

Tourism, Equalities, Communities & Culture Committee

Date: **24 September 2020**

Time: **4.00pm**

Venue **Hove Town Hall - Council Chamber**

Note: in response to current Government Regulations this meeting is being held as a virtual meeting for councillors and accessible via Skype. Public speaking and engagement opportunities will be made available.

The meeting will also be webcast live to the internet.

Members: **Councillors:** Stephanie Powell (Joint Chair), Marianna Ebel (Joint Chair), Clare Rainey (Deputy Chair), Carmen Appich (Oppositions Spokesperson), Robert Nemeth (Group Spokesperson), Amanda Evans, Phelim MacCafferty, Mary Mears, Jackie O'Quinn, Dee Simson

Invitees Lola Banjoko, Joanna Martindale, Anusree Biswas Sasidharan, Nick May

Contact: **Greg Weaver**
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AGENDA

PART ONE

Page

PROCEDURAL MATTERS

18 PROCEDURAL BUSINESS

- (a) **Declarations of Substitutes:** Where councillors are unable to attend a meeting, a substitute Member from the same political group may attend, speak and vote in their place for that meeting.
- (b) **Declarations of Interest:**
 - (a) Disclosable pecuniary interests;
 - (b) Any other interests required to be registered under the local code;
 - (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

- (i) the item on the agenda the interest relates to;
- (ii) the nature of the interest; and
- (iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

- (c) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public. A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and on-line in the Constitution at part 7.1.

19 MINUTES

7 - 42

To consider the minutes of the meetings held on (a) the 18 June 2020 and (b) the Special Meeting held on the 29 July 2020.

Contact Officer: Greg Weaver
Ward Affected: All Wards

Tel: 01273 291214

20 CHAIRS COMMUNICATIONS

21 CALL OVER

- (a) Items (25 – 34) will be read out at the meeting and Members invited to reserve the items for consideration.
- (b) Those items not reserved will be taken as having been received and the reports' recommendations agreed.

22 PUBLIC INVOLVEMENT

To consider the following matters raised by members of the public:

- (a) **Petitions:** To receive any petitions presented by members of the public;
- (b) **Written Questions:** To receive any questions submitted by the due date of 12 noon on 18 September 2020;
- (c) **Deputations:** To receive any deputations submitted by the due date of 12 noon on 18 September 2020.

23 ITEMS REFERRED FROM COUNCIL

43 - 62

Items referred from the last meeting of Full Council held on 13 August 2020 (copy attached).

(a) Petitions:

- (i) Add a Sign to the Queen Victoria Statue in Hove explaining the impact of the Empire
- (ii) Prioritise & Support Community Led Affordable Housing Over Private Developers in the City
- (iii) Declare Brighton & Hove to be an Anti-Racist City

(b) Notices of motion:

- (i) Committing to Make Brighton and Hove Free of Modern Slavery
- (ii) Black Lives Matter / Anti-Racist Council
- (iii) Historic Monitoring Events on Madeira Drive

24 MEMBER INVOLVEMENT

63 - 66

To consider the following matters raised by Members:

- (a) **Petitions:** To receive any petitions;
- (b) **Written Questions:**

A list of questions submitted by Members has been included in the agenda papers.

- (c) **Letters:** To consider any letters;
- (d) **Notices of Motion:** to consider any Notices of Motion submitted directly to the Committee:

(1) **Fair Trade** – Proposed by Councillor Appich.

25	UPDATE TO FOOD PLANNING ADVICE NOTE (PAN)	67 - 128
	Report of the Executive Director Economy, Environment & Culture.	
	<i>Contact Officer:</i> Helen Pennington	<i>Tel:</i> 01273 292333
	<i>Ward Affected:</i> All Wards	
26	ANTI-SLAVERY PLEDGE	129 - 140
	Report of the Interim Executive Director for Housing, Neighbourhoods & Communities.	
	<i>Contact Officer:</i> Tim Read	<i>Tel:</i> 01273 290393
	<i>Ward Affected:</i> All Wards	
27	REWILDING OF WATERHALL GOLF COURSE	141 - 166
	Report of the Executive Director, Economy, Environment & Culture	
	<i>Contact Officer:</i> Ian Shurrock	<i>Tel:</i> 01273 292084
	<i>Ward Affected:</i> Withdean	
28	FOOTPRINT - THE RESPONSIBLE EVENT FOR THE UK PROPERTY INDUSTRY	167 - 212
	Report of Executive Director Economy, Environment & Culture	
	<i>Contact Officer:</i> Ian Shurrock	<i>Tel:</i> 01273 292084
	<i>Ward Affected:</i> Brunswick & Adelaide	
29	DRAFT URBAN DESIGN FRAMEWORK SUPPLEMENTARY PLANNING DOCUMENT (UDF SPD)	213 - 394
	Report of the Executive Director, Economy, Environment & Culture	
	<i>Contact Officer:</i> Paula Goncalves	<i>Tel:</i> 01273 292352
	<i>Ward Affected:</i> All Wards	
30	THE HIPPODROME, MIDDLE STREET - URGENT WORKS NOTICE	395 - 400
	Report of the Executive Director, Economy, Environment & Culture	
	<i>Contact Officer:</i> Tim Jefferies	<i>Tel:</i> 01273 293152
	<i>Ward Affected:</i> Regency	

- 31 SUPPORT FOR THE CITY'S CREATIVE AND CULTURAL SECTOR 401 - 428**
 Report of the Executive Director, Economy, Environment & Culture
Contact Officer: Donna Chisholm
Ward Affected: All Wards
- 32 PUBLIC SPACE PROTECTION ORDERS- DOG CONTROL, ALCOHOL IN PUBLIC PLACES AND GATING 429 - 488**
 Report of the Interim Executive Director Housing, Neighbourhoods and Communities
Contact Officer: Jo Player Tel: 01273 292488
Ward Affected: All Wards
- 33 MARY CLARKE STATUE APPEAL UPDATE 489 - 500**
 Report of the Executive Director, Economy, Environment & Culture
Contact Officer: Branwen Lorigan Tel: 01273 291094
Ward Affected: All Wards
- 34 APPOINTMENT OF A STANDING INVITEE TO THE TECC COMMITTEE 501 - 504**
 Report of the Executive Lead Officer for Strategy, Governance & Law.
Contact Officer: Abraham Ghebre-Ghiorghis Tel: 01273 291500
Ward Affected: All Wards
- 35 ITEMS REFERRED FOR FULL COUNCIL**
 To consider items to be submitted to the 22 October Council meeting for information.
- In accordance with Procedure Rule 24.3a, the Committee may determine that any item is to be included in its report to Council. In addition, any Group may specify one further item to be included by notifying the Chief Executive no later than 10am on the eighth working day before the Council meeting at which the report is to be made, or if the Committee meeting take place after this deadline, immediately at the conclusion of the Committee meeting*

ACCESS NOTICE

In response to the current situation with Covid-19 and the easing of Regulations, this Committee meeting will be held virtually via Skype and web cast simultaneously.

The City Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public. Provision is also made on the agendas for public questions to committees and details of how questions can be raised can be found on the website and/or on agendas for the meetings.

The closing date for receipt of public questions and deputations for the next meeting is 12 noon on the fourth working day before the meeting.

For those members of the public wishing to actively take part in the meeting a link will be emailed so that they can join the meeting.

Meeting papers can be provided, on request, in large print, in Braille, on audio tape or on disc, or translated into any other language as requested.

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FURTHER INFORMATION

For further details and general enquiries about this meeting contact Greg Weaver, (01273 291214, email greg.weaver@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

Date of Publication - Wednesday, 16 September 2020

AGENDA ITEM 19(a)

BRIGHTON & HOVE CITY COUNCIL

TOURISM, EQUALITIES, COMMUNITIES & CULTURE COMMITTEE

4.00pm 18 JUNE 2020

SKYPE

MINUTES

Present: Councillor Appich (Chair) Evans (Deputy Chair), Ebel (Opposition Spokesperson), Nemeth (Group Spokesperson), Grimshaw, Mac Cafferty, O'Quinn, Powell, Rainey and Simson

Other Invitees present: Lola Banjoko (B&H CCG), Anusree Biswas Sasidharan, Joanna Martindale (Community Voluntary Sector) and Nick May (Sussex police).

PART ONE

1 PROCEDURAL BUSINESS

1(a) Declarations of substitutes

1.1 There were none.

1(b) Declarations of interest

1.2 Councillor Powell declared her ongoing employment with Sussex Police and that her partner was involved as a consultant working with various local charities.

1(c) Exclusion of press and public

1.3 In accordance with Section 100A of the Local Government Act 1972 ("the Act"), the Planning Committee considered whether the public should be excluded from the meeting during consideration of any item of business on the grounds that it is likely in view of the business to be transacted or the nature of the proceedings, that if members of the public were present during it, there would be disclosure to them of confidential information as defined in Section 100A (3) of the Act.

1.4 **RESOLVED** – That the public be not excluded during consideration of any item of business on the agenda.

2 MINUTES

2.1 **AGREED** – that the minutes on the 5th March 2020 and 7th May 2020 be signed as a correct record.

3 CHAIRS COMMUNICATIONS

3.1 The Chair gave the following communications:

“As a new chair, I’d like to put on record how the I want to approach the next few months. This Committee is key to the Council’s anti racism work. I also want to support recovery from COVID, including supporting our events and creative industries, as well as champion healthy and active lifestyles.

Equalities

I intend to lead on and champion our commitment to anti-racism and engagement work. I intend to focus on actions rather than words. As a start, I issued a detailed statement last week, which outlined our action plan to work closely with BME communities to create and deliver an anti-racism strategy. We are of course all against racism and inequality in all its forms, but as a council we need to do more than be against racism – we need be an actively anti-racist council, and proactively challenge racial inequality. We all have a role to play here. We have already met with Operation Black Vote and with the council’s internal leadership network. In addition, the leader, the labour team and I have had a number of conversations with residents and their representatives, as no doubt the other members of the committee have. We will bring back a report to this committee in September outlining what progress we have made, and the next steps.

Refugee week

During Refugee week I am delighted to announce that Brighton & Hove Libraries have been successful in their Library of Sanctuary application. This is only the second library service in the country to receive the award so a great achievement. The review panel was unanimous in concluding that Brighton & Hove Libraries fully met the conditions to be granted a Sanctuary Award following their application in December.

The award of Library of Sanctuary status demonstrates our cities’ commitment to offer sanctuary to refugees and asylum seekers in Brighton & Hove.

Healthy and active lifestyles

Sport and physical activity is very important to both the physical and mental health of the city’s population. The Sport & Leisure Service will therefore continue the development of events that encourage such activity ,we will review the ageing stock of sports facilities to seek investment to improve the quality of those facilities and provide new ones. We will work closely with Public Health to develop a new Sport & Physical Activity strategy for the City.

Waterhall

A preferred leaseholder to undertake rewilding at Waterhall Golf Course, provide an events venue and educational centre was approved at Policy & Resources Committee

on 23rd January 2020. This followed a recommendation from the TECC Committee at the January meeting. The preferred leaseholder has indicated that the events venue would not be financially viable and therefore will not be in a position to complete the lease negotiations, as per their bid.

However, the preferred leaseholder would still like to see rewilding take place at Waterhall Golf Course and would like to support the council to achieve this aim by funding instructing ecological studies to progress the potential re-wilding process. These studies are essential to determine the best conservation management plan for the site. Furthermore, this would enable potential applications for Countryside Stewardship Grants to manage a variety of habitats including for species rich grassland.

The council's Cityparks Service will assess if it is feasible for the service instead to undertake the management of the rewilding. A report on that assessment will be brought to the TECC Committee in September. In addition, consideration will be given to the options in relation to use of the site that would be complementary to rewilding including the clubhouse. In the meantime the site will be managed by the Cityparks Service but with minimal resources allocated.

VISITBRIGHTON

Over the past months VisitBrighton has continued to disseminate the latest tourism related COVID-19 government guidance and funding streams via a twice-weekly newsletter to tourism businesses and stakeholders

The team have worked in partnership with VisitBritain, VisitEngland and Tourism South East on the development of recovery campaigns and with Brighton and Hove tourist business to prepare a post-lockdown marketing campaign. We continue to liaise with conference and event's organisers to re-schedule events, ensuring business is retained in the City for the recovery period.

From 8 – 10 May VisitBrighton hosted Big BrightOnline Weekender, bringing together the best of Brighton's virtual festival performances, reaching 209,000 people.

VisitBrighton have partnered with United We Stream which aims to showcase our world class cultural talent, live streaming bands, DJs, singers and performers.

Meetings

The labour team and I have (virtually) met with numerous residents, community and business representatives, over the last month, and we will continue to do so, to help support this Committee's urgent recovery work on equalities, communities, culture and tourism."

- 3.2 Councillor O'Quinn addressed the Committee and gave the following communication:

“The city’s creative and cultural sector should and does have our wholehearted support because of its enormous value to the city both economically and socially. We need to work especially hard to support this sector in the coming months as it has been devastated by the Coronavirus Emergency. Much work is already being done by the Brighton and Hove Arts and Creative Industries Commission, in partnership with the council, to get this sector back on its feet again. People involved in the Arts and Culture are being directed to the Business Grants available and to the Discretionary Small Business Grant. Indeed, a workshop was held last Thursday by an events company to help those involved in the events industry to apply for the Discretionary Grant. Networking is being encouraged even more and a highly focused move to track down relevant grants, and the council have a vital role to play here.

I think we are all aware that to quote “culture is the lifeblood of a vibrant society, expressed in the many ways we tell our stories, celebrate, remember the past, entertain ourselves, and imagine the future. Our creative expression helps define who we are and helps us see the world through the eyes of others. For individuals everywhere, culture is also a means of expressing creativity, forging an individual identity, and enhancing or preserving a community’s sense of place. In children and young people, participation in culture helps develop thinking skills, builds self-esteem, and improves resilience, all of which enhance education outcomes”.

Residents of Brighton and Hove participate in culture in many ways—as audiences, professionals, amateurs, volunteers, and donors or investors and this summer it is hoped that many outside events will be organised for people, especially young people. Even a Storytelling session organised by a local café with outside space in a park can be a valuable to culture in the city. It is good to hear that South East Dance is designing an extended programme for young people this summer in order to provide some structured and focused activities until more schools reopen in the Autumn.

Culture and the Arts provides important social and economic benefits to the city. With improved learning and health, increased tolerance and inclusion, and opportunities to come together with others, culture enhances our quality of life and increases overall well-being for both individuals and communities, a fact which is well recognised by the Arts and Creative Industries Commission and the Council.

To quote “Culture helps build social capital, the glue that holds diverse communities together. It fosters social inclusion, community empowerment, and capacity-building, and enhances confidence, civic pride, and tolerance. Cultural engagement also plays a key role in poverty reduction and communities-at-risk strategies”, something which is at the heart of the council’s policies thus I heartily support this NOM.”

4 CALL OVER

4.1 The following items were called:

- 7- Anti-Social Behaviour Hove Seafront
- 8- Pride 2022 – 2026 inclusive
- 10-Queen’s Park Conservation Area Proposed

- 4.2 The following items were not called and as a result were agreed as per the recommendations in the report:

9- Saltdean Lido Restoration
11-Revised Developer Contributions Technical Guidance

5 PUBLIC INVOLVEMENT

(a) Petitions

(i) Stop residents being sandwiched between two HMO's

- 5.1 The Committee considered a petition that requested that Brighton and Hove City Council try and refuse any application made for an HMO that would mean a resident being sandwiched between two HMO houses. This petition was signed by 31 people.

- 5.2 The Chair gave the following response:

“Planning applications for HMOs are currently assessed using City Plan Part One Policy CP21 which states that new HMOs will not be permitted where more than 10 per cent of dwellings within a radius of 50 metres of the application site are already in use as HMOs

The council is currently preparing City Plan Part Two which contains a policy (DM7) with three new criteria relating to concentrations of HMOs. This will mean that additionally applications will normally only be permitted where:

- a) fewer than 20% of dwellings in the wider neighbourhood area are already in use as HMOs;*
- b) the proposal does not result in a non-HMO dwelling being sandwiched between two existing HMOs in a continuous frontage;*
- c) the proposal does not lead to a continuous frontage of three or more HMOs.*

The Proposed Submission version of City Plan Part Two was approved a full Council in April this year and will be published for consultation once current government restrictions relating to Covid-19 have been eased. It will then be submitted to government for a public examination and, if found sound, can be adopted by Council to form part of the development plan for the city.”

- 5.3 **RESOLVED** – that Committee note the petition.

(b) Written Questions

(i) Carnegie Library

- 5.4 Christopher Hawtree put the following question:

“Would Councillor Appich please tell us how much has been spent upon the repair and maintenance of Hove’s Carnegie Library since 2016?”

- 5.5 The Chair gave the following response

“From April 2016 to March 2020 the sum of £301,577 was spent on the repair and maintenance of Hove Library.”

5.6 Mr Hawtree gave the following supplementary question:

“What plans were there or the maintenance for the front of the building and would fund from the lottery be sought to carry out such work”

5.7 The Chair offered a written response.

(ii) Madeira Drive

5.8 Ms Amanda Bryce gave the following question:

“Since 20 April Madeira Drive has been a haven for people wanting a break from the impacts of COVID-19 by walking or cycling easily at 2m distance along the seafront and away from traffic.

As well as benefits for physical and mental health, traffic-free places like this are proven to significantly increase an area’s social and economic vitality.

As businesses reopen, what is the council doing to gather views and build on the success of a “Madeira Drive for people not cars” to lock in these benefits in the future, especially in combination with proposals to rebuild the Arches?”

5.9 The Chair gave the following response:

“Madeira Drive has been shut in response to the current pandemic, to provide additional space in the city for walking and cycling. This closure is identified in the council’s Brighton and Hove City Council Urgent Response Transport Action Plan and policy framework as we prepare the city to come out of lockdown. The closure of Madeira Drive continues to be assessed and a decision will be made at the Environment Transport and sustainability committee on the 23rd June. This decision will include considering walking, cycling and the needs of local businesses.”

5.10 Ms Bryce asked the following supplementary question:

“The aim should be to keep Madeira Drive as a low traffic zone and to keep it attractive and thriving not a car park. How will BHCC go forward with this?”

5.11 The Executive Director, Economy, Environment & Culture stated that this would be considered at the Environment, Transport & Sustainability Committee on the 23rd June.

6 MEMBER INVOLVEMENT

(b) Written Questions

(i) Pesticides Used Hollingbury Golf Course

6.1 Councillor Ebel put the following question:

“Following the lease for Hollingbury golf course being agreed with Circle, concerns have been raised about recent chemical damage to the greens. The chemical seems to have been used inappropriately and completely damaged the grass. Can you please confirm:

- a) What type of chemical was used on the golf course
- b) Whether Circle are allowed to use this chemical under the terms of the lease
- c) Whether Circle held the correct licence to spray this chemical
- d) That Circle complied with the relevant health & safety regulations when this chemical was applied
- e) That the Council has been carrying out checks to ensure any weed killers are used in line with the relevant regulations

6.2 The Chair gave the following response:

- “a) While a glyphosate based weed killer was used in this instance, the leaseholder has confirmed that such a weed killer will not be used in the future.
- b) As a leaseholder, Circle Golf are required to comply with statutory health and safety requirements and environmental legislation. Therefore any substances used are required to comply with these laws. The product is labelled as ‘non-hazardous’ and is an EU licenced product which is legal in the UK, so would be regarded as acceptable.
- c) The Circle have confirmed that the member of staff holds the relevant certificate.
- d) The Circle have confirmed that they complied with the required Health and Safety requirements.
- e) As The Circle are occupying the land under a lease rather than a management contract the Council have no right or responsibility to be involved with the day to day operation of the facility. Also, the council should not intervene with the leaseholders management of the golf course unless there is a significant breach. That responsibility has been granted to The Circle under the lease. The council must also be mindful that there is a covenant within the lease (as for all tenants) that The Circle have the right to quiet enjoyment, and regular interference could be seen to be a breach of this.

6.3 Councillor Ebel gave the following supplementary question:

“How would BHCC in particular work with police to tackle ASB and crime?”

6.4 The Head of Safer Communities offered to provide a written response.

(ii) Brighton & Hove Seafront

6.5 Councillor Ebel gave the following question:

“Due to the COVID-19 pandemic pubs and restaurants are closed and it is unlikely that they will fully reopen with no restrictions over the summer. As a result of this residents and visitors to the city will increasingly use the city’s open spaces, and in particular the

beach, Hove Lawns & the promenade. Whereas pubs & restaurants are licensed establishments controlled by the license holder, this does not apply for the city's open spaces. Even in a normal year without a pandemic it is a difficult task to keep beachgoers safe.

The Seafront Team currently has only a limited number of staff. Can the administration look into increasing the team size to ensure the team has the capacity to keep beachgoers (visitors to our city as well as local people) safe?"

6.6 The Chair gave the following response:

"While the core Seafront Team is on duty 365 days a year, a significantly expanded seasonal team is recruited for each summer. Despite the challenges created by the current pandemic over 40 staff will join the core team to work as Seafront Co-ordinators, Beach Lifeguards and to crew the rescue launch. In addition, security stewards are being engaged on a flexible basis to assist with monitor particular pinch points that lead from the Upper Prom to the Lower Prom, to assist with the flow of pedestrians to the beach."

6.7 Councillor Ebel gave the following supplementary question:

"Can a community meeting be held with issues mounting up."

6.8 The Assistant Director Culture, Tourism & Sport agreed that this was possible.

(iii) City's Charity Sector

6.9 Councillor Powell asked the following question:

"Local charities are at the heart of supporting some of our most vulnerable communities. They, like all of us, are adapting to new ways of working which present challenges. Given that the council's Equalities team provide some support to them, they will have some useful feedback on how charities are coping at this time. Could the Chair therefore detail how the council has supported local charities with the challenges presented by covid-19 including:

- a) Decrease in funding
- b) Adapting to new ways of working, including different ways of service delivery
- c) Providing training and support to staff
- d) Increase in Service Users
- e) Increase in new and/or complex needs from service users
- f) Operational challenges of charities and their staff
- g) Furlough, and minimised staff levels"

6.10 The Chair gave the following response:

"a) Officers are concerned that the local CVS sector will be severely impacted by the loss of income from fundraising and other loss of income caused by the pandemic. The impact will be caused by the loss of income caused by the consequences of lockdown – charity shops closing, other trading opportunities

reduced, the cancellation of fundraising events (boot sales, fetes, major events such as Pride, Brighton Marathon), changes in charitable trusts and foundations priorities (not funding business as usual activities), lower investment returns, reduced demands from a weakened economy and lockdown, and loss of individual donations. The scale of the impact on the Brighton & Hove CVS is currently not clear. Officers had considered a financial survey of the sector, but were cautioned away from this as the feedback reported from Community Works was that the sector was already engaged in a number of surveys and that charity officers did not have the capacity for more. Officers were happy to step back from this approach, in particular as the result of a survey conducted by the National Council for Voluntary Organisations (NCVO) is due to be published by the end of June 2020. This report will identify the financial challenges faced by the sector as a result of the pandemic. A Report published by Pro Bono Economics (May 2020) has confirmed concerns, reporting that in April 50% of charities feared that they could go out of business in the next 6 months, rising to 70% in 12 months.

- b) The All Party Members Advisory Group (MAG) agreed on 26th March 2020 to allocate £150,000 from the BHCC Communities Fund (Engagement Fund) to support the local CVS sector in responding to the pandemic:

Grants of up to £5,000 can be applied for by any organisation that is a registered charity or community interest company operating within the city. The priority for this first tranche of funding will be for organisations providing support to vulnerable residents whose vulnerability does not meet the government's seriously vulnerable criteria.

Examples

- A service that supports people who are vulnerable with other underlying health conditions, including disabilities or mental health conditions
- A service that supports younger residents who are vulnerable through their lifestyles
- A service that supports residents who are vulnerable through their social circumstances, including their accommodation

What we will fund

- Organisational running costs including volunteer expenses, transport, staff costs
- Small capital costs that support organisational delivery during the emergency
- Specific costs that enable the organisation to adapt the delivery of services during the emergency.

The MAG meeting of 21st May 2020 approved the final tranche of bids. The original £150,000, plus a brought forward surplus from 2019-20 of £20,000 have now been allocated; 46 bids have been approved.

- c) Officers are keen to develop and agree a support package for the local CVS sector, working in collaboration with infrastructure organisations. At this stage the nature, format and delivery route has not been agreed. Feedback from the sector

suggest that chief officers are just emerging from the challenges of service change caused by lockdown.

- d) Many local CVS organisations are seeing increased demand for services, but this is not universal across the sector. It is also reported that many expect to see the demand increase as the year progresses, for example those in the advice sector where demand has decreased as many people are now getting advice through other messaging, but as lockdown decreases and poverty impacts will see this demand increase substantially.

Another aspect is in relation to the 'reach' of help services as a result of the pandemic. This is perhaps best illustrated by the impact of food distribution, in which the network of food banks, deliveries, and meals has reached into some communities which may not have been linked effectively into networks of support. This is a positive impact but one that has to be sustained.

Please also see Communities Fund investment at (b) above as some of this investment has been to support the increases in service users.

- e) The immediate needs impact of the pandemic has focussed on isolation, mental health and access to food. Many charities that work with people with mental health or related conditions have worked creatively and quickly to continue to offer support to their service users on line through one to one support online or via the phone. Many services delivered much of this work pre-pandemic through group delivery, and the challenge has been to resource the change to one to one delivery, with the potential to have to reduce capacity accordingly.

The medium to long impact will be on mental health and increased poverty. The numbers of people losing their jobs, increase in Universal Credit claims, and the resultant individual and family poverty. In addition, charities are concerned about capacity both in their services and in the statutory services for this increased demand, with charity staff and volunteers also concerned about volunteer and staff burnout.

