

Brighton Marina Neighbourhood Forum

12th September 2018.

Consultation on the Draft City Plan Part Two
Brighton & Hove City Council
Planning Policy Team
By email to planning.applications@brighton-hove.gov.uk

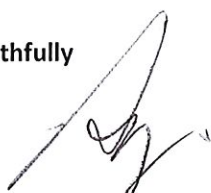
Dear Sir/Madam

Re: Consultation on the Draft City Plan Part Two

We enclose herewith the response of the Steering Committee of the Brighton Marina Neighbourhood Forum to the City Plan Part Two consultation.

We have in particular commented on those matters which we see as having especial relevance to the Marina. We have sought to align our comments with the contents of the vision statement of the Marina Forum (also enclosed), which will underpin our forthcoming development of a neighbourhood plan for the Forum area.

Yours faithfully



Andrew Knight
Chair, Brighton Marina Neighbourhood Forum Steering Committee,
on behalf of the Steering Committee.



For Official Use:
Respondent Number:
Date Received: / / /2018
Entered onto Portal: Yes/No

Draft City Plan Part Two
Consultation Period: 5th July 2018 until
5pm on 13th September 2018
Word Response Form

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Draft City Plan Part Two – Consultation

Brighton & Hove City Council has published the draft City Plan Part Two for a 10 week period of consultation starting 5th July 2018. This follows on from the scoping consultation undertaken July - September 2016.

The draft City Plan Part Two sets out the preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications. The City Plan Part Two will support the implementation and delivery of the City Plan Part One.

The council is seeking your views on the draft Plan and supporting documents. Your comments will help inform the final version of the City Plan Part Two. So if you have any comments about the approaches in the plan then we would urge you to submit those comments during this consultation so that they can be fully taken into account.

The Draft City Plan Part 2 and supporting documents including a quick guide to the City Plan Part Two as well as background evidence documents are available to view and download from the Council’s website at: www.brighton-hove.gov.uk/cityplan-part2.

Part A: Contact Details

I consent to being added to the Planning Policy, Heritage and Projects team mailing list and contacted via email regarding forthcoming news and consultations

Yes

Privacy Notice: (ctrl & click to view)

<https://www.brighton-hove.gov.uk/content/planning/planning-applications/planning-service-privacy-statement>

Please note that you must complete Part A as anonymous forms cannot be accepted.

Organisation Name (If applicable)	Brighton Marina Neighbourhood Forum Steering Group
Name	Andrew Knight (Chair)
Address	Administration Office, Brighton Marina, Brighton, BN2 5UF
Email Address	andrew@brighton-marina.co.uk
Agent Name (If applicable)	N/A
Agent Name	
Agent Address	
Agent Email Address	

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) **DM1**

Policy Name (e.g. Housing Quality, Choice and Mix) **Housing Quality, Choice and Mix**

a) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

b) Please explain why you support this policy?

We welcome the policy aspirations of developing sustainable places with high quality of life, and of the range of property and tenures being diverse to accommodate the needs of our diverse City.

c) If you support this policy but have some suggested wording changes please outline these clearly below

We suggest that the feasibility assessments for 'affordable' types of tenure give consideration to the service charge liabilities incurred by the residents of the development. For example, residents at the Marina will have a liability for service charges currently between £3.50 and £4.00 per square foot and such a liability may affect the sustainability of some types of tenure.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) DM2

Policy Name Retaining Housing and Residential Accommodation

c) Do you Support or Object to the policy?

Support



If you support this policy, please go to questions (b) and (c)

d) Please explain why you support this policy?

In addition to the reasons in the City plan document, we are concerned at loss of residential accommodation to the short-term-let rental market, particularly as marketed through 'AirBnB.' In practice the lack of regulation of this activity results in loss of residential accommodation as it becomes non-regulated, non-taxpaying guest houses for remote investors who see an opportunity for return that does not have the controls applicable to other opportunities. As well as loss of residential accommodation this has a detrimental effect on hotels (paying business rates) in the City. The City plan's desire to attract more quality hotels to the City will also be negatively affected by unregulated short-term letting.

c) If you support this policy but have some suggested wording changes please outline these clearly below

We suggest wording be added to achieve some control and regulation of the prolonged use of properties as short-term lets ('AirBnB') to avoid loss of long-term residential accommodation. This may be an area that warrants a whole policy to deal with it.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) DM7

Policy Name (e.g. Housing Quality, Choice and Mix) Houses in Multiple Occupation.

e) Do you Support or Object to the policy?

