

Compiled by the Planning Policy, Projects & Heritage Team  
at Brighton & Hove City Council

# **Urban Design Framework**

## **Supplementary Planning Document**

### **Draft UDF SPD consultation report**

April 2021

# Contents

<b>1. About this report</b> .....	<b>3</b>
<b>2. Summary of findings</b> .....	<b>3</b>
<b>3. Responses received</b> .....	<b>6</b>
<b>4. Consultation findings</b> .....	<b>7</b>
Q3 In responding to this survey, are you: .....	7
Q4 What is your Postcode? .....	8
<b>Contents and About this SPD</b> .....	<b>8</b>
Q5 Do you have any comments on the table of CONTENTS and/or ABOUT THIS SPD sections of the Draft SPD (pages 1-5)? Please reference page number if possible. ....	9
<b>SECTION A: Local priorities</b> .....	<b>10</b>
Q6 To what extent do you support or object and/or have comments regarding the OVERARCHING CRITERIA identified for determining the quality of new development? ..	10
Q7 Do you have any comments regarding these criteria? .....	11
<b>1. Context</b> .....	<b>11</b>
Q8 To what extent do you support or object to the DESIGN PRIORITIES set out in the Context sub-sections of the Draft SPD (pages 7-16)? .....	11
Q9 To what extent do you find the GOOD PRACTICE EXAMPLES provided for each of the Context sub-sections helpful or unhelpful? .....	12
Q10 Do you want to suggest GOOD PRACTICE EXAMPLES that better illustrate your comments and/or the design priorities identified in the Context section? .....	12
Q11 To what extent do you support or object to the NEIGHBOURHOOD CATEGORISATION set out in sub-section 1.2. Neighbourhood character of the Draft SPD (pages 9-10)?.....	13
Q12 To what extent do you support or object to the STRATEGIC VIEWS LANDMARKS AND APPROACHES identified in sub-section 1.4. Views and landmarks (pages 13-14)?..	13
Q13 Do you have any additional COMMENTS on the Context section of the Draft SPD? Please reference the sub-section and page number.....	16
<b>2. Spaces between buildings</b> .....	<b>18</b>
Q14 To what extent do you support or object to the DESIGN PRIORITIES set out in the Spaces between buildings sub-sections of the Draft SPD (pages 17-29)? .....	18
Q15 Do you have any additional COMMENTS on the Spaces between buildings section of the Draft SPD? Please reference the sub-section and page number.....	18
Q16 To what extent do you find the GOOD PRACTICE EXAMPLES provided for each of the Spaces between buildings sub-sections helpful or unhelpful? .....	20

Q17 Do you want to suggest good practice examples that better illustrate your comments and/or the design priorities identified in the SPACES BETWEEN BUILDINGS section? If yes, please provide details .....	20
<b>3. Buildings .....</b>	<b>21</b>
Q18 To what extent do you support or object to the DESIGN PRIORITIES set out in the Buildings sub-sections of the Draft SPD (pages 30-39)? .....	21
Q19 Do you have any additional COMMENTS on the Buildings section of the Draft SPD? Please reference the sub-section and page number.....	21
Q20 To what extent do you find the GOOD PRACTICE EXAMPLES provided for each of the Buildings sub-sections helpful or unhelpful? .....	22
Q21 Do you want to suggest good practice examples that better illustrate your comments and/or design priorities identified in the BUILDINGS section? If yes, please provide details. ....	22
<b>SECTION B: Tall buildings .....</b>	<b>23</b>
Q22 To what extent do you support and/or object to the aspects of the current framework as set out in SPGBH15 Tall buildings that have been progressed into the Draft SPD?.....	23
Q23 To what extent to you support or object to the additional information provided for each of the tall building areas set out in City Plan Part One Policy CP12 Urban Design? .....	24
Q24 Do you have any additional comments on SECTION B TALL BUILDINGS of the Draft SPD? .....	27
<b>SECTION C: Planning process .....</b>	<b>28</b>
Q25 To what extent do you agree and/or disagree with the STAGES IN THE DESIGN PROCESS set out in Pre-application process sub-section of the Draft SPD?.....	28
Q26 Do you have any comments regarding the PRE-APPLICATION PROCESS section? .....	29
Q27 Do you have any comments regarding the DESIGN ADVICE SERVICES section? ..	30
Q28 Do you have any comments regarding the COMMUNICATING DESIGN IDEAS WELL section?.....	30
Q29 Do you want to suggest good practice examples that better illustrate your comments and/or the examples provided in the PLANNING PROCESS section? If yes, please provide details.....	30
<b>SECTION D: Appendices .....</b>	<b>31</b>
Q30 Do you have any comments regarding the Appendices section of the Draft SPD? ...	31

## Appendices to this consultation report

- Summary of online events
- Transcripts of Consultation Portal responses
- Transcripts of email responses

## 1. About this report

- 1.1. This report summarises the findings of the city-wide public consultation on the draft version of the Urban Design Framework Supplementary Planning Document (UDF SPD) conducted by Brighton & Hove City Council's Planning team.
- 1.2. The guidance looks at opportunities to support design discussions between applicants, designers, planning officers, councillors and communities and deliver better design outcomes from new development in the city. This includes showing how good urban design can help to improve existing areas, shape new places and deliver more inclusive, accessible, sustainable and climate resilient buildings, spaces and places for the city; its residents and visitors. Once adopted, the UDF SPD will guide decisions on planning applications.
- 1.3. The purpose of the consultation was to get feedback on the draft version of the supplementary guidance that is required to support the city councils' corporate objectives as set out in the Council Plan 2020-2023 – A Fairer City with a Sustainable future and the vision, objectives and planning policies set out in the Brighton & Hove City Plan (Parts One and Two), in particular City Plan Part One Policy CP12 Urban Design.
- 1.4. The findings of this consultation will feed into the final version of the UDF SPD that will be submitted to the council's Tourism, Equalities, Communities & Culture Committee for adoption in early Summer 2021.

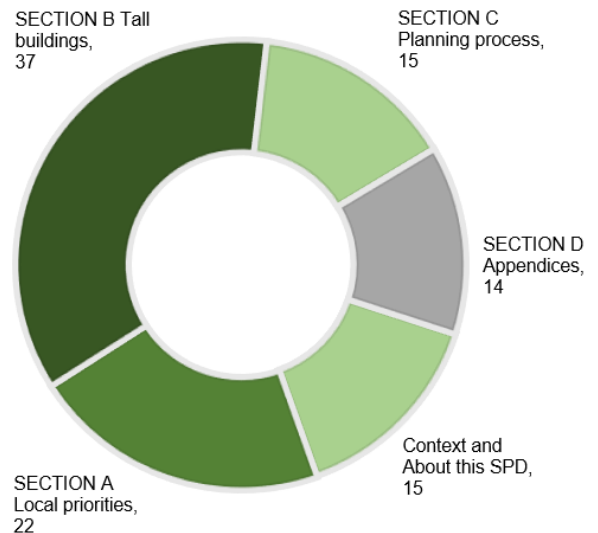
## 2. Summary of findings

- 2.1. The consultation on the Draft Urban Design Framework Supplementary Planning Document (UDF SPD) ran from 23/10/2020 to 11/12/2020.
- 2.2. It was undertaken, so far as reasonably practicable in light of the Covid-19 pandemic, in accordance with the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 and the guidance set out in the council's adopted Statement of Community Involvement for supplementary planning documents.
- 2.3. The consultation included:
  - 5 dedicated online events for those stakeholders that had formally requested to be kept informed about planning consultations;
  - 12 online briefings for local city partnerships that registered an interest in helping to promote the consultation among their members;
  - a survey posted on the council's online Consultation Portal made available to all those stakeholders / individuals who have registered an interest to be kept informed of planning consultations and anyone else who wanted to comment on the document; and
  - opportunities for people without internet access to view consultation documents using computers available in council libraries, given that libraries were running a restricted service and were not able place paper copies of the document at the libraries.
- 2.4. Overall, the council received 77 responses in total.

- 2.5. Most respondents live, work and/or run a business in Brighton & Hove (72%) and nearly half (44%) submitted responses on behalf of an organisation (see 3.3 below).
- 2.6. Below is a summary of responses and issues that attracted the greatest number of comments per section and sub-section of the Draft UDF SPD. The summary is set out in order of the document structure.
- 2.7. A more detailed breakdown of responses is provided in section 4 of this report: Consultation Findings.

### Overall

- There is broad support for most aspects of the guidance.
- The graph on the right indicates the maximum number of responses received for each section. Section B Tall buildings is shown as attracting the most interest. It is important to note that most of these focused specifically on guidance provided for Tall Building Area 9 Shoreham Harbour.



### Contents and About this SPD

- There were 15 responses were received regarding this section of the guidance.
- Respondents put forward ideas for making structure clearer, improving illustrations/diagrams and/or using more local good practice examples.
- Some suggested that the guidance is made mandatory and/or strengthened while others requested a clearer steer that considerations set out in the guidance are not mandatory and/or should be treated flexibly.

### SECTION A Local priorities

- A maximum of 22 responses were received regarding this section of the guidance.
- On average two out of three respondents strongly support or tend to support the overarching criteria for determining the quality of new development, priorities and good practice examples provided in the Context, Spaces between buildings and Buildings sections of the guidance.
- More than half of respondents strongly support or tend to support all but category 3A (urban areas where positive and pro-active measures required to secure major enhancement) of the neighbourhood categorisation set out in heading 1.2: Neighbourhood Character,
- Detailed comments received ranged from:

- ensuring new development is in keeping with the surrounding area;
- suggestions for new strategic views and landmarks;
- strengthening guidance on active travel (including cycling and walking standards and 15/20-minute neighbourhood principles); to
- equal access and securing biodiversity net gains.