- f) There have been a number of operational challenges for charities. These include:
- Lack of IT equipment for staff clients and volunteers to enable remote working
 - Cost pressures to address this – partly relieved by Community Fund mentioned earlier
 - Lack of IT equipment for clients to enable remote delivery to take place
 - Staff and volunteer absence caused by self isolation, quarantining, looking after family members who are unwell
 - Staff managing caring responsibilities at home (children at home)
 - There will be substantial accommodation issues for most charities as they attempt to move back to building based work. The provision of safe working environments for staff, volunteers and service users has the potential to be expensive and may require long term home working for staff and revised business delivery models with new accommodation sought to enable safe delivery, for example, of group based therapeutic services. For most of the local charities, the nature of the

building stock that they have become used to may not be appropriate to sustain safe practice.

- Please also see the investment from the Communities Fund at (b) above as this has supported the equipment needs of both the charity and service users.
- g) It is not known how many staff across the charity sector in the city have been furloughed. Charity work that is funded through the public sector cannot furlough staff who are employed to do that work.

For those staff who are not funded by public sector income, it is likely that furlough will have been used. However, the length of lockdown, social distancing measures, etc. have not been possible to anticipate and so many charity Trustees, chief officers and staff will have been determined to continue to operate a service for their clients even if the funding looks precarious. The challenge for Trustees and chief officers will be managing the changes to the furlough system in the context of potential loss of fundraised income, hence the need to ensure that support, training and guidance is in place to ensure that this is managed effectively. It is very likely to lead to job losses across the local CVS sector.

The disproportionate impact of the pandemic on BAME individuals in respect of their personal health, the impact on already isolated and marginalised communities, and the death of George Floyd and the BLM are important to highlight as we plan for a sustainable future for the charity sector.”

6.11 Councillor Powell gave the following supplementary question:

“What support is being given by BHCC to meet support in particular to emergency funding and partnership working?”

6.12 The Chair stated this would be discussed later in the agenda as part of the notice of motion.

(iv) Deployment

6.13 Councillor Powell gave the following question:

“A number of staff who work in tourism roles have been deployed to services including Bereavement Services, and those residents receiving all levels of care through Adult Health and Social Care. Working in these areas would no doubt mean difficult, challenging and often distressing phone calls between the Service User and the council employee - some of whom may have never worked in a frontline capacity in this way before.

Could the Chair describe to the committee the types of training and support that staff are being offered at the outset, and on an ongoing basis during the pandemic to deal with this type of work?”

6.14 The Chair gave the following response:

“The nature of the deployment work was that employees volunteered and they were able to return to their substantive work if the role did not work out. We had 3 instances in 91 matches.

Staff provided to Bereavement Services were from the Brighton Centre and Royal Pavilion. The nature of this work (stewarding work - to ensure that the public maintain social distancing in the crematorium grounds) required a similar skill set that security staff already had. Assessment Services and Referral Officers for Access Point were provided with on – the job training. This has been so successful with the majority of staff that the manager would like to encourage the deployees to apply for work in this area. An Induction checklist was provided to all receiving managers to support staff being deployed to an area of work.

I am pleased to tell you that staff from our libraries have been very involved in the distribution of Personal Protective Equipment (PPE) throughout lockdown. Library staff make up the majority of staff involved in this important work and they have been working collaboratively with staff from other teams to ensure the smooth distribution of PPE to key settings across the city. One of the library staff members has many years’ experience working with the distribution of humanitarian aid and brought their skills (and spreadsheet templates!) to get systems in place and to create a functional logistics operation. The team’s work has undoubtedly contributed to saving lives in the city and I am grateful for their efforts.

There are also a range of distance learning resources hosted on the Learning Gateway (the council’s learning platform) a list of which I can send to you. aimed at addressing the development needs of new starters or people working under temporary deployment. Courses include:

- Coronavirus Awareness
- Infection Prevention and Control
- Information Governance, GDPR and Cyber Security
- Personal Protective Equipment
- Health and Safety
- Fire Safety
- Care Certificate: Person Centred Values
- Safeguarding Adults
- Safeguarding Children
- Fluids and Nutrition
- Safer People Handling.
- Basic Life Support

The content is a mix of locally hosted and curated content suitable for people working in social care and other settings. Additionally there are courses relevant to the present work context including:

- Remote working
- Building resilience
- DSE
- Email stress Lone Working

- Stress Management and Wellbeing
- IT courses”

6.15 Councillor Powell gave the following supplementary question:
“Was there a possibility of ongoing training work for staff?”

6.16 The Chair stated that a written answer would be provided.

(v) Equalities

6.17 Councillor Powell gave the following question:

“Last year, Resources Committee heard a report on the Councils fair and inclusive action plan, produced in response to a second Global HPO report.

The report was triggered as little action had been taken between the 2013 report and the 2018 report. Could the Chair please assure the committee that the fair and inclusive action plan is in progress and commit to a future report to this committee?”

6.18 The Chair gave the following response:

“The Fair & Inclusive Action Plan remains very much in progress and is overseen by the Corporate Equality Delivery Group. Directorate Action Plans have been updated to include relevant equality objectives against which progress will be monitored as part of the Performance Management Framework.

The action plan will now form an important strand in the anti racism work we are undertaking. A meeting with the Council’s leadership network this week highlighted some of the actions already taken, as well as identifying the gaps.

An update on the Fair & Inclusive Action Plan was provided at the Members Modernisation meeting in January this year and a more detailed report will be provided to this committee in Autumn 2020.”

6.19 Councillor Powell gave the following supplementary question:

“A need for senior leadership was still required. Would the Chair work with Councillor Moonan, who sits on the Council’s Constitutional working group to ensure that this happens swiftly as it has already been 12 months since this request.”

6.20 The Chair stated that the Senior Leadership team were signed up to this responsibility of equality and a program had been brought to P&R Committee, was already being rolled out.

(vi) Libraries Plan

6.21 Councillor Rainey gave the following question:

“The proposal is to have an iterative process for the development of the new Libraries Plan. Libraries regularly receive feedback from library users and there is a wealth of

existing data from previous engagements with library users and other stakeholders that can inform the initial draft plan.

The draft strategic plan will be put out for consultation for a minimum of six weeks this autumn, seeking feedback through:

- Online survey and hard copies in libraries
- Consultation through community and voluntary sector groups and other partners who can seek the views of residents in their neighbourhoods or targeted client groups.
- Council members and council services with whom Libraries Services work
- Libraries staff and unions

The draft plan will be at a fairly strategic level and set the direction and priorities for the service, with a commitment to carry out more consultation in 2021 around detailed aspects of the service and stock, based on the survey started and abandoned due to COVID earlier this year. This feedback will be used to make amendments to the Libraries Plan, and to provide more specific information.

A lot of the feedback Libraries receive is gathered from people actually entering libraries and completing the surveys or engaging in focus groups. There is a real possibility that even after lockdown is eased, there will be a continuation of social distancing for quite some time, which will particularly disadvantage vulnerable people. So to restart the previous consultation as soon as libraries reopen seems unfair to some residents who may not feel confident to venture into public spaces so soon.

However, given the impacts of the current crisis, it seems appropriate to provide some high level information about the current direction and priorities of Libraries Services so that there is transparency about how things are currently operating, given that the previous plan ended in March 2020, and also committing to amending the plan once we have the comprehensive feedback from the consultation next year.

A report is scheduled to be brought to this Committee in March 2021.”

6.22 The Chair gave the following response:

“The Covid-19 pandemic has had an unprecedented impact upon the delivery of council services.

The recruitment process and the need to re-design the service to meet the challenges posed by the pandemic have contributed to a slight delay in the commencement of a service.

The service commenced in a new form last weekend.”

6.23 Councillor Rainey gave the following supplementary question:

“Can committee please provide details on the extent of the Arise library strategy briefing plan?”

6.24 The Chair stated that it was currently in the pre-consultation phase and that a further consultation would be taking place over a minimum of 6 weeks.

(vii) Lifeguards

6.25 Councillor Nemeth gave the following question:

“Will the Chair urgently write to the members of this committee giving a full explanation as to why lifeguards are not in place (or were not in place if the problem has been resolved by the time of the meeting) on the beaches of Brighton & Hove?”

6.26 The Chair gave the following response:

“The Covid-19 pandemic has had an unprecedented impact upon the delivery of council services.

The recruitment process and the need to re-design the service to meet the challenges posed by the pandemic have contributed to a slight delay in the commencement of a service.

The service commenced in a new form last weekend.”

6.27 Councillor Nemeth gave the following supplementary question:

“Was the issue with regard to planned reduced service or recruitment?”

6.28 The Assistant Director Culture, Tourism & Sport stated that there was a full recruitment process however during this period Brighton had engaged the lockdown period. It was stated that 40 lifeguards had now been successfully recruited.

(viii) West Brighton

6.29 Councillor Nemeth gave the following question:

“Given the recent strength of feeling that was expressed by the public when Hove was downgraded to simply being a western suburb of Brighton by the Council, will the Chair commit to pushing for funding for ‘Hove’ boundary signage as existed in the past?”

6.30 The Chair gave the following response:

“While it is of course important that the history of Hove is maintained, unfortunately, there is no specific funding available for the provision of new signing unless it is linked to a particular scheme or project. The maintenance of existing signing prioritises replacing safety signs as funds are limited at this current time.”

6.31 Councillor Nemeth gave the following supplementary question:

“Within the city plan part 2 there was an amendment for signage. Can BHCC please clarify this?”

- 6.32 The Head of Planning stated that there was a late amendment to a policy in the City Plan Part 2 which had agreed to submitting to a planning inspector. It was stated that this didn't require signage, a review could be considered should funding be made available.

(ix) Planning Rules Relaxation

- 6.33 Councillor Nemeth gave the following question:

"What plans does the Council have, if any, to examine which planning rules might be relaxed to stimulate the economy during/after the Covid crisis?"

- 6.34 The Chair gave the following response:

"Several temporary changes to planning rules have been introduced to help developers and businesses with recovery. These have been implemented locally and some of the measures are:

- To allow temporary extensions to construction hours in response to the government's request. We have provided clear guidance on the website to developers. This will allow us to consider and mitigate any impact on residential amenity that might arise from these requests.
- Temporary permitted development rights have been introduced to allow more flexibility to allow takeaways from restaurants, cafés and bars for a year until March 2021. In addition to this councils and health providers can establish temporary facilities to support the response to the coronavirus (Covid-19) outbreak.
- Relaxing controls which restrict the time and number of deliveries to shops and supermarkets. The government has requested that local planning authorities (LPAs) should not undertake enforcement action where such planning conditions have been breached
- The Government is also considering extending the life of planning consents in response to delays on building starts caused by the emergency.

An example of where we can assist locally is the Part payment policy for CIL. This is before TECC Committee today and will assist developers by spreading the costs of CIL across a longer period.

In terms of policy – we need to carefully consider the impact the pandemic has had for our town centres, housing delivery and employment floorspace before introducing long term planning policy changes. This needs to be carried nationally and locally. There will be an opportunity to consider these changes when we review City Plan Part One."

- 6.35 Councillor Nemeth gave the following supplementary question:

"Is CIL the only project being taken locally not imposed by Government?"

- 6.36 The Head of Planning stated that in terms of construction hours, a local approach had to be taken. BHCC supported an extension to the standard period of consent.

(x) Madeira Drive

- 6.37 Councillor Nemeth gave the following question:

“Will the Administration commit to the continuation of historic motoring events on Madeira Drive regardless of the street’s future with regard to car use?”

6.38 The Chair gave the following response:

“Each year the applications to hold all events on Madeira Drive are brought to this committee to provide landlord’s consent. This will continue irrespective of the use of Madeira Drive.

Madeira Drive has been shut in response to the current pandemic, to provide additional space in the city for walking and cycling. This closure is identified in the council’s Brighton and Hove City Council Urgent Response Transport Action Plan and policy framework as we prepare the city to come out of lockdown. The closure of Madeira Drive continues to be assessed and a decision will be made at the Environment Transport and sustainability committee on the 23rd June. This decision will include considering walking, cycling and the needs of local businesses.”

6.39 Councillor Nemeth gave the following supplementary question:

“Is there any unequivocal assurance that speed trials, minis and scooters will receive support from the administration?”

6.40 The Chair stated that this would need to be discussed with officers and colleagues.

(xi) Planning Enforcement

6.41 Councillor Nemeth gave the following question:

“Please provide up to date statistics for this service which show the effect of the Corona virus on new cases, overall case numbers and solved cases.”

6.42 The Chair gave the following response:

“Officers have prepared a table which sets out comparative performance on Enforcement Cases between March and May 2019 and 2020. This table will be emailed to you and will be supplied in the minutes of this meeting. It shows that there has been a reduction in the number of complaints received compared to last year - particularly in April. It also shows a more significant reduction in enforcement cases closed between the two periods – a fall of 25%.”

(xii) Waterhall

6.43 Councillor Nemeth gave the following question:

“How much has now been spent on mothballing Waterhall Golf Course since its closure by the Council at the end of March?”

6.44 The Chair gave the following response:

“As Waterhall Golf Course closed in the middle of the Covid-19 lockdown it has not been fully vacated or mothballed. To ensure the site is secure the council’s corporate security company make daily checks and the existing CCTV and security systems have been improved. To date approximately £9K has been spent.”

6.45 Councillor Nemeth gave the following supplementary question:

“Can Committee further clarify on the separation between clubhouse and land which is referred to in the introduction of the report?”

6.46 The Chair stated that assurances had been given and that now leaseholder had withdrawn from the situation, the report would be brought back to September Committee.

(xiii) Hove Lagoon Pump

6.47 Councillor Nemeth gave the following question:

“Will the Council publicly commit to putting in place a maintenance contract for the pump at Hove Lagoon, as per industry standards, to avoid unnecessary expense and closure as has now taken place at least twice at the Lagoon in the past two seasons?”

6.48 The Chair gave the following response:

“The council is in the process of arranging a maintenance contract.”

6.49 The Executive Director – Economy, Environment & Culture offered to find the timetable for procurement.

(xiv) Bee Bricks

6.50 Councillor Nemeth gave the following question:

“Given the inevitable difficulties that exist in checking that bee bricks have in fact been installed on new developments as per the wishes of this committee, will the Council commit to writing to those who have gained planning permission after the relevant date last year to ensure compliance?”

6.51 The Chair gave the following response:

“Bee brick conditions have been attached to the majority of householder and minor applications since 1 November 2019.

Applicants are required to comply with the bee brick condition, as they are all planning conditions attached to their consent. Conditions are worded in a way to make that clear to applicants and failure to comply is at their risk.

In terms of monitoring compliance - there would be real challenges with resourcing pro-active condition monitoring. It would require the diversion of resources away from processing planning applications and enforcement cases – which are currently the priority. In terms of future development, however, you can be assured that if a complaint is received it will be investigated.”

6.52 Councillor Nemeth gave the following supplementary question:

“Why isn’t a letter being sent out?”

6.53 The Head of Planning state that BHCC was unable to do this at the time as resources were being focused on planning applications and providing an enforcement service. The Head of Planning stated that they were unaware as to why the industry had not been made aware and that they were happy to write to raise awareness and promote this.

(c) Members Letters

(i) Valley Gardens Phase 3

6.54 The Committee considered a letter from Councillor Lee Wares with regard to the Valley Gardens Phase 3.

6.55 The Chair provided the following response:

“Thank you for writing to me on 19 May as Chair of the Tourism, Equalities, Communities and Culture Committee regarding your concerns about Phase 3 of the Valley Gardens scheme and the city’s tourism and wider economy. I do apologise for the delay in responding to you and that you did not receive an acknowledgement of receipt of your letter.

As the city as a whole is striving to manage the consequences of this unprecedented pandemic and its effects on people’s lives and businesses, I can fully understand and sympathise with the concerns of those who are working within our highly valued and successful visitor economy. The resilience and future sustainability of the city is therefore at the heart of our recovery programme, and part of that work will be to ensure that the tourism sector will recover and then continue to flourish. I have every confidence that it will, and I will do what I can in my role to help achieve that by working with elected colleagues and officers across the council, and with those stakeholders who are affected within the city.

I am aware that there have been discussions and questions raised during the development of the Valley Gardens Phase 3 design, and that these have been heard and considered at a number of committee and council meetings over a number of months. You will be aware that Councillor Pissaridou and the other members of the Environment, Transport & Sustainability Committee have listened and responded to these concerns and views, in addition to those expressed during the public consultation, when making decisions about this part of the scheme. Stakeholders, such as the Valley Gardens Forum and Tourism Alliance, and bus and taxi operators and sustainable transport user groups, have been engaged in the process and will continue to be involved in developing the design, which I welcome.

Phase 3 is the final stage of what will be a complete and fantastic transformation of Valley Gardens which will help to regenerate it all the way from London Road and St Peter’s Church to the Palace Pier and wider seafront, and those areas adjacent to it like the North Laine and St James’s Street will also benefit from this. I am confident that the

combination of the accessible and refreshed, landscaped gardens; increased areas of public space; and the sustainable transport infrastructure that has secured investment from the Local Enterprise Partnership and the council's Government-funded Local Transport Plan capital programme will draw in more people and over time will become much enjoyed, remembered, and revisited by visitors as well as the local community.

Councillor Pissaridou's recent letter (6 May) set out the positive future that Valley Gardens can bring for the city, despite these difficult times. The Government's current focus during the transition from lockdown is on delivering greater changes that give people more space and enable the use of active travel. This is entirely consistent with the objectives of this scheme, which has been developed and designed over a number of years and is therefore a leading example of what can be achieved. Once we have got beyond this immediate period of difficulty and uncertainty for our residents and businesses, I believe that this scheme will stand the test of time and be at the heart of the city's future for many years to come. It is about creating more accessible public space for everyone and will provide a vastly improved setting for our heritage and tourism assets. The city's economy will therefore benefit as will its residents, because we can build even further on the current desire that local people are showing to use sustainable transport to get around for work as the city gradually begins to open back up, as well as for leisure and exercise. This scheme will help the city prepare for the future as we move forward and recover from the impacts of the pandemic and continue our journey towards carbon-neutrality by 2030. Therefore, I think it should continue to be progressed based on the decisions that the council has already made.

We want everybody to participate in the city's future and to consider how they can contribute towards it – businesses, local communities and visitors – because a sustainable economy and a stable climate are not mutually exclusive. In my role as Chair of the TECC Committee, I will happily engage with, listen to and work with those with an interest or stake in the local economy, particularly the tourism sector which is so important to our city and the local community, in order that we can make informed and balanced decisions that will ensure that the city's recovery is completed as quickly and effectively as possible."

(d) Notice of Motion

(i) Support for the City's Creative and Cultural Sector

- 6.56 The Committee considered a Notice of Motion from Councillor Rainey and Councillor Ebel which sought to provide support for the City's creative and cultural sector by requesting a report be brought to future TECC committee.
- 6.57 Introducing the motion Councillor Rainey noted the plight of the cultural and artistic sector. It was stated that the creative industries generated 1.55 billion pounds in turnover in 2018 and that this had increased by 20% since 2014. It was noted that there had been little financial security as sole traders and small companies needed greater publicity and support.
- 6.58 Councillor Ebel formally seconded the motion.

6.59 Councillor O’Quinn remarked that the City’s cultural and creative sector had been devastated by the Corona virus emergency and that culture was a lifeblood to a vibrant society. It was stated that culture helped to build social capital and fostered social inclusion, community, pride and tolerance.

6.60 Councillor Nemeth agreed and expressed support for this notice of motion.

6.61 **Resolved** – that a report be brought to a future committee.

(ii) Charity Sector and Support for Volunteering

6.62 The Committee considered a Notice of Motion from Councillor Powell and Councillor Ebel which requested a report to a future committee regarding the charity sector and with a view to providing support for volunteering.

6.63 Introducing the motion Councillor Powell stated that Covid had a detrimental impact on the charity sector and requested BHCC to consider how to ensure further partnerships in working with the voluntary sector.

6.64 Councillor Ebel formally seconded the notice of motion.

6.65 Councillor Simson expressed support for this notice of motion.

6.66 Jo Martindale, stated pride in this sector. It was stated that a large amount of organisations were making attempts to meet the challenge of operating during such a challenging time such as migrating to an online office.

6.67 The Chair stated the following:

“Our voluntary and community sector is hugely valuable in this city.

Volunteers stepped up rapidly to respond to the COVID crisis, informally via street and mutual aid groups, and more formally by volunteering through community works and the food partnership.

This should of course be recognised, and I fully support the proposal to explore how we can reward and recognise the role of our volunteers.

Sadly, the sector will have suffered from the impact of the COVID crisis, and, as I have already outlined in my response to Cllr Powell’s written question, we do not yet know what that impact will be, until we have begun to come out of the crisis and counted the cost.

What we do know is that the impact of lockdown, social distancing measures, and medium to longer term demand for services are not yet known, and that many charity trustees, chief officers and staff were determined to continue to operate a service for their clients even if the funding looks precarious.

I have spoken with some of the sector representatives, who have signalled a likely increase in demand post lockdown, particularly relating to mental health support, domestic abuse support and financial advice services.

The council, in its role as civic leader, needs to ensure that support, training and guidance is in place to avoid disastrous outcomes, however, we are likely to see job losses across the local voluntary and community sector.

A report to this committee setting out the challenges to the sector, as well as some possible solutions, is welcome.

I will therefore be voting in support of this motion.”

6.68 **RESOLVED** – that a report be brought to future TECC Committee.

7 ANTI-SOCIAL BEHAVIOUR HOVE SEAFRONT

7.1 The Committee considered a report of the Interim Director Housing Neighbourhoods and Communities which sought to provide an outline of the specific issue of anti-social behaviour on Hove Seafront. The report was provided by the Head of Safer Communities.

7.2 On behalf of the Conservative Party, Councillor Nemeth moved a motion to add recommendations 2.2 to 2.8 as shown in bold italics below:

2.2 Praises the efforts of the Seafront Office in dealing with anti-social behaviour on Hove seafront.

2.3 Requests that the Chief Executive of Brighton & Hove City Council writes to the Divisional Commander of Sussex Police to ask for assistance i) in dealing with the more serious breaches of by-laws by means of scheduled crackdowns and ii) in developing a joint strategy to make better use of CCTV resources on and around the seafront.

2.4 Calls on officers to draw up plans to regularise signage on Hove seafront to make existing rules clearer.

2.5 Calls on officers to prioritise the clean-up of various seafront graffiti hotspots such as the King Alfred and Hove Lagoon.

2.6 Gives officers backing to spend from existing budgets a sum of up to £500 for packets of graffiti wipes that would be made available free of charge from the Seafront Office to anybody wishing to clean up graffiti on the seafront.

2.7 Calls on officers to discuss the ongoing overflowing bin situation with appropriate colleagues.

2.8 Calls on officers to circulate other ideas to further bolster ongoing efforts.

7.3 Councillor Simson formally seconded the amendment.

- 7.4 Nick May, Sussex Police, confirmed a large number of reports of anti-social behaviour on the seafront and agreed with Councillor Nemeth. It was stated that the congregation of young adults in the area was inevitable and that overall levels of crime levels had increased although were not higher than what would be expected at this time. It was noted that there was an emerging issue with regard to the status of Regency Square. A brief overview was provided of the levels of engagement by police officers across Brighton and Hove. It was stated that overall the approach was based around the threat of harm and risk.
- 7.5 Councillor MacCafferty noted that an intimidating atmosphere had grown within the vicinity of the seafront. More field officers on seafront was welcomed. It was stated that amendment 2.3 could not be agreed to due to the rhetoric.
- 7.6 Councillor O'Quinn noted Councillor MacCafferty's concerns regarding the rise of anti-social behaviour and further noted a rise in petty crime.
- 7.7 The Chair noted the main objection to 2.3 was due to the language.
- 7.8 Councillor Simson expressed concern regarding the amount of vandalism that had taken place during the lockdown. Support from Councillor MacCafferty was welcomed.
- 7.9 Councillor Nemeth addressed concerns regarding the wording of amendment 2.3 and confirmed that he would be happy to amend this item following consensus.
- 7.10 Committee agreed an amendment to the wording of amendment 2.3 as below in bold italics:

2.3 ***Requests that the Chief Executive of Brighton & Hove City Council writes to the Divisional Commander of Sussex Police to ask for assistance i) in dealing with the more serious breaches of by-laws ii) in developing a joint strategy to make better use of CCTV resources on and around the seafront.***

7.11 **RESOLVED** – That the Committee

1. Noted the contents of the report.
2. Praised the efforts of the Seafront Office in dealing with anti-social behaviour on Hove Seafront.
3. Requested that the Chief Executive of Brighton & Hove City Council writes to the Divisional Commander of Sussex Police to ask for assistance i) in dealing with the more serious breaches of by-laws and ii) in developing a joint strategy to make better use of CCTV resources on and around the seafront.
4. Called on officers to draw up plans to regularise signage on Hove seafront to make existing rules clearer.
5. Called on officers to prioritise the clean-up of various seafront graffiti hotspots such as the King Alfred and Hove Lagoon.
6. Gave officers backing to spend from existing budgets a sum of up to £500 for packets of graffiti wipes that would be made available free of charge from the Seafront Office to anybody wishing to clean up graffiti on the seafront.

7. Called on officers to discuss the ongoing overflowing bin situation with appropriate colleagues.
8. Called on officers to circulate other ideas to further bolster ongoing efforts.