Support



If you support this policy, please go to questions (b) and (c)

f) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

In addition to the current content of the policy we would encourage the City Council to develop a register of leasehold and other premises where HMO's are forbidden by covenants entered into by property owners. For example, leaseholders at Brighton Marina are forbidden from using their properties as HMO's and this is doubtless the case elsewhere in the City. A register could allow a cross-check and avoid properties being registered by an owner or agent as HMO's in breach of covenants, either knowingly or unwittingly.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) DM14

Policy Name (e.g. Housing Quality, Choice and Mix) Special Retail Area – Brighton Marina.

g) Do you Support or Object to the policy?

Support



If you support this policy, please go to questions (b) and (c)

h) Please explain why you support this policy?

We support this policy but have some reservations.

We should ensure that the policy does not give greater status to poor quality retail than to high quality services. Nor should the policy seek to turn back the clock - local bank branches, for example, are a thing of the past and do not need to be brought back. There should be much more flexibility for units to change between retail and other uses, such as cafés, restaurants, hair dressers etc., The starting point should be about what will be interesting and vibrant as part of the street scene, and add value to the marina as a destination.

Existing shops at the Marina struggle and always have done. Footfall is insufficient to properly support a retail offer. The diversity of property uses that this policy seems to look towards is desirable. The Marina is a residential district and leisure destination site, as well as an employment area.

The presence of a supermarket and filling station work against the provision of the retail parade type of offer. The premises that do work here are currently represented here – services for example.

More work/employment space is desirable to encourage use and footfall all week and all year (and to meet the need for employment space in the City).

The policy aspires to provide premises desirable to Marina residents. We suggest that if this aspiration is to remain, research should be done to gather evidence as to what Marina residents want.

Retailers thrive today either on convenience or providing an experience. The location context of the premises and sense of place needs to provide synergy for this to be successful (together with sufficient footfall). Successful city centres now have twice as much office space as retail space. Too much retail, even in city centres, does not have the demand to sustain it, hence vacancies often seen in City centres.

The Marina is currently blighted with areas of 'Greyfield' space - some retail and some restaurant – allowing flexibility of use is important to establish sustainable uses for these premises.

c) If you support this policy but have some suggested wording changes please outline these clearly below

We suggest that the policy name "Special Retail Area" be changed to "Special **Commercial** Area" which gives equal status to all types of customer-facing trading uses, and seeks to ensure a vibrant street scene and interesting mix of uses while remaining relaxed about whether these

uses are shops or other things.

Also, criteria (a) *"The proposed use would retain and/or complement the existing diversity and mix of retail uses (especially the convenience and service offer) and support non-retail uses such as leisure, tourism and commercial uses within the Marina"* may not be measurable due to subjectivity and as such may not be worth retaining.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) DM15

Policy Name (e.g. Housing Quality, Choice and Mix) Special Retail Area – The Seafront

i) Do you Support or Object to the policy?

Support



If you support this policy, please go to questions (b) and (c)

j) Please explain why you support this policy?

From our viewpoint at the Marina, we are concerned at the general state of decay and dereliction of the lower seafront to the East of the Palace Pier.

The seafront should be a driving force for tourism for the City and East of the Pier is currently deleterious to this.

We welcome encouragement of temporary uses, especially for the Black Rock site which has failed to attract a viable permanent use for over 40 years.

The policy should ensure that the door is open for developments that will bring high quality, sustainable, innovative and attractive development to Black Rock, Madeira Drive, the Madeira Drive arches and Aquarium Terraces all of which currently blight the City.

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) DM17

Policy Name: Opportunity areas for New Hotels and safeguarding conference facilities.

k) Do you Support or Object to the policy?

Support



If you support this policy, please go to questions (b) and (c)

l) Please explain why you support this policy?

Conference business has become essential to Brighton in recent decades (and does currently contribute economically to the Marina). We are concerned that the ability of the City to draw this business is declining and this decline will continue if City centre conference facilities are not available and developed to a contemporary standard.

We have a two-fold concern regarding the proposed conference facilities at Black Rock centre. Firstly the site is blighted (as currently) for years, with no 'meanwhile' use, on the promise that the conference development may happen. Secondly we are concerned at the prospect of a major conference centre being built which due to its off-centre location proves unattractive to conference organisers and is unused.