## SECTION B Tall buildings

- A maximum of 37 responses were received regarding this section of the guidance
- On average half or just over half of respondents strongly supported or tended to support the identified indicative boundaries and the proposed design considerations for tall building areas except for Area 9 Shoreham Harbour.
- In regard to height ranges, there was roughly a three-way split as per table below:

Tall Building Area	Level of support and/or objection
1 Brighton Marina	Just over a third of respondents strongly support or tend to support to height ranges set out for this area
2 Brighton Station / New England	Just over a third of respondents strongly support or tend to support to height ranges set out for this area
3 Central Seafront	Just over a third of respondents strongly support or tend to support to height ranges set out for this area
4 Eastern Road / Edward Street	Just over a third of respondents strongly object or tend to object to height ranges set out for this area
5 Hove Station	Just over a third of respondents strongly support or tend to support to height ranges set out for this area
6 Lewes Road	Just over a third of respondents strongly object or tend to object to height ranges set out for this area
7 London Road / Preston Road	Just over a third of respondents neither support nor object to or don't know/not sure about height ranges set out for this area
8 Western Seafront/Kingsway	Just over a third of respondents strongly support or tend to support to height ranges set out for this area

- Two out of three respondents strongly objected to the indicative boundaries, height ranges and design considerations set out for Tall Building Area 9 Shoreham Harbour. Respondents made comments/suggestions to address issues raised including:
  - ensuring greater consideration of the impact of wind and overshadowing upon open spaces for people and nature; to
  - encouraging ‘tall’ and ‘very tall’ development only in exceptional circumstances and/or when these provide greater benefits like, for example, more affordable housing.

## **SECTION C Planning process**

- A maximum of 15 responses were received regarding this section of the guidance.
- Three out of four respondents strongly agreed or tended to agree with the stages in the design process.
- Detailed comments received included:
  - the need to encourage applicants to factor in design priorities at the earliest stages of the design process; and
  - for the Local Authority and applicants to raise the standards and consistency in public consultations by positively engaging with local communities at the various stages of the design process.

## **SECTION D Appendices**

- There were 14 responses were received regarding this section of the guidance.
- Comments involved requests for the detailed list of documents to be improved and extended to include all relevant Planning Advisory Notes (PAN) and/or available external guidance to setting maximum densities, explaining what constitutes 'enhancement' of an area from a community's perspective, and/or referring to Listed Buildings and the need to review older Character Area Statements.

## **3. Responses received**

- 3.1. The council received a total of 77 responses of which:
  - 24 were received via Consultation Portal (2 of these via response forms); and
  - 53 were received via email.
- 3.2. Of all responses received 25 were submitted on behalf and/or in support of the Kingsway and West Hove Residents Association regarding section 5.9 of the Draft UDF SPD: Tall buildings Area 9: Shoreham Harbour.
- 3.3. The following organisations submitted responses to this consultation:
  - Brighton Active Travel;
  - Brighton & Hove Community Land Trust;
  - Brighton & Hove Food Partnership;
  - Brighton & Hove Local Access Forum;
  - Brighton & Hove Planning Agents Forum (PAF);
  - Brunswick Town Association;
  - Citydesigner on behalf of advisors to Brighton Central-Churchill Square masterplan;
  - Cycling UK, Brighton and Hove;
  - Environment Agency;
  - Friends of the South Downs / South Downs Society;
  - Green Varndean Action Group;

- Highways England;
- Historic England;
- Hove Civic Society;
- Kingsway and West Hove Residents Association;
- Lichfields on behalf of Landsec;
- Montpelier and Clifton Hill Association;
- Natural England;
- Network Rail;
- North Laine Community Association;
- Police and Crime Commissioner for Sussex;
- Quad on behalf of St William Homes;
- Rottingdean Parish;
- RSPB England - Brighton Office;
- Savills on behalf of Legal & General Investment Management;
- Shoreham Port Authority;
- South Downs National Park Authority;
- Southern Water;
- Sport England;
- Sussex & Surrey Police;
- Sussex Wildlife Trusts;
- Sustrans; and
- The Brighton Society.

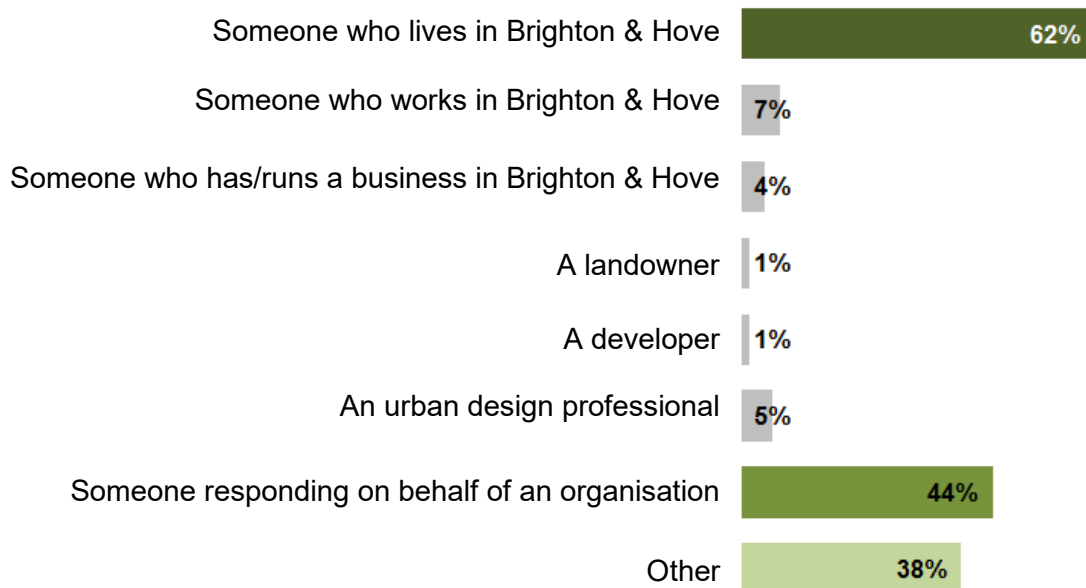
## 4. Consultation findings

- 4.1. The consultation findings across all responses received are set out in more detail below. The findings are ordered according to questions in the online survey posted on the council's Consultation Portal. The corresponding sections and sub-sections of the Draft UDF are as follows:
- Respondent details: Q1-Q4.
  - Contents and About this SPD: Q5.
  - Local priorities: Q6-Q21.
  - Tall buildings: Q22-Q24.
  - Planning Process: Q25-Q29
  - Appendices: Q30
- 4.2. Questions 1 and 2 of the survey asked respondents for information; some of which is not included in this report as this would be against GDPR requirements.

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Q3 In responding to this survey, are you:

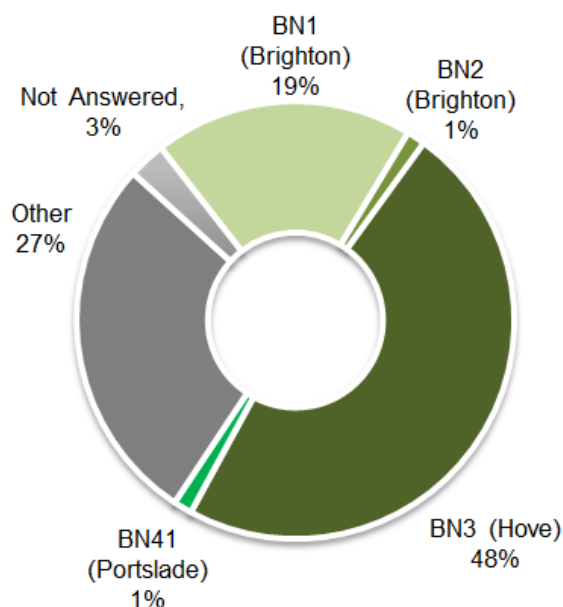




4.3. There were 77 responses received for this question and, as the graph above indicates, most respondents live and/or work in Brighton & Hove and/or responded on behalf of an organisation.

#### Q4 What is your Postcode?

- 4.4. There were 75 responses received for this question and, as the graph below indicates, almost half of respondents are from Hove (BN3).
- 4.5. The high percentage of responses received from Hove (BN3) is a result of a high number of responses received from supporters of the Kingsway and West Hove Residents Association regarding Tall Building Area 9: Shoreham Harbour (set out page 57 of the Draft UDF SPD).



## Contents and About this SPD

*‘Should there be a section on climate emergency?’*

*‘Where for the most part the new draft does read very well, its structure might be clearer were this made more emphatic in the two introductory pages.’*

Q5 Do you have any comments on the table of CONTENTS and/or ABOUT THIS SPD sections of the Draft SPD (pages 1-5)? Please reference page number if possible.

