

Brighton Marina Neighbourhood Forum

7th June 2019

Brighton and Hove City Council
Planning Committee
Hove Town Hall
Hove BN3 3BQ

By email to planning.applications@brighton-hove.gov.uk

Re: Brighton Marina Outer Harbour Development
Application number: BH2019/00964

Dear Councillors

Brighton Marina Neighbourhood Forum is a community planning body, drawn from and representing both the local residential and business communities within Brighton Marina.

Our Forum is engaged in developing a Neighbourhood Plan that will contain policies agreed by our local community to shape future planning and development in the marina. Once adopted, our Plan will become part of the Council's City Plan, and will be used by you to determine planning applications; our expectation is that you will require future planning applications to conform to our policies and be in keeping with our requirements before you will grant them permission. The current planning application comes too soon for our Neighbourhood Plan, which is still being developed.

We have a clear vision and set of objectives for the Marina (appended to this letter) which were developed on the basis of wide consultation in our community, and we have sought to engage pro-actively with this proposal at its pre-application stage. We have written twice to the applicant, setting out our priorities and concerns. Copies of these letters are also appended to this letter for your information and may be found within the planning application documentation 'Statement of Community Involvement,' document BMOHD27, pages 93-102.

In the **spirit of community planning**, we urge your Committee to use our Neighbourhood Vision and objectives as a template against which to judge this application, in order that the community's needs and aspirations are taken fully to heart when you make this important decision.

Our Neighbourhood Forum constitution explicitly disbars us from taking a view on any specific planning application prior to the adoption of our Neighbourhood Plan. This letter, therefore, should not be taken to be either supporting or objecting to this application.

Yours sincerely



Andrew Knight
Chair of Steering Group
Brighton Marina Neighbourhood Forum.

Brighton Marina Neighbourhood Forum

Outer Harbour Development

Response to early design proposals – November 2018

Introduction:

Brighton Marina Neighbourhood Forum welcomes the opportunity to comment on the early design proposals presented by the Outer Harbour Development Company Partnership LLP. As a voluntary organisation comprising marina residents and businesses, and empowered to lead the development of neighbourhood planning policies to shape and guide the future development of the Marina, we would hope to be able to develop a constructive and interactive relationship with the developer. We are supportive of the principle of development to provide much-needed local housing, and to act as a catalyst for the economic regeneration of the Marina. We believe that we have a positive input to make into the design process to ensure that the final scheme coming forward is one that:

- Is fully in line with our Neighbourhood Vision Statement (attached as Annexe)
- Provides homes for people to put down roots in our community,
- Enhances the physical environment of the Marina,
- Brings a sustainable residential community into the development
- Complements and seamlessly links into the existing first phase of the development and the wider surroundings.

This document originated from workshop sessions held at the full meeting of the Brighton Marina Neighbourhood Forum on 15 November 2018, at which members were encouraged to study the exhibition boards and discuss their reactions to the development proposals.

On the vision:

We welcome the developer's stated commitment to provide high-quality homes aimed at the UK market, specifically those who live and work in Brighton.

It is vitally important that these fine aspirations are actually delivered. Phase One of the Outer Harbour has had a problematic start, with a large number of the units being used as unregulated short-term lets, often as multi-occupancy accommodation especially for students, and unregulated hotel accommodation, rather than homes for Brighton people. The two initial apartment buildings are blighted by a transient population with no sense of ownership or buy-in to the surroundings or community. We call on both the developer and the Planning Authority to ensure that the troubled experience of Phase One cannot be repeated.

We worry that the plans for the development of conference facilities on the adjacent Blackrock site present a real risk from unfettered, unregulated AirBnB use, and we urge that robust measures are put in place, both through the planning processes and in the leases, to ensure that what is being built are genuine homes that people will live in and form a genuine community. We would particularly like to see initiatives

that encourage first-time buyers and key-workers into the development. One of the features to encourage this would be to ensure that the buying process took the needs of such purchasers into account.