As the retail 'landscape' in the UK changes it seems increasingly unlikely that the proposed extension of Churchill Square will remain an attractive development. Consideration should be given to a total review of the Black Rock conference centre plan looking again at redeveloping conference facilities in the current Brighton Centre location.

We would like to see flexibility of use opened up for the whole DA2 area including Black Rock and Gas Works including innovative masterplanning for this area which has the potential to open up a new and thriving district of the City.

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) DM18

Policy Name (e.g. Housing Quality, Choice and Mix) High Quality Design and places.

m) Do you Support or Object to the policy?

Support
Object

If you support this policy, please go to questions (b) and (c)

If you object to this policy, please go to questions (d) and (e)

n) Please explain why you support this policy?

We welcome the emphasis on high quality design and placemaking, in particular the emphasis on public realm, which has been poor in areas of the city, including the Marina.
We support the requirement for artistic content in development design.

c) If you support this policy but have some suggested wording changes please outline these clearly below

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) DM33

Policy Name Safe, sustainable and active travel

o) Do you Support or Object to the policy?

Support



If you support this policy, please go to questions (b) and (c)

p) Please explain why you support this policy?

We strongly support these policies in particular in respect of the public realm where there needs to be sufficient funding available to achieve excellent outcomes, including to fund Council involvement in control of delivery.

We welcome the opportunity to address the lack of pedestrian permeability often caused in developments by divisive road layouts and level changes – the Marina has suffered from this.

c) If you support this policy but have some suggested wording changes please outline these clearly below

We would suggest ensuring that the policy addresses the management and control by the Council of investment in the public realm in relation to large developments. Disjointed public realm has been a long-standing problem at the Marina and this should be acknowledged and learnt from, otherwise it will be repeated throughout future large-scale developments.

Cycle routes – We are concerned that the Madeira Drive cycle route needs to be finished (it stops at the bottom of Duke’s Mound), and this should be addressed within Black Rock proposals.

The DA2 area overall needs public transport innovation. This should be a major new district of the City and transport needs should be recognised to avoid later problems, policies should exist to encourage innovative solutions, perhaps trams or monorail. The coastal route East from Brighton city centre is reliant on inadequate road infrastructure and future sustainability and development will be blighted by this.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Part B: Your Representation relating to Development Management Policies

Policy Number (e.g. DM1) DM45

Policy Name (e.g. Housing Quality, Choice and Mix) Community energy.

q) Do you Support or Object to the policy?

Support

If you support this policy, please go to questions (b) and (c)

r) Please explain why you support this policy?

c) If you support this policy but have some suggested wording changes please outline these clearly below

Marina residents connected to a District Heating System comment that they are ambivalent regarding the arrangement. The downside is reported as high fixed costs and there is of course no choice of supplier. These systems are largely unregulated, in contrast to other energy supply arrangements and we would welcome wording that requires suppliers to comply with industry voluntary regulation and best-practices.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

Site Allocations – Strategic Site Allocations

(Ctrl & click to view): **Strategic site allocations: (policies SSA1-SSA7)**

Please use a separate sheet for representations against each Strategic Site Allocation

- SSA1, Brighton General Hospital Site
- SSA2, Combined Engineering Depot, New England Road
- SSA3, Land at Lyon Close, Hove
- SSA4, Sackville Trading Estate & Coal Yard, Hove
- SSA5, Madeira Terrace & Madeira Drive
- SSA6, Former Peter Pan Leisure Site (adjacent Yellow Wave)
- SSA7, Land Adjacent Amex Community Stadium, Falmer Way

Policy Number SSA5

Policy Name Madeira Terrace & Madeira Drive

a) Do you Support or Object to the policy?

Support



If you support this policy, please go to questions (b) and (c)

b) Please explain why you support this policy?

We welcome access improvements along to the East end of Madeira Drive, to Black Rock and the Marina. Currently there are no streetlights, no cycle lane, no coherent pavement and the whole area does not feel safe, especially after dark.

c) If you support this policy but have some suggested wording changes please outline these clearly below

We would urge that employment space be added to the policy to create activity all week and all year and not be seasonal.
Temporary, or indeed any, use for Black Rock should be included.
Consideration of the extension of Volks Railway to the Marina should be included in any Black Rock/Madeira Drive scheme.

d) Please explain why you object to this policy?

e) If you Object to this policy and would like to put forward some alternative wording for the policy please set this out clearly below

f) Are there any other sites that could be allocated as strategic sites ?