4.6. There were 15 responses received to this question. Suggestions/Comments made are summarised below.

Comments/Suggestions	Number of responses
Suggestions to make structure clearer, improve illustrations/diagrams and/or provide local good practice examples	9
Guidance welcomed	4
Introduce section on climate emergency and/or set out clearer targets to address climate challenge	2
Re-word aspects of guidance that are too prescriptive placing additional financial burden and threatening viability	2
Make guidance mandatory	2

## SECTION A: Local priorities

*'...[A]ny development should be [in] keeping with the local built area.'*

*'For Historic England, a primary issue is ... to ensure the existing distinctive historic environments are maintained and provide a context for high quality, contemporary design in new developments. We are pleased that the SPD successfully achieves this.'*

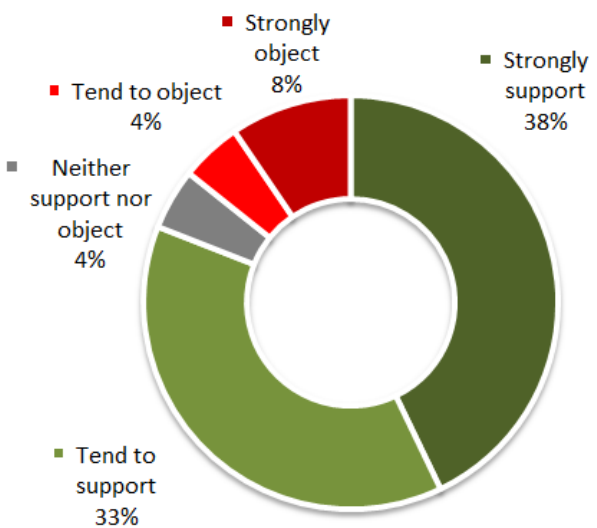
*'There could be reference to 15-minute neighbourhoods ...'*

*'Introduce cap on high-density development.'*

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Q6 To what extent do you support or object and/or have comments regarding the OVERARCHING CRITERIA identified for determining the quality of new development in the city?

- 4.7. These criteria were set out in bold text on page 6 of the Draft SPD.
- 4.8. There were 22 responses to this question.
- 4.9. As the graph on the right indicates a significant majority of respondents strongly supported or tended to support the overarching criteria identified in the Draft SPD.



**Q7 Do you have any comments regarding these criteria?**

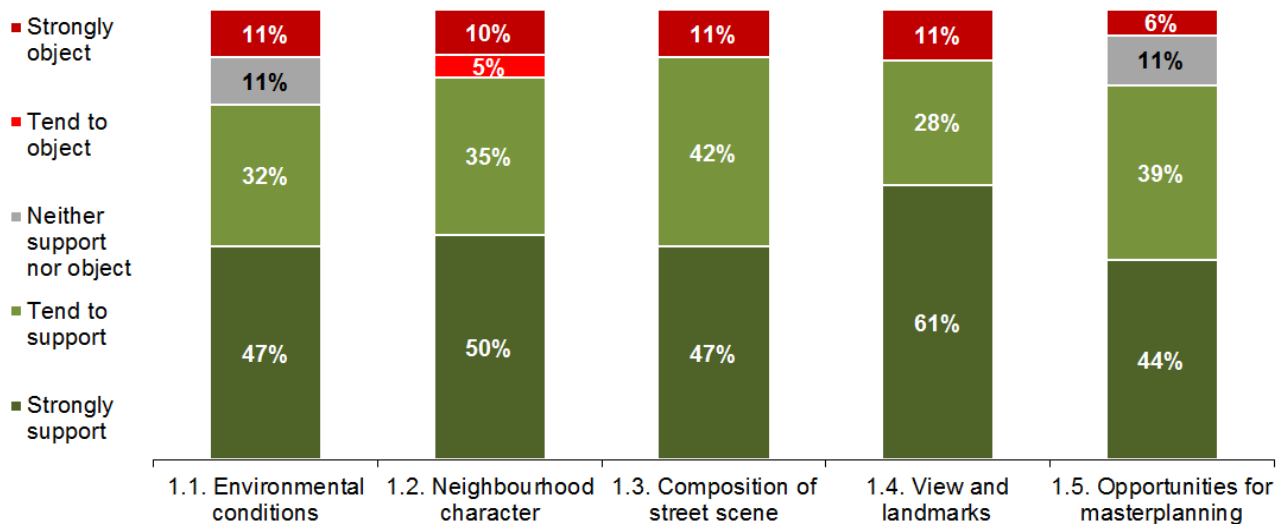
4.10. There were 16 responses to this question. Suggestions/Comments made are summarised in the graph below.

Comments	Number of responses
Ensure new housing looks similar to existing buildings, in particular in Conservation Areas and/or Urban Fringe sites	6
Guidance strikes a good balance across priorities, including Heritage	4
Introduce cap on and/or do not promote high-density development given impact upon traffic congestion and ability to meet biodiversity targets	3
Strengthen need for access to local services within 15-minute walking distance and/or cycling	2
Emphasise the need for carbon neutrality and to consider air quality and its impact of local pollution upon health	2
Add reference to need to consider crime prevention, access for emergency services and protection of crowded places	1
Not enough reference made to importance of the city's heritage	1
Not enough reference in this section to the importance of community involvement at the early stages of the design process	1
Strengthen need to consider equal/disabled access journeys into and through spaces and buildings	1

**1. Context**

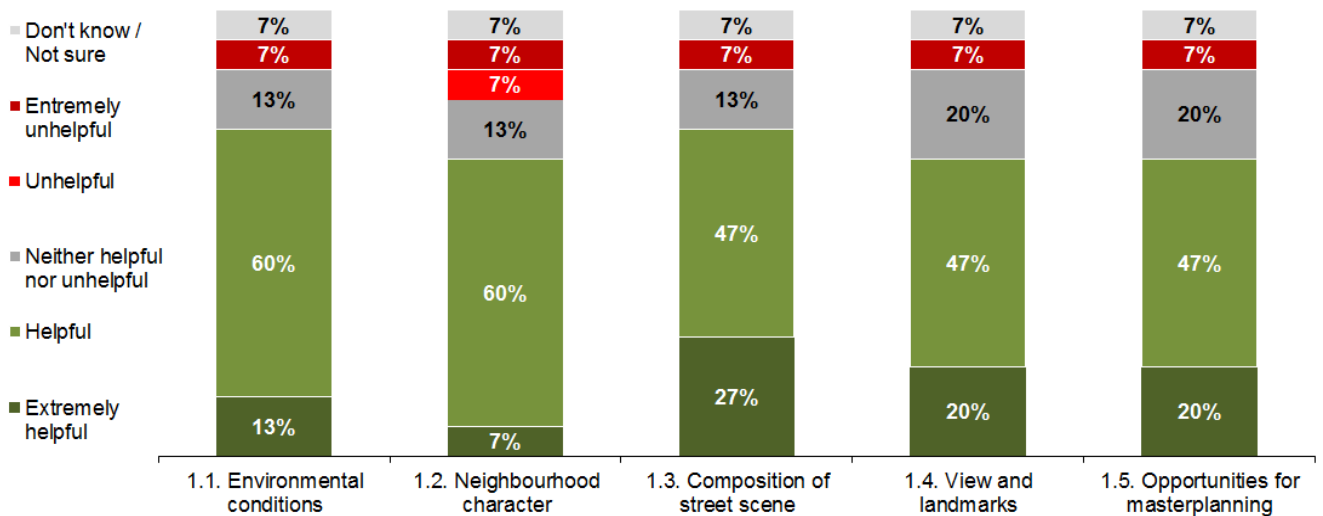
**Q8 To what extent do you support or object to the DESIGN PRIORITIES set out in the Context sub-sections of the Draft SPD (pages 7-16)?**

4.11. There were 18 responses to this question. As the graph below indicates, of those who answered this question, a significant majority supported or tended to support the priorities identified in this section of the Draft SPD.



**Q9** To what extent do you find the GOOD PRACTICE EXAMPLES provided for each of the Context sub-sections helpful or unhelpful?

4.12. There were 15 responses to this question. As the graph below indicates, of those who answered this question, a majority found good practice examples provided in this section of the Draft SPD helpful or extremely helpful.



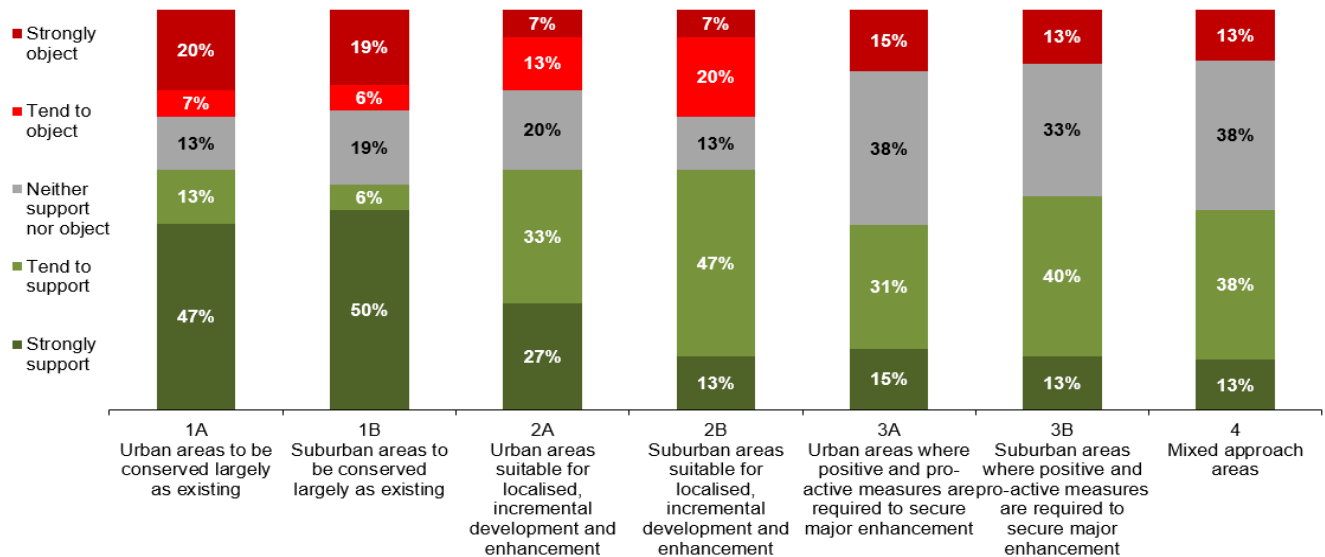
**Q10** Do you want to suggest GOOD PRACTICE EXAMPLES that better illustrate your comments and/or the design priorities identified in the Context section?

