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Brighton Society Response to the Urban Design Framework Supplementary Planning Document – Issues and Options paper

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SPD Issues and Options

Issue A: Priority areas for enhancement and design guidance identified above?

Brighton & Hove has 34 Conservation Areas, over 1300 Listed Buildings and a unique landscape setting and topography within the area between the hills and valleys of the South Downs as they fall towards a long seafront which extends from Shoreham Harbour in the west to the chalk cliffs of Rottingdean and Saltdean to the east.

These Heritage assets and the unique physical characteristics of the city's landscape setting are vitally important when it comes to determining the way in which new buildings are related to the city's historical patterns of development and the value and scale of its surrounding landscape and seascape.

Detailed studies to ensure this relationship is preserved and enhanced are vital requirements of an Urban Design Framework.

Issue B: Accommodating taller development

One of the problems developers have had in formulating acceptable proposals for new buildings within the Tall Building zones has been the lack of proper guidance on the constraints on design and height in relation to important considerations such as the relationship to local and citywide topography, the existing pattern and scale of the surrounding area and the importance of views, particularly those from Heritage assets - which include listed buildings and parks, and Conservation Areas.

Each Tall Building zone has its own constraints - the relationship to hills and valleys, the desirability of keeping tall buildings below the tops of hills and skylines from important viewpoints and key heritage assets and Conservation Areas throughout the city.

The scale and character of neighbouring buildings and streets are vitally important considerations which up to now have never been formally set out in relation to any of the Tall Building zones. The result has been 'open sesame' for developers to

come to their own conclusions as to what they - not the public interest - regard as appropriate. Circus Street, Preston Barracks, Anston House, the first (withdrawn) Sackville Tower applications and more recently, the Legal and General 18-storey tower block on New England Street, are all examples of the failure of the Tall Buildings Policy to set out the necessary planning constraints in terms of landscape and Heritage considerations.

And finally, we would emphasise yet again that high density does not have to mean high buildings. High densities can be and are achieved by low-rise buildings. Here in Brighton the most densely populated neighbourhood in the City is the area between Western Road and Lansdowne Road in Hove bounded by York Road to the east and Lansdowne Street to the west. At 315 persons per hectare this area is also the most densely populated area in the South East outside London. (B&H City Snapshot Summary of Statistics 2014).

We would suggest that a high density, low rise approach based on this development model would be a far more appropriate and sympathetic solution to Brighton's housing problems than are tall buildings.

Issue C: Building Design

We have previously noted that Brighton & Hove has 34 Conservation Areas, and over 1300 Listed Buildings. Certainly within all the areas containing these heritage assets - which constitute the majority of the city's central areas and wards - and other areas where the landscape setting is important, it is vital to ensure that planning guidelines are set which are designed to preserve and enhance our city and its landscape setting, and do not affect those areas in a way which causes harm to those heritage and landscape assets.

Each neighbourhood has its own particular design constraints in terms of scale and height, pattern of development, architectural language, use of materials, relationship to the topography etc. In Conservation Areas, many of these constraints are set out in the local Conservation Area Character Statements against which design proposals can be measured.

However these Character Statements need to be updated in several Conservation Areas, and where this is so it should be specifically recognised and highlighted in the UDF SPD.

The recent Character Statements for the Old Town and Queen's Park set an excellent standard to which all other Character Statements should aspire.

Developments outside Conservation Areas are hardly less important because almost every area within the City, borders or overlooks one of the 34 Conservation Areas. Constraints on the heights, scale and character of those developments which could have a detrimental effect on those Conservation Areas, will need to be included in the SPD to take account of this.

Issue D: Public Realm design

The city's record in creating better public spaces is not good. Its parks are not being properly maintained, its street furniture, particularly on the seafront is badly maintained, its buildings and neighbourhoods are increasingly covered in scruffy and ugly graffiti, its streets are over-run with cars and traffic.