On the site layout, buildings and design:

The initial sketch drawings have elicited a generally positive response from our Forum members. We feel that the revised concept is a better 'fit' with modern Brighton than the previous scheme. We feel it is important to maintain open areas between the buildings to allow views out to sea, and we particularly like the creation of a curved 'beachfront' on the southern aspect.

We have some concerns about the increase in the proposed number of dwellings in the development, and the resulting height and bulk of the 17 storey 'U-shaped' block on the western side of the site. We feel that there is a risk of this block being too big and too imposing, especially when viewed alongside the tower block. Great care will need to be taken to ensure that this block does not become a daunting and off-putting structure more reminiscent of an inner-city high-rise estate than a desirable water-front apartment complex. We note the reduction in height of the tower, and that it is now of a more conventional shape and design. However, it is still 28 floors high, and therefore care should be taken to ensure it looks elegant rather than just functional.

We are also concerned to understand how this development will look when set alongside what has already been built. We would like more visual 'cues' to be taken from Phase One, so that the architectural style does not clash with what is already here, and we are concerned that the bulk and height of the new buildings may look out of scale when set beside the existing buildings. No roof-line drawings or impressions of how the development will look when seen from a distance have been made available, and therefore it is not possible to judge at this stage if the proposed buildings fit well or not into the bigger picture.

Similarly, we would urge the architects to ensure that the buildings do not look too flat-fronted and uniform but have some character, and that they avoid using materials and design features (such as railings on balconies) that will weather poorly or cause excessive wind-noise for residents.

On the proposed retail provision:

We understand that the planning authority is pressing for retail space to be included in this development, particularly in the southernmost building facing the sea, but we have concerns about this proposal. The marina already contains a large amount of commercial space, including retail and restaurant provision, much of which is struggling to achieve sustainability, despite its more central location to the marina.

We consider that the provision of a café / ice cream kiosk may be an attractive idea, but we would caution against the provision of 'shop' units, which risk being permanently empty and boarded up, blighting the residential development. We

consider that there is scope for some office accommodation within the development as a more viable alternative to retail space.

On the connections beyond the site boundaries:

We support the developer's plans to create attractive walking routes through the development. To achieve this, the site must link seamlessly into its surroundings, and care must be taken at every interface between the development site and the neighbouring land.

Most importantly, this development represents a one-off opportunity to complete the sea-front walking route all the way from Shoreham Harbour through the marina to the Eastern breakwater.

Phase One of the outer harbour has suffered from lack of attention to detail at the site edges – most starkly in the terrible access from boardwalk level to street level. Phase Two not only gives the opportunity to redress these problems, but in fact, it is essential to the scheme's success that this is done.

It is the detail that is crucial here – for instance the pedestrian routes diagram correctly illustrates a walk through from the site between Orion and Sirius to the marina boardwalk, but in reality, this will require consent from another landowner to cut through the existing concrete wall. Similarly, the new residents will need access routes northwards, including to Asda, but the detail of how pedestrian movements will flow in this direction, or how the changes in level are to be designed have not yet been shown.

We would like assurances from the developer that these very important pedestrian through-routes can and will be delivered, and we would urge the planning authority to seek such assurances too.

On travel, transport and parking:

We support the aspirations to encourage sustainability in travel and transport; but we would urge a 'reality check' on how these proposals will be impacted by the behaviour of real people living in this space. This is not a city-centre development, and commuting is slow, with no limited stop bus service to the city centre. We feel that the demand for cars will be much higher than the currently proposed provision allows, and we would urge a re-think and a more realistic assessment. The service and delivery access needs careful consideration, and we feel this is an important detail that must be appropriately planned to avoid problems with traffic congestion and inappropriate parking.

Vehicle access to the marina is already difficult, and the single road to the site is frequently congested, particularly at weekends. The original consented scheme proposed reversing the direction of traffic flow so that vehicles exiting do not have to cross the path of vehicles entering – we strongly support this and urge that it is done as soon as possible.

On the open space:

We welcome the design vision to open up the site to pedestrian walkways and open spaces, but we have some concerns about the landscaping of these open areas. We live in an environment where not much will grow, and we are concerned that the provision of too much green space and soft landscaping will become a fruitless drain on maintenance resources. We would prefer the open spaces to be predominantly made up of shingle and grass with only minimal planting.

