.</p> <p>This excludes:</p> <ul style="list-style-type: none"> • Land that is or has been occupied by agricultural or forestry buildings; • Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; • Land in built-up areas such as private residential gardens, parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, has not been previously developed, and; • Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings).
Built Heritage (or Historic Built Environment)	Buildings and other structures considered to be of a special architectural or historic quality or interest. Includes, but not limited to, Listed Buildings and Conservation Areas.
Built up area	Area identified within which the development of the city has occurred already. The outer limits of the built up area are defined on a policies map.
Carbon Footprint	The term "carbon footprint" refers to the amount of carbon dioxide (CO ₂) emitted as a result of specific activities. The carbon footprint is often considered over the period of a year and often is used specifically in relation to emissions resulting from energy use from buildings. 'Zero carbon' means that there will be no net annual CO ₂ emissions resulting from energy use in a building
Community	A levy allowing local authorities to raise funds

Infrastructure Levy (CIL)	from owners or developers of land undertaking new building projects in their area.
Climate Change	Accounts for long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Often regarded as a result of human activity and fossil fuel consumption.
Code for Sustainable Homes (CSH)	The Code for Sustainable Homes (CSH) is an environmental assessment method for rating and certifying the performance of new homes. It is a Government owned national standard intended to encourage improvement in sustainable home building. The Code looks at various aspects of design such as (but not limited to): energy and carbon emissions; water; materials; ecology; waste; flood risk and health impacts
Connectivity	Connectivity or permeability refers to the visual and physical accessibility into and within an area.
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. In respect of Brighton & Hove they are usually designated by the city council, though the Secretary of State can also designate them.
Creative Industries	The creative industries include: advertising; architecture; art and antiques markets; computer and video games; crafts; design; designer fashion; film and video; music; performing arts; publishing; software; and television and radio.
Density (dwellings)	Measure used to describe the numbers of housing units associated with a given area e.g. dwellings per hectare. Net density includes access roads within the site; private garden space; car parking areas; incidental open space and landscaping; and local children's play areas where these are to be provided.
District Centre	Groups of shops often containing at least one supermarket or superstore and a range of non retail services such as banks and restaurants as well as local public facilities such as a library. Smaller in size than Town and Regional centres.
District Heating Network	This term is generally given to a system where a centralised heat generating plant (using any one of a range of technologies) provides heat to surrounding buildings in the area by means of a network of pipes carrying hot water or steam.
Downland	Usually treeless open land with only a thin covering of soil on the chalk uplands.
Ecological footprint	An “ecological footprint” measures the total amount of land and resources needed by an individual, and includes their carbon footprint
Environment Agency	The leading public body for protecting and improving the environment of air, land and water in England and Wales.
Exception Test	Applied following application of the Sequential Test (see