8 PRIDE 2022-2026 INCLUSIVE

- 8.1 The Committee considered a report of the Interim Executive Director Housing, Neighbourhood which sought to provide an update on the status of Pride 2022-2026. The report was provided by the Head of Safer Communities.
- 8.2 The Assistant Director Culture Tourism & Sport stated that Pride was the city's largest annual outdoor festival and pride had 3 financially successful years, it was noted that a cost sharing agreement would be entered in to with Pride CIC.
- 8.3 Councillor Powell presented an amendment on behalf of the Green Party as shown below in bold italics and strokethrough:
 - 2.1 That the Committee gives consent to the Brighton Pride Community Interest Company to stage the Pride Parade through the city and a fenced and ticketed Pride Festival in Preston Park and Pride Village Party in the St James' Street area for the years 2021 – 2026 and grants delegated authority to the Executive Director Economy, Environment & Culture to agree the terms of the annual licences ***save that if it is proposed that there is a material change to the terms (other than those relating to cost sharing which are dealt with at 2.2) compared to previous years, the lead members of this committee shall be consulted.***
 - ~~2.2 That the Committee grants delegated authority to the Executive Director Economy, Environment & Culture to reach agreement with BPCIC regarding cost sharing over a four year period 2021-2024 with the aim that full cost sharing, as set out in the report, is reached by 2024.~~
 - 2.2 ***That the Committee recognises that given that Pride 2020 has been cancelled due to the Covid-19 pandemic, that current projection models for Pride at the time of writing may well be unreliable. Therefore the Committee agrees: - to delay the decision to reach an agreement for cost sharing until after Pride 2021 has taken place, when both Pride CIC and the council will have a clearer and more realistic financial position, from which to review and decide on the matter going forward. - that this matter is also brought back to TECC in September 2021, for councillors to review.***
- 8.4 Councillor MacCafferty formally seconded the amendment.
- 8.5 Councillor Simson noted the Pride should only pay some of the cost as it benefitted the city largely. Further clarification was sought regarding 3.10 as to whether if this was in reference to other funding raised or commercial. Further request was sought for the costings at the Old Steine. Finally a further enquiry was made as to the figure of recovery and whether this was broken down annually.
- 8.6 The Assistant Director Culture Tourism & Sport stated that all current events paid for parking bay suspensions and if any event used parking bays in the city, generally BHCC covered the cost.

- 8.7 The Head of Safer Communities stated that with regard to Licensing, this was in relation to the number of people in Preston Park for Pride. It was further stated that charities rates were for national charities, further information in writing was offered to Councillor Simson.
- 8.8 Councillor Simson enquired if Pride was classed as a community or charity.
- 8.9 The Assistant Director Culture Tourism & Sport confirmed that pride was classed as a community.
- 8.10 A vote was taken on the Amendment which passed.
- 8.11 **RESOLVED** – that Committee:
1. Gave consent to the Brighton Pride Community Interest Company to stage the Pride Parade through the City and a fenced and ticketed Pride Festival in Preston Park and Pride Village Party in the St James' Street area for the years 2021 – 2026 and granted delegated authority to the Executive Director Economy, Environment & Culture to agree the terms of the annual licences save that if it is proposed that there is a material change to the terms (other than those relating to cost sharing which were dealt with at 2.2) compared to previous years, the lead members of the committee shall be consulted.
 2. Recognised that given that Pride 2020 has been cancelled due to the Covid-19 pandemic, that current projection models for Pride at the time of writing may well be unreliable. Therefore the Committee agreed:
 - To delay the decision to reach an agreement for cost sharing until after Pride 2021 has taken place, when both Pride CIC and the council will have a clearer and more realistic financial position, from which to review and decide on the matter going forward.
 - That the matter also be brought back to TECC in September 2021, for Councillors to review.

9 SALTDEAN LIDO RESTORATION

9.1 **RESOLVED:** That Committee

1. Recommended to Policy & Resources Committee that it agreed to grant a 63-year lease of Saltdean Lido to SLCIC.
2. Recommended to Policy & Resources Committee that it agreed to accept a revised schedule of loan repayments for the outstanding loan of £0.220m and granted delegated authority to the Executive Director Economy, Environment & Culture and the Acting Chief Finance Officer to agree the revised schedule.
3. Recommended to Policy & Resources Committee that it grant delegated authority to the Executive Director Economy, Environment & Culture and the Acting Chief Finance Officer to take all necessary steps to implement the recommendations above.

4. Recommended to Policy & Resources Committee that it grant delegated authority to the Executive Director Economy, Environment & Culture to approve the scheme proposed by SLCIC within the parameters outlined in 3.6.

10 QUEEN'S PARK CONSERVATION AREA PROPOSED ARTICLE 4 DIRECTION

- 10.1 The Committee considered a report of the Executive Director, Economy, Environment & Culture which sought approval to make a non-immediate Article 4 direction for the Queens Park conservation area together with the required statutory consultation and to further provide a summary of the response to the informal public consultation. The report was presented by the Planning Team Leader.
- 10.2 The Planning Team Leader stated that the report would come in to effect in 12 months' time and that it must first be subjected to further consultation with residents.
- 10.3 Councillor Rainey referred to concerns made by residents in appendix 1 and enquired if alterations would take into account BHCC commitment to achieve 0 carbon emissions.
- 10.4 Planning Team Leader stated that results following consultation was split on windows and low level support for solar panels. It was stated that if people wanted to replace their timber sash windows, this could be done with anything.
- 10.5 Councillor Rainey enquired how article 4 direction could be secured.
- 10.6 The Planning Team Leader stated that in many cases what was meant was that people would repair like for like rather than alteration that would mean attaining planning applications. It was noted that this only applied to the front of buildings, it was clarified that any works were viable at the rear of the household.
- 10.7 **RESOLVED:** That Committee:
 1. Authorised the making of a non-immediate Article 4 Direction to the Queen's Park conservation area to remove the permitted development rights listed in Appendix 2, to come into effect in twelve (12) months from this date, subject to statutory consultation.
 2. Noted the representation (listed in Appendix 1) made during the informal consultation period.

11 REVISED DEVELOPER CONTRIBUTIONS TECHNICAL GUIDANCE

- 11.1 **RESOLVED:** That Committee
 1. Approved the revised Developer Contributions Technical Guidance attached as Appendix 1, subject to any minor alterations (grammatical and spelling) to be agreed by the Head of Planning in consultation of the Chair of TECC Committee.
 2. Approved the proposed Community Infrastructure Levy Instalment Payment Policy, attached as Appendix 2.
 3. Agreed the amendment of the planning application local validation criteria to require a completed CIL Additional Information Form 1 as part of the validation process from 6th July 2020 for all applications for full planning permission, including householder

applications for reserved matters following an outline planning permission, and for applications for lawful development certificates.

4. Agreed the validation requirement set out in paragraph 2.3 would lapse if Full Council did not, on 23rd July 2020, approve the commencement of CIL.

12 ITEMS REFERRED FOR FULL COUNCIL

- 12.1 No items were referred to Full Council.

The meeting concluded

Signed

Chair

Dated this

day of

AGENDA ITEM 19(b)

BRIGHTON & HOVE CITY COUNCIL

TOURISM, EQUALITIES, COMMUNITIES & CULTURE COMMITTEE

4.00pm 29 JULY 2020

VIRTUAL MEETING - SKYPE

MINUTES

Present: Councillor Ebel (Joint Chair), Powell (Joint Chair), Rainey (Deputy Chair), Appich (Opposition Spokesperson), Nemeth (Group Spokesperson), Evans, Phillips, O'Quinn and Simson

Other Members present: Lola BanJoko, Nick May and Anusree Biswas-Sasidharan.

PART ONE

13 PROCEDURAL BUSINESS

13(a) Declarations of substitutes

13.1 Councillor Alex Phillips for Councillor Phelim MacCafferty.

13(b) Declarations of interest

13.2 Councillor Stephanie Powell declared her ongoing employment with Sussex Police and he partner's employment as a consultant working with various local charities.

13(c) Exclusion of press and public

13.3 In accordance with Section 100A of the Local Government Act 1972 ("the Act"), the Planning Committee considered whether the public should be excluded from the meeting during consideration of any item of business on the grounds that it is likely in view of the business to be transacted or the nature of the proceedings, that if members of the public were present during it, there would be disclosure

14 CHAIRS COMMUNICATIONS

14.1 The Chair gave the following communications:

"A week is a long time in politics, so they say, and so here we are under a new Green administration.

Firstly, we would like to thank Cllr Carmen APPICH for all of her work on the Committee so far. We are very much looking forward to a continued constructive collaboration and dialogue with her in her new role as the Opposition Spokesperson of the Committee.

Secondly, we are under no illusion that this is a very difficult time in local government: the pandemic, 10 years of austerity (and counting), and the unresolved issue of Brexit continue to hammer council finances.

Our priority now must be to help the city recover as safely as possible in every area – from tourism, to events, to hospitality, to the charity sector, and we need everyone on board to help us to achieve this.

We would like to thank each and every one of you here today - and your teams for your continued hard work and dedication during these exceptionally challenging past few months. You have all managed to continue many of the council services, other public sector services, and the charity and voluntary services running during this hugely challenging time, in a situation not seen before in our lifetime. Thank you for what you have done and are continuing to do.

The city of course, has sadly missed out on so many important events due to the pandemic, not least Pride, which would have taken place this weekend. It is important to note that 2020 marks 50 years since the founding of the Gay Liberation Front, and with recent news of “anti-LGBT+ zones” being created in Poland, it is a timely reminder that LGBT+ equality, which has been so hard fought for, must never be taken for granted. We will still be able to celebrate Pride online with FABULOSO, so that we can still fully support and celebrate our fantastic LGBT+ communities, so Happy Pride everyone!

So, as new Joint Chairs we wanted to give you some explanation as to how the Joint Chair will work, as this is the first time of doing this. It is a new way of working, which we as the incoming administration are doing on several committees. We are doing this so that:

large portfolios can be shared to enable those councillors who are working and/or who have caring responsibilities to be able to also carry-out more senior roles on the council.

b) we also felt that two brains was rather better than one in these challenging times.

So, we felt that it was important to divide-up the portfolio of the Tourism, Equalities, Communities and Culture Committee, and so we have the following broad headings in order to give you a first point of contact:

Cllr Marianna EBEL will be your first point of contact for the following areas:

Tourism & Marketing
Culture, Arts and Heritage
Events
Leisure, Sports & Recreation
Conservation and Design
Building Control
Museums

Planning

I will be your first point of contact for the following areas:

Equalities

Community and Voluntary Sector

Libraries

Neighbourhood and Community Development

Community Wealth Building

Community Safety

Crime and Disorder Committee

Prevent Duty

Additionally, we have Cllr Clare RAINEY as our Deputy Chair, whose invaluable experience and work that she has done so far with regards to the arts sector and libraries will continue.

We are keen to catch-up with all relevant officers and city contacts as soon as possible. We would ask groups and individuals to get in touch with us or officers, so that we can start arranging those meetings.

So, Cllr Marianna EBEL and I haven't been in the Joint Chair role a week yet, but already we have hit the ground running. Cllr EBEL and is attending the meeting with BLM and BHBuses later this week. I attended, along with the Mayor and Cllr APPICH, the exciting re-opening of the Royal Pavilion on Monday. Yesterday I attended the Racial Harassment Forum and listened to their requests and concerns. We reaffirmed at this meeting our commitment as the Green Group, along with our Labour colleagues, to committing to working with them and others, to improve the lives of our BAME community by starting with our own council, which brings me to our one agenda item today: Becoming An Anti-Racist Council.

Now, today's meeting is somewhat topsy-turvy, as we should have had the petition from Mo KANJILAL on this subject, and the GG NoM at last week's Full Council, but other events rather changed the proceedings, so this is to reaffirm that that petition and the NoM will be heard at a future Full Council.

I would like to stress that this agenda item today is not a moment in time. This is about looking at deconstructing old systems and structures, and creating better ways of working, in order to create a fairer and equal society with the focus on anti-racism. It is an ongoing piece of work that must come back to this committee again and again. Today's agenda item is a continuation of a journey that is progressing all too slowly. We need every co-optee, and every voice to get involved and to contribute to making this societal shift, so that Brighton & Hove can be both a City of Sanctuary and an Anti-Racist Council."

15 PUBLIC INVOLVEMENT

15 (a) Written Questions

15.1 There were none.

15 (b) Deputations

15.2 There were none.

16 ANTI-RACISM STRATEGY

16.1 The Committee considered a report of the Interim Director of Housing, Neighbourhoods, Communities which sought to set out the immediate actions the council were taking to with respect to becoming an 'anti-racist' council. It also sought to outline the effort in increasing equality by informing how BHCC would plan, finance, deliver, commission and review services. The report was provided by the Head of communities and equality.

16.2 The Head of Communities and Equality stated the importance of moving fast with the implementation of the strategy and that asking people to detail racist experiences would further compound harm as a result no consultation was needed. It was noted that other groups in the city would be included. It was clarified that a progress report would be brought next year.

16.3 Councillor Simson referred to the new resource area on the website and enquired if this had already occurred and if so when.

16.4 The Head of Communities and Equality stated that the website had not yet been made live as resources on the website had not yet been made ready.

16.5 Councillor Appich enquired the new administration would be moving forward with BHCC's new responsibilities.

16.6 The Head of Communities and Equality referred to BHCC's 13 activities and stated that Councillors would be involved in different activities in different ways. It was stated that this was about changing BHCC at a foundational level.

16.7 The Chair stated that intersectionality would be a key feature of the strategy.

16.8 Councillor Phillips stated 7 different areas to direct progress:

- Importance was stressed on decolonising the curriculum and that Black, Asian and Minority Ethnic role models should be brought to light.
- It was noted that there was a question brought at Full Council regarding the exclusion of ethnicities.
- Reference was made to intersectionality, it was stated that more people would be invited to take part in the governing process.
- It was stated that rules on political representation would be looked at.
- Reference was made to hate crimes and that it would be good to track statistics from police. It was stated that

16.9 The Head of Communities and Equality responded with the following:

- Stated that the 'upstanding' programme would be set up to create a city Community network to train people on how to act when witnessing 'hate'.

- The Head of Communities and Equality referred to the engagement plan and stated that this could be brought back to a later meeting. It was stated that White British officers should not be engaging in the process as it could be seen as taking over the voice of Black, Asian & Minority Ethnic involvement.
- It was stated that colleagues in Family, Children and Learning would be looking at anti-racism measures to be implemented in schools.
- It was stated that CAG would be looking at how to implement intersectionality out to all.
- It was stated that, as per the fair an inclusion action plan, workforce changes would be forthcoming and that HR would be involved in this.

- 16.10 Councillor Rainey referred to item 3.5 and stated that efforts would be underway to look at institutional racism within the justice system. It was stated that there were issues with Black, Asian and Minority Ethnic people being disproportionately affected by a Stop and Search policy.
- 16.11 The Interim Director for Housing, Neighbourhoods & Communities clarified that part of the strategy was to work in partnership with statutory agencies in the City, It was stated that BHCC would work with many partners. Reference was made to Councillor Alex Phillips comments and it was stated that BHCC's approach would be first and foremost led by the entire community. It was noted that the entire community would decide what was to be prioritised for the City.
- 16.12 Councillor O'Quinn further clarification as to the Stop and Search figures that were alluded.
- 16.13 Councillor Rainey clarified that the figures stated were for Sussex.
- 16.14 Councillor O'Quinn stated that colonial action was taught in great length within the curriculum. It was noted that she had previously taught at the schools noted in the report.
- 16.15 The Head of Communities and Equality clarified that decolonisation implied looking at the way that history was taught. It was stated that it would be an effort to redress the perception of and the representation of Black people in British history.
- 16.16 Councillor O'Quinn stated that the report was worded poorly and noted that good history teachers already did this.
- 16.17 Councillor Evans referred to 3.52 and enquired how work had been started. Reference was made to the Health and Overview Scrutiny Committee (HOSC) and if it would be possible to explore how HOSC could advance anti-racism action.
- 16.18 The Head of Communities and Equality stated that they were happy to explore how HOSC could be involved.
- 16.19 Anusree Biswas, Co-optee, requested possible KPIs and performance targets. Clarification was sought with regard to funding and resources. It was stated that older Black, Asian and Minority Ethnic groups and intersectional groups should be included. It

was stated that racism required action and that it required powerful white people to realise their grip on power.

- 16.20 The Head of Communities and Equality stated that there was an internal group meeting being held weekly and that issues such as structural discrimination was being discussed. It was noted that various KPIs and performance targets were established and that lots of correspondence from individuals in the city had been received. It was clarified that all residents in the City would be engaged to ultimately decide the priorities of the City. It was noted that a conversation had to be held with White British people and to note how they would participate in this. It was clarified that a budget was being worked on at the moment and that a dedicated officer would be established to focus on workforce change. It was stated that someone with lived experience of the City would be appointed and that they would be supported by Democratic Services.
- 16.21 Anusree Biswas agreed that White British people needed to be included in conversations. It was stated that the representative appointed needed to understand the nuance of policy with respect to racism experienced in the city, it was stated that it was not enough to be black.
- 16.22 The Head of Communities and Equality stated that focus would be placed on action to be taken earlier in the process.
- 16.23 Anusree Biswas sought clarification with regard to the local outbreak plan and expressed concern that there would be another wave of Covid 19 and that this would affect the most vulnerable including Black, Asian and Minority ethnic people and the homeless.
- 16.24 The Head of Communities and Equality stated that efforts were being undertaken to focus on this issue such as the provision of cultural appropriate food.
- 16.25 Lola BanJoko, co-optee, noted that BHCC had been in close communication with many groups across Brighton and Hove. It was stated that a Talent Management Program was being set up. Reference was made to risk assessments and that areas such as schools would be looking at how to implement this will being mindful of risks being carried out. It was noted that there was a higher number of deaths among pregnant Black, Asian and Minority ethnic women.
- 16.26 Councillor Ebel stressed the importance of a commitment to equality of opportunity for all and that racism must be confronted. It was stated that white people must acknowledge their privilege and educate themselves to improve the lives of all in the city. It was stated that intersectionality was important and that racism against a person was worse if they were also either female or gay. It was confirmed that the anti-racist strategy would have a strong focus on this.
- 16.27 Councillor Grimshaw referred to the process of decolonising history education and noted the example of what was taught regarding the history of the Pavilion and the treatment of Indian people. It was stated that what was not focused on was how white people were not as positive as what was historically taught. It was noted that history should be truthful and ought not gloss over various events that also occurred.

16.28 Councillor Simson stated that the Black, Asian and Minority ethnic community was not a community rather that it was a large block of people with lots of different communities within. It was further stated that this work should not be rushed.

16.29 **RESOLVED:**

- (1) That the actions committed to in the report towards becoming an anti-racist council and the authority's plan for being led by Black, Asian and Minority ethnic (BAME) residents and communities in the development of its anti-racism strategy be noted;
- (2) That officers be instructed to provide a progress report in November 2020 on the council's activity to becoming an anti-racist council; and
- (3) That it be noted that the draft anti-racism strategy would be brought to committee for approval in Spring 2021 at the latest.

17 ITEMS REFERRED FOR FULL COUNCIL

17.1 No items were referred to the next council meeting.

The meeting concluded at

Signed

Chair

Dated this

day of

Subject:	Petitions		
Date of Meeting:	24 September 2020		
Report of:	Executive Lead Officer for Strategy, Governance & Law		
Contact Officer:	Name:	Mark Wall	Tel: 01273 291006
	E-mail:	mark.wall@brighton-hove.gov.uk	
Wards Affected:	All		

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

- 1.1 To receive any petitions received directly by Democratic Services in accordance with the required time-frame or referred from the special Council meeting held on the 13 August 2020.

2. RECOMMENDATIONS:

- 2.2 That the Committee responds to the petition either by noting it or writing to the petition organiser setting out the Council's views, or where it is considered more appropriate, calls for an officer report on the matter which may give consideration to a range of options, including the following:

- taking the action requested in the petition
- considering the petition at a council meeting
- holding an inquiry into the matter
- undertaking research into the matter
- holding a public meeting
- holding a consultation
- holding a meeting with petitioners
- calling a referendum

3. PETITIONS

Add a sign to the Queen Victoria Statue in Hove, explaining the Impact of the Empire

Lead Petitioner – Tim Telford

- 3.1 To receive the following petition referred from the special meeting of the full Council and signed by 364 people:

The statue of Queen Victoria in Hove proudly declares her the Ind Imperatrix (Empress of India). This is a title given to her because of the British colonisation of India. It is estimated that the colonisation led to the death of 35 million Indian people although it is known more people

lost their life to famine in this time which may have been directly due to British mismanagement.

Proudly declaring Queen Victoria, the Empress of India implies a glory to the Empire which is unfounded. We ask that a sign is placed near the statue that gives a brief account of the impact of colonisation, including the estimated number of deaths. This sign will help to educate people about Britain's more difficult history with the rest of the world.

This will not right any wrongs done. But it will show that we, in Brighton and Hove, refuse to stand by the glorious image of empire presented in the Victorian propaganda this statue represents.

<https://www.google.co.uk/amp/s/www.independent.co.uk/news/world/asia/india-35-million-deaths-britain-shashi-tharoor-british-empire-a7627041.html%3famp>

Subject:	Prioritise & Support Community Led Affordable Housing over Private Developers in the City - Items referred from the Special Council meeting held on the 13 August 2020		
Date of Meeting:	24 September 2020		
Report of:	Executive Lead Officer for Strategy, Governance & Law		
Contact Officer:	Name:	Mark Wall	Tel: 01273 291006
	E-mail:	mark.wall@brighton-hove.gov.uk	
Wards Affected:	All		

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

- 1.1 To receive the following petition for consideration which was debated at and referred from the Special Council meeting held on the 13 August 2020.

2. RECOMMENDATIONS:

- (1) That the petition is noted;
- (2) That the Council recognise and welcome the role of community-led housing projects in creating neighbourhoods while at the same time addressing the city's housing shortage in a manner that focuses on the quality of the build, affordability, social value, sustainability, conservation and enhancement of the natural environment; and
- (3) That the Council continue to explore borrowing from the PWLB and on-lending to community-led housing projects as a matter of urgency as a way of supporting such community-led efforts.

3. CONTEXT / BACKGROUND INFORMATION

- 3.1 The petition is detailed below:

PRIORITISE & SUPPORT COMMUNITY LED AFFORDABLE HOUSING OVER PRIVATE DEVELOPERS IN THE CITY

- 3.1.1 We the undersigned petition Brighton & Hove Council to prioritise community led housing over profit-led private developers when making council and brownfield land identified in the City Plan available for new homes in the city. We also call on them to explore how to make land financially viable for community self-build so that the homes created on it can be truly affordable for local people for ever.

Lead Petitioner – Andrea Jones

Additional Information:

3.1.2 Brighton is in the middle of a deepening housing crisis. The city has the second largest rough-sleeping population in the country, one of the highest housing waiting lists and the second highest house prices in the UK. There are also thousands of families and key workers trapped in unsustainable housing situations because of the disastrous disconnect between average wages and average house prices alongside paying astronomical rents or being stuck with mortgages they can never pay off.

Unlike private developments evidence from across the country shows that community-led housing:

- 1) Creates truly affordable housing that STAYS AFFORDABLE
- 2) Reduces the need for social care in older people by creating SUPPORTIVE COMMUNITIES
- 3) Are built to the HIGHEST ECOLOGICAL AND ENVIRONMENTAL standards
- 4) REDUCE POLLUTION and congestion
- 5) Create truly COLLABORATIVE COMMUNITIES with beneficial infrastructure for neighbouring communities and provide a BOOST TO THEIR LOCAL ECONOMIES.

We recognise that land is at a premium in our small city as well as the huge challenges that local authorities face in delivering services to greater numbers of people with ever reducing budgets. However, we would argue that selling land to the highest bidder (generally private developers and corporations) is a false economy and does little to address the housing crisis. Private developers often prioritise profit over the needs of local communities, don't build to the highest environmental standards and rarely deliver on their affordable housing targets. Large developments where the majority of the homes are for sale at full market value feed high house prices and drive out young people, families and key workers who can no longer afford to live in their home city.

With a thriving community led housing sector in Brighton, national grants available, and a public mood which wants to see fast action on housing and the environment; there has never been a better time for the city council to take a bold and powerful step to show its commitment to community led housing and have this innovation shared across the country and celebrated by its residents.

We acknowledge the good work already done by the council to support Community Led Housing but passionately believe that one of the most significant solutions to our city's housing crisis is supporting and resourcing local people to build their own homes and communities. If spare land is always sold to the highest bidder at the highest price, we are selling out the people of our wonderful city to private business and their profit margins.

Further reading and research:

Benefits of cohousing Report September 2019, Bridport group/project, Dorset
<http://www.lse.ac.uk/geography-and-environment/research/lse-london/documents/Reports/Bridport-cohousing-report.pdf>

Labour case for community led housing: http://labour.org.uk/wp-content/uploads/2019/06/12081_19-Land-for-the-Many.pdf

High environmental standards etc: <http://www.grcc.org.uk/affordable-housing/community-led-housing-benefits>

Who benefits from CLH? <http://clhtoolkit.org/housing/who-benefits-community-led-housing-schemes>

Evidence on benefits from Wikipedia including links to research:

https://en.wikipedia.org/wiki/Community-led_housing

2017 speech from then housing minister Housing Minister Alok Sharma's to the Community-Led Housing Conference <https://www.gov.uk/government/speeches/community-led-housing>

The economic case for CLH against selling land to private developers:

<https://neweconomics.org/2018/05/making-the-case/>

<https://neweconomics.org/2018/05/making-the-case-5>

Benefits research:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=10&ved=2ahUKEwjEue3akZnjAhUyt3EKHXNXDfsQFjAJegQIBxAC&url=https%3A%2F%2Flocality.org.uk%2Fwp-content%2Fuploads%2F2018%2F03%2FLocality_Small-Scale-Community-led-Housing.pdf&usq=AOvVaw3l4Oe8onnFgVxv699GwilK

Building and Social Housing Foundation now World Habitat – source

- 3.2 An extract from the minutes of the special council meeting held on the 13 August 2020 is detailed below setting out the petition and recommendations for the committee to consider:

SPECIAL COUNCIL

4.30pm 13 AUGUST 2020

VIRTUAL MEETING - SKYPE

MINUTES

Present: Councillors Robins (Chair), Mears (Deputy Chair), Allcock, Appich, Atkinson, Bagaeen, Barnett, Brennan, Childs, Clare, Deane, Druitt, Evans, Fishleigh, Fowler, Gibson, Hamilton, Heley, Hill, Hills, Hugh-Jones, Janio, Knight, Lewry, Littman, Lloyd, Mac Cafferty, McNair, Miller, Moonan, Nemeth, Nield, O'Quinn, Osborne, Peltzer Dunn, Phillips, Pissaridou, Platts, Powell, Shanks, C Theobald, Wares, West, Wilkinson and Williams

PART ONE

32 PETITIONS FOR DEBATE.

(1) PRIORITISE & SUPPORT COMMUNITY LED AFFORDABLE HOUSING OVER PRIVATE DEVELOPERS IN THE CITY

- 32.1 The Mayor stated that where a petition secured 1,250 or more signatures it could be debated at the council meeting. He had been made aware of six such petitions and would take each in turn, although those relating to Madeira Drive and Old Shoreham Road would be taken in one debate as there were petitions in favour and against the proposals.
- 32.2 He noted that there were amendments to the cover reports' recommendations for the first petition, the second and third petitions which would be taken as part of the debate on the matter in question.