4.13. There were 3 responses to this question. Suggestions made included:

- Providing examples for 1.2 Neighbourhood character and 1.4 Views and landmarks; and
- Using examples of creative/innovative incorporation of non-petrol-fuelled vehicles and community consultation.

**Q11 To what extent do you support or object to the NEIGHBOURHOOD CATEGORISATION set out in sub-section 1.2. Neighbourhood character of the Draft SPD (pages 9-10)?**

4.14. There were 15 responses to this part of the question. As the graph below indicates a majority of those who answered this question supported the categories identified as areas to be conserved and those suitable for localised, incremental development and improvement. A smaller majority supported the categorisation of areas where measures are required to secure major enhancement and mixed approach areas.

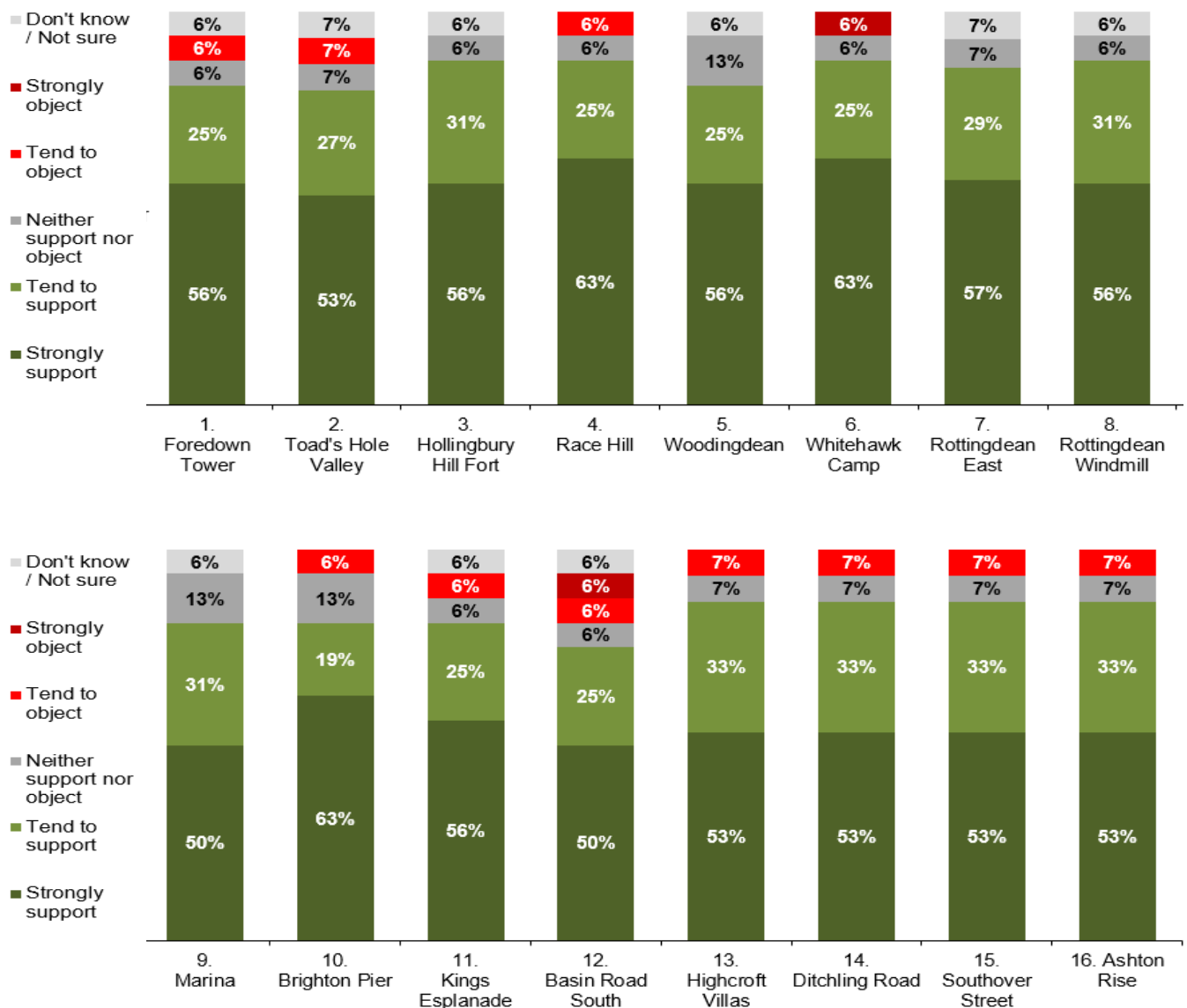


4.15. Of the 15 respondents, 6 provided more detailed comments on the categorisation including:

- Requests for review 'urban' and 'suburban' classification of particular areas;
- Concerns that emphasis on preserving and piecemeal enhancement for most areas limits scope for high-density, high-quality, contemporary design;
- Making Categorisation map clearer by using greater contrast to differentiate colours and adding SDNP boundary; and
- Concerns about the impact neighbourhood gentrification could have upon affordability (i.e. housing tenure and rent levels) in poorer neighbourhoods which tend to be classed as being 'less sensitive to change'.

**Q12 To what extent do you support or object to the STRATEGIC VIEWS LANDMARKS AND APPROACHES identified in sub-section 1.4. Views and landmarks of the Draft SPD (pages 13-14)?**

4.16. There was an average of 15 responses to the STRATEGIC VIEWS part of the question. As the graph below indicates a considerable majority supported the 16 views identified.



4.17. Of those who responded, 7 provided more detailed comments on STRATEGIC VIEWS including:

- Requests for additional views to be included from Clifton Hill, Peace Statue, Bevendean Down and Surrenden Road;
- Acknowledge importance of the setting and views to and from the SDNP and for applicants to get input from SDNPA prior to submitting an application to Brighton & Hove City Council;
- Ensuring views do not hold back new development and/or that new development enhances views; and
- Ensure foreground features do not hide features in the background.

4.18. There was an average of 15 responses to LANDSMARKS part of the question. As the graph below indicates a substantial majority of those who answered this question supported the 21 landmarks identified in the Draft UDF SPD.

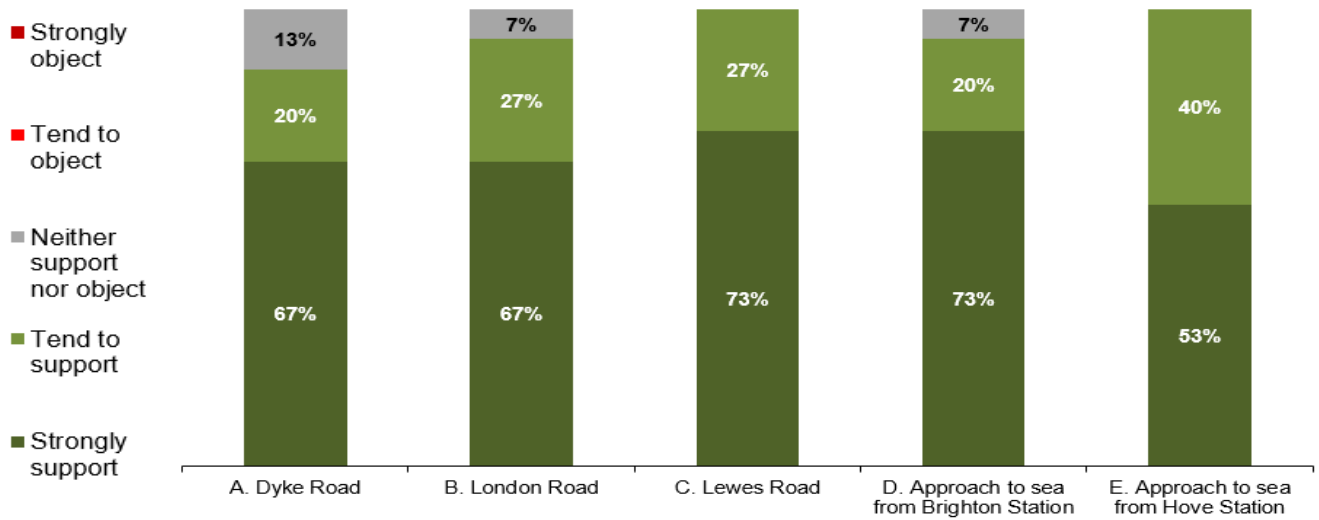


4.19. Of those who responded, 4 provided more detailed comments on LANDMARKS including:

- Requests for Royal Crescent and other elements of Kemp Town, i360, Rampion Wind Farm and Peace Statue to be added to list of identified landmarks; and
- Consider view corridors to landmarks.



4.20. There was an average of 15 responses to the APPROACHES part of the question. As the graph below there was significant support for all 5 approaches identified in the Draft UDF SPD.



4.21. Of those who responded, 3 provided more detailed comments on APPROACHES including:

- Requests for coastal approaches by sea of East-West along the NCN and the England Coast Path and A259 to be added to list of identified approaches; and
- Consider improving main routes into the city for cyclists, buses and pedestrians.