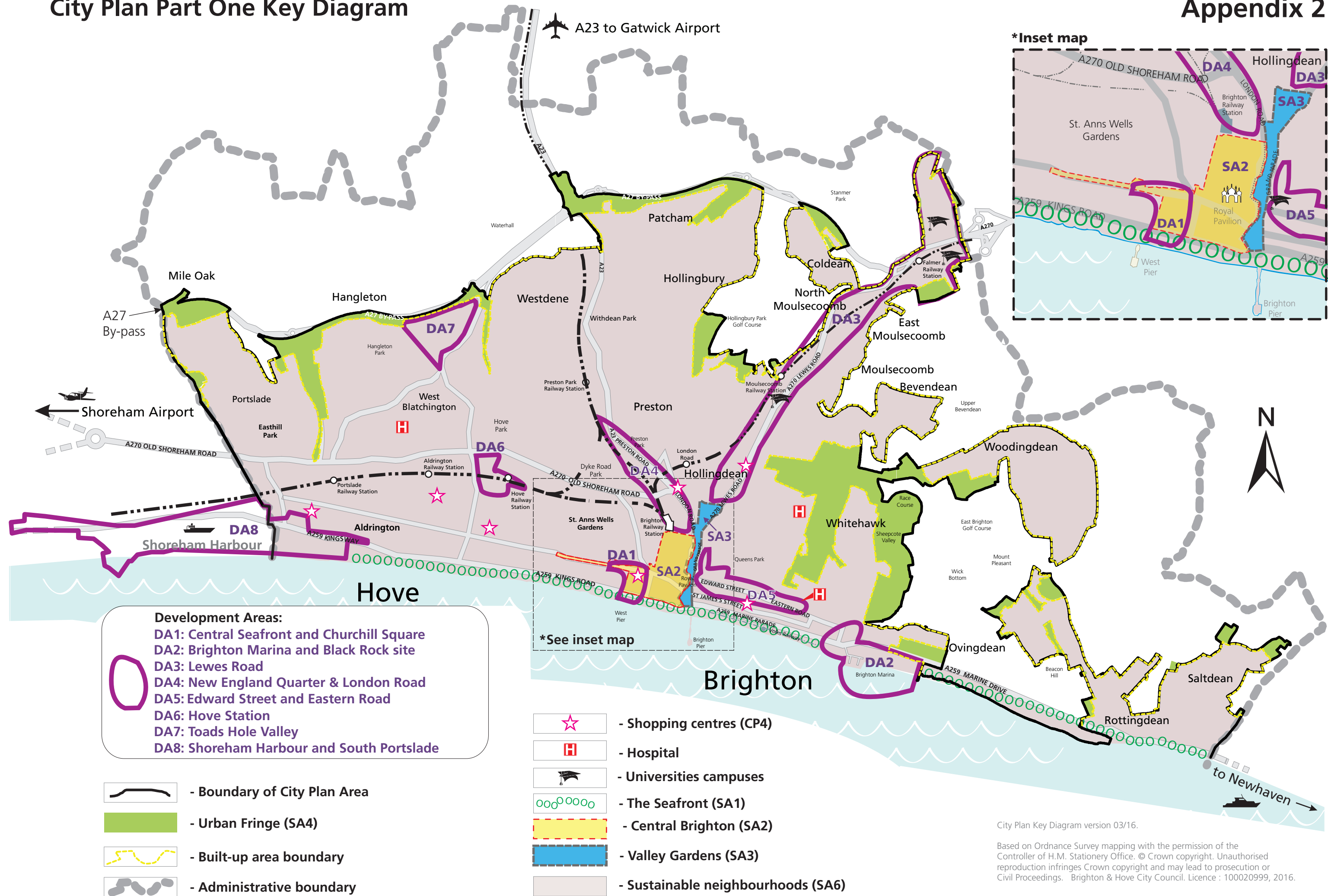
	separate definition), where it is not possible, consistent with wider sustainability objectives, for the development to be located in zones of lower probability of flooding the Exception Test can be applied. This provides a method of managing flood risk while still allowing necessary development to occur.
Green Network (GN)	A series of interlinked natural green spaces and nature conservation features connecting the urban area, urban fringe, the seafront and surrounding downland.
Greenfield Land	Site that has not been previously been built on (includes areas such as playing fields, allotments, countryside and gardens).
Gypsies and Travellers	Gypsies and Travellers are defined as persons of a nomadic habit of life, whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such.
Health Impact Assessment (HIA)	HIA is a practical approach that determines how a proposal (such as a development scheme or a policy) will affect people's health. Recommendations to 'increase the positive' and 'decrease the negative' aspects of the proposal are produced to inform decision-makers.
Historic Parks and Gardens	Gardens, parks and landscapes whose character reflects the period (or periods) of their design, and sometimes also the style of a particular designer. English Heritage compiles the list on the Register of Parks and Gardens of Special Historic Interest in England.
Hotel Core Zone	An area identified on a Policies Map within which tourist accommodation would be afforded special protection by planning policy.
Housing Trajectory	The purpose of a housing trajectory is to track the provision of housing supply over the entire lifespan of a development plan and support the plan, monitor and manage approach to housing delivery by monitoring both past and anticipated completions.
Legibility	The degree to which a place can be easily understood and traversed by people.
Listed Building	A building of national importance due to its architectural or historic interest. They are buildings which have been included in the Statutory List of Buildings of Special Architectural or Historic Interest. The List is compiled by the Secretary of State (Department of Culture, Media and Sport), with advice from English Heritage and other specialist organisations, using agreed national criteria.