- 32.3 The Mayor then invited Ms. Corina Edwards-Colledge to present the petition concerning the prioritisation of affordable housing in the city.
- 32.4 Ms. Edwards-Colledge thanked the Mayor and stated that the petition which had been signed by 1,351 people called on the Council to recognise the need to prioritise community-led housing over private developments. She stated that a thriving community-led housing sector would address many of the issues faced by people who wanted to secure an affordable home and would support the key aims of the city plan. She believed it would create supportive and secure communities with housing that met the highest environmental standards and support the growth of local communities. The hope was that the City Council would deliver on providing sites for truly affordable housing, access to funding through the public works loans board and to ensure that land prices are affordable. She hoped that a collaborative relationship with local Housing Groups could be developed so that strategic housing provision could become a reality.
- 32.5 Councillor Hugh-Jones thanked Ms. Edwards-Colledge for presenting the petition and stated that the Administration fully supported its aims. She noted that the community land trust focussed on building for the community and placed an emphasis on affordability. The key point being that the land was held in trust so that prices remained affordable for future buyers. It did allow for units to be sold to finance other building and developments could be of a mixed tenure although the aim would be that the majority of properties would be for rent. The difficulty for local authorities was managing the right to buy scheme which has its complexities and means the council is having to try to constantly catch-up to maintain its housing stock. There was a clear need to work with community led schemes to maximise housing availability at an affordable cost for those in need. Hence the amendment that she wished to move on behalf of the Green Group.
- 32.6 Councillor Gibson formally seconded the amendment and reserved his right to speak in the debate.
- 32.7 Councillor Appich welcomed the petition and stated that the planning policies set out in the City Plan parts 1 and 2 were strongly supportive of community-led housing. She noted that officers and councillors were working to find ways to support local schemes and enable access to funding streams and hoped that this would be progressed. She also expressed concern on the impact of the proposed changes to the planning process could have on the availability of affordable housing in the city.
- 32.8 Councillor Mears welcomed the petition and the Green Group amendment and stated that housing was an important issue for the city and the availability of suitable housing for everyone needed to be addressed. There was a need for a mixture of provision, and she acknowledged that community-led schemes were an important element in developing communities and ensuring that affordable housing was available in the city.
- 32.9 Councillor Janio questioned the approach and suggested that the provision of housing should be left to the private sector and the free market rather than the council selling assets to a particular group at a discount which would then

disadvantage another group. He could not support the petition or the amendment.

32.10 Councillor Gibson noted the comments and suggested that the current housing crisis had resulted from the failure of the free market to ensure that there was sufficient availability at an affordable rate. He believed the petition and the support of the council for a community land trust was an opportunity to begin to tackle the crisis and he welcomed the cross-party support for the amendment.

32.11 The Mayor thanked Ms. Edwards-Colledge for joining the meeting and presenting the petition and noted that the amendment had been accepted.

32.12 The Mayor then put the recommendations as amended to the vote and called on each of the Group Leaders to confirm their position as well as the Groups in turn and each of the Independent Members:

Councillor Mac Cafferty stated that the Green Group were in favour of the recommendations as amended and this was confirmed by the Green Group Members;

Councillor Platts stated that the Labour Group were in favour of the recommendations as amended and this was confirmed by the Labour Group Members;

Councillor Wares stated that the Conservative were in favour of the recommendations as amended and this was confirmed by the Conservative Group Members;

Councillor Brennan confirmed that she was in favour of the recommendations as amended;

Councillor Fishleigh confirmed that she was in favour of the recommendations as amended;

Councillor Janio confirmed that he was against the recommendations as amended;

Councillor Knight confirmed that she was in favour of the recommendations as amended.

32.13 The Mayor confirmed that the recommendations as amended had been carried.

32.14 **RESOLVED:**

- (1) That the petition be noted and referred to the Tourism, Equalities, Communities & Culture Committee for consideration;
- (2) That the Council recognise and welcome the role of community-led housing projects in creating neighbourhoods while at the same time addressing the city's housing shortage in a manner that focuses on the quality of the build, affordability, social value, sustainability, conservation and enhancement of the natural environment; and

- (3) That the Council continue to explore borrowing from the PWLB and on-lending to community-led housing projects as a matter of urgency as a way of supporting such community-led efforts.

Subject:		Declare Brighton & Hove to be an Anti-Racist City - Items referred from the Special Council meeting held on the 13 August 2020	
Date of Meeting:		24 September 2020	
Report of:		Executive Lead Officer for Strategy, Governance & Law	
Contact Officer:	Name:	Mark Wall	Tel: 01273 291006
	E-mail:	mark.wall@brighton-hove.gov.uk	
Wards Affected:		All	

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

- 1.1 To receive the following petition for consideration which was debated at and referred from the Special Council meeting held on the 13 August 2020.

2. RECOMMENDATIONS:

- 2.1 That the petition be noted.

3. CONTEXT / BACKGROUND INFORMATION

- 3.1 The petition is detailed below:

DECLARE BRIGHTON & HOVE TO BE AN ANTI-RACIST CITY

On 12th June 2020 Brighton & Hove City Council issued a statement pledging to be an anti-racist council. We welcome this statement and ask the council to go further and declare the city of Brighton & Hove to be an Anti-Racist City. To drive inclusion in our city, embrace cultural diversity and encourage equity of opportunity, our community must work together to be actively anti-racist.

Building on the history of the people of Brighton, who have always turned out on mass to protest against far-right marches and meetings that have descended on our city, including the landmark moment when Mosely gathered the far-right at The Level in 1948 and the people of Brighton turned out to protest and successfully halted this event.

Lead Petitioner – Mo Kanjilal

Additional Information:

Brighton has the spirit to lead the way in being the beacon city for anti-racism and true empowerment to black people and people of colour, as it has shown for our LGBTQIA+ community. Brighton is a city of inclusivity, recognised both nationally and internationally, and we believe this city is capable of setting the example for what it means to be a truly Anti-Racist City.

Brighton And Hove City Council has already demonstrated the commitment and ambition to achieve this, however, it is vital that this is demonstrated through concrete and visible actions. By bringing all of our city's organisations, services, community groups and individuals together to combat racism and prejudice. We can make Brighton & Hove an example to the rest of the country on how to create a truly inclusive city. Our requests are:

- **Terminology** - Brighton & Hove City Council (BHCC) should use appropriate terminology when referring to people who are targets of racism because they are not white. People of Colour is the appropriate term to use. BAME and BME also refers to minority ethnic people, which can include any group of people that find themselves in an ethnic minority, but they may not experience racism due to the colour of their skin. To address the needs and lived experiences of people who have experienced racism, People of Colour is a good term to use.
- **Schools** - we welcome the news that BHCC are working on a schools' program. The council should actively work with schools ensuring a safe, anti-racist, non-hostile environment is created for children, families and staff. This work should address recruiting People of Colour to redress the lack of representation throughout the hiring in schools for teachers, head teachers and governors. Schools should recruit at least two parent governor positions for POC and actively recruit for the positions to be filled. There should be a format for people to raise concerns about racism they are experiencing or witnessing within their school anonymously with a link directly to the council which is monitored and responded to. Brighton schools should have anti-racism, history of POC, British imperialism and colonialism taught at a significant level throughout the school curriculum across all year groups. Schools should also be included in the education program in the next point.
- **Adult education program** - an anti-racism education program needs to take place in workplaces, and service providers throughout Brighton. The most effective delivery of this is through specialised theatre education projects that involve both performance, interactive workshop, and in-service training. This is an effective delivery system which has proven success in both delivery and outcomes. BHCC should commission this work to be created and delivered throughout education establishments, workplaces and service providers to ensure effective education to facilitate the creation of an anti-racist city.
- **Businesses** - BHCC should not purchase the services from any provider that has not demonstrated that they have anti-racist policies and employ POC as full-time staff members. Businesses should commit to anti-racism processes in order to bid for council tenders and show that they are actively addressing diversity and anti-racist policies in their businesses. There should be initiatives run with Brighton's business community to set targets and timeframes to increase diversity in these organisations.
- **Council BAME group** - BHCC should create a second paid position on the currently named The BME Worker's Forum, to ensure that it is successful in its ability to take an active role in driving change in the future city council, so the burden is never left to just one person, to be the lone voice in any meeting. There should be a facility for all council staff to

anonymously raise concerns about racism they are experiencing or witnessing within their workplace, that is monitored and responded to.

- **Festivals** - BHCC should commit to being the new hosts for the RISE festival, which was ended through funding cuts. As Brighton has proven itself to be outstanding hosts to PRIDE, it can now demonstrate that it leads the way as a city of anti-racism by hosting RISE festival, giving it a new permanent home. BHCC should ensure that Brighton Festival, Brighton Fringe, and the film festival all demonstrate substantial representation of POC and this should be the key factor in them allowing the festivals to take place in the city. Each festival should have a specific space dedicated to showing the work of POC as well as included throughout the festivals.
- **Policing** - Brighton & Hove City Council need to take an active role in addressing the detrimental actions of Sussex Police towards People of Colour, particularly Black people, that have resulted in hostile experiences for POC to live in or visit Brighton. BHCC must conduct an inquiry into Sussex Police practices which disproportionately target and impact Black people and People Of Colour. Particularly the practice of Stop and Search, high amounts of Use of Force, and application of PREVENT involving children and families of People of Colour. Social justice groups and the media have raised concern that Brighton has one of the highest disparities in the country, with 3.5 white people in every 1000 stopped by Sussex Police in the last year compared to 38 in 1000 black people. We find this inequality unacceptable in a council that declares itself anti-racist. BHCC needs to outline an action plan for working with Sussex Police to change this culture in order to ensure their human rights are respected as residents or visitors of Brighton.
- **Funding for cultural research & community spaces** - funding cuts have stripped away services and projects for people of colour in our city such as the Black and Minority Ethnic Young People's Project (BMEYPP). The Black and Minority Ethnic Community Partnership (BMECP) is a useful and highly valued facility, however, People of Colour still feel disenfranchised in our city. Brighton & Hove's Black History Month has done fantastic work and the council could add to this by funding research into the history of People of Colour in Brighton and Hove, and the history of anti-racism, by collaborating with the city's two universities. The research could be displayed on a website. We also propose the council works with residents of colour to create a community-run hub in a central Brighton location. This space could include a community café, workshop training areas, and a performance area to provide a permanent venue for people of colour to share their creativity with our city. This would demonstrate a genuine commitment to anti-racism.
- **i360 Sponsorship** - the council should end sponsorship of council managed spaces by brands that support racist policies - British Airways is the sponsor for the i360 and many residents were appalled at the council lighting it purple to demonstrate an 'anti-racist' stance. British Airways are complicit in the hostile environment and make £30 million per annum from deportation contracts. These deportations of People of Colour are to countries where their lives may be in danger, where they may have no family or friends, and may have never lived there. British Airways have not investigated the death of Jimmy Mubenga who was suffocated whilst being

deported on a British Airways flight in October 2010. His last words were 'I can't breathe'. As Brighton and Hove city council are so moved by the last words of George Floyd, they should be equally as moved by the final words of Jimmy Mubenga and end relations with British Airways. They owe the council £3.1 million (10% of annual profits from deportation contracts). We ask that this £3.1 million be ring-fenced for targeted community support for people of colour.

Brighton & Hove has a reputation as an open and inclusive city, but we know there are areas in which we fall woefully short. We ask you to build on the brave ideals this city is known for and lead the way for this country by demonstrating the power of Brighton & Hove as an Anti-Racist City.

- 3.2 An extract from the minutes of the special council meeting held on the 13 August 2020 is detailed below setting out the petition and recommendations for the committee to consider:

SPECIAL COUNCIL

4.30pm 13 AUGUST 2020

VIRTUAL MEETING - SKYPE

MINUTES

Present: Councillors Robins (Chair), Mears (Deputy Chair), Allcock, Appich, Atkinson, Bagaeen, Barnett, Brennan, Childs, Clare, Deane, Druitt, Evans, Fishleigh, Fowler, Gibson, Hamilton, Heley, Hill, Hills, Hugh-Jones, Janio, Knight, Lewry, Littman, Lloyd, Mac Cafferty, McNair, Miller, Moonan, Nemeth, Nield, O'Quinn, Osborne, Peltzer Dunn, Phillips, Pissaridou, Platts, Powell, Shanks, C Theobald, Wares, West, Wilkinson and Williams

PART ONE

32 PETITIONS FOR DEBATE.

DECLARE BRIGHTON & HOVE TO BE AN ANTI-RACIST CITY

- 32.1 The Mayor stated that where a petition secured 1,250 or more signatures it could be debated at the council meeting. He had been made aware of six such petitions and would take each in turn, although those relating to Madeira Drive and Old Shoreham Road would be taken in one debate as there were petitions in favour and against the proposals.
- 32.2 He noted that there were amendments to the cover reports' recommendations for the first petition, the second and third petitions which would be taken as part of the debate on the matter in question.
- 32.60 The Mayor then invited Mo Kanjilal to present the petition concerning the prioritisation of affordable housing in the city.

- 32.61 Mo Kanjilal thanked the Mayor and stated that the petition which had been signed by 1,949 people called on the Council to declare Brighton and Hove as an Anti-Racist City. She noted that the petition had reached the required 1,250 signatures within two days and had then reached a total of 2,380 which showed the desire to be seen as an anti-racist city. There was a clear need to address the spectre of racism that existed in the city and action needed to be taken so that real change could be made, and this could be demonstrated to the rest of the country. She hoped that such change would be led by the city council and a clear pathway for a truly anti-racist city to be created.
- 32.62 Councillor Powell thanked Mo for presenting the petition and noted that a report had been considered at the special meeting of the Tourism, Equalities, Communities & Culture Committee on the 29 July outlining the council's commitment to becoming an anti-racist city. The report had been unanimously agreed and set out the work programme to achieve the objective. The Council recognised the need for it as an organisation to change and intended to work with community groups to help to achieve that and to lead the city in becoming an anti-racist city.
- 32.63 Councillor Appich welcomed the petition and stated that the Labour Group would continue to support the work required to implement change that was required. She noted that the proposed anti-racism strategy had been approved at the Tourism, Equalities, Communities & Culture Committee meeting. She stated that it was a hugely important piece of work that had to be undertaken and welcomed the full support of all the Groups on the council.
- 32.64 Councillor McNair welcomed the petition but felt that there were questions that needed to be considered in taking matters forward such as how issues would be raised in schools, how would businesses ensure they can employ the best people for the job, and how will a holistic approach be taken to ensure all aspects of diversity are included as anti-racism was not just about colour. He hoped that in looking to the future people would also look to where we have come from.
- 32.65 Councillor Brennan welcomed the petition and stated that with the recent death of George Lloyd the need for action had been highlighted. In looking across the council chamber she was mindful of the need for the political groups to take action and encourage people from all ethnic groups to get involved and stand as councillors to reflect the community make-up of the city. She was pleased to see the anti-racism strategy had been agreed and looked forward to seeing that taken forward and the council taking action to become an anti-racist authority.
- 32.66 Councillor Powell noted the comments and thanked councillors for their contributions and noted that there was a lot to do. She believed that a start had been made and by working together change could be achieved.
- 32.67 The Mayor thanked Mo for joining the meeting and presenting the petition.
- 32.68 The Mayor then put the recommendation to the vote and called on each of the Group Leaders to confirm their position as well as the Groups in turn and each of the Independent Members:

Councillor Mac Cafferty stated that the Green Group were in favour of the recommendations as amended and this was confirmed by the Green Group Members;

Councillor Platts stated that the Labour Group were in favour of the recommendations as amended and this was confirmed by the Labour Group Members;

Councillor Wares stated that the Conservative were in favour of the recommendations as amended and this was confirmed by the Conservative Group Members;

Councillor Brennan confirmed that she was in favour of the recommendations as amended;

Councillor Fishleigh confirmed that she was in favour of the recommendations as amended;

Councillor Janio confirmed that he was against the recommendations as amended;

Councillor Knight confirmed that she was in favour of the recommendations as amended.

32.69 The Mayor confirmed that the recommendations as amended had been carried.

32.70 **RESOLVED:** That the petition be noted and referred to the Tourism, Equalities, Communities & Culture Committee for consideration.

Subject:	Items referred from the Council meeting held on the 13 August 2020		
	Committing to Make Brighton & Hove Free of Modern Slavery		
	Black Lives Matter – Notice of Motion		
	Historic Motoring Events on Madeira Drive – Notice of Motion		
Date of Meeting:	24 September 2020		
Report of:	Executive Lead Officer for Strategy, Governance & Law		
Contact Officer:	Name:	Mark Wall	Tel: 01273 291006
	E-mail:	mark.wall@brighton-hove.gov.uk	
Wards Affected:	All		

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

- 1.1 To receive the following Notices of Motion which were debated at and referred from the full Council special meeting held on the 13 August 2020.

2. RECOMMENDATIONS:

- 2.1 That the Committee responds to the motion concerning Committing to Make Brighton & Hove Free of Modern Slavery either by noting it or where it is considered more appropriate, calling for an officer report on the matter as requested, which may give consideration to a range of options;
- 2.2 That the Committee responds to the motion concerning Black Lives Matter / Anti-Racist Council either by noting it or where it is considered more appropriate, calling for an officer report on the matter as requested, which may give consideration to a range of options; and
- 2.3 That the Committee responds to the motion concerning Historic Motoring Events on Madeira Drive either by noting it or where it is considered more appropriate, calling for an officer report on the matter as requested, which may give consideration to a range of options.

3. CONTEXT / BACKGROUND INFORMATION

- 3.1 The following resolution from the full council meeting held on the 13 August 2020 for the committee to consider is detailed below:

SPECIAL COUNCIL

4.30pm 13 AUGUST 2020

VIRTUAL MEETING - SKYPE

MINUTES

Present: Councillors Robins (Chair), Mears (Deputy Chair), Allcock, Appich, Atkinson, Bagaeen, Barnett, Brennan, Childs, Clare, Deane, Druitt, Evans, Fishleigh, Fowler, Gibson, Hamilton, Heley, Hill, Hills, Hugh-Jones, Janio, Knight, Lewry, Littman, Lloyd, Mac Cafferty, McNair, Miller, Moonan, Nemeth, Nield, O'Quinn, Osborne, Peltzer Dunn, Phillips, Pissaridou, Platts, Powell, Shanks, C Theobald, Wares, West, Wilkinson and Williams

PART ONE

35. NOTICES OF MOTION

(2) COMMITTING TO MAKE BRIGHTON & HOVE FREE OF MODERN SLAVERY

- 35.7 The Notice of Motion as listed in the agenda was proposed by Councillor Appich on behalf of the Labour Group and formally seconded by Councillor O'Quinn.
- 35.8 Councillor Mears moved an amendment on behalf of the Conservative Group which was formally seconded by Councillor Bagaeen.
- 35.9 Councillor Shanks spoke on the motion and expressed the Green Group's support for the motion as amended.
- 35.10 Councillor Appich noted the comments and confirmed that she was happy to accept the amendment.
- 35.11 The Mayor noted that the amendment had been accepted and that the Council was happy to move to a vote on the motion as amended, and therefore put the revised motion to the vote:

That this Council opposes modern slavery in all its forms and requests officers to bring a report to the next ordinary meeting of the TECC Committee exploring proposals to commit the Council to doing everything in its power to make our city free of modern slavery, and ways to work with national and local government, law enforcement agencies, business, the community and voluntary sector, faith bodies and our local communities to;

- demonstrate strong leadership for anti-slavery initiatives:
- raise awareness amongst our staff, associates and the people we service on a daily basis

- train our staff to recognise and respond appropriately to potential signs of slavery
- share intelligence and information to help detect slavery and ensure it cannot take root
- support victims and survivors in our communities
- remove slave-based labour from our supply chains
- contribute to building a prosperous and slavery-free economy.

That the report in 2.1 also includes a full detailed update on the work the council has done in respect to the Labour Group NoM (referred to in the supporting information) agreed by this Council in July 2018 by reference to the report that was requested by the Policy, Resources & Growth Committee in October 2018.

35.12 He then called on each of the Group Leaders to confirm their position as well as the Groups in turn and each of the Independent Members:

Councillor Mac Cafferty stated that the Green Group were in favour of the motion as amended and this was confirmed by the Green Group Members;

Councillor Platts stated that the Labour Group were in favour of the motion as amended and this was confirmed by the Labour Group Members;

Councillor Wares stated that the Conservative were in favour of the motion as amended and this was confirmed by the Conservative Group Members;

Councillor Fishleigh confirmed that she was voting in favour of the motion as amended;

Councillor Knight confirmed that she was voting in favour of the motion as amended.

35.13 The Mayor confirmed that the motion had been carried.

3.2 The following resolution from the full council meeting held on the 13 August 2020 for the committee to consider is detailed below:

(3) BLACK LIVES MATTER / ANTI-RACIST COUNCIL

35.14 The Notice of Motion as listed in the agenda was proposed by Councillor Heley on behalf of the Green Group and formally seconded by Councillor Powell.

35.15 Councillor Peltzer Dunn moved an amendment on behalf of the Conservative Group which was formally seconded by Councillor Bagaeen.

35.16 Councillor Evans moved an amendment on behalf of the Labour Group which was seconded by Councillor Childs.

35.17 Councillors Littman and Platts spoke on the motion and the proposed amendments.

35.18 Councillor Heley thanked the Members for their comments and stated that she could not accept the Conservative amendment but was happy to accept the Labour amendment.

35.19 The Mayor noted that the Conservative amendment had not been accepted and therefore put it to the vote and called on each of the Group Leaders to confirm their position as well as the Groups in turn and each of the Independent Members:

Councillor Mac Cafferty stated that the Green Group were against the amendment this was confirmed by the Green Group Members;

Councillor Platts stated that the Labour Group were against the amendment and this was confirmed by the Labour Group Members;

Councillor Wares stated that the Conservative were in favour of the amendment and this was confirmed by the Conservative Group Members;

Councillor Fishleigh confirmed that she was voting in favour of the amendment;

Councillor Knight confirmed that she was voting against the amendment.

35.20 The Mayor confirmed that the amendment had been lost.

35.21 The Mayor noted that the Labour amendment had been accepted and that the Council was happy to move to a vote on the motion as amended, and therefore put the revised motion to the vote:

Further to previous council communications, this council formally pledges to be an antiracist council and to advocate values of anti-racism across Brighton and Hove. [1]

Council therefore resolves to ask the Chief Executive to:

- Work to convene a meeting with political leaders in the city and the Brighton and Hove Black Lives Matter group, to respond to demands
- Offer support to those taking part in the Black Lives Matter protests through outlining practicable council health and safety assistance available to organisers during the Covid-19 pandemic; e.g. measures or signage to aid social distancing, access to protective equipment etc.

Council also requests that the Chief Executive writes to the Sussex Police and Crime Commissioner (PCC), expressing this council's desire for the PCC to conduct an investigation into:

- the disproportionate use of stop-and-search powers against BAME communities, and pressing for a review into the response of Sussex PCC to the Stephen Lawrence inquiry and Lammy review; as well as the role of local Community Scrutiny panels; [2]
- how the use of excessive force and the Prevent strategy discriminate against BAME communities in Sussex

Further, that council requests officers bring a report on the above matters to the Tourism Equalities, Communities and Culture committee, in particular detailing:

- information on the BAME pay gap and underrepresentation of BAME employees within the council, [3] which may be shaped by the results of the Global HPO report on Race Equality in Employment; and a timeline for implementation of any recommendations that result from this [4]

35.22 He then called on each of the Group Leaders to confirm their position as well as the Groups in turn and each of the Independent Members:

Councillor Mac Cafferty stated that the Green Group were in favour of the motion as amended and this was confirmed by the Green Group Members;

Councillor Platts stated that the Labour Group were in favour of the motion as amended and this was confirmed by the Labour Group Members;

Councillor Wares stated that the Conservative were in favour of the motion as amended and this was confirmed by the Conservative Group Members;

Councillor Fishleigh confirmed that she was in favour of the motion as amended;

Councillor Knight confirmed that she was in favour of the motion as amended.

35.23 The Mayor confirmed that the motion as amended had been carried.

3.3 The following resolution from the full council meeting held on the 13 August 2020 for the committee to consider is detailed below:

(4) HISTORIC MOTORING EVENTS ON MADEIRA DRIVE

35.24 The Notice of Motion as listed in the agenda was proposed by Councillor Nemeth on behalf of the Conservative Group and formally seconded by Councillor Miller.

35.25 Councillor Appich moved an amendment on behalf of the Green Group which was formally seconded by Councillor Evans.

35.26 Councillors Theobald and Lloyd spoke on the motion and the amendment and expressed their support.

35.27 Councillor Nemeth thanked everyone for their comments and the support for the aims of the motion and stated that he would accept the amendment.