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Q13 Do you have any additional COMMENTS on the Context section of the Draft SPD? Please reference the sub-section and page number.

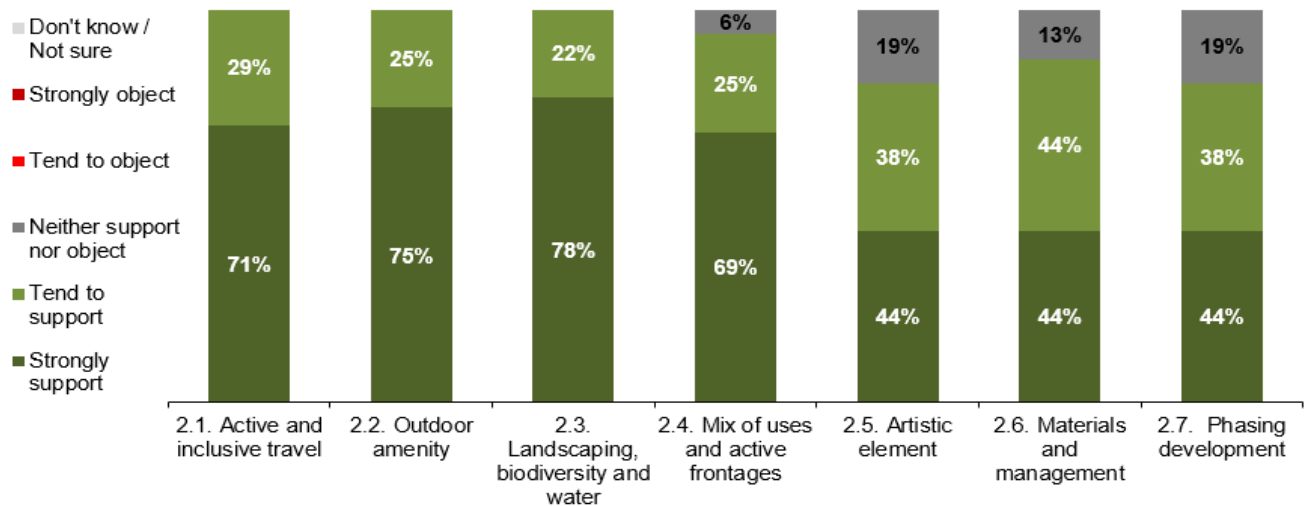
4.22. Detailed comments and/or suggestions were put forward by 14 respondents. These included requests to:

Comments/Suggestions	Number of responses
Ensure compliance with the standards for cycling and walking infrastructure, particularly space and facilities provided for each mode of transport	4
Use other/additional case studies, in particular local examples	4
Strengthen measures to deliver biodiversity net gains, particularly tree planting	3
Promote low-speed, low traffic streets that maximise active travel, equal access and children play and minimise rat runs and car parking	3
Reduce dominance of cars and hardstanding surfaces and maximise infrastructure provision for electric vehicles	3
Considerations are not mandatory and should be treated flexibly	2
Use of shared space should be exception and carefully considered as it can result in a threatening environment for less agile users.	2
Refer to need to conserve and enhance key views and views of key landmarks within the SDNP	2
Avoid placing habitable spaces where traffic may be congested and launch (i.e. hill climb or start).	1
Assess impact of wind conditions in all uses of public routes	1
Consider adopting a tree levy on all new developments	1
Introduce new trees in carriageway space rather than pavements to ensure roots do not adversely impact upon equal access.	1
Set criteria to assess departures from established neighbourhood character	1
Welcomed measures to protect the Brighton Chalk Block Aquifer	1
Refer to importance of parameter plan summarising townscape and landscape considerations, proposals and guiding principles for future development	1
Consider ecological information from the onset and use it to inform the masterplanning process and strategic green network biodiversity net gains.	1

## 2. Spaces between buildings

Q14 To what extent do you support or object to the DESIGN PRIORITIES set out in the Spaces between buildings sub-sections of the Draft SPD (pages 17-29)?

4.23. There was an average of 16 responses across the 7 priorities identified in this question. As the graph below indicates a considerable majority of those who answered this question supported the priorities identified this section of the Draft UDF SPD.



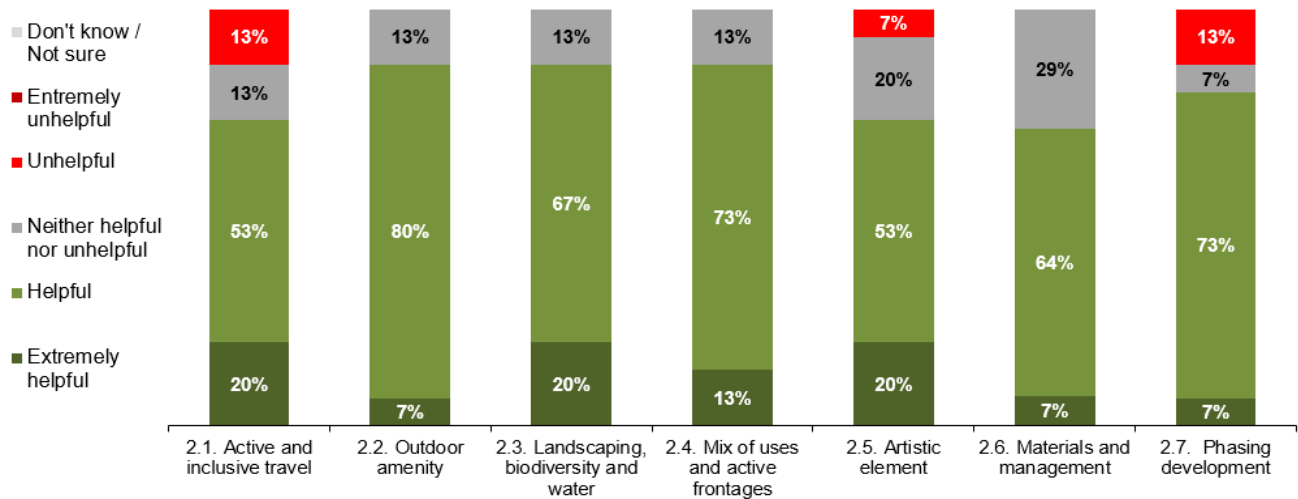
Q15 Do you have any additional COMMENTS on the Spaces between buildings section of the Draft SPD? Please reference the sub-section and page number.

4.24. Detailed comments and/or suggestions were put forward by 25 respondents. These included requests to:

Comments/Suggestions	Number of responses
Encourage use of street design and/or walking and cycling infrastructure standards and the use of sustainable materials, segregated lanes and/or 15-minute neighbourhood principles	9
Strengthen reference to health benefits associated with active travel principles and lower car use, in particular improved air quality	6
Set out evidence base needed to support assessment of outdoor amenity priorities/sports provision, biodiversity enhancement, impact of wind and/or levels of sunlight/daylight	6
Ensure developments are fully accessible with wide, continuous, safe and even routes, including connections to the SDNP/countryside	5
Show how safe, multi-function local streets and open spaces can provide opportunities for children play, communal gardening and places to rest	5
Emphasise how green infrastructure can help to optimise blue infrastructure and biodiversity net gains and minimise impact of lighting on landscape	5
In low- and/or car-free development optimise parking provision for Blue Badge holders	4
Explain how densities need to be sufficiently high for local amenities to deliver 15/20-minute neighbourhoods and how this approach may not be achievable in lower-density, suburban areas of the city	2
Identify opportunities for pooling resources to deliver large scale artistic element that can create a collective legacy for the city	2
Avoid placing active ground floor uses, outdoor seating, amenity and balconies in locations where harmful emissions are high	1
Highlight potential for sporting activities to attract multiple users and spectators and contribute to the vitality and viability of town centre areas	1
Encourage engagement with local communities when commissioning artistic element within schemes	1
Prevent risk to public health of contaminated land	1

**Q16** To what extent do you find the GOOD PRACTICE EXAMPLES provided for each of the Spaces between buildings sub-sections helpful or unhelpful?

4.25. There was an average of 15 responses received to this question. A significant majority of respondents considered the examples provided helpful or extremely helpful.



**Q17** Do you want to suggest good practice examples that better illustrate your comments and/or the design priorities identified in the SPACES BETWEEN BUILDINGS section? If yes, please provide details below.