Local Centre	Include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, post office and a pharmacy. Other facilities could include a hot food takeaway and launderette.
Local Enterprise Partnership	A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.
Local Nature Reserve (LNR)	Local Nature Reserves are for both people and wildlife. They are places with wildlife or geological features that are of special interest locally. They offer people special opportunities to study or learn about nature or simply to enjoy it.
Local Transport Plan (LTP)	(Also called the Full Local Transport Plan when it has been approved by the Government). It is the document prepared by the city council which sets out its transport policy and proposals and is prepared in order to bid for Government funding for all forms of transport.
Mixed use developments	A development that contains two or more uses e.g. residential, employment, leisure, community uses.
Natural England	A statutory body formed in 2006 with the bringing together of English Nature, the landscape, access and recreation elements of the Countryside Agency and the environmental land management functions of the Rural Development Service.
Nature Improvement Areas	Inter-connected networks of wildlife habitats intended to re-establish thriving wildlife populations and help species respond to the challenges of climate change.
One Planet Approach	The 'One Planet Living' 10 guiding principles are a simple way to plan, deliver, communicate and mainstream sustainable development and a sustainable economy.
Permeability	The degree of movement possible or permitted between public outside and private inside or between urban areas, buildings, places and spaces.
Planning Obligations/ Developer contributions	Planning Obligations or Developer Contributions are secured through Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. They are a legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990.
Policies Map	Map which identifies sites/areas to which particular policies apply.
Public Art	Public art includes permanent and temporary work, art facilities and arts training. Public art can create and enhance local distinctiveness and help develop a desirable sense of place. They often provide important opportunities to involve the local community and will offer work opportunities to local artists.

Public Realm	This is the space between and within buildings that are publicly accessible, including streets, squares, forecourts, open spaces and public and civic buildings.
Regional Centre	The highest level of shopping centre (also known as the city centre) serving a wide catchment area.
Renewable Energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat.
Sequential approach	The preferred hierarchy of land for certain uses in descending order of preference.
Sequential Test	A risk based approach to assessing flood risk, which gives priority to sites in ascending order of flood risk, i.e. lowest risk first.
Shoreline Management Plan (SMP)	Provides a large-scale assessment of the risks associated with coastal processes and present a long term policy framework to reduce these risks to people and the developed, historic and natural environment in a sustainable manner. A SMP is a high level document that forms an important element of the strategy for flood and coastal erosion risk management.
Site of Nature Conservation Importance (SNCI)	These are locally designated wildlife sites to support both locally and nationally threatened wildlife, and many sites will contain habitats and species that are priorities under the county or UK Biodiversity Action Plans (BAP)
Sites of Special Scientific Interests (SSSIs)	These are designated by Natural England (the government nature conservation agency) under the Wildlife and Countryside Act 1981. Such sites are of special national interest by reason of their flora, fauna, geological features or landforms.
South Downs National Park Authority (SDNPA)	The South Downs National Park came into being on 31st March 2010. As a National Park, the SDNPA has statutory purposes and socio-economic responsibilities as specified in the Environment Act of 1995.
Special Area of Conservation (SAC)	SACs are designated by the European Commission (EC) under the EC Directive on the conservation of habitats and wild flora and fauna (The Habitats and Species Directive 1992). The Habitats Regulations 1994 translate the Directive into UK legislation. SACs are outstanding examples of selected habitat types important for the continuing wellbeing and survival of selected non-bird species (birds are protected under their own European legislation). The Directive states that SACs are to be afforded absolute protection subject to 'imperative reasons of overriding public interest'.
Special	Areas which have been identified as being of international

Protection Areas (SPAs)	importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.
Strategic Housing Market Assessment (SHMA)	This assessment is to help understand the nature and level of housing demand and need within the joined market area and provides information and guidance for a variety of housing and planning policies including those in the City Plan.
Strategic Flood Risk Assessment (SFRA)	Created to help appraise, manage and reduce flood risk in relation to the location of potential new development in the city.
Strategic View	The line of sight from a particular point to an important landmark or skyline.
Supplementary Planning Document (SPD)	Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan.
Sustainability Appraisal (SA)	The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the Sustainability Appraisal (SA) achievement of sustainable development. A sustainability appraisal is a systematic process, to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document.
Sustainable Transport Modes	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.
Sustainable Community Strategy	Document that sets out the vision and plans of the agencies, organisations and communities who work together through the 2020 Community Partnership to improve the quality of life in Brighton & Hove.
Tenure	Housing tenure describes the legal status under which people have the right to occupy their accommodation. The most common forms of tenure are home-ownership (including homes owned outright and mortgaged) and renting (including social rented housing and private rented housing)
Town Centre	Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood

	significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.
Townscape	General view, appearance and character of an urban scene/landscape.
Transport Assessment	A comprehensive and systematic process of looking at the impact on transport of a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling, and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.
UNESCO Biosphere Reserve	Biosphere reserves are sites recognised under UNESCO's Man and the Biosphere Programmes, which innovate and demonstrate approaches to conservation and sustainable development. They share their experience and ideas nationally, regionally and internationally within the World Network of Biosphere Reserves.
Urban Fringe	The land between the defined built up area boundary and the South Downs National Park.
Windfall Site	Windfall sites are those which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available.
Zero carbon	'Zero carbon' means that there will be no net annual CO2 emissions resulting from energy use in a building



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Brighton & Hove
City Council