Why not close more streets and return them to the people as suggested by Prof. Stefan Lehmann of Portsmouth University in his inspiring talk to the Vision 2030 event in July this year? East Street and New Road are about the only examples – and even then the streets are not fully closed to traffic. It is not good enough for a city which claims to be committed to being a One Planet City.

Recent planning approvals show that the quality of public space is not currently regarded as important. Look at Circus Street, where the public spaces between the tall buildings will be totally overshadowed and receive hardly any sunlight.

Look at Preston Barracks where the public spaces are just the left-over spaces between tall buildings, again mostly overshadowed and receiving little sunlight during the day.

Look at Anston House, where tall buildings will overshadow the Rose Garden in late summer, autumn and early spring, all times when people will want to sit out on sunny days.

Look at the First Base site in Edward Street - the public spaces will be in shadow most of the day even in summer. Little sunlight will shine into there.

Look at Moshimo in Bartholomew Square - the ineptly called 'skylight restaurant' will overshadow much of the already unattractive square most of the day.

Look at Pavilion Gardens which are now deemed so dangerous after dark, that they may have to be closed to the public and become a gated, fenced off area.

We don't see much commitment to making public spaces in our city attractive in current Council Policy.

Issue E: Views and Vistas

Preservation of important views is vitally important. We have emphasised this and the importance of protecting the existing topography and landscape in the earlier responses in this survey. We are very concerned that conglomerations of tall buildings will disguise the lines of the landscape, and intrude upon and project high up above existing horizons and skylines formed by the surrounding landscape.

We are concerned too that conglomerations of tall buildings along the seafront could eventually create a wall of buildings between the city and the sea, particularly when viewed from high points on the outskirts of the city and from the South Downs.

Very few planning applications show adequately what the visual effects of tall buildings will be, sometimes because they don't show long views at all, or if they do, the quality of the image is so poor as to be meaningless.

The recent application for the 18-storey tower on New England Street, while not itself in a Conservation Area, does show how visibly prominent the tower of this proposal will be from a great many viewpoints within the ring of Conservation Areas which surround the site, but there are no distant views shown from higher points around the city or from the South Downs.

The proposal for the 15-storey tower on Lyons Close in Hove will, together with the 8-storey Hyde Housing building nearing completion Newtown Road nearby, block off the last remaining view of the sea from Hove Park.

The tall buildings at the Marina have effectively blocked off the views of the chalk cliff to the east which used to be clearly visible from Hove seafront.

Almost every tall building proposal is blocking important views and causing harm to our landscapes and seascapes because they are not being adequately controlled. More controls have to be imposed to regulate this process.

Additional comments

The Brighton Society is very aware that because the Council cannot demonstrate a 5-year housing supply, the NPPF instructs Councils *"that in order to refuse planning permission, the Council would need to demonstrate that in planning terms any adverse impacts of the proposal would significantly and demonstrably outweigh any benefits and in each case the harms need to be weighed against the benefits."*

We are very concerned that many of the matters which we have referred to in our responses to the earlier questions, such as good design, heritage assets, protection of landscape and topography, preservation of views etc., are "at risk" as a result of undue emphasis on the NPPF criteria set out above.

Our understanding is that the NPPF is a material consideration in determining the outcome of planning applications; but matters such as Heritage and Design etc. are also material considerations.

It seems to us that the balance between these two material considerations must be redressed in favour of Heritage and Design. Otherwise the historic character and the quality of our urban realm, our streets, our open spaces and our new buildings will be prejudiced - forever.

There is an old quote from a leading town planner in the 1960s which is worth reminding ourselves of: ***"the role of good planning is to prevent the likelihood of irreversible mistakes"***.

Do you consider the Urban Design Framework Supplementary Planning Document (UDF SPD) to have any equalities implications, positive or negative? If so, please provide further details.

No - there are enough visual, environmental and amenity issues and problems that the Urban Design Frameworks should be addressing, without introducing potentially controversial equalities, social and welfare issues into the discussion.

These should be addressed by other Council policies.