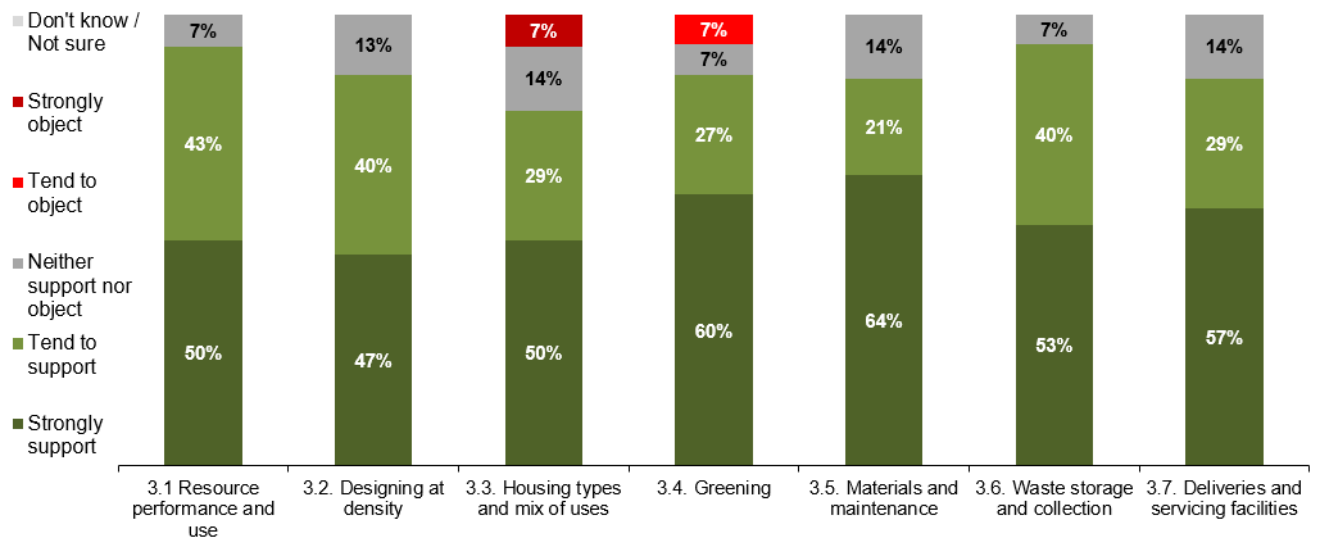
4.26. Detail comments and suggestions were put forward by 8 respondents to this question. Of these, 7 suggested additional and/or replacement good practice examples including:

- Diagram illustrating relationship between built form and public accessible space;
- Inclusive and commercial cycling;
- Multi-function streets and facilities designed for electric and/or autonomous vehicles; and
- Food growing.

### 3. Buildings

Q18 To what extent do you support or object to the DESIGN PRIORITIES set out in the Buildings sub-sections of the Draft SPD (pages 30-39)?

4.27. There was an average of 14 responses to priorities set out in this question. As the graph shows, there was significant support among respondents for the priorities identified.



Above: Responses to design priorities identified in section 3 Buildings of the Draft UDF SPD.

Q19 Do you have any additional COMMENTS on the Buildings section of the Draft SPD? Please reference the sub-section and page number.

4.28. Detailed comments and/or suggestions were put forward by 20 respondents. These included requests to:

Comments/Suggestions	Number of responses
Set out methods/assessment tools to calculate carbon emission reduction, carbon capture, embodied carbon and/or reduction in car use	5
Refer to the need to provide convenient, dry, secure indoor and outdoor cycle storage and parking facilities including non-standard cycles	4
Highlight additional benefits of greening including carbon neutrality, water management and wildlife including measures to retrofit green infrastructure	4
Strengthen need to tackle housing inequality/affordability for local people	3
Request highest/zero carbon standards of design and construction, in particular for affordable housing	1
Ensure transport corridors with road traffic emissions are not fully enclosed forming street canyons that result in poor air quality	1
Refer to space requirements needed to deliver renewable heat generation and other energy saving measures	1
Request statement setting out how the design and layout of the development meets the principles of active design	1
Consider post-Covid space demand for home working	1
Consider use of underground waste storage and collection in large new build development.	1
Emphasise importance of delivery and servicing facilities where there is higher dependence on home deliveries (i.e. car-free development)	1
Consider the need to provide gender neutral toilet and changing room facilities	1

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**Q20** To what extent do you find the GOOD PRACTICE EXAMPLES provided for each of the Buildings sub-sections helpful or unhelpful?

4.29. There was a technical problem with the question posted on the Consultation Portal that meant that some response options were not available. As a result, responses were not accurately recorded and are not included in this report. Respondent comments/suggestions regarding good practice examples were captured as part of Q21 below.

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**Q21** Do you want to suggest good practice examples that better illustrate your comments and/or the design priorities identified in the BUILDINGS section? If yes, please provide details below.

4.30. Detailed comments and/or suggestions were put forward by 6 respondents. These included:

- Three respondents asking that good practice examples of passive, active surveillance and accessible parking, dropped kerbs and covered, easy to access indoor and outdoor cycle storage, in particular in flatted development be provided;
- Two respondents suggested using local examples to illustrate application of circular economy principles;
- One respondent suggested using less onerous, easier to achieve examples of green walls than that of the All England Club; and
- Another using more examples of Passivhaus development.

## SECTION B: Tall buildings

*‘Tall buildings with flats for the elderly and disabled with only dropped kerbs are not good as wheelchair users living in these flats can only go around the outside path.’*

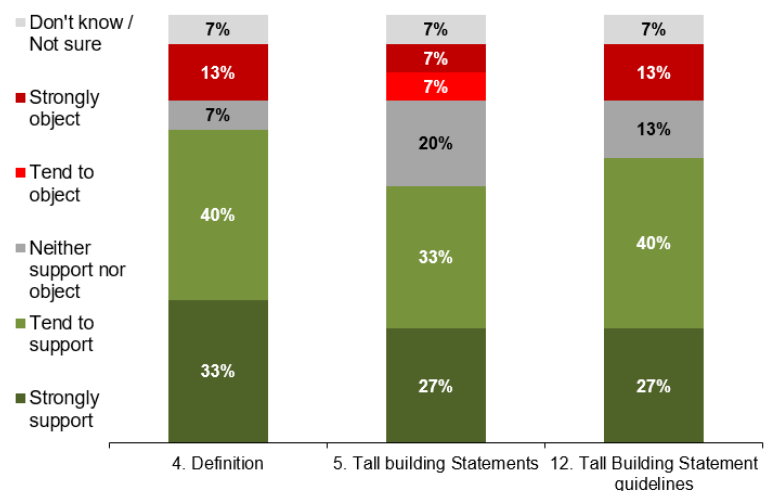
*‘Tall buildings combined with narrow roads ... reduce our ability to see the sky ..., get a lot of sunshine, see the green hills ... connection with nature has been severed.’*

*‘... [WE] acknowledge the attempts of this draft UDF to mitigate the harmful impact of tall buildings in our city.’*

Q22 To what extent do you support and/or object to the aspects of the current framework as set out in SPGBH15 Tall buildings that have been progressed into the Draft SPD?

4.31. There were 15 responses to this question.

4.32. As the graph on the right indicates, there was broad support for the elements of the existing framework being progressed into the UDF SPD. Greater support was registered for the Definition and Tall Building Statement guidelines than for the Tall Building Statements element of the framework.

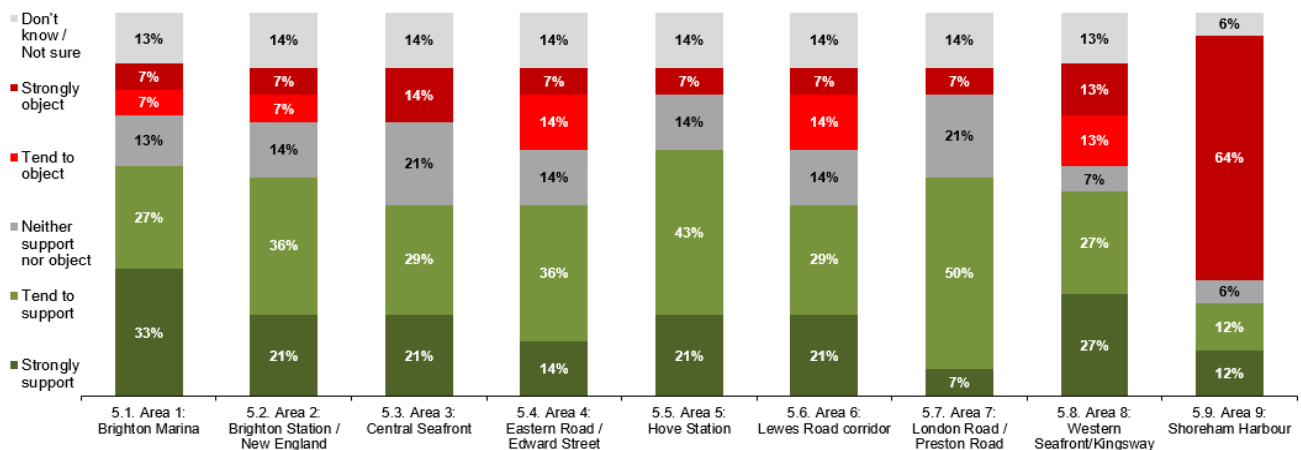


Above: Responses to SPGBH15 Tall buildings framework progressed into Draft UDF SPD.



**Q23** To what extent to you support or object to the additional information provided for each of the tall building areas set out in City Plan Part One Policy CP12 Urban Design?

- 4.33. Regarding INDICATIVE BOUNDARIES, there were 33 responses received regarding Area 9 Shoreham Harbour; 15 regarding Areas 1 Brighton Marina and 8 Western Seafront/Kingsway; and 14 regarding the remaining tall building areas.
- 4.34. As the graph below suggests, there was broad support for indicative boundaries identified for most tall building areas identified in this section of the Draft UDF SPD apart from Area 9 Shoreham Harbour. In this case, most respondents objected or tended to object to indicative boundaries.



Above: Responses to indicative boundaries set out in sub-section 5 Tall Building areas of the Draft UDF SPD.

- 4.35. Thirty-two respondents provided more detailed comments on indicative boundaries for two of the Tall Building Areas set out in this part of the question. The table below summarises comments/suggestions provided for each area.