35.28 The Mayor noted that the amendment had been accepted and that the Council was happy to move to a vote on the motion as amended, and therefore put the revised motion to the vote:

This council resolves to:

- (1) Recognise the huge financial and cultural contribution to the local tourist economy of the many motoring events that take place in the city and on Madeira Drive in particular;

- (2) Recommends to ETS Committee that any post-Covid changes to the layout of Madeira Drive do not prevent historic motoring events from taking place; and
- (3) Recommends to TECC Committee that urgent confirmation is given that historic motoring events will be given permission to take place.

35.29 He then called on each of the Group Leaders to confirm their position as well as the Groups in turn and each of the Independent Members:

Councillor Mac Cafferty stated that the Green Group were against the motion as amended and this was confirmed by the Green Group Members;

Councillor Platts stated that the Labour Group were in favour of the motion as amended and this was confirmed by the Labour Group Members;

Councillor Wares stated that the Conservative were in favour of the motion as amended and this was confirmed by the Conservative Group Members;

Councillor Fishleigh confirmed that she was voting in favour of the motion as amended;

Councillor Knight confirmed that she wished to abstain from voting on the motion as amended.

35.30 The Mayor confirmed that the motion as amended had been carried.

WRITTEN QUESTIONS FROM COUNCILLORS

A period of not more than fifteen minutes shall be allowed at each ordinary meeting for questions submitted by Members.

The question will be answered without discussion. The person who asked the question may ask one relevant supplementary question, which shall be put and answered without discussion. The person to whom a question, or supplementary question, has been put may decline to answer it.

(1) Anti- Racism – Amanda Evans

Following the excellent report and debate at the last meeting of this committee, and the NoM passed at full council, could we please have a brief update on the progress of the work being done on Becoming an Anti-Racist Council?

(2) New Flats at Brighton Marina and the Gasworks – Bridget Fishleigh

Nearly 2,000 new flats will be built at Brighton Marina and the Gasworks site over the next few years. I know that there is no master plan for transport for this area, but we will need new roads, flyovers, bridges, tunnels, pavements, cycle paths and bus lanes to transport people into, around and out of the area.

Please would you tell me what the process and timescales are for planning, financing and building these?

(3) Section 106 monies – Bridget Fishleigh

Do you agree that ward councillors should be involved in the allocation of Section 106 monies and, if so, would you please put a process in place to make sure we are consulted before the legal agreements are finalised by which time it's too late?

(4) Anti-Social Behaviour on Hove Seafront – Robert Nemeth

Will the Chair provide an individual update on each of the Recommendations 3-8 of Agenda Item 7 (Anti-social Behaviour on Hove Seafront) from the 18th June 2020 meeting of this committee as reproduced below?

(3) Requested that the Chief Executive of Brighton & Hove City Council writes to the Divisional Commander of Sussex Police to ask for assistance i) in dealing with the more serious breaches of by-laws and ii) in developing a joint strategy to make better use of CCTV resources on and around the seafront.

(4) Called on officers to draw up plans to regularise signage on Hove seafront to make existing rules clearer.

- (5) Called on officers to prioritise the clean-up of various seafront graffiti hotspots such as the King Alfred and Hove Lagoon.
- (6) Gave officers backing to spend from existing budgets a sum of up to £500 for packets of graffiti wipes that would be made available free of charge from the Seafront Office to anybody wishing to clean up graffiti on the seafront.
- (7) Called on officers to discuss the ongoing overflowing bin situation with appropriate colleagues.
- (8) Called on officers to circulate other ideas to further bolster ongoing efforts.

(5) Fly-Posting on the Seafront – Robert Nemeth

Would the Chair join community groups, amenity societies and tourist businesses by making a strong and unequivocal statement against fly-posting on the Brighton & Hove seafront, and will she pledge to call on colleagues to investigate and prosecute where possible those participating in fly-posting campaigns in tourist areas?

(6) Sport on Hove Seafront – Robert Nemeth

Will the Chair pledge to call for consultation with the many groups which participate in various sporting activities on the Hove seafront if/when further changes to the parking arrangements are considered?

(7) Covid and Sport – Robert Nemeth

What analysis has been carried out on the effects of COVID on sport and leisure in Brighton & Hove?

NOTICE OF MOTION

LABOUR PARTY

FAIR TRADE

This Council resolves:

- To note the importance of Fair Trade as part of a sustainable future;
- To note the Council's continued commitment to Fair Trade as part of the minimum buying standards for food and catering contracts;
- To note that opportunities to increase the Council's commitment to buying Fair Trade for food and catering contracts continue to be sought and taken wherever possible within the current budgetary constraints;
- That a report be brought to the next meeting of this Committee setting out progress against the Council's commitments to and support for Fair Trade since 2016.

Proposed by: Cllr Appich

Seconded by: Cllr

Supporting information:

The city was awarded Fair Trade City status in 2004 and renewed in 2015. At the [Policy, Resources and Growth committee](#) on 9 June 2016, members supported proposals initially raised as a Notice of Motion at Full Council in January 2016. A renewal application has to be submitted by the spring of 2021.

The council's Sustainability Action Plan 2015 to 2017 confirmed the commitment to Fair Trade.

The Council's corporate plan 2020 – 2023 reaffirms its commitment to a "fairer city and sustainable future".

The year 2020 is set to become one of the hottest in recorded history. Climate change is a global issue that has disproportionately impacted millions of farmers daily.

Farming families are increasingly concerned about the future of food production, as the environmental impacts of climate change will intensify in the coming years.

Therefore, it is essential to give a platform to elevate the voices of marginalised farmers and workers whose livelihoods are being threatened.

The Fairtrade approach to climate change focuses on making farmers adaptable and resilient by implementing sustainable supply chains that will ensure their wellbeing and food security.

Subject:	Update to Food Growing and Development Planning Advice Note		
Date of Meeting:	24 September 2020		
Report of:	Executive Director, Economy, Environment & Culture		
Contact Officer:	Name:	Helen Pennington	Tel: 01273 292333
	Email:	Helen.pennington@brighton-hove.gov.uk	
Ward(s) affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 This report seeks approval of the 2020 Update to the Food Growing and Development Planning Advice Note (PAN). The Planning Advice Note provides technical guidance on the integration of food growing opportunities within new developments, including best practice examples and design considerations to help meet planning policy for sustainable development.

2. RECOMMENDATIONS:

- 2.1 That the Committee adopts the 2020 Update to the Planning Advice Note: Food Growing and Development, attached as Appendix 1, subject to the finalisation of any document design matters, including any additional images and visuals, by the Head of Planning and any minor editorial changes in consultation with the Chair of TECC Committee.

3. CONTEXT/ BACKGROUND INFORMATION

Background

- 3.1 Planning Advice Notes are prepared to provide detailed technical guidance and information on planning policy matters and are aimed at developers, architects, landscape designers and local authority planning officers. They do not introduce any new requirements for planning applicants or introduce new planning policy. Guidance within a Planning Advice Note (PAN) will have some weight as a material consideration in the determination of planning applications.
- 3.2 Brighton & Hove is recognised as a pioneer for sustainable food through its cross-sector activity led by the Brighton & Hove Food Partnership. As a city, Brighton & Hove was the first to adopt a Food Growing PAN in 2011 to encourage developers to include space for food growing in new development. It was also the first city to achieve Silver 'Sustainable Food City' status in 2015. Brighton and Hove Food Partnership is currently working to achieve Gold 'Sustainable Food City' status on behalf of the city, with a final submission due

November 2020. The adoption of this PAN was included as an aspiration in the 2018 bid so will directly help with achieving the award.

- 3.3 The preparation of the PAN has been undertaken as a joint exercise between Brighton & Hove City Council Planning and Sustainability officers and the Brighton and Hove Food Partnership. The initial drafting of the PAN was funded by the Food Partnership, using funding from the Esmée Fairbairn foundation to employ expertise from national food organisation Sustain.

Policy context

- 3.4 Since the publication of the 2011 Food Growing PAN, the City Plan Part One has been adopted and Part Two of the City Plan is now being brought forward. Many of the City Plan policies positively encourage the provision of food growing as part of achieving sustainable development.
- 3.5 Creating a more sustainable city is central to the vision and strategy for the City Plan. The updated PAN specifically supports the implementation of City Plan Part One policy CP8 Sustainable Buildings, which expects developments to demonstrate how they encourage food growing. The PAN also supports the delivery of a number of other City Plan policies including CP18 Healthy City and SA6 Sustainable Neighbourhoods.
- 3.6 The PAN also helps to meet the objectives of the Brighton & Hove Food Strategy Action Plan (2013, updated 2018), adopted by the council and the Local Strategic Partnership (now Brighton Connected), and by the Brighton & Hove Wellbeing Board, which seeks to ensure residents have the opportunity to eat healthy food from sustainable sources. The current COVID19 situation also demonstrates how important it is that residents have access to healthy food and that opportunities for food growing are important for mental health and well-being.

Content of the guidance

- 3.7 The 2020 PAN provides guidance on how food growing can be successfully integrated within new development, includes best practice examples and outlines practical consideration to ensure planting is successful. The 2020 PAN has been updated to:
- Reflect current adopted and emerging local planning policy (City Plan Part 1 and Proposed Submission City Plan Part 2)
 - Reflect national planning policy (NPPF)
 - Provide further information on food-growing design options and their potential suitability
 - Provide advice on management and maintenance considerations

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 In 2017, Brighton & Hove City Council, in partnership with the Brighton & Hove Food Partnership, pledged to become a “Veg City” as part of the “Peas Please” initiative to increase vegetable consumption across the UK. This included a commitment to consider production of a Food Supplementary Planning Document (SPD) to improve upon and replace the existing Food Growing and Development PAN 2011.
- 4.2 In order to progress this commitment in a timely manner, a PAN rather than a statutory SPD has been produced. Improvements and updates to the PAN have meant that the objectives of this commitment have been achieved.
- 4.3 The alternative option of not updating the Food Growing PAN would result in relying on guidance that does not reflect the current adopted planning policy framework or that emerging through City Plan Part Two. The opportunity to update the guidance with new methods of implementing food growing and learning from best practice would also be lost.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The PAN was subject to informal stakeholder discussion. This included seeking comments on an early draft by emailing individuals and organisations with an interest in food growing including food growers at the Food Partnership and academics interested in food growing at the University of Brighton; shared through social media; internal consultation with council officers including the Sustainability team and Planning’s Development Management team; and presentation and discussion with the Planning Agents Forum, which comprises local architects and planning agents.
- 5.2 Feedback was positive and input from stakeholders valuable in helping to shape the content of the document.

6. CONCLUSION

- 6.1 This updated Planning Advice Note will further support the integration of food growing opportunities within new developments. It updates and builds upon the current guidance, providing best practice examples of a range of food growing measures and designs, and supports the implementation of a range of policies within the local planning policy framework.
- 6.2 The updated PAN will help applicants make successful planning applications, will support Planning Officers in making recommendations to determine planning applications and will help to ensure that new development achieves high sustainability principles.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 There are no direct financial implications from the recommendations of this report (revised planning advice note). It is assumed that any implementation costs are contained within existing budgets. This will be reviewed as part of budget setting and monitoring.

Finance Officer Consulted: Name Jess Laing

Date: 14/08/2020

Legal Implications:

- 7.2 As noted in the body of the report, the Food Growing and Development Planning Advice Note will have some weight as a material planning consideration in the determination of relevant planning applications.

Lawyer Consulted:

Name Hilary Woodward

Date: 5/8/20

Equalities Implications:

- 7.3 A Health & Equalities Impact Assessment was undertaken on all policies contained within the City Plan Part One during its preparation. This concluded that the policies should guide development to create healthy, cohesive and vibrant communities. A separate Equality Impact Assessment has not been carried out on the updated PAN.

Sustainability Implications:

- 7.4 The PAN supports the use of land for local food production and therefore contributes towards achieving sustainable communities.

Brexit Implications:

- 7.5 There are no anticipated impacts arising from Brexit of relevance to the PAN. The PAN could help support local food resilience.

Any Other Significant Implications:

Crime & Disorder Implications:

- 7.6 Food projects offer the opportunity for increasing community cohesion, can enhance sense of ownership that local people have, and can potentially increase natural surveillance.

Risk and Opportunity Management Implications:

- 7.7 Whilst a risk assessment has not been undertaken, there are not considered to be any significant risks associated with publishing the updated PAN.

Public Health Implications:

- 7.8 The planning system has a role to play in supporting the creation of healthy communities. Engagement by residents in food growing projects encourages physical activity, supporting physical health and mental wellbeing, provides

opportunities for social interaction and cohesion, and supports greater consumption of fresh fruit and vegetables.

Corporate / Citywide Implications:

- 7.9 This PAN particularly supports the objectives of Local Strategic Partnership (Brighton Connected). This includes the topic of food and recognises the need for sustainable food systems. In addition, the Corporate Plan 2020-30 supports the bid to become a Gold Sustainable Food City.

SUPPORTING DOCUMENTATION

Appendices:

1. Updated Food Growing and Development Planning Advice Note 2020

Background Documents

None.

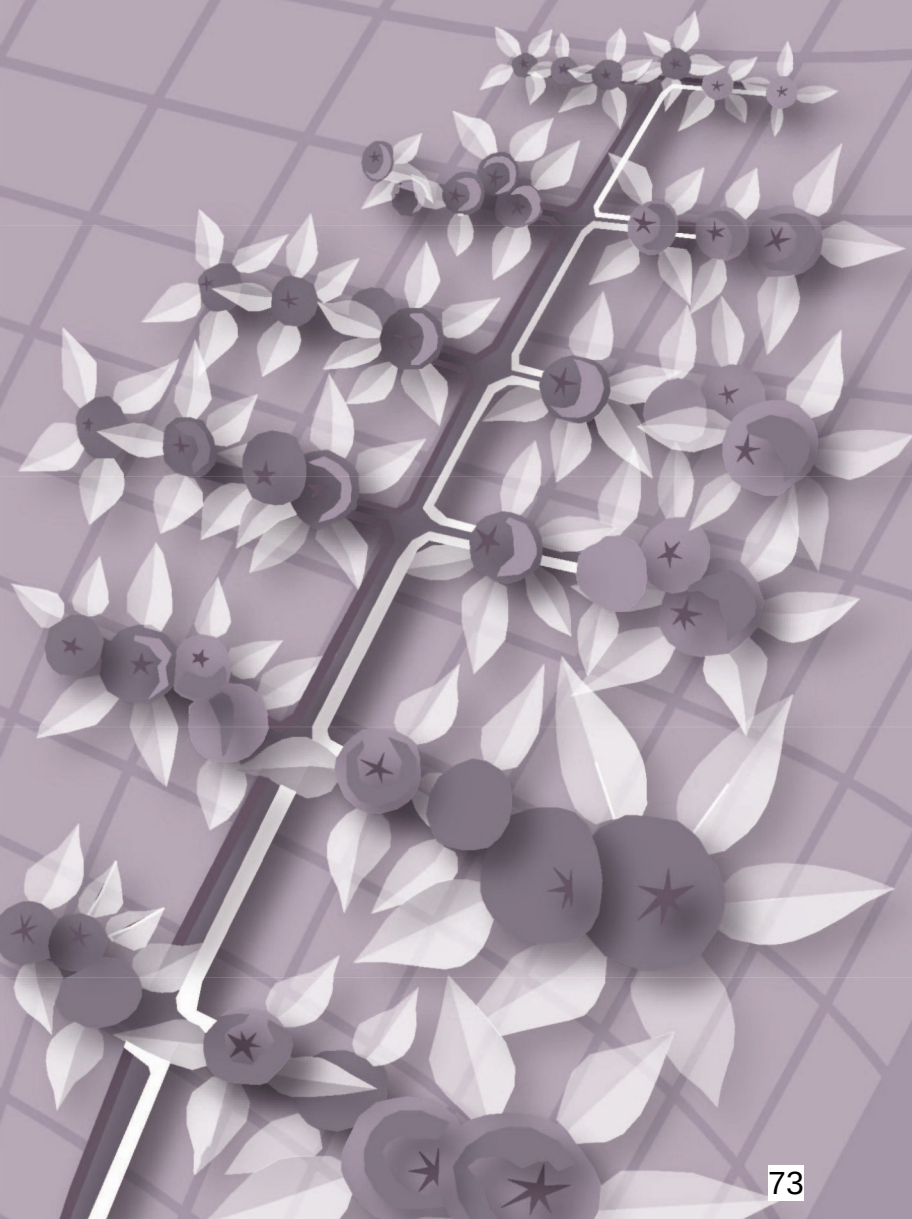
PAN 06

Food Growing and Development

Updated September 2020

Brighton & Hove City Council's Local Development Framework

Planning Advice Note



Food Growing and Development

Updated September 2020

Contents

1. Introduction.....	1
Using this PAN.....	1
2. Brighton and Hove – a Sustainable Food City	2
The Vision	2
Benefits of integrating food growing in new development.....	2
3. Planning Policy Framework	6
Planning Considerations	7
4. Design for food growing.....	9
Design options	9
A: Edible Landscaping	10
B: Outdoor amenity space.....	12
C: Orchards	18
D: Therapeutic gardens.....	19
E: School gardens.....	20
F: Meanwhile gardens.....	21
Some suggestions for suitable locations	22
5. Practical considerations.....	23
Space	23
Access	25
Aspect and light	26
Wind	26
Water	26
Energy	27
Soil/growing medium.....	27
Contaminated Land.....	27
Composting.....	28
Pollution	29
Storage	29
Planting.....	29
Cost	29
6. Management and Maintenance	31
Management responsibility.....	31
Ongoing maintenance	32

Food Growing and Development

Updated September 2020

Resources	38
Appendix 1 Policy Framework	39
National Policy	39
The National Planning Policy Framework.....	39
National Planning Practice Guidance	39
National Design Guide	39
Public Health.....	40
Brighton and Hove City Plan	41
Brighton and Hove City Plan Part One (2016).....	41
Proposed Submission City Plan Part 2 (April 2020)	42
Other City Strategies.....	43
Appendix 2 Brighton & Hove Checklists	44
Health Impact Assessment Checklist	44
Sustainability Checklist	44
Appendix 3 Building accreditation schemes	46
Appendix 4 Edible Plants	48
Appendix 5 Further Information.....	50

Food Growing and Development

Updated September 2020

1. Introduction

Brighton & Hove first adopted a Planning Advisory Note (PAN) in 2011 to encourage developers to include space for food growing in new developments. Since then, the City Plan Part One has been adopted (2016) and Part Two of the City Plan (Development Management and Site Allocations) is now being brought forward. This update to the PAN illustrates how the current and emerging local planning policy framework can be implemented and sets out good practice examples to demonstrate how food growing can be successfully integrated in most new developments across the city.

The timing of the PAN update is even more relevant in the light of the 2020 COVID19 pandemic which has highlighted the importance of protecting food resilience in the city, ensuring access to healthy foods and the significant health benefits of food growing.

Using this PAN

This Planning Advice Note (PAN) is primarily aimed at developers, their designers, architects, landscape designers and consultants, and local authority planning officers. It provides guidance and best practice advice and illustrations on how to implement policy requirements relating to food growing and contribute to making Brighton & Hove a sustainable food city.

It will also be of interest to organisations and individuals managing local food growing spaces. Other local authorities are welcome to share the information.

The guidance is supported by case studies to show how even small-scale development can incorporate food growing into developments.

We hope the PAN will inspire developers to embrace the opportunities of food growing in their new development to create places that people will be proud of living or working in; provide a chance to address some of the inequalities in access to productive green spaces; and create viable developments that meet high standards of sustainability.

Acknowledgements

We would like to thank the development professionals and the food growing community in Brighton and Hove for contributing and commenting on the revision of the PAN, which has been co-produced with Brighton & Hove Food Partnership thanks to funding from the Esmée Fairbairn Foundation and expertise from Sustain.



Food Growing and Development

Updated September 2020

2. Brighton and Hove – a Sustainable Food City

The Vision

Brighton and Hove is a city with a long history of sustainable food work and is a member of the Sustainable Food Cities network. This Planning Advice Note (PAN) gives some ideas and inspiration on how development can help achieve the vision for a city where citizens, whether residents, employees, students or visitors value their food. Daily exposure to food growing will raise awareness of the value of food and increase understanding of how to cook and eat more healthily. Food plants will be a normal part of the landscape.

Food growing can be woven into the fabric of development sites and the urban environment on whatever scale is appropriate. The PAN illustrates how this can be achieved. (Larger scale agriculture projects and formal allotments are beyond its scope.)

The ambition for new development in the city to incorporate productive growing spaces within its design will help achieve the following key Brighton and Hove development principles:

- Achieving a high quality design
- Delivering sustainability
- Creating healthy communities

In other words, a place where investors will continue to want to invest and people will want to live, work and visit.

Benefits of integrating food growing in new development

Social, economic and environmental benefits

Food growing spaces contribute to the City's green infrastructure network providing important benefits¹, such as:

- Biodiversity – space and habitat for wildlife with access to nature for people;
- Amenity – places for outdoor relaxation and play;
- Climate change adaptation – for example flood alleviation and cooling urban heat islands; air quality improvement;² increased food resilience & food security;
- Environmental education;
- Improved health and well-being – lowering stress levels and providing opportunities for exercise;
- Local distinctiveness – enhancing the special qualities of an area.

¹ See case studies in Sustain (2014) Planning sustainable cities for community food growing, https://www.sustainweb.org/publications/planning_sustainable_cities/#

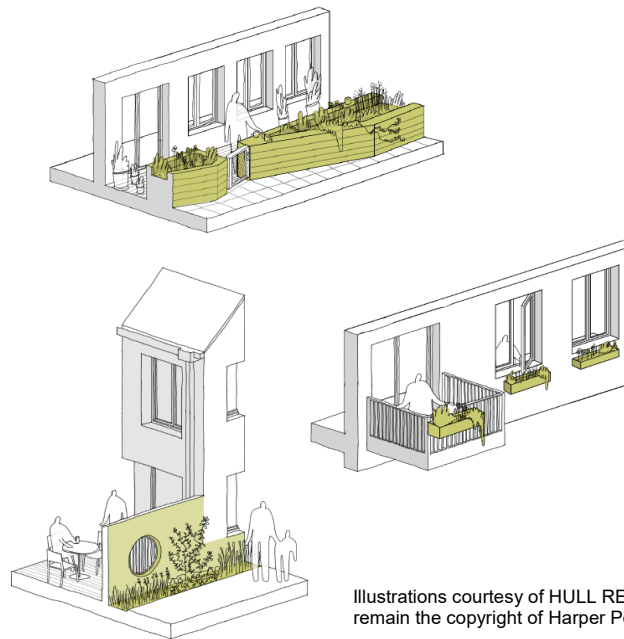
² A Low Carbon Route Map, Planning and Measuring Emission Savings for Climate Challenge Fund Projects (2011) Keep Scotland Beautiful & The Scottish Government. CCF Food Low Carbon Food Map at www.keeptoscotlandbeautiful.org/climatechallengefundfood

Food Growing and Development

Updated September 2020

Making space for planting

Hull Residential Design Guide



Illustrations courtesy of HULL RESIDENTIAL DESIGN GUIDE remain the copyright of Harper Perry Ltd and Hull City Council

Even on small sites, there are many opportunities to create spaces for planting and growing. This could be on an individual basis or collective shared arrangement such micro-allotments.

The developer benefits from integrating food growing in their development by:

- Creating a more marketable development;
- Building up a reputation for quality developments that people want to live or work in;
- Incorporating sustainable drainage;
- Creating a role for future occupiers to have a stake in the success of the development;
- Conforming to planning policy by demonstrating how they meet sustainability principles and meeting open space standards;
- Complementing the Brighton food scene.

Food Growing and Development

Updated September 2020

Development Economics

House builders can opt to demonstrate the quality of their homes and give householders the confidence that new homes are well designed, built and cost effective to run by gaining accreditation through the BRE Home Quality Mark (HQM)³. Credits are awarded for the provision of food growing space within the development. HQM is part of the BREEAM family of quality and sustainability standards (Appendix 3).

Design and Residential Amenity

Food growing contributes to high quality design and the provision of a good standard of amenity for existing and future residents within housing developments. Food growing spaces are places where residents feel more involved with their surrounding open space and take more care of their environment. Designing food growing into residential developments helps make cities more liveable and this has a particular relevance in a lockdown situation (e.g. Covid19). This is most relevant on high density developments with little or no private open space. Amenity spaces can be designed flexibly so that the option to grow food can be taken at any time.

Regeneration and Community Development

Communal food growing spaces foster community cohesion and inclusion by providing opportunities for social interaction and active leisure. Whilst these gardens have a common goal of growing food, they also improve the local area and contribute to successful regeneration.

Sustainability

Food growing spaces contribute to achieving policies on mitigating and adapting to the effects of climate change and other sustainability priorities.

Health and Wellbeing

The activity of growing food offers people the chance to take exercise, reduce stress and get fresh air whilst the harvest increases access to fresh and healthy fruit and vegetables. Many health centres, hospitals and charities recognise the health benefits of urban agriculture in preventing illness and triggering healing responses.

Education, Skills and Enterprise

Small-scale food growing spaces provide a learning environment for young and old to develop transferable skills that increase skills and employability. Food growing in schools has been shown to help children and young people achieve learning, skills, health and well-being outcomes.