We have no detail as yet on the provision of play facilities, but some residents are concerned that formal play/games areas will generate unwelcome levels of noise and attract anti-social behaviour, which is already a problem in this part of the marina.

We would urge that the provision for play is restricted on-site to natural landscape features. If a playground is to be considered, we would prefer it to be located in a more suitable location away from residents and / or that a S106 contribution is made to enhance the play facilities on nearby Marina Drive instead.

On phasing:

As we understand it, the plan is to develop the western end of the site – i.e. the tower and the ‘U-shaped’ building first. This means that for the first several years these buildings will be physically isolated from the rest of the marina. It is crucial that the external environment is planned carefully – people do not want to be living in a building site for years, and the first residents will need pleasant walking routes into the inner-harbour area, north to Asda and Kempton, and west to the beach.

We urge the developer to make an effort to ensure that proper plans are made and delivered right at the start for pedestrian links in all three directions to ensure the living experience of the early residents is a good one from day one, and we call on the planning authority to insist on fully-detailed plans for the treatment of the external areas and their links beyond the application site, and to ensure that these links are delivered through robust planning conditions.

The outer harbour area is a residential area and a business location. The needs of the people who are already living and working adjacent to this site need to be safeguarded throughout the building process, and in the time-gaps between the phases of development. The area needs to be kept pleasant and accessible throughout.

On the S106 agreement:

S106 contributions are an important mechanism for the provision of social, environmental and community infrastructure that the new population will require. We want this resource to be directed towards the right things. This is particularly important in this location, as the planning authority’s policy is to set a 0% Community Infrastructure Levy for the marina.

As the Neighbourhood Forum, whose mission is to shape land use planning policies for our community, we believe we are best placed to know what S106 facilities are needed. We would ask that we are fully consulted by the planning authority on the proposed content of the S106 contributions. In particular, the S106 agreement should contain the provision of stepped access from the western breakwater down to street level south of the multi-storey car park to open up access from the seafront into the heart of the marina, as well as stairs from the Boardwalk to street level, as the most effective ways to link up the old and new phases of the marina and the seafront.

The derelict Blackrock site, almost adjacent to this development area, and at the end of the proposed western pedestrian access, represents a visual and social blight on the marina. It is unpleasant and off-putting to walk past, and acts to deter visitors from coming into the marina. Its derelict appearance makes residents feel unsafe using this route, particularly during hours of darkness. Improvement of this area is essential to encourage more pedestrian and cyclist access to the marina rather than the use of cars. We propose that this site is opened up and grassed-over using S106 resources to provide a temporary public open space in the years pending its redevelopment.

There is concern about the impact that the doubling of the local population will have on health services and other essential community facilities.

Modern primary care facilities require relatively large spaces to provide for a number of GPs as well as related nursing and clinical services, and this cannot be accommodated in a space the size of an apartment (as has been demonstrated by the lack of take up by NHS funded services of the health space built into Phase 1). Thought and planning needs to be given to how to cater to the new population's healthcare needs, as it is already difficult for marina residents to access these services.

Health services are not the only community facilities that our new population will require, and there is concern that childcare, school, dentist, social care and other community support services will not be accessible to the marina community, particularly as there is virtually no realistic scope for these facilities to be provided on site due to the lack of available sites. We urge the planners to allow changes of use of existing commercial premises on the Marina to community uses.

Finally, in the interests of sustainability, we would urge that the development seeks to use water-source heat pumps to provide for the development's energy needs, taking advantage of the site's ideal location next to the sea.

In conclusion, Brighton Marina Neighbourhood Forum welcomes the initial proposals for the next phase of the outer harbour development. This is a development that we want to support and one in which we want to be fully engaged. Above all, we would not like to see this being a missed opportunity to enhance the marina and to resolve the outstanding problems caused by the first phase, because this is not a self-contained, stand-alone site, but one that must join seamlessly into the wider marina if it is to succeed.

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Brighton Marina Neighbourhood Forum Vision Statement.

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.