Part D: Your Representation(s) relating to Any Other Comments & Equalities

Any other comments

Please use a separate sheet for each representation

(Ctrl & click to view):

- [Introduction](#)
- [Appendix 1: Glossary of terms](#)
- [Appendix 2 Parking Standards – Policy DM36 Parking and Servicing \(adopted Parking Standards SPD\)](#)
- [Appendix 3 - Local Wildlife Sites \(Policy DM37 Green Infrastructure and Nature Conservation](#)
- [Appendix 4 - Policy H2 Urban Fringe Housing Site Maps \(see also proposed draft Policies Map\)](#)
- [Appendix 5 - List of Brighton & Hove Local Plan policies that will be superseded on adoption of the City Plan Part 2](#)
- [Appendix 6 Table 1 – Proposed Changes to Policy Map – new additions/ amendments by virtue of policies in Draft City Plan Part 2/ Updates](#)
- [Appendix 6 Table 2 Policies Map – Proposed Changes to the City plan Part 1 Policies Map due to retained Brighton & Hove Local Plan Policies being superseded by City Plan Part 2 policies](#)
- [Supporting documents to the City Plan Part Two](#)
- [Background studies for the City Plan Part Two](#)

AO1 Do you have any other comments on any other part of the plan or its supporting documents? If you are commenting on more than one supporting document / background study please make this clear in the box below by using headings.


Equalities

The council has a duty under the Equalities Act 2010 to eliminate discrimination and advance equality of opportunity for people with the following protected characteristics: age, disability, race, religion, sex, sexual orientation, gender reassignment, marriage and civil partnership, and pregnancy and maternity. In addition the council has a duty to foster good relations between all communities.

A Health and Equalities Impact Assessment on the Draft City Plan Part Two has been undertaken and is available to view [here](#) [PDF, 2.8MB]

AO2 Do you consider the City Plan Part Two to have any equalities implications, positive or negative? If so, please provide further details.

Progress should benefit everyone.

Signed*:	
Dated*:	12 th September 2018.

All representations must be received at the email or postal address given on this form by **5.00pm on 13th September 2018.**

Due to the length of the consultation period please kindly note that late representations will not be accepted.

Completed forms should be sent to:

Email: planningpolicy@brighton-hove.gov.uk

Post: Consultation on the Draft City Plan Part Two
Brighton & Hove City Council
Planning Policy Team
1st Floor Hove Town Hall
Norton Road
Hove BN3 3BQ

If you have any further queries please contact us on 01273 292505 or via email planningpolicy@brighton-hove.gov.uk

Brighton Marina Neighbourhood Forum

Brighton Marina Neighbourhood Forum Vision.

We want Brighton Marina to be developed in a way that realises the full potential of this special place by the sea for residents, workers and visitors.

Our shared aim for Brighton Marina is that future development of the Marina fulfils the objectives of supporting high quality of life, sustainability, connectedness and being a highly-valued asset. A place where residents, tourists and businesses all thrive.

OBJECTIVES:

High Quality of Life:

- A positive choice as a feel-good place to live, work and visit.
- Public spaces and facilities that are enjoyable places to be.
- Making the most of our location on the coast and by the sea.

Sustainability:

- Economically sustainable. A mix of residential and commercial premises and property uses that are always in demand, maximising numbers of people in the Marina throughout the year.
- Environmentally sustainable. Aiming to have a positive effect on the natural environment and marine wildlife, and to minimise negative impacts.
- Future sustainable. Able to respond to changing requirements and demand to provide a significant contribution to the City's need for homes, workplaces and leisure space.

Connectedness:

- Connected within itself. Development plans must bring stakeholders together to make a cohesive and enjoyable place for individual employees, residents, berth holders and visitors.
- Connected to the city. Joined up transport links and welcoming entrances for vehicles, pedestrians, cyclists and boats.
- Development should make the Marina better and easier for pedestrians to get around.
- Residents across long-standing and new developments have a great sense of community, respect and shared interests and work together to build a collective sense of pride and belonging.
- Represented in the city by being an electoral ward.

A Valuable Asset

- Valued as a unique part of the city. Brighton's marina and the City's access to the sea. The UK's largest marina.
- Valued for quality of management.
- Valued in the city and region for its positive environmental and economic contribution.