³ <https://www.homequalitymark.com/>

Food Growing and Development

Updated September 2020

Continuous Productive Urban Landscapes Speculative drawing for a typical UK street

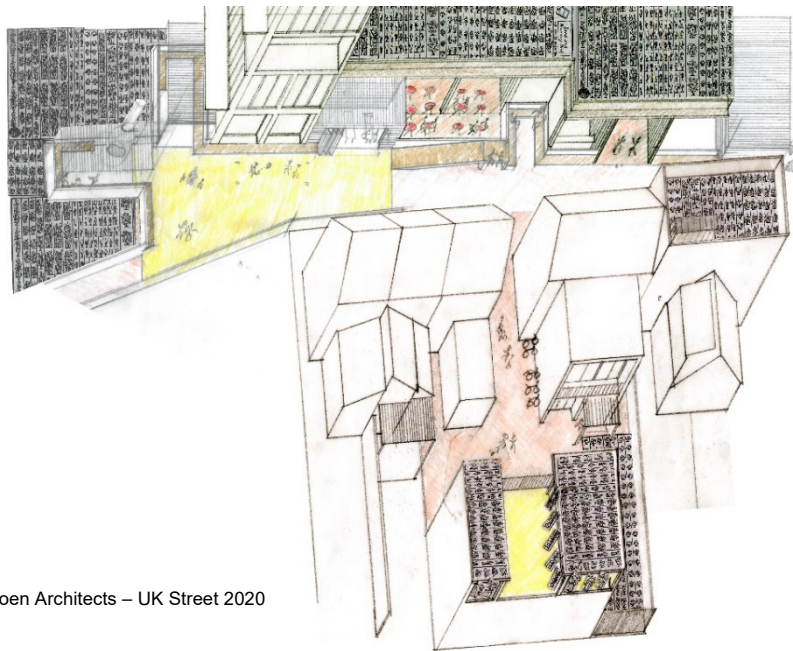


Image credit: Bohn&Viljoen Architects – UK Street 2020

An interpretation of a typical UK street with food growing incorporated in rooftop gardens and other outdoor spaces. The image demonstrates the potential use of space within dense, multi-story urban areas.

Food Growing and Development

Updated September 2020

3. Planning Policy Framework

As a city, Brighton & Hove was the first to adopt a Planning Advisory Note in 2011 to encourage developers to include space for food growing in new developments. Since then, the City Plan Part One has been adopted and a Part Two Plan (Development Management and Site Allocations) is being brought forward. This update illustrates how the current local planning policy framework can be implemented.

The PAN builds upon and provides more detailed advice and guidance on how to implement policies set out in the city's adopted development plan, the Brighton and Hove City Plan, which strongly supports the provision of on-site food growing initiatives. As such, the PAN will be used to determine planning applications and will have some weight as a material consideration in decision-making.

The PAN does not introduce new planning policies neither is it intended to add unnecessarily to the financial burdens on development. Indeed, the intention is to ensure that the design and management of outdoor amenity space already required as part of a good development is food friendly.

Planning Policy Framework

This Planning Advice Note reflects the National Planning Policy Framework (NPPF) and also supports the delivery of the Brighton & Hove City Plan. The following policies **specifically refer to food growing** in their wording or supporting text:

Adopted City Plan Part One policies:

- DA7 Toads Hole Valley
- SA4 Urban Fringe
- SA5 South Downs
- SA6 Sustainable Neighbourhoods
- CP8 Sustainable Buildings
- CP12 Urban Design
- CP13 Public Streets and Spaces
- CP16 Open Space
- CP18 Healthy City

Emerging policies in the Proposed Submission City Plan Part Two:

- DM1 Housing Quality, Choice and Mix
- DM4 Housing and Accommodation for Older Persons
- DM19 Maximising Development Potential
- DM22 Landscape Design and Trees
- DM37 Green Infrastructure and Nature Conservation
- H1 Housing Sites
- H2 Housing Sites Urban Fringe

Food Growing and Development

Updated September 2020

The PAN also supports Supplementary Planning Documents, specifically:

- Nature Conservation and Development SPD10 (and any further update)
- Sustainable Drainage SPD16
- Design Guide for Extensions and Alterations SPD12 Update
- Urban Design Framework SPD (forthcoming)

Appendix 1 outlines in more detail the planning policies which are most relevant to food growing and which provide the wider policy context for the PAN.

Planning Considerations

For developers:

- ❖ Give early consideration in landscaping proposals to the location of food growing spaces, the use of productive trees, other edible planting, together with structures needed to facilitate food growing, such as storage for tools and equipment, water supply and irrigation e.g. water butts can be integrated as part of a cohesive design for the development as a whole.
- ❖ Note that there are very few development proposals which could not find some space for some food planting.
- ❖ Landscape design which offers flexibility will enable garden space to be adapted for food growing or general planting according to occupiers' interests in the future.
- ❖ Vacant sites awaiting redevelopment may be suitable for 'meanwhile' gardens with potential benefits for the community in the interim.
- ❖ Commit to entering into and adhering to planning conditions/Section 106 obligations requiring on-going management and maintenance to ensure spaces will be managed successfully once the development is completed.
- ❖ All residential planning applications involving new builds and conversions within the city require a completed Brighton & Hove sustainability checklist. See extract at Appendix 2
- ❖ Some development schemes will require a Health Impact Assessment to be undertaken. This includes consideration of how a development supports access to green space, exercise, and healthy food.
- ❖ Remember that incorporating food growing spaces and provision will also help to meet other policy requirements around sustainability and biodiversity.

For the Council

- ❖ Draw attention to the policy requirements and the planning considerations mentioned above early on in planning application discussions, ideally at the pre-application stage.
- ❖ Consider the use of appropriate planning conditions, Section 106 Legal Agreements or Informative notes that can be attached to planning consents to ensure food growing in developments, and their on-going maintenance.
- ❖ If not included in drawings submitted with an application, in some cases it may be appropriate to secure (through condition or S106 agreement) the identified space for food growing, either alongside or as part of / instead of wider open space uses.

Edible Landscape within Urban Development

Blatchford Community Park, Canada



Artist impression of part of a sustainable redevelopment site which balances social, economic and ecological outcomes

Food Growing and Development

Updated September 2020

4. Design for food growing

This section demonstrates a range of different food growing spaces and how they can be successfully incorporated into scheme designs showcasing some good practice examples.

Outdoor amenity space includes private gardens, balconies, communal open space and general landscaped areas within any development. The ideal is to build in flexibility to the design and to also consider initial and ongoing management to enable the users to become as involved as they would like. Solutions need not require additional expenditure unless the developer chooses to be particularly ambitious. Opportunities include using edible plants in amenity landscaping through to communal gardens.

Representation of a range of different design types would eventually have a cumulative impact across neighbourhoods on biodiversity, amenity and food awareness. So not all elements need to be designed into each and every development.

Design options

Six types of edible designs are described in this section:

- A: Edible landscaping
- B: Outdoor amenity space
- C: Orchards
- D: Therapeutic gardens
- E: School gardens; and
- F: Meanwhile gardens

Edible Landscaping

Andernach Edible City



Photo credit: Stadt Andernach/Maurer



An 'edible city' with food growing in public spaces and where ornamentals might usually be planted. Vegetables were planted around the grounds of the city wall, fully accessible to the public.

Food Growing and Development

Updated September 2020

A: Edible Landscaping

At its simplest, edible landscaping is the use of food producing plants where ornamental plants might have been used.

This approach is suitable at a landscape scale for larger developments and can also provide a solution on more restricted sites where perhaps only limited amenity space can be provided.

On a larger development, edible landscaping could be adopted in addition to the provision of specific food growing space that may have been a policy requirement and in addition to other types of landscaping that might be required.

Over time, the green networks of Brighton and Hove could become edible routes through the cumulative contribution of new developments using productive trees and plants in their landscaping schemes. Such planting could be within development site boundaries or in the public realm.

Benefits:

- Embraces the public's engagement with food and the environment
- Raises awareness of food and makes it publicly accessible and available
- Major sustainability benefits such as water management, carbon capture, barrier to pollution and habitats and food sources for wildlife providing a higher level of biodiversity than in many open spaces
- Vertical growing increases habitat types in an urban area, reduces air pollution, provides some thermal efficiency

Edible hedgerows and trees

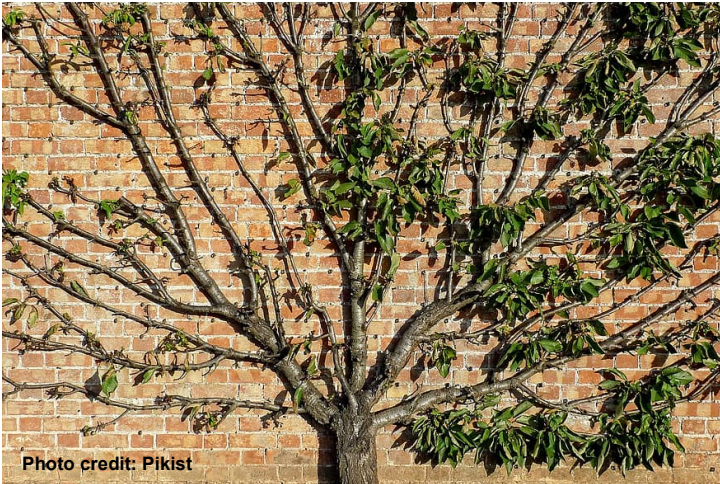
Hedges can be created from fruit and nut trees to provide screens, shelter or boundaries. Public facing site boundaries are particularly suitable to give edible plants a higher profile. Edible hedgerows or productive trees could form part of the comprehensive design of larger developments such as business parks, as well as residential, and on routes between.

Image: [Saunders Park Edible Garden](#), Brighton. Edible hedge planted Feb 2019 follows a border line and includes rosemary, red, black and white currants, jostaberry, gooseberry, quince and blackberry.



Food Growing and Development

Updated September 2020



Vertical growing

External walls are best used for training espaliered and climbing edible plants growing in soil or large containers. Advantage should be taken of south and west facing walls for fruiting trees, including those needing protection from frosts. Historic walled kitchen gardens provide inspiration which can be adapted to the scale of development. Suitable on all types of development with minimal investment.

Well trained fruit trees are space efficient, productive and attractive all year round.



Living walls however, require modular planting systems attached to the walls, irrigation systems and an intensive maintenance regime. They can be used in high specification building design to increase building performance but they require substantial investment and high maintenance to be successful.

Some modular planting systems include productive plants such as salads and herbs. Maintenance of productive living walls is high as they will require harvesting and seasonal replanting and therefore will need to be accessible.

They will also have a dormant period during the winter when plant growth will, at best, be slow and allowance will need to be made for the unattractive appearance of the walls at this time.

Edible landscape – Possible locations:

Large greenfield site	Residential urban fringe	Residential development on previously developed land	Care homes, sheltered/retirement units	Health facilities	Student Housing	Mixed use development	Education	Office development	Business parks	Retail, tourism and hospitality;	Hotels / Visitor Accommodation
🍏	🍏	🍏	🍏	🍏	🍏	🍏		🍏	🍏	🍏	🍏
🍇	🍇	🍇	🍇	🍇	🍇	🍇	🍇	🍇	🍇		

Edible Landscape 🍏

Edible hedgerows 🍇

Food Growing and Development

Updated September 2020

B: Outdoor amenity space

Benefits:

- Slows down rainwater run off - Sustainable Drainage Systems (SUDS)
- Increases biodiversity
- Sequesters carbon
- Provides benefits of green space in a densely developed urban environment for physical and mental health
- Occupiers of developments are more likely to take care of their surroundings where they benefit directly from the produce grown
- The open space becomes a productive space with a purpose
- In the case of roof gardens, increases energy efficiency by providing highly insulated roofs

The requirement of planning policy to provide outdoor amenity space in new development can be achieved through a wide range of formats according to the scale and type of development and the nature of its future occupiers. We look here at potential options including integrating ornamental with edible planting, communal gardens i.e. shared food growing spaces, small individual plots or mini allotments, roof gardens (see below), internal atriums/courtyards and balconies.

Integrating ornamental with edible planting

Traditional gardening styles of cottage and potager gardening, as well as forest gardening, embrace this mixed approach. Cropping can be integrated within areas of soft landscaping with a minimum cost outlay. Integrating ornamental with edible planting is an approach which is suitable across all development types and scales.

Forest gardening principles can be applied in dense urban areas where often the open space has partial shade during the day. Perennial ground level plants, shrubs, trees and climbers offer a wide range of edible plants which can be grown, subject to light levels. Species are chosen for their beneficial effects on each other, creating healthy systems that maintain fertility. With a greater use of perennials, and little need for digging, weeding or pest control, this is a low maintenance, way of gardening that might provide design solutions to sites that are in partial shade.

This approach will only require a small number of people to get involved in managing the food growing space and is a low maintenance regime. Larger sites could include a mix of landscapes such as more formal gardens or individual plots that require higher maintenance by either residents or contractors.

An integrated ornamental and edible communal amenity space can include the planting of fruit, nut trees and vines, both freestanding and espaliered against walls. Beds can include perennial edible shrubs such as artichoke, currants, herbs, rhubarb and fruit alongside ornamental plants. Planting could include native species of plants that would be suitable for Brighton and Hove.

Food Growing and Development

Updated September 2020

Communal gardens

A communal or community garden is a growing site not based at an allotment or school, where people grow collectively or are allocated a small individual plot (they are sometimes referred to as mini allotments but are not statutory, i.e. protected by the Allotment Act).

The garden is established by, or with a community of users - a community may be a local area or a particular group of people e.g. employees, residents, service users. Community Gardens can be located on housing developments, places or work, on 'meanwhile' or temporarily available land and in community centres.

The aim is to create attractive amenity space for all occupiers of the development to enjoy, so an important consideration is the provision of seats and shelter as part of a well-designed garden.



Photo credit: Caroline Whiteman

Community Garden

A community garden accessed by a group of volunteers who share responsibility for the whole space. Food is grown throughout the garden and the produce is shared amongst the volunteers.



Photo credit: Caroline Whiteman

Mini Allotments

Individual raised beds could be used as mini allotments whereby an individual is responsible for one food growing space in a shared area.

Food Growing and Development

Updated September 2020

Roof gardens

Roof terraces can be designed to be accessible for food growing provide food growing areas for staff on office buildings or for residents on residential developments. Roof terraces can also be provided on smaller scale residential buildings or on stepped development.

Load bearing capacity and access should be addressed at the design stage. Large containers full of compost and plants together with people using the garden add considerable weight.

The design will need to create a suitable microclimate taking into consideration strong and salt laden winds and sunshine. Wind breaks and shading may be needed to prevent food plants drying out, as winds tend to be stronger at high level. Wooden structures decay at a faster rate than on less exposed sites. Avoid solid walls which can pose problems with turbulence. Fruit and vegetables will grow well with the high light levels but remember to provide shelter for people to sit and enjoy the garden. Access will need to be considered for maintenance too.

Trees require deeper soils than shrubs and perennials. Beds for growing should be incorporated into the roof at the time of design/construction. Containers can be added after completion or in conversion projects but may then look uncoordinated and lack an integrated irrigation system.

Intensive green roofs need regular maintenance, relatively deep soils and an irrigation system. Consideration should be given to storage of materials and equipment and composting of waste plant material.

Roof Garden

One Brighton Development



Photo credit: Brighton and Hove City Council

A pioneering example of incorporating food growing in developments; 28 rooftop mini allotments were included for residents in One Brighton, a low carbon development built in 2009.

Food Growing and Development

Updated September 2020

Atriums/courtyards

Buildings with atriums or courtyards with adequate exposure to sunlight can create opportunities for food growing. Such situations will often create micro-climates allowing plants such as tomatoes and citrus fruits to be cultivated. Ground level beds or raised beds can be used, as well as wall climbing plants. Consideration for the irrigation system and control of water run-off is part of the design stage.

These gardens will be seen up close, requiring high maintenance. Suitable for a range of developments such as hotels, business, offices, health and residential care.

Growing Area in an Internal Courtyard Bainbridge Island, Washing State USA



Food Growing and Development

Updated September 2020

Private amenity space

Balconies

Balconies can provide small spaces to grow a limited selection of plants and are particularly suited to higher density residential developments. Aspect is critical. North facing balconies overshadowed by other buildings will only be able to grow a limited variety of food plants (e.g. salads). In contrast, balconies in full sun with their plants in containers will need copious watering. Balconies overhanging from the property above may prevent rain from reaching containerised plants below.

Containers / window boxes can also be incorporated into balcony design. Railings and structures joining neighbouring balconies can be designed to support climbing / espaliered plants for shade, shelter and privacy. Loading capacity should be addressed at the design stage. There will be strict weight restrictions on balconies suspended out from the building. The provision of a balcony in a housing development can inspire an interest in plants and add to residential amenity.

Food Growing on a Private Balcony

Vertical Veg, United Kingdom



Photo credit: Sarah Cuttle/[Vertical Veg](#)

Food Growing and Development

Updated September 2020

Private Gardens



Photo credit: Gillian Morgan

Developments of housing with private gardens provide opportunities for establishing a framework of edible landscaping as described in the edible hedges/trees and orchards sections.

Properties could have planters with suitable soil for edible crops if there are restrictions on growing in the open soil. Even where space is limited there are design solutions which can encourage residents to grow their own.

Bin storage frame used as a growing space

Outdoor amenity space – Possible locations:

Large greenfield site	Residential urban fringe	Residential development on previously developed land	Care homes, sheltered / retirement units	Health facilities	Student Housing	Mixed use development	Education	Office development	Retail, tourism and hospitality;	Hotels / Visitor Accommodation
  	   	    			 	  		 	 	 

Integrated gardens 

Communal gardens 

Roof gardens 

Internal Atriums/ courtyards 

Balconies 

Private gardens 

Food Growing and Development

Updated September 2020

C: Orchards

Benefits

- Easily identifiable produce and easy to consume.
- Can be the focus of community (school, residents etc) events e.g. apple day.
- Protects genetic diversity by planting local species.
- High amenity value with seasonal interest, an advantage over other more traditional amenity trees.
- A wide variety of trees are available to suit a range of situations, even where an amenity tree may not be appropriate.

Orchards can be created even where the availability of land is limited. An on-site orchard can be planted with just 5 trees or more.

Fruit trees can be grown on dwarfing rootstock to keep them small. Family apple and pear trees which grow different varieties on one tree can be planted on small sites; fruit trees can be trained against walls as espaliers or grown as screening. Development proposals for extensions which require the felling of a tree provide the opportunity to plant a productive tree as a replacement and will provide an investment for the future.

Many fruit and nut trees will be productive soon after planting and will not only become more productive with time but will gain in biodiversity value. Sussex varieties will grow well in the local climate and soil.

On small sites, trees will need training, pruning, watering and feeding - being more suitable for individual care or written into a professional landscaping contract. Trees can be allowed to grow more naturally on larger sites.

Photo credit: Brighton Permaculture Trust



Orchards:

Planted on land surrounding a housing estate, Brighton

Orchards / fruit trees – Possible locations:

Large greenfield site	Residential development Major/minor	Residential extensions	Care homes, sheltered/retirement units	Health facilities	Education

Food Growing and Development

Updated September 2020

D: Therapeutic gardens

Benefits

- Private space for contemplation and family relationships
- Communal activity with shared objectives
- Mental & physical well being
- Activating memories of food and growing

Therapeutic gardens are usually secure and private in courtyard settings with high visibility from inside the development.

Design should take into consideration the garden's high amenity value and the provision of places for visitors and residents to sit.

Paths should enable use by all residents and the garden should have level access. Therapeutic gardens mostly provide an opportunity to grow herbs amongst other plants with sensory interest. A display fruit and vegetable garden will help conversations and jog memories with dementia patients. Poisonous plants must be avoided.

Responsibility for maintenance will depend on the nature of the centre. Although gardens will generally be the responsibility of contract gardeners, sessions run for service users may be led by experienced gardeners. There may be therapeutic benefits for volunteer gardeners from amongst family and friends, but this will need organising.

Gardening at the Dementia Project, Brighton



A quiet, secluded garden with temporary, accessible growing spaces

Therapeutic gardens – Possible locations:

Care homes, sheltered/retirement units	Health facilities

Food Growing and Development

Updated September 2020

E: School gardens

Benefits

- Supporting curriculum learning by weaving food growing across the curriculum for different school years.
- Improving physical health & mental well-being of pupils by learning about healthy eating and increasing attainment levels.
- Encouraging enterprise skills & improving behaviour by generating pride in selling the food grown or processed.
- The aim is to get children growing, cooking and eating; learning good habits and skills from an early age.
- Children will pass their knowledge onto to adults.

Designing an urban school or nursery garden is much the same as any communal growing space.

A common design is for each class to have a raised bed accessible from hardstanding. Planting beds will need to be narrower than usual to enable children to reach across.

New schools in dense urban areas that have to provide their playgrounds and sports facilities on the roof will need to follow the advice for roof gardens. Composting bins, water butts and storage areas are essential. A greenhouse is useful in a sunny, south-facing position, sheltered from strong winds. A wetland area will increase biodiversity. This could also be in a raised bed if the ground is unsuitable.

If there is space it is a good idea to design an outside teaching area with seats under shade. Gates, entrances, paths and surfaces should enable access by a full range of pupils with special needs. It is important that plants are not poisonous or irritants. Schools will want the design to promote sustainability in the sourcing of plants and materials.

School Forest Garden

Hertford Junior School, Brighton



Photo credit: Brighton Permaculture Trust

Permaculture forest garden built on the school grounds. The design included a forest garden, shelter belts, edible plantings, a wildlife pond and outdoor learning areas.

School gardens– Possible locations:

Schools	Nurseries
	

Food Growing and Development

Updated September 2020

F: Meanwhile gardens

Benefits

- Opens up vacant sites and reduces the impact of hoarding that is normally placed around a development site, sometimes for many years.
- Can be a successful way for developers to engage with local communities with initial facilitation organised by the developer through local organisations.
- Provides residents with an opportunity to demonstrate an interest in growing.
- Meanwhile gardens can be a stepping stone for new growers to find a more permanent site.

Temporary or “meanwhile” gardens on sites pending redevelopment can be created with containers such as builders’ bags, boxes or skips.

These are planted and can be moved to other vacant sites when the site is required for development. Suitable for hardstanding.

Temporary gardens are likely to be more appropriate in containers as planting directly into the soil, e.g. on previously developed land, may not be appropriate due to concerns regarding safety and potential contamination.

Meanwhile gardens – Possible locations:

Large greenfield site	New residential development on previously developed land
	

Temporary Garden in Portable Containers Kings Cross, London



Photo credit: John Sturrock

Tips, crates and other portable containers can create thriving meanwhile gardens. These containers were moved to another temporary site.

Some suggestions for suitable locations

This is not a comprehensive range of possibilities and we would welcome more designs.

	Edible Landscape	Public realm	Edible hedgerows	Vertical walls	Integrated Gardens	Communal gardens	Roof gardens	Internal Atriums/ courtyards	Balconies	Private gardens	Orchards	Therapeutic gardens	School gardens	Meanwhile gardens
Large greenfield site	✓	✓	✓		✓	✓				✓	✓			✓
Residential urban fringe Major/minor	✓		✓	✓	✓	✓	✓			✓	✓			
Residential development on previously developed land Major/minor	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓			✓
Care homes, sheltered/retirement units	✓		✓	✓		✓		✓				✓		
Health facilities	✓		✓			✓						✓		
Student Housing	✓		✓				✓		✓					
Mixed use development (including residential)) Major/minor	✓	✓	✓	✓		✓	✓		✓					
Education			✓	✓	✓						✓		✓	
Office development Major/minor	✓	✓	✓				✓	✓						
Industrial premises	✓		✓											
Retail, tourism and hospitality	✓	✓					✓	✓						
Hotels / Visitor Accommodation	✓	✓					✓	✓						

Food Growing and Development

Updated September 2020

5. Practical considerations

How food growing can be successfully incorporated into new developments will be subject to a range of factors dependent on the purpose, scale and location of the development. It will be rare to find there is no opportunity to integrate edible planting into the design. However, there are some key considerations to ensure the planting will be successful into the future.

The following factors should be taken into consideration at design stage:

- Space
- Access
- Aspect and light
- Water
- Energy
- Wind
- Soil/growing medium
- Compost
- Contamination
- Pollution
- Storage
- Planting

Space

Ideally, food growing would take place in the open ground in private or communal gardens. Some developments may have no open ground available but could consider utilising rooftops, walls or balconies as growing spaces. Raised beds and containers could also provide solutions.

Some developments may have limited space in which case landscaping could include productive plants such as herbs, fruit trees, climbing edibles, hedgerows or a green roof.

Land that is considered unsuitable for buildings i.e. land susceptible to subsidence or awkward pockets may be suitable for the food growing space.

Raised Beds

Reasons for building raised beds might include presence of contaminated, compacted or thin soil, to protect archaeological remains, to introduce a variety of different soils, to provide growing space where there is hardstanding or on roofs or to enable easier access for gardeners with limited mobility. It is generally preferable for reasons of aesthetic and management to grow communally in the open soil. If privatised plots form the design model rather than communal gardens, the opportunity for a sense of community and enjoyment of food growing and sharing may be lost. Management issues may also arise if individually allocated beds become disused.

Food Growing and Development

Updated September 2020

Courtyard of Residential Development incorporating raised beds

Wellend Villas, Brighton



Photo credit: Lou Parkinson

Raised beds and growing containers for food growing in private and secluded central courtyard for communal access

Whilst there are several advantages for growing vegetables in raised beds, beds can dry out quickly so an easy source of water is required. Conversely, raised beds will slow water run-off from areas of hardstanding, contributing to a sustainable drainage scheme. Compost will also need to be replaced after a period.

Raised beds of wooden construction will eventually fall apart. Robust and long-lasting materials and high quality of construction should be used. It will be important to consider whose responsibility it will be to repair and replace the beds.

Beds can be built at different heights to be more inclusive (and to allow deep rooting plants). Some gardeners may need to sit on the edge and reach into the bed. To allow a raised bed to be accessed from both sides would generally require the bed to be around 1 metre wide. This width enables all areas of the bed to be reached without standing in the bed. There are no rules for the length although ideally they should be orientated to run north to south so that they receive even sunlight levels. A long bed can be subdivided for sharing. Raised beds do not need to be rectangular!

Food Growing and Development

Updated September 2020

Containers

Containers are likely to be high maintenance and will require regular, often daily watering depending on their size, location and planting. They may be the best solution for placing on hardstanding or for use in meanwhile gardens.