Vision Statement adopted at the Forum Steering Group Meeting held on 24th September 2018, following consultation at the Annual General Meeting of the Forum held on 16th May 2018.

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Brighton Marina Outer Harbour Development

Steering Committee Response to Second Development Exhibition, 9th January 2019.

The Brighton Marina Neighbourhood Forum is grateful for the opportunity afforded by the Outer Harbour Development Team to preview the second exhibition and discuss the content with members of the development team. On the basis that the concept and principles of the development remain the same, our response made in November 2018 still substantially reflects our position. In summary we welcome the principle of development of housing at the Marina and want the development to fulfil the objectives of the forum vision statement for the Marina, specifically High Quality of Life, Sustainability, Connectedness and a valuable asset to the City and region.

In this response we have generally followed the headings of our previous response, commenting on changes made.

1. Vision.

The stated commitment to create a viable community and to meet the specific needs of Brighton people is welcomed. As part of making good on this intention, and alongside the intention of properties being available through 'help to buy' or successor schemes, we urge the drafting of lease terms that will encourage owner occupiers and long term residents and that will proscribe short-term lettings.

2. Site Layout and Design.

It has been helpful to see some additional pictures of proposed appearance of the development looking from the North West. The stepping in height of buildings is welcome but we do still have concerns regarding the bulk of the buildings and their relation with the neighbouring phase one. In particular the finishes shown in the drawings look very grey in colour and together with the small spaces between high buildings this may create oppressive public spaces between buildings. We wonder whether considerably more white coloured (and therefore more reflective) finishes would ease this. Also use of the Brighton 'turquoise' colour could help anchor the buildings in the context both of the seafront and the phase 1 buildings which have elements in this colour.

3. Retail

We have previously expressed strong reservations regarding retail provision and these remain valid. It is to be welcomed that the spaces are now smaller and the suggestion of the flexible working space seems much more likely to be successful than retail. We urge the minimising of retail space; even central Brighton seafront units have little trade for a considerable portion of the year and the Marina will always have less footfall than these.

4. Connections

As previously stated, the 'connectedness' of the development, in particular with the rest of the Marina and beyond, is critical to success. The external environment must link seamlessly into the surrounding areas of the marina, the seafront and Asda. In particular, we have not yet seen details of how the new development will join on to phase one: a joined-up, walkable route, without walls, barriers or detours, through from phase 1 to phase 2 is in our

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view essential, and is in fact an important link in the coastal path. To our earlier comments we would add that it is good to see some initial thoughts for attractive pedestrian access both for the public and for phase 2 residents during the construction phase of phase 3. If the new route from the west Breakwater through the development and on into the Marina is to be a success it must be joined up and pleasant to use throughout the phase 3 construction.

5. Transport, Travel, Parking.

We previously expressed concern that the level of parking provision would be a deterrent factor for long-term owner occupiers. It is therefore good to see more parking provided. We would like to see more detail of how the road access to the development works as this did not appear to be present. We reiterate our point regarding traffic routing around 'Park Square this is essentially the 'wrong way round,' with all traffic out crossing the path of entering traffic. Whilst we understand that there are different land ownerships involved we would urge developers to seek to find a solution to this problem.

6. Environmental

We were pleased to see a proposed water source heat pump system. It seems very sensible and environmentally beneficial to use such a scheme in this location.

The new diagrams of the "beach front" show what looks like a Perspex or glass "wall" along the front. Whilst this may create a pleasant open look in the drawings, this would not provide an acceptable solution in practice. We urge the use of proven and durable materials (such as railings) for such an exposed location.

It was also good to see some clarification of how the spending beach would deal with wave energy beneath the "beach front" promenade. This is an area of concern for the forum members who are boat owners and for whom navigation of the entrance channel is of great importance. We are keen to see full modelling of the wave behaviour for the chosen design and confirmation that navigation will not suffer adversely.

In conclusion, the changes made since the first exhibition are generally welcomed, although concerns raised in our initial response are often still relevant; we recognise that until the full detail required for a planning application is available this will continue to be the case. We look forward to seeing the application in due course.

End.