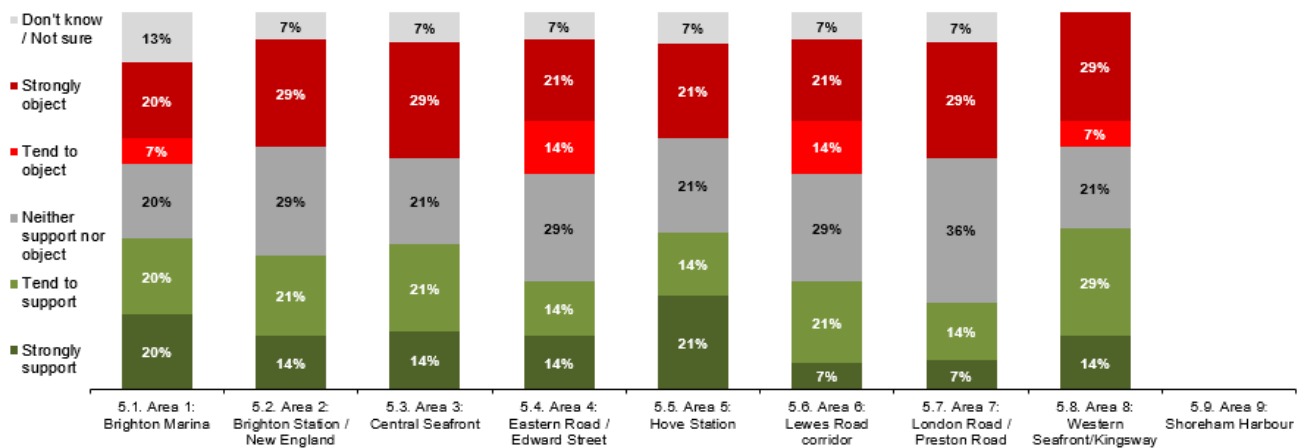
Tall Building Area	Comments regarding indicative boundaries
1 Brighton Marina	Two respondents pointed out that the inclusion of the Gasworks site and the area to the east extends the boundary beyond that set out in City Plan Part One Policy CP12 Urban Design and requested that this be revised accordingly.
9 Shoreham Harbour	Shoreham Harbour requested that clarification be provided regarding character areas boundaries to align this tall building area with this and other policies set out in the Shoreham Harbour Joint Area Action Plan (JAAP). This request was further supported by 29 responses received from and/or in support of the by the Kingsway and West Hove Residents Association Committee (KAWHRA) to incorporate JAAP boundaries to this area's map.

- 4.36. Regarding HEIGHT RANGES, there were 15 responses to 5.1. Area 1: Brighton Marina and 14 responses to all other areas identified in this part of the question.
- 4.37. A technical problem meant that an option for respondents to 'support' or 'object' to height ranges identified for Area 9 Shoreham Harbour was not available. However, detailed comments captured as part of the 'comments' section of this

question indicate that most respondents 'strongly object' or 'tend to object' to height ranges proposed for this tall building area (see 5.42 below).

4.38. As the graph below indicates, there was roughly a three-way split whereby just over a third of respondents:

- 'strongly objected' or 'tended to object' to height ranges set out for Areas 4 Eastern Road / Edward Street and 6 Lewes Road corridor;
- 'strongly supported' or 'tended to support' the height ranges set out for Areas 1 Brighton Marina, 2 Brighton Station / New England, 3 Central Seafront, 5 Hove Station and 8 Western Seafront/Kingsway; and
- 'neither supported nor objected' to height ranges set out for Area 7 London Road / Preston Road.



Above: Responses to height ranges set out in sub-section 5 Tall Building areas of the Draft UDF SPD.

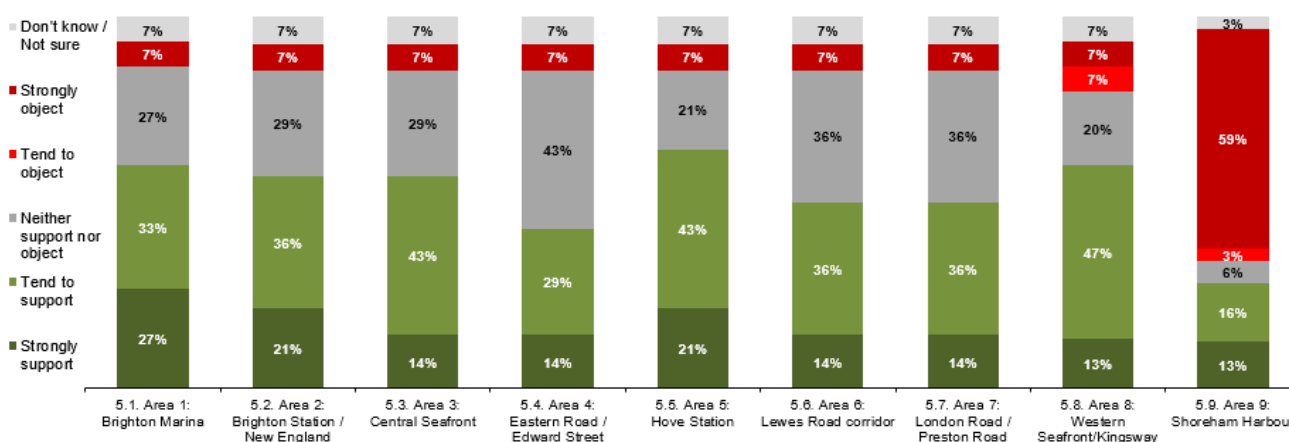
4.39. In addition to the responses identified in the graph above, a further 37 responses were received regarding indicative height ranges for eight of the Tall Building Areas set out in this part of the question. The table below summarises comments/suggestions provided for each area.

Tall Building Area	Comments regarding height ranges
1 Brighton Marina	One respondent thought height ranges were about right.
2 Brighton Station / New England	Two respondents indicated that recently granted consent for tall building is too high. One other suggested maximum height should not exceed the 6 to 8 storey range. One respondent suggested that recently granted consents for tall buildings should be considered when setting height range.
3 Central Seafront	One respondent thought maximum height should be 6 to 8 storeys.
4 Eastern Road / Edward Street	
5 Hove Station	
6 Lewes Road	
7 London Road / Preston Road	

Tall Building Area	Comments regarding height ranges
9 Shoreham Harbour	Twenty nine respondents asked that heights be described in metres as well as in storeys and that a maximum height range of 8 storeys (24 metres) be set for sites located above the level of Basin Road North and/or to 5 to 6 storeys (15 to 18 metres) above the level of Kingsway.

4.40. Regarding DESIGN CONSIDERATIONS, there were 32 responses received regarding Area 9 Shoreham Harbour; 15 regarding Areas 1 Brighton Marina and 8 Western Seafront/Kingsway; and 14 regarding the remaining tall building areas.

4.41. As the graph below suggests, more respondents 'strongly supported' or 'tended to support' design considerations identified for tall building areas apart from Area 9 Shoreham Harbour. For this area, most respondents 'strongly objected' or 'tended to object' to design considerations.



Above: Responses to design considerations set out in sub-section 5 Tall Building areas of the Draft UDF SPD .

4.42. Of those who responded, 36 provided more detailed comments on design considerations for each of the Tall Building Areas set out in this part of the question. The table below summarises comments/suggestions provided for each area.

Tall Building Area	Comments regarding design considerations
1 Brighton Marina	The Environment Agency suggested strengthening reference to reducing the risk of flooding from the sea and surface water where possible. One respondent thought design considerations were about right. Another that overdevelopment should be avoided.
2 Brighton Station / New England	One respondent thought there is a need to improve connections to facilitate walking and cycling and signpost funding opportunities. One other suggested extension of the Greenway concept and improved wayfinding could help to create a better sense of place.
3 Central Seafront	One respondent thought that considerations are not flexible enough to enable for tall buildings to be located on the periphery of the Brighton Centre/Churchill Square site and/or to unlock the potential of view corridors, use mix and public realm network across this site.

Tall Building Area	Comments regarding design considerations
9 Shoreham Harbour	<p>The Environment Agency requested reference be made to the need to minimise flood risk and reduce the impact of noise and air pollution.</p> <p>Twenty-nine respondents asked for considerations identified in the Draft UDF SPD to be combined and aligned with the relevant character areas and design policies in the Shoreham Harbour Joint Area Action Plan (JAAP).</p> <p>One respondent suggested referring to the need to support and develop the use of Shoreham Harbour as a port.</p>

## Q24 Do you have any additional comments on SECTION B TALL BUILDINGS of the Draft SPD?

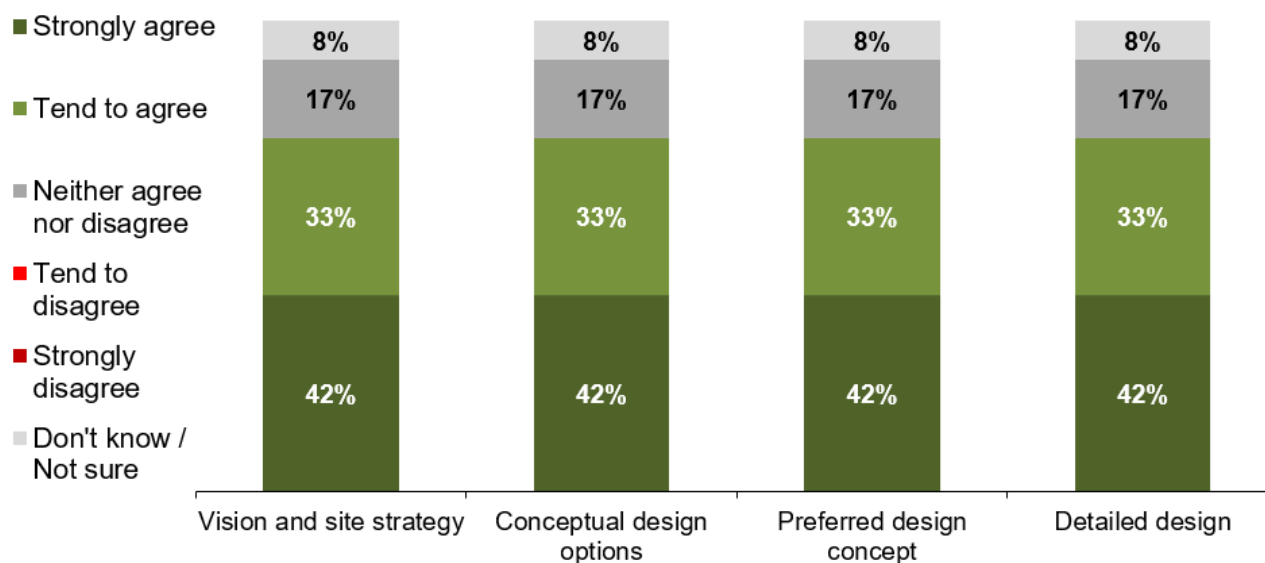
4.43. Detailed comments and/or suggestions were put forward by 15 respondents. These varied from views to potential trade-offs and issues that need to be prioritised when assessing proposals.