Access

The food growing space must be accessible both for people and materials.

Consider who the growing space will be used by and how they will be able to reach it through the development (e.g. staff, residents, general public, elderly people, children, vulnerable users, etc.). For example, will access paths to and between food growing plots allow for people of all ages and abilities to take part (levels, widths, surfaces, heights). Where the bed will be mainly used by children, narrow beds up to 120cm wide will enable children to access from both sides. Heavyweight or dirty materials such as compost and tools may need to be taken through the development – a particular issue for rooftop or balcony growing.

Raised Beds Accessible by Path Robert Lodge, Brighton



The communal garden is on one level with access to raised beds. The sides of the beds are wide enough to sit on so gardening can be done whilst sitting down and benches throughout mean the space is widely accessible.

Food Growing and Development

Updated September 2020

Aspect and light

Food plants require exposure to direct sunlight during the growing period. Ideally growing spaces should be south or west facing and not permanently shaded from direct sun by other structures, buildings, or trees.

In partial shade, areas for food growing will need careful design choice of suitable plants and full shade should be avoided. (see Appendix 4 for planting suggestions)

Natural surveillance from homes that overlook the space will increase security as well as provide an attractive outlook.

Wind

Adequate shelter needs to be planned into any growing space to allow crops to thrive. Exposure to wind, especially salty sea wind, can damage plants and hinder their growth. Building materials must also be robust and structures well secured. This is an issue for all growers in the Brighton and Hove area, but particular consideration is needed on roof gardens and balconies and sites exposed to coastal winds.

Water

Any food growing will need a reliable water supply. The incorporation of rainwater collection into any design is preferable, both for sustainability but also for plant health. Easy access to mains water may be necessary as a backup for dry weather or if rainwater collection is not possible. Reliance on mains water, if not monitored, can lead to over watering and wastage and future occupiers will have to pay the water bills.

Irrigation systems may be built into the planting areas to ensure water is directed where it is most needed.

Consideration should also be given to water delivery and storage systems to ensure risk of Legionella is controlled.

Retrofitting infrastructure will generally require planning consent for future occupiers, so ensure the correct infrastructure is installed during construction.



Food Growing and Development

Updated September 2020

Energy

Power for lighting, tools, any social area or an area for food preparation and cooking should be considered at design stage. Retrofitting would trigger not only the need for planning consent for future users but significant investment. Solar power may be an option.

Soil/growing medium

Soil is an essential component for growing food which will vary according to the setting. Rooftop or container growing may require a more lightweight free draining growing medium. Building rubble and subsoil should be cleared from areas to be used as gardens. On difficult sites it may only be possible to dig out tree pits or beds and fill with an approved planting medium.

Contaminated Land

Soil in urban settings may need to be checked for contamination and quality.

The suitability of the land for growing food should be assessed as previous or current land use could have created contamination of the soil. It is the developer's responsibility to ensure any risks posed are appropriately managed. Depending on the circumstances, soil contamination can be overcome by use of containers or raised beds or by replacing soil.

Contaminated Land Led to the Implementation of Raised Beds Brighton Greenways



After this public site in Brighton was found to have contaminated soil, raised beds made of recycled materials were implemented as an alternative.

Food Growing and Development

Updated September 2020

Composting

All food growing requires on-going inputs to maintain the fertility of the growing medium.

On larger sites, provision of on-site composting should be designed in from the outset. This will also help manage organic 'waste' generated within the development. On restricted sites space could be allocated for a Hot bin which is roughly the same size as a wheelie bin. Houses that have individual gardens can also include space for composting. Developments which consist of flats can include communal composting space – Brighton & Hove is unique in running a community composting scheme on 25 sites across the city.

If developers would like to incorporate a community composting facility which could form part of a new development, adding a unique selling point and helping to reduce carbon footprint, technical guidance on dimensions needed for a communal compost bin can be found at

<https://bhfood.org.uk/resources/food-and-planning-advice/>

Community Composting for Local Residents

Brighthelm, Brighton



Photo credit: Brighton and Hove Food Partnership

Composting bins are provided for residents to manage household food waste. The product of which is used by those growing food in their private gardens/balconies. The bins require maintenance and usage instructions.

Food Growing and Development

Updated September 2020

Pollution

Air quality: designers should assess whether the site would be affected by air pollution and choose the design of food growing space accordingly such as internal courtyards/balconies/roofs, planting barrier hedges. Parts of Brighton, Hove and Portslade, and part of Rottingdean High Street, are in an Air Quality Management Area⁴.



Photo credit Gillian Morgan

Storage areas and seats built into the ends of raised beds

Storage

Adequate provision for the storage of tools and equipment will need to be integrated into the design. Retrofitting infrastructure will generally require planning consent so it is best to show solutions on the development's planning application.

Planting

Planting of perennial plants, herbs and fruit and nut trees will provide the structure of the design. Annual edible plants require more maintenance than ornamental plants and edible perennials such as fruiting shrubs and trees are easier to manage. If little or no maintenance is to be provided, consider using wild fruiting species such as wild plums, blackthorn, cherry, crab apple, hazel and using species local to Sussex. Fruit trees trained as espaliers, cordons, fans and stepovers, require twice yearly pruning. Consideration should be given in design and management to the ultimate height and the spread of canopy and roots. Fruit trees can be grown on dwarfing rootstock for constrained sites. On highly visible amenity areas think about edible flowers and plants for all year interest. Take care not to use poisonous or toxic plants in a design that encourages users to pick produce.

Cost

There is no reason for a food growing scheme to cost more than a non-edible scheme, but a key consideration is the cost of repairs and maintenance. These will be reduced if the original provision has been well thought out, is well designed and robust. The cost depends on the size, ambition and type of growing space being created.

It may be necessary to purchase suitable soil, on the other hand, fruit trees may be less expensive than amenity trees. The developer may decide to fund a facilitator to set up a group or provide weekly sessions to support the growers in gaining the necessary skills to maintain the space.

Once a project is up and running, small pots of funding may be available or growers can source materials (compost, manure, building materials) locally. Growers are often keen to be actively involved in identifying project needs and can be effective in sourcing free materials.

⁴ <https://uk-air.defra.gov.uk/aqma/list?la=B&country=all&pollutant=all>

Food Growing and Development

Updated September 2020

Food growing projects can deliver substantial cost benefits to developments (reduction in grounds maintenance costs, increased responsibility for keeping public areas clean and tidy, security and surveillance).

Funding for Maintenance Wellend Villas, Brighton



Photo credit: Lou Parkinson

The gardening group formed as a sub-group of the resident's association at Wellend Villas.

They applied for an initial grant through Southern Housing's Community initiatives fund to set up the communal garden. The group have led on the development of the garden, the planting and care and are actively looking into further funding for ongoing maintenance.

Food Growing and Development

Updated September 2020

6. Management and Maintenance

Management and maintenance are also key considerations at the design stage to ensure that the benefits of including a food growing space within new development are realised and can be ongoing. Information is set out in this section to assist developers, landowners and occupants with this matter.

Actions through the planning system which can help to ensure risk is managed at the planning stage of development are:

- ❖ Requiring applicants to submit landscape management plans showing how the food growing space will be managed and maintained with the planning application; and
- ❖ Using planning conditions, S106 planning agreements and Informatives that will secure management systems to be put in place prior to the occupation of the development.

Management responsibility

Adequate resourcing for long-term management and maintenance should be considered from the outset because this will influence the appropriate type of landscaping / food growing spaces provided. The responsibility for ongoing management is also an important matter:

- Who has ultimate responsibility for the land e.g. developer, freeholder?
- How will on-going management and maintenance of the growing areas be arranged - by a caretaker, external contractor or estate manager representing the landowner or by the residents / occupiers of the development?

Once schemes are complete, on-going maintenance is an important factor in ensuring the open space is well used, valued and safe. Getting aspects of the design right in the first place will help ensure future success.

Involvement of urban food growers with experience of management and maintenance in the initial design stage could be beneficial, especially if they are likely to have an ongoing role in helping to establish the garden. This means not only thinking about the layout and aesthetics but also the needs of the users.

Prior to occupation, it would be advantageous to put a system in place for allocation of space, training, advice etc. It is more likely that interest would be generated and maintained if garden plots were run as clubs with a knowledgeable grower from the community.

On developments where the developer has a long-term interest in the success of the scheme (in reputational terms or due to land ownership) the professional support of an experienced gardener is valued in terms of social cohesion and shared responsibility for the new development. Social landlords tend to take this approach as they have a more long-term interest than traditional developers. This is changing as private developers work on masterplans for larger sites to be developed over many years. A commitment to long term success could entail employing a gardener or bringing in an experienced grower to encourage the new occupiers and provide them with ongoing, regular support for at least a year until they have gained confidence. On a residential site the facilitator could start gardening clubs and encourage residents to get to know each other by being out in the garden, growing and sharing food.

Food Growing and Development

Updated September 2020

Ongoing maintenance

- What role is there for the occupants of the development?
- Who will be growing the food?

Each design option will have its own maintenance regime. Where there is an easily identifiable community of users (e.g. residents, schools), they may wish to have a hands-on role in growing. Hospitality businesses (cafes/hotels/restaurants) may employ a dedicated food grower to provide crops as part of being a sustainable food business. Where the community of users has a more passive engagement with the setting e.g. on a business park, it may be more appropriate to start with landscape contractors. (The table below illustrates the relationship between different types of food growing and maintenance regimes). Developers could investigate local options to provide ongoing maintenance on their behalf.

In developments with temporary, seasonal or transient residents e.g. student accommodation, rented flats for single people, low maintenance edible landscape may be more appropriate. Green roofs installed here could have the potential to be retrofitted to a roof garden (loading, access, water etc) should the nature of the occupants change over the life of the building.

There is always the possibility that eventual users will not buy into such food growing projects. This is why it's important to work through these matters at design stage to create a resilient design.

Different models for managing ongoing maintenance will require different things from the landowner in order to deliver a meaningful project. The degree to which a site is self-managed by occupiers through to the use of contractors where there is no obvious user group may alter over time. For example, contractors would maintain areas of specialised design or carry out structural work and residents would do the daily growing.

Four main models are considered here, but there may be scope for mixed options, so long as responsibilities are clear.

- Landowner control
- Community-led projects
- Partnership projects
- Meanwhile spaces

Food Growing and Development

Updated September 2020

Landowner control

Landowners employ contractors to implement and manage the landscape plan. Requires a landscape regime that is affordable for tenants into the future.

“Community” led projects

a) Self-managed shared space

Led by occupiers of the development e.g. residents on a housing development, employees in a business park or office roof garden.

These projects depend on passion and activism of a group of people who are determined to grow food locally. Arrangements could be a garden committee with a constitution or a general users forum for the whole development. They will often sit under a development user group or a residents' association. Any ground rules for use of the growing space will be set by the landowner and then the garden will be self-managing.

The landowner, occupier or estate management company can assist growers by:

- Engaging with all the occupiers to ensure buy in and inclusivity.
- Promoting the project through resident/staff newsletters,
- Giving permission and providing a simple agreement outlining expectations (lease, licence, terms of use). Many groups operate without a formal lease or a licence, however, it is good practice to set out the basics in writing around the terms of the agreement.
- Liaising with grounds maintenance contractors to review maintenance of the food growing area, agree working practices and demarcation of responsibilities e.g. structural work to be undertaken by the contractors.
- Identifying a key contact in the site management organisation to liaise with growers.
- Advising on any need for public liability insurance, risk assessment for activities or open events, health and safety implications of the site.
- Clarity over responsibility for repairs & renewals.

Larger social housing developers may have a community engagement officer; smaller developments may provide support through a local organisation with community growing expertise for the first year to ensure a successful start. It may be an idea to offer taster sessions or workshops to inspire occupants.

The primary role of the landowner's representative in securing a long-term future for the edible planting is to identify the need and aspiration for food growing among new or existing occupiers of the development. Measures need to be put in place to sustain the project in the case of leadership change.

Benefits of community managed growing spaces:

- Local residents have support from the landowner from the beginning of the project.
- Spaces can be designed to accommodate food growing from occupation of the development.
- Less outgoing expenditure on third party organisations.
- Empowering to communities.
- Clear demonstration to residents of landlord investing in the community.

Food Growing and Development

Updated September 2020

Community-Led Gardening Project

Albion Community Garden, Brighton



Photo credit: Albion Community Association

Managed by Albion Community Association, this communal garden was built as part of the Brookmead Extra Care residential scheme built by Brighton & Hove City Council. The community organisation organise events and gardening activities and a joint composting scheme.

Food Growing and Development

Updated September 2020

b) Individually allocated beds

When planning the garden, a decision needs to be made about whether all or some of the growing plots are communal or whether they are allocated to individuals. If the latter, then a decision should be made about who gets the plots – first come first served or priority to those without gardens or who have children. It is also good practice to have a simple agreement and to charge a notional annual fee, so that if the garden or plot is not used then it can be reallocated.

This can be managed by the estate management company or by an on-site organisation/manager. Estate management companies tend not to have experience of managing shared facilities such as gardens. Experience of renting car parking spaces does not transfer well to allocating and managing individual growing plots. Having a growing plot is treated as a private transaction rather than a method of managing a shared space for all to enjoy as part of the amenity of the development. If a bed is unallocated and no longer generating an income, it is taken out of service to the detriment of the overall provision of open space within the development.

Partnership Projects

In many situations there could be a combination of local organisations and individuals interested in setting up the growing project. For example, a local organisation or charity may have secured external funding to support food growing in the area and be looking for suitable locations. Even if a local lead for the project isn't forthcoming from the on-site community, a food growing project may still be welcomed in the area.

Often, partner organisations can act as an intermediary to support resident involvement, facilitate workshops and deliver training sessions. In this case, the role of the landowner is primarily to work with the partner organisation to ensure that it consults meaningfully with the local community.

As estate management organisations tend to have limited experience of resident/employee involvement, this option reduces the burden from their staff team. They may assist by:

- Promoting the project locally and through resident / staff newsletters
- Giving permission and providing a simple partnership agreement outlining expectations.
- Liaising with grounds maintenance teams to alter maintenance of the area.
- Supporting the development of a group to take on the long-term site management.

Meanwhile spaces

Many sites with future plans have been used for temporary food growing under the idea of 'meanwhile uses'. In this situation it is important that growers understand this temporary nature and that a licence is set up. It is also worth thinking about a notice period in relation to the growing season and the transferability of any materials or growing beds that are built.

Food Growing and Development

Updated September 2020

Edible planting in the public realm

Stanford and Cleveland Community Garden, Brighton



Photo credit: Stanford and Cleveland Community Garden

This 30ft by 20ft community garden is situated on an open street corner. It won the Best Community Garden award 2014. It shows passers-by that it is possible to grow your own food which includes fruit trees and soft fruit.

<https://community21.org/partners/prestonpark/directory/food/14067>

Food Growing and Development

Updated September 2020

Maintenance of Edible Spaces				
	Maintenance requirement • L Low • M Medium • H High	Grounds maintenance contractors	Self-managed and / or contract gardeners for all or part	Individual occupiers
Edible Landscaping	L	Y		Y if incorporated within individual plots/ gardens.
Forest Gardens	M		Y	
Communal gardens	H		Y Potential for residents to take on management for all or some communal amenity open space.	Y if raised beds allocated to individuals
Roof gardens	H		Y Potential for staff or residents to take responsibility for areas under direction from facilities manager	Y if raised beds allocated to individuals
Internal Atriums / courtyards	H	Y		
Orchards	L		Y Pruning under specialist guidance	Y if trees distributed across private gardens
Therapeutic gardens	H		Y Potential for user groups to participate in gardening activities led by professional	
School gardens	H		Y Lead member of staff to organise & train other staff to carry out tasks and run educational sessions. Potential for parent/carers to be involved; holiday cover needed for watering; involvement of corporate volunteering teams for major tasks.	
Meanwhile gardens	M		Y Community group leases site from developer	

Food Growing and Development

Updated September 2020

Resources

Planning and Food Growing

Sustain (2014) Planning sustainable cities for community food growing, https://www.sustainweb.org/publications/planning_sustainable_cities/#

TCPA Practical Guides – Guide 8: Creating health promoting environments <https://www.tcpa.org.uk/tcpa-practical-guides-guide-8-health>

TCPA 2019, [Practical Guide on “Edible Garden Cities”](#). This practical guide provides an overview of the policy requirements, background principles and current practices for embedding sustainable food systems from the outset in new development.

Blog on productive urban landscapes from Katrin Bohn (<http://blogs.brighton.ac.uk/pulr/>)

Viljoen, A. & Bohn, K. (eds.) (2014) Second nature urban agriculture: Designing productive cities. United Kingdom: Routledge.

Design & technical

https://www.sustainweb.org/publications/grow_more_food_top_tips/

<https://www.sustainweb.org/publications/urbanfarmingtoolkit/>

https://www.sustainweb.org/publications/edible_cities/

Greenspace Scotland, 2013, *Our Growing Community Resource Pack* developed to help Scottish communities explore new places and more ways to grow their own fruit and vegetables. <https://www.greenspacescotland.org.uk/food-growing-publications>
https://drive.google.com/file/d/12ty4r_sJ2mz4OtiVukKzoxAWL-VpgUpd/view

Environmental Protection UK, 2014, *Growing edible Crops*. produced to explain the potential health risks of growing edible crops where the condition of the soil may not be known and to provide information on what can be done to reduce these risks. <https://www.environmental-protection.org.uk/resource/growing-edible-crops/>

https://www.groundwork.org.uk/wp-content/uploads/2019/08/Air_Quality_GI_Toolkit_for_Schools.pdf

<https://www.farmgarden.org.uk/system/files/workplacegrowing12014.pdf>

<https://cris.brighton.ac.uk/ws/portalfiles/portal/4752412/Mikey+Tomkins.pdf>

Management

https://www.sustainweb.org/publications/capital_growth_what_we_learned/

https://www.sustainweb.org/publications/edible_estates/

Practical guide to help urban food growers incorporate wildlife-friendly practices and principles into their gardens. https://www.sustainweb.org/publications/london_grows_wild/

<https://www.groundwork.org.uk/themes/landscape-design-and-management/>

Food Growing and Development

Updated September 2020

Appendix 1 Policy Framework

National Policy

The National Planning Policy Framework

The National Planning Policy Framework specifically recognises the role of food in creating healthy communities. Local planning authorities should ensure the provision of safe and accessible green infrastructure, access to healthier food and allotments to achieve healthy, inclusive and safe places which enable and support healthy lifestyles (paragraph 91).

The Framework confirms that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. (NPPF para 124)

National Planning Practice Guidance

Planning Practice Guidance recognises the multiple functions of green infrastructure:

- Building a strong, competitive economy
- Achieving well-designed places
- Promoting healthy and safe communities

This PAN has been compiled to ensure that opportunities for recreation, exercise, social interaction, experiencing and caring for nature, community food-growing and gardening can improve the wellbeing of our neighbourhoods and bring mental and physical health benefits to residents as required by national guidance.

Planning Practice Guidance also highlights the role of planning in creating a healthier food environment.

“Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.”

National Design Guide

The National Design Guide 2019⁵ sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is based on national planning policy, and forms part of the Government’s collection of planning practice guidance. It covers the built form as well as the quality of the spaces between buildings.

In summary, the National Design Guide sees well-designed places as those that are integrated within a network of greenspaces. Public, shared and private outdoor spaces should contribute to biodiversity, water management, climate change mitigation and resilience. It recognises that the inclusion of activities such as play, food production, recreation and sport will also have benefits for health, well-being and social inclusion. However, it is not enough for spaces to be well designed at the outset; maintenance and management regimes should be based on an understanding of the

⁵ MHCLG, 2019, National Design Guide Planning practice guidance for beautiful, enduring and successful places
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835212/National_Design_Guide.pdf

Food Growing and Development

Updated September 2020

costs for occupants or users, to ensure longevity. “Well-designed places consider management and maintenance regimes from the early stages of the design process.”

This PAN reflects some key principles relating to the definition of good design and the relationship between buildings and spaces.

Public Health

Public Health England include “Access to fresh, high quality affordable food” as a healthy community indicator in their health and urban planning toolkit.⁶

NHS England guide, “Principles 4-8 Design, deliver and manage”⁷ looks at how communities can be designed in a way that encourages people to live healthier, more sustainable lives. The guide covers the key elements of developing healthy places including a significant chapter on healthier eating, access to affordable healthy food and food growing.

- “Development partners should work with the community to create and sustain areas in new developments where food could be grown.”

Include opportunities to grow food

New developments provide an opportunity to embed food growing in the local environment from the outset. When people grow food in allotments or community gardens and at home they can learn about horticulture and healthier eating and gain access to affordable vegetables and fruit. They are able to connect with nature, meet and share with neighbours, engage in physical activity and enhance the appearance of their neighbourhood. (NHS, 2019)

⁶ <http://www.apho.org.uk/resource/view.aspx?RID=93163>

⁷ NHS, (2019) Putting Health into Place: Principles 4 - 8 Design, Deliver and Manage
<https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/>

Food Growing and Development

Updated September 2020

Brighton and Hove City Plan

Brighton and Hove City Plan Part One (2016)⁸

Creating a more sustainable city is at the heart of the vision and strategy for the City Plan. The Strategy for the future of Brighton & Hove identifies the need to tackle the causes and effects of climate change. Adopting environmentally friendly practices such as growing more local food is one of the ways this can be achieved.

The aim is for all new development, whether large or small, to incorporate sustainable design features. All development proposals including conversions, extensions and changes of use will be expected to demonstrate how the development encourages food growing (Policy CP8 Sustainable Buildings). Productive planting in the public realm also contributes to an attractive city (CP13 Public Streets and Spaces).

The City Plan promotes and supports access to healthier lifestyles including access to healthy food. Planning will contribute to this city-wide objective by recognising, safeguarding and encouraging the role of allotments; garden plots within developments; small scale agriculture and farmers markets in providing access to healthy, affordable locally produced food options. (CP18 Healthy City). There are strong links between this policy and the City Plan policies on Urban Design (CP12); Public Streets and spaces (CP13); and Open space (CP16) where urban design, the provision, design of and access to open space (including natural green space) and the design of the public realm can encourage more active lifestyles.

The City Plan recognises that space for local food growing provides an opportunity to improve the environment and help to develop community cohesion and improve health outcomes (SA6 Sustainable Neighbourhoods). It also recognises that larger scale developments offer specific opportunities, e.g. the development of Toad's Hole Valley and Court Farm (Policy DA7 – Toad's Hole Valley) and new landscaping at Valley Gardens (Policy SA3 Valley Gardens). New allotments and local food production in the urban fringe will contribute to city's green network (Policy SA4 Urban Fringe).

Open space standards are set for new development (CP16 Open Space). Community gardens and community open space initiatives will help provide access to nature, local food growing and health benefits as well as social cohesion. If on-site food growing is designed to provide flexibility in use it will be able to adapt to changes in trends. A standard has been set for 'allotment' provision, however, it is recognised that, for many developments, innovative solutions will need to be found to help meet the city's open space requirements. This PAN provides ideas on how this might be achieved.

⁸ https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20version%20cityplan%20March%202016compreswith%20forward_0.pdf

Food Growing and Development

Updated September 2020

Proposed Submission City Plan Part 2 (April 2020)⁹

The City Plan Part Two states that the provision of useable outdoor amenity space is part of securing good design and a good standard of residential development in the city. This is a requirement for all scales of residential development (DM1 Housing Quality, Choice and Mix). Not only does this improve the health, well-being and general quality of life of the city's residents, it has the potential to support and enhance local biodiversity.

It is accepted that in some schemes it may be difficult to provide outdoor amenity space whilst maximising development potential (DM19) but there are many ways of achieving this e.g. gardens, balconies, patios, roof terraces and shared amenity spaces in flatted forms of development. This PAN shows how these amenity areas can also provide space for food growing.

Communal space and suitably landscaped outdoor space for informal recreation, including space that gives residents the ability to grow plants and food is a requirement in residential accommodation to meet the specific accommodation needs of older people (DM4 Housing and Accommodation for Older Persons).

Landscape plans which accompany planning applications should facilitate greater flexible and multi-functional use including food growing where practicable. High quality planting and landscape materials appropriate to the site and its proposed use including the planting of native species, new trees, hedges and the use of permeable hard landscape materials are all part of good design. In addition, plans should include provision for viable long-term maintenance and durable materials and include a funded maintenance plan. (DM22 Landscape Design and Trees)

On major and public realm schemes a Green Infrastructure plan and details of structural landscaping, which contribute to the existing overall landscape quality of an area, will need to be agreed with the council prior to the determination of a planning application. (DM22 Landscape Design and Trees)

⁹ <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two>

Food Growing and Development

Updated September 2020

Other City Strategies

The provision of new food growing spaces is part of wider strategic initiative to work towards a sustainable food system in the City coordinated through Brighton & Hove Food Partnership whose members include representatives from the public health team at NHS Brighton & Hove, the City Council, Food Matters and for a Councillor from the Sustainability Cabinet.

Brighton & Hove Food Partnership is a member of the UK Sustainable Food Cities (SFC)¹⁰ network. This is a growing movement of over 50 towns, cities, boroughs and regions that share the same approach for transforming food, food culture and who recognise the role of food as a catalyst for change in addressing key economic, environmental and social issues.

The Brighton and Hove Food Strategy Action Plan

The Brighton and Hove Food Strategy¹¹ aims to achieve a healthy, sustainable and fair food system for everyone in the city and beyond. Launched in 2006, refreshed in 2012 and 2018, the Action Plan sets out how collectively as a city we will achieve a vision of a healthy, sustainable and fair food system for Brighton and Hove. The action plan is based on community engagement involving almost 100 partners including 26 separate City Council departments, and a year-long consultation with over 600 people to gather commitments and ideas from across the city and beyond. The strategy has been adopted by Brighton & Hove City Council and the Local Strategic Partnership. The Planning Advisory Note 2011 was a key achievement of the action plan.