- Four respondents considered that given the adverse impact of wind and overshadowing from tall buildings it is important, when assessing proposals, to ensure these do not create inhospitable open spaces for people and plant growing;
- Three respondents who pointed out that limited availability of space for new development in the city will mean that proposals for taller buildings need to be considered as an option;
- Three respondents who stressed that ‘tall’ and ‘very tall’ development is harmful and/or unacceptable and should only be considered in exceptional circumstances and/or when providing greater benefits like, for example, more affordable housing;
- Two respondents considered given the impact of air pollution upon tall building users, there is a need to ensure, when assessing proposals, continuous long-term user exposure, in growth and/or congested areas of the city is avoided; and
- Two respondents requested that the need for tall buildings to provide safe, secure, accessible cycle parking and storage with e-bike charging points in fire safe lockers and non-standard cycle facilities be emphasised;
- One respondent requested that the tall buildings definition be simplified and/or made clearer and that the Tall Buildings Statement guidelines set out in Section D be condensed and incorporated into the Tall Building Statement section. They also asked for the recommendation that all buildings should not mask natural valley formations to be removed given it unduly restricts compositional approach and would be better assessed on a case by case basis;
- One respondent requested that the need to facilitate walking and cycling and identify cycling routes be strengthen and for funding opportunities available to deliver improvements to be added; and
- Another that a request for applicants to undertake a townscape and visual impact assessment and to agree inclusion of transport chapter as part of an EIA be included in the guidance.

## SECTION C: Planning process

Q25 To what extent do you agree and/or disagree with the STAGES IN THE DESIGN PROCESS set out in Pre-application process sub-section of the Draft SPD?

4.44. There were 12 responses to this part of the question. As the graph below indicates there was strong agreement with the stages identified in this part of the Draft UDF SPD.



Above: Responses to stages of design process set out in Section C Planning process of the Draft UDF SPD .

4.45. Of those who responded, 2 provided more detailed comments/suggestions. The table below summarises these by stage.

Stage in the design process	Comments/suggestions
Vision and site strategy	One respondent thinks it is important to ensure comprehensive early consultation is carried out and feedback is sought from the local community prior to a planning application being submitted.
Conceptual design options	One respondent feels requests for figure ground studies, plans, sections, elevations, 3D images and/or models is too excessive, onerous and items such as sections and elevations should not be expected. One respondent suggests asking applicants about impact upon local heritage assets.
Preferred design concept	One respondent suggests requesting drawings in greater detail and a sustainability strategy is overly prescriptive for the pre-application stage. Instead, a more targeted approach to drawings and engagement with sustainability officers at an early stage to ensure policy requirements are considered as part of the emerging design proposals is needed.

Stage in the design process	Comments/suggestions
	One respondent suggests requesting a design statement from applicants setting out minimum design information given that many applications, particularly the smaller ones, fail to explain how proposals relate to the surrounding urban context.
Detailed design	<p>One respondent finds the request for applicants to submit a Design and Access Statement (DAS) or fully-realised and calculated sustainability strategies prior to submission of an application too onerous and should be made optional or replaced by information that can be shared iteratively during the pre-application stage.</p> <p>One respondent suggested making the distinction between 'detailed design' and that which refers to that produced after planning approval has been granted.</p>

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## Q26 Do you have any comments regarding the PRE-APPLICATION PROCESS section of the Draft SPD?

4.46. There were 15 responses received which included comments/suggestions received regarding the pre-application process.

- Five respondents highlight the importance of factoring in design priorities at the earliest stages of the design process (i.e. active design, ecological assessments, gender neutral facilities, food growing, daylight/sunlight);
- Four respondents feel the standards and consistency in public consultations by the Local Authority and applicants could be raised by, for example, adding guidance on community consultation and/or promoting the use of consultation rooms where design proposals could be displayed and discussed with local communities;
- Four respondents want to ensure poor design is refused and/or suggest upgrading wording from 'council recommends' to 'require';
- Three respondents stress the need for applicants to positively engage with local communities at the various stages of the design process (i.e. more often and meaningfully rather than as part of a tick-box exercise);
- Two respondents ask for greater clarity on the required number, type and arrangements of design consultations given that expectation of all applicants entering into 3 pre-app consultations and the ability of the LPA to cope with increased demand is unrealistic;
- One respondent finds information about the nature and amount of information required at pre-application stage too prescriptive, failing to recognise the demand of different types of application (i.e. detailed, outline or hybrid) and the role of planning conditions in enabling details to be agreed at the later stages of the design process; and
- One respondent suggested cross referencing the design stages with the RIBA Plan of Work 2020; and

- One respondent stressed the need for applicant and design team expectations to be matched by reciprocal expectations of BHCC departments in facilitating a smooth, linear assessment process.

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Q27 Do you have any comments regarding the DESIGN ADVICE SERVICES section of the Draft SPD?

- 4.47. There were 6 responses to this question. These included requests from:
- Three respondents to signpost free design advice/review delivered by non-governmental organisations that are not part of council services (i.e. Conservation Advisory Group, Brighton & Hove amenity societies and Sustrans);
  - Two respondents to ensure design advice benefits from local knowledge;
  - The Environment Agency to signpost their charged for service to provide detailed and bespoke pre-application advice; and
  - One respondent to encourage applicants to collaborate with the council's Equalities co-ordinators, local trans groups and University of Brighton to create leading best practice in trans-inclusive design.

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Q28 Do you have any comments regarding the COMMUNICATING DESIGN IDEAS WELL section of the Draft SPD?

- 4.48. There were 4 responses to this question. These included requests from:
- One respondent to provide guidance on the quality and size of supporting documents;
  - One respondent to simplify the content and reduce the length of documents given that this can be a barrier to engaging local communities and non-experts;
  - One respondent to refer to Design Council online guidance on how to write, read and use Design Statements; and
  - One respondent to promote use of 3D modelling as consultation tool.
- 4.49. Of those who responded, 6 provided comments on sub-section 9.1. A day in the life. This included suggestions from:
- Two respondents to identify some assigned personas to guide assessment such as, for example, a disabled cyclist, a transgender and/or resident living in affordable housing accommodation; and
  - One resident to include assessment of performance over the lifetime of the development in regard to, for example, maintenance, responses to climate change, changes in use, adaption and/or re-assembly.

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Q29 Do you want to suggest good practice examples that better illustrate your comments and/or the examples provided in the PLANNING PROCESS section? If yes, please provide details below.

4.50. There was 1 response to this question. The respondent asked whether the approach set out in this section of the guidance is a preferred approach that can be applied flexibly according to the type of application and proportionately when it comes to the level of information to be provided as part of the Design & Access Statement.

## SECTION D: Appendices

Q30 Do you have any comments regarding the Appendices section of the Draft SPD?

4.51. There were 14 responses to this question. Two respondents thought this part of the document is comprehensive. The table below summarises other comments/suggestions received by section.

Appendices section	Comments/suggestions
10 Extended list of policies and documents	Four respondents suggested providing a detailed list of relevant Planning Advisory Notes (PAN) and/or available external guidance on active travel.
11 Neighbourhood sensitivity to change and priorities for enhancement	Three respondents suggested setting maximum densities, explaining what constitutes 'enhancement' of an area from a community's perspective, and/or referring to Listed Buildings and the need to review older Character Area Statements. One respondents asked that the Gas Works site in the Blackrock Area description is recognised as distinct from the wider Roedean area likened to group 3A rather than 2A (i.e. as 'urban areas where positive and pro-active measures are required to secure major enhancement').
12 Strategic viewpoints and landmarks	Two respondents suggested removing reference to groups of buildings being staggered or stepped to respond to natural slope contours to allow for scale and massing to be determined through site-specific consideration. The South Downs National Park asked that all viewpoints within or are on the edge of the SDNP are clearly identified.
13 Tall Building Statement guidelines	Regarding infrastructure, one respondent highlighted the need to ensure utility companies assess capacity of water/sewage systems before planning approval has been granted. Regarding public realm and open spaces, Natural England suggested flagging up the need to consult the organisation if an Environmental Assessment or Habitats Regulation Assessment is required. Regarding sustainability, the Environment Agency suggested including water efficiency targets in the Sustainability Statement guidelines.





Brighton & Hove  
City Council