The Brighton and Hove Food Strategy Vision

Our vision is a city where everyone has the opportunity to eat healthy food from sustainable sources

- It is a city where residents know where their food comes from, understand and celebrate the delicious diversity of food that changes with the seasons and feel a connection to the people and the surrounding land and sea that provide it.
- It is a place where everyone feels confident in cooking nutritious meals, where people are healthier and where, from a young age, we learn to grow food and to cook using fresh ingredients. [...]
- Everyone lives within walking distance of a source of fresh, affordable food that has been farmed, caught or harvested in a sustainable way. [...]
- Communities have access to land and buildings to support food production through joint-buying or other community investment initiatives.

Milan Urban Food Policy Pact

Brighton and Hove is a signatory city to the Milan Urban Food Policy Pact¹², an international agreement committing to healthy, sustainable food.

“Acknowledging that urban and peri-urban agriculture offers opportunities to protect and integrate biodiversity into city region landscapes and food systems, thereby contributing to synergies across food and nutrition security, ecosystem services and human well-being;”

¹⁰ <http://sustainablefoodcities.org>

¹¹ <https://bhfood.org.uk/wp-content/uploads/2018/11/Final-FULL-WEB-Food-Strategy-Action-Plan.pdf>

<https://bhfood.org.uk/resources/food-strategy/>

¹² <http://www.milanurbanfoodpolicypact.org/text/>

Food Growing and Development

Updated September 2020

Appendix 2 Brighton & Hove Checklists

Health Impact Assessment Checklist

A Health Impact Assessment guidance and checklist has been produced by the council. This checklist brings together various local planning policy requirements relating to health and aims to support applicants who are either required to undertake HIA, or who are required to demonstrate how their development minimises adverse impacts and maximises positive impacts on health.

The guidance can be found on the council website:

<https://www.brighton-hove.gov.uk/content/planning/planning-applications/planning-policy-advice-and-guidance>

Sustainability Checklist

The sustainability checklist is an online tool that is required to be completed for all residential planning applications. The following extracts from the checklist are of relevance to growing food

Water

Does the development include proposals to:

- Incorporate rainwater butts
- Incorporate rainwater harvesting system
- Incorporate grey water recycling system
- Carry out feasibility study for rainwater harvesting and/or grey water recycling

Building standards

Will any dwellings be evaluated under a certified scheme to assess sustainability?

- No Certification scheme will be used
- Home Quality Mark one star
- Home Quality Mark two star
- Home Quality Mark three star
- Home Quality Mark four star
- Home Quality Mark five star
- PassivHaus
- Other, please specify

Growing food

Is there provision for food growing included on the development site?

Where is it located?

- Roof
- Ground level
- Other, please specify

Food Growing and Development

Updated September 2020

Details of food-growing space

- Raised beds (sqm)
- Allotment (sqm)
- Dedicated area on ground level (sqm)
- Communal growing space (sqm)
- Fruit trees (specify number of trees)
- Nut trees (specify number of trees)

Will introduced soil be prepared to BS Top Soil Standard?

Will fruit trees be planted away from busy roads?

Will there be a gardener to oversee these facilities?

Waste

Will composting facilities will be provided?

The checklist can be found on the council website:

<https://www.brighton-hove.gov.uk/content/planning/planning-applications/sustainability-checklist>

Food Growing and Development

Updated September 2020

Appendix 3 Building accreditation schemes

BREEAM Communities

BREEAM Communities is a framework for considering the issues and opportunities that affect sustainability at the earliest stage of the design process for a development. The scheme addresses key environmental, social and economic sustainability objectives that have an impact on large-scale development projects. Certain developments within Brighton & Hove are required to meet BREEAM standards. The following extracts are of relevance to food growing.

Category SE 02 – Demographic needs and priorities

Criteria CN2 Local needs and requirements.

The community and appropriate stakeholders are consulted on the local needs and requirements that are desired as part of the proposed development. Their views are then prioritised in order of desirability (low, medium and high) taking into account the local authority's strategy for the local area eg. for:

- allotment space or places growing fresh fruit and vegetables

Category GO 04 – Community management of facilities

Criteria CN1 Community facility.

All community facilities being developed during the construction phases will be managed and procedures will be in place to allow handover to a responsible party at project completion.

This could include community buildings, allotments, meeting places, areas of public access, or any other facility agreed by the community.

BREEAM Communities technical manual (2017) can found as follows:

https://www.breeam.com/communitiesmanual/content/resources/otherformats/output/10_pdf/20_a4_pdf_screen/sd202_breeam_communities_1.2_screen.pdf

Home Quality Mark (HQM)

The Home Quality Mark is a certification scheme for new homes. Developers can pursue this if they chose to do so, however it is not a local requirement. The following extracts are of relevance to food growing.

Issue 2.1 Identifying Ecological Risks and Opportunities

Title: 04 Comprehensive route - Wider site sustainability

Criteria 12: When determining the optimal ecological outcome for the site, consider the wider site sustainability-related activities and the potential for ecosystem service-related benefits.

For criteria 12, the considerations made as part of determining the optimal ecological outcome for the project must also consider opportunities for integrating ecology with wider site sustainability related activities and ecosystem service related benefits, including but not limited to the following:

1. Landscape, including design, heritage and local character, and green infrastructure.
2. Health and wellbeing:

Food Growing and Development

Updated September 2020

- a. Recreational space (including growing space, community agriculture or horticultural and allotment activities). This may feed into the 2.5 Recreational Space issue.

5. Community and end-user engagement and involvement

Issue 2.5 Recreational Space

Title: 05 Growing space

Criteria 6: Up to 3 credits can be awarded where growing space is provided in close proximity to the home. Credits are awarded depending on whether the growing space is private or communal. This space must be in addition to any space used to achieve credits in the 'Private space' or 'Communal space' criteria.

Criteria 7: Where growing space is provided in a communal area, suitable management and maintenance arrangements are in place.

Criteria 8: The local authority and local growing initiatives or groups (where present) have been consulted to determine the demand for, and suitable types of, growing space.

Criteria 9: The outputs of the consultation feed into the provision of growing space.

Title 06 Expert input

Criteria 10: Criteria 6–criteria 9 have been achieved and growing space is being provided.

Criteria 11: Expert input is sought at the design stage to inform the design of the growing space, and their advice feeds into the provision of growing space.

Criteria 12: Growing space is planted with low maintenance species in part of the area, in accordance with the expert input.

The Home Quality Mark Technical Manual can be found as follows:

<https://www.homequalitymark.com/wp-content/uploads/2018/09/HQM-ONE-Technical-Manual-England.pdf>

Food Growing and Development

Updated September 2020

Appendix 4 Edible Plants

Edible plants suitable for shade (an indicative selection)

	Light shade	Partial shade	Moderate shade	
Perennial Fruit				
Red, white & black currents	✓	✓		Good for West facing parts of the garden with afternoon sun; East facing parts of the garden with morning sun but shaded in the afternoon.
Gooseberries	✓	✓		
Raspberries	✓	✓		
Rhubarb	✓	✓		
Hazel & cob nuts	✓	✓		
Morello cherries	✓			Recommended for east and north facing walls.
William's pears	✓			
Cooking apples	✓			Early maturing varieties
Pears, apples, plums, cherries				Tolerant of East facing parts of the garden that receive morning sun but shaded in the afternoon.
Elder <i>Sambucus nigra</i>	✓	✓		
Perennial Herbs				
Golden hop <i>Humulus lupulus</i>	✓	✓		A vigorous climber will cover unsightly walls
Golden oregano <i>Origanum vulgare 'Aureum'</i>	✓	✓		
Apple Mint	✓	✓	✓	
Angelica <i>Angelica archangelica</i>	✓	✓		
Sea Kale <i>Crambe maritima</i>	✓	✓		
Wild Strawberry <i>Fragaria vesca</i>	✓	✓		
Sweet cicely <i>Myrrhis odorata</i>	✓	✓		
Red Veined Sorrel <i>Rumex sanguineus</i>	✓	✓	✓	
Babington perennial leek	✓	✓	✓	

Food Growing and Development

Updated September 2020

Types of shade

Full sun	More than six hours of direct sun per day at midsummer.
Light shade	A site that is open to the sky, but screened from direct sunlight by buildings or trees.
Partial shade	Three to six hours per day of direct sun at midsummer.
Moderate shade	A site receiving sunlight for two or three hours of direct sunlight each day at midsummer.
Heavy shade	Less than two hours of direct sun per day.

Annual vegetables

The following annual vegetables are all relatively tolerant of light shade when transplanted as young plants. They will be fairly successful in partial shade with some direct sun in midsummer but gardens that rely on these conditions will constrain gardeners.

Beetroot, carrots (baby), chard, kale, kohlrabi, leaf salads, lettuce, peas, runner beans and spinach.

List of perennial fruits suitable for growing outside in suitable locations

South facing parts of the garden are the sunniest and suitable to grow all fruit, especially those that need ripening.

Apples	Kiwi fruit
Apricots	Medlars
Blackberries	Mulberries
Blackcurrants	Peaches
Blueberries	Pears
Cherries	Plums
Figs	Quinces
Gooseberries	Raspberries
Grapes	Redcurrants

Sussex varieties of fruit

<https://sussexappletrees.co.uk/#pg-220-1>

<http://www.sussexfruittrees.co.uk/fruit-varieties/apples/sussex-cultivars/>

Further advice provided by The Royal Horticultural Society is available:

<https://schoolgardening.rhs.org.uk/Resources/Info-Sheet/Planning-a-Fruit-Garden?returnUrl=%2FResources%2FFind-a-resource%3Fso%3D0%26pi%3D40%26ps%3D10%26f%3D2%2C4%3A%26page%3D5>

<https://www.rhs.org.uk/advice/profile?PID=934#section-4>

Food Growing and Development

Updated September 2020

Appendix 5 Further Information

Food and planning - advice for developers <https://bhfood.org.uk/resources/food-and-planning-advice/>

Edible Landscaping

Viljoen, A. & Bohn, K. (eds.) (2014) Second nature urban agriculture: Designing productive cities. United Kingdom: Routledge

The term Continuous Productive Urban Landscape (CPUL) was coined by Viljoen and Bohn, working at University of Brighton. CPUL is a network of interconnected green space in which food production is fully integrated into the urban fabric. The aim is to overcome the perceived divide between town and country and, through local production and consumption, encourage healthy and sustainable lifestyles.

Edible hedgerows and trees

<https://www.growveg.co.uk/guides/creating-an-edible-hedge-for-foraging-at-home/>

<https://www.hedgesdirect.co.uk/acatalog/Edible-Hedging-Guide.html>

https://www.theorchardproject.org.uk/guides_and_advice/contamination-issues/

Vertical growing

Advice for small scale community and home growing making effective use of walls growing in containers. <https://verticalveg.org.uk/>

Green walls: <https://www.rhs.org.uk/advice/profile?pid=547>

Outdoor amenity space

Crawford Martin, 2010, "Creating a Forest Garden: Working with nature to grow edible crops", includes a detailed directory of edible trees, shrubs, herbaceous perennials, annuals, root crops and climbers. <https://www.greenbooks.co.uk/creating-a-forest-garden>

<https://www.agroforestry.co.uk/about-agroforestry/forest-gardening/>

<https://spiralseed.co.uk/making-forest-garden/>

<https://www.incredibleedible.org.uk/news/forest-gardens-part-of-incredible-edible-landscapes/>

<https://brightonpermaculture.org.uk/permaculture/what-is-permaculture/>

Food Growing and Development

Updated September 2020

Roof gardens

<https://livingroofs.org/intensive-green-roofs/>

<https://greenrooftraining.com/>

Roof gardens and balconies, practical considerations

<https://www.rhs.org.uk/advice/profile?pid=674#section-1>

Green roofs

<https://www.rhs.org.uk/advice/profile?pid=289>

Green roof and roof garden installations

<https://livingroofs.org/wp-content/uploads/2019/04/LONDON-LIVING-ROOFS-WALLS-REPORT-2019.pdf>

Orchards

<https://brightonpermaculture.org.uk/orchards-and-fruit/our-work-with-orchards-and-fruit/>

<https://brightonpermaculture.org.uk/orchards-and-fruit/sussex-apples/>

https://www.theorchardproject.org.uk/guides_and_advice/things-to-look-out-for-when-planning-an-orchard/

https://www.theorchardproject.org.uk/guides_and_advice/growing-fruit-in-containers/

Therapeutic gardens

https://www.sustainweb.org/news/sep18_sow_the_city/

<https://www.mariecurie.org.uk/blog/a-peaceful-haven-at-the-hospice/159588>

<https://www.maggiescentres.org/how-maggies-can-help/help-available/social/gardening-groups/>

School gardens

<https://schoolgardening.rhs.org.uk/Resources/Info-Sheet/setting-up-a-school-garden?returnUrl=%2FResources%2FFind-a-resource%3Fso%3D0%26pi%3D30%26ps%3D10%26f%3D2%2C12%3A%26page%3D4>

<https://www.schoolfoodmatters.org/why-school-food-matters>

Food Growing and Development

Updated September 2020

Practical considerations

Composting

<https://sussexwildlifetrust.org.uk/discover/in-your-garden/sustainable-gardening>

<https://www.rhs.org.uk/advice/profile?pid=444>

<https://www.gardenorganic.org.uk/compost>

<https://bhfood.org.uk/how-to-hub/composting-tips/>

<https://bhfood.org.uk/directory-hub/community-composting/>

Raised beds

<https://www.thrive.org.uk/files/images/Shop/How-to-build-raised-beds.pdf>

<https://www.incredibleedible.org.uk/news/soil-v-raised-beds-some-ideas/>

<https://www.rhs.org.uk/advice/profile?PID=428>

Containers

<https://verticalveg.org.uk/>

Fruit growing <https://www.rhs.org.uk/advice/profile?pid=321>

Maintenance: <https://www.rhs.org.uk/advice/profile?pid=350>

Vegetables <https://www.rhs.org.uk/advice/profile?pid=527>

Management & ongoing maintenance

<https://brightonpermaculture.org.uk/orchards-and-fruit/plant-a-community-or-school-orchard/>

<http://nationalforestgardening.org/benefits-of-forest-gardens/sustainable-food-and-other-produce/>

<https://brightonpermaculture.org.uk/orchards-and-fruit/sussex-apples/>

Sustain, 2014, Edible estates, A good practice guide to food growing for social landlords

https://www.sustainweb.org/publications/edible_estates/?section=

Subject:		Anti-slavery pledge	
Date of Meeting:		24th September 2020	
Report of:		Interim Executive Director – Housing, Neighbourhoods & Communities	
Contact Officer:	Name:	Tim Read	Tel: 01273 294628
	Email:	Tim.read@brighton-hove.gov.uk	
Ward(s) affected:		All	

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 The Modern Slavery Act came into effect in 2015. It covers offences of human trafficking, labour exploitation (slavery / forced or compulsory labour), domestic servitude, sexual exploitation and criminal exploitation. Brighton & Hove City Council is a designated First Responder agency and is subject to the Duty to Notify the Home Office – as the Single Competent Authority - of all potential victims of modern slavery and human trafficking in the city.
- 1.2 The Sussex Anti-Slavery Network is a regional network consisting of Sussex Police, the Office of the Sussex Police & Crime Commissioner, all local authorities in Sussex (including districts and boroughs), other law enforcement agencies and the community and voluntary sector. The Home Office is encouraging all local authorities to sign up to the Anti-Slavery Pledge spearheaded by Birmingham City Council in 2019 in advance of Anti-Slavery Day 2020 (18th October). This work is being coordinated locally by the Sussex Anti-Slavery Network. The draft Brighton & Hove City Council anti-slavery pledge and statement of intent seeks to clearly demonstrate the city's legal and moral duties to do all it can to end all forms of modern slavery and human trafficking in Brighton & Hove.

2. RECOMMENDATIONS:

- 2.1 That the Committee recommends to Full Council that Brighton & Hove City Council signs up to the Anti-Slavery Pledge and statement of intent as drafted (appendices one and two refer).
- 2.2 That the Committee recommends to Full Council that it appoints an elected member to champion the work required under the auspices of the pledge.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 Brighton & Hove City Council has been a designated First Responder agency since 2015. It is clear that there is some understanding of modern slavery and human trafficking across the organisation and council staff have referred some potential victims into the National Referral Mechanism (NRM) for the Single

Competent Authority (Home Office) during that time period. It is recognised nationally that the number of NRM referrals made do not fully reflect the true scale of the issues that we have in the country in relation to these crime types.

- 3.2 The city's Community Safety & Crime Reduction Strategy 2020-23 has an exploitation theme for the first time which includes modern slavery and human trafficking out of recognition that this is a priority area of the Community Safety Partnership Board together with the Safeguarding Adults Board and Safeguarding Children Partnership Board.
- 3.3 The latest Government data tells us that in 2019-20 the total number of UK NRM referrals was 10,627. This has increased from just 711 in 2010 (when this type of recording began). In 2019-20 this was a UK total of 5860 adult referrals and 4545 referrals for children. Brighton & Hove City Council submitted six in total (one adult, five children) which is one less from 2018-19. In comparison, East Sussex County Council submitted two (child) referrals for 2019-20 (none in 2018-19), West Sussex County Council submitted ten (child) referrals for 2019-20 (none in 2018-19) and Sussex Police submitted 39 adult and 61 child referrals for 2019-20 (47 in 2018-19). It is clear there is more work to be done to ensure NRM referrals are being made for all potential victims of modern slavery and human trafficking.
- 3.4 Brighton & Hove City Council established a Modern Slavery Steering Group in 2019 chaired by the Community Safety Team with representation from key council services including Adult Social Care, Children's Services and Housing Options. The primary function of this group was to develop a modern slavery referral pathway that all council staff can use to refer potential victims of modern slavery into so that they can be interviewed by specially trained staff to determine if they are potential victims and if so to refer them into the NRM. This referral pathway was introduced on 1st April 2020 and since then it has received four notifications from Housing Options related to adults (believed to be labour exploitation) and four notifications from Children's Services related to children (believed to be criminal exploitation – namely 'county lines'). This already exceeds what was submitted by Brighton & Hove City Council in the whole of the previous financial year.
- 3.5 As a First Responder agency Brighton & Hove City Council has a Duty to Notify the Home Office under Section 52 of the Modern Slavery Act 2015. As a local authority the council is encouraged to publish a supply chain transparency statement under Section 54 of the Modern Slavery Act 2015 which, whilst this is not currently a legal Duty, it is expected to become one in the near future.
- 3.6 The Sussex Anti-Slavery Network has agreed a set of key performance indicators to enable progress to be tracked and monitored. These indicators include senior buy-in (elected members, senior officers), attendance at the Network, number of specially trained staff, a clear external and internal modern slavery policy, transparency around supply chain, availability of appropriate modern slavery training, monitoring of S.52 Duty to Notify and a strategic working group to oversee this work. At the time of writing both of the county councils in Sussex have committed to signing this pledge in time for Anti-Slavery Day 2020.

- 3.7 The draft pledge and statement of intent are based on the Birmingham City Council documents which are recommended as best practice by the Home Office. The documents contain clear activities to ensure the council is doing all it can to tackle all forms of modern slavery in the city and the actions outlined in the statement of intent inform the council's Modern Slavery Steering Group's action plan. The Steering Group is co-chaired by the Head of Safer Communities and Exploitation Coordinator on behalf of the local authority.
- 3.8 The draft Anti-Slavery Pledge can help to support some of the activity of the Anti-Racism Pledge in terms of focusing on supporting Black, Asian and Minority Ethnic (BAME) businesses through council procurement and encouraging local support; and working with BAME communities and groups to agree our approach to different statues, plaques and street names.
- 3.9 There is limited hard data to demonstrate the impact COVID-19 has had on exploitation within Brighton & Hove although this is currently being developed as a priority area as part of the Exploitation Action Plan as part of the Community Safety & Crime Reduction Strategy. However, Sussex Police undertook a specific police operation named Apollo to gather partnership intelligence across the county to increase understanding of the impact COVID-19 has had on drug supply and demand. This clearly has an impact on potential exploitation in relation to Organised Crime Groups, gangs and criminal networks. Some of the information received from CGL (Change, Grow, Live who are commissioned to deliver the Brighton & Hove Substance Misuse Recovery Service) and St Mungos (who are commissioned to deliver homelessness outreach work) identified that drug supply was interrupted by COVID-19 initially which may lead to an increase in exploitation tactics and potentially serious violence due to debt entrapment.
- 3.10 The Community Safety Team has had increasing engagement with commissioned supported accommodation providers within the city and it appears that there has been an increase in the criminal and sexual exploitation of vulnerable women particularly.
- 3.11 Additionally, there are concerns that refugees, migrants and asylum seekers with no recourse to public funds will be increasingly driven into forms of exploitation (such as nail bars, food delivery, car washes, farming, etc.) because of increasing poverty. This is something that is being closely monitored by the local authority as part of the city's COVID recovery plans.
- 3.12 Further to the Cooperative Party's Notice of Motion to sign up to a Charter Against Modern Slavery (presented to the [Policy, Resource & Growth Committee in October 2018](#)) progress has been made in relation to improving practices of the council's corporate procurement service including identifying a lead officer to develop the organisation's position related to S.54 of Modern Slavery Act 2015 to have clear and transparent supply chains. This is not currently a statutory duty for local authorities however this is expected to change in coming months and therefore this is a key component to the ongoing work of the Modern Slavery Steering Group described previously. A Modern Slavery Coordinator was recruited for a fixed-term contract to ensure compliance with S.52 of Modern Slavery Act 2015 to notify Home Office of all potential victims and this work is now overseen by the Exploitation Coordinator (a permanent post) to drive this

work forward including the delivery of multi-agency training around spotting the signs of modern slavery and trafficking and how to refer using the online portal (National Referral Mechanism). The Anti-Slavery Pledge and associated documents presented to this committee update on the auspices of the previous Notice of Motion and bring it in line with recommended national best practice based on the ongoing developing picture as directed by the Home Office in the past 12 months.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 No other alternative option was considered as only close partnership working with strong leadership between the council, other public bodies and the community and voluntary sector can ensure that the city as a whole tackles exploitation in all its forms.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 There has been no consultation in the compiling of this report due to the nature of the pledge being for Brighton & Hove City Council only. However, members of the Modern Slavery Steering Group will undertake community engagement as part of their activity to deliver on the actions in the statement of intent as required.

6. CONCLUSION

- 6.1 Brighton & Hove City Council prides itself as a safe and welcoming destination for visitors, residents and businesses as recognised by its City of Sanctuary status. The Anti-Slavery Pledge is a public statement that the council seeks to build on this – together with partner organisations – to eradicate all forms of modern slavery and trafficking in the city.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 There are no member expenses attached to the role of modern slavery champion.
- 7.2 There are no specific financial implications arising from the report. Any activity or actions required in supporting the Anti-Slavery Pledge can be delivered from within the Council's existing resources.

Finance Officer Consulted: Michael Bentley

Date: 08/07/20

Legal Implications:

- 7.3 Council Committees do not have delegated powers to sign up to charters, alliances or pledges on behalf of the Council. All such requests must instead be referred to Full Council. Other legal implications are set out in the body of the report.

Equalities Implications:

- 7.4 Modern slavery and human trafficking often target the most vulnerable and isolated in society, so the legally protected characteristics of disability, ethnicity, age, sex/gender are particularly relevant here, as well as other social inclusion issues relating to poverty, debt, and housing and migration status. This focused and partnership-based approach will ensure better co-ordination and sharing of intelligence to enable more effective interventions. Ongoing assessment of who is most vulnerable and most harmed by modern slavery will continue throughout the work.

Sarah Tighe-Ford (Equalities Manager) Date: 26/08/20

Sustainability Implications:

- 7.5 There are no sustainability implications identified at this stage.

Brexit Implications:

- 7.6 There are no Brexit implications identified at this stage.

Crime & Disorder Implications:

- 7.7 The Local Government Association produced guidance about how local authorities are expected to tackle modern slavery in 2019. This guidance states that modern slavery is a serious, complex and often organised crime. Under Section 17 of the Crime and Disorder Act councils have a duty to do all that they reasonably can to prevent crime and disorder in their areas, which will include modern slavery and trafficking. There are a range of crimes where councils may come across victims of modern slavery, including county lines, child sexual exploitation, gangs, violent crime, drugs and begging, amongst others. Many parts of the council have powers of entry and inspection that can be used to disrupt the activities of traffickers and criminal networks including trading standards, environmental health, planning enforcement and housing inspection.

The local authority has a significant role to play in leadership and coordination of the close partnership working with other public bodies and the community and voluntary sector.

Risk and Opportunity Management Implications:

- 7.8 This risk is one that all services should be aware of as part of their usual delivery and planning. The city council's Strategic Risk Register does not include reference to or actions relating to modern slavery and human trafficking and there is no specific risk register on this that the City Council's Risk Management Lead is aware of.

Public Health Implications:

- 7.9 All forms of exploitation described earlier in this report have significant public health implications such as poverty, mental health, substance misuse, sexual abuse, serious violence, criminal exploitation and cuckooing of children and vulnerable adults. The Home Office Serious Violence Strategy considers all of these as symptoms of serious violence and advocates a public health preventative approach to tackling this.

Corporate / Citywide Implications:

- 7.10 Section 52 of the Modern Slavery Act 2015 specifies that a public authority (within the designated list) must refer the details of every person for whom they have reasonable grounds to believe is a victim of a S.1 or S.2 MSA offence. Our combined, effective and meaningful interoperability seeks to ensure that professionals are sighted on all the relevant information and scenarios that might provide those grounds. If a person should have been recognised as a victim and was not referred, then it is possible that the “first responder organisation” can be accused of failing to carry out its legal responsibilities. Our pledge is calculated to be a catalyst to identify more accurate referrals and for the chances of legal action taken to be avoided.
- 7.11 Article 4 of the European Court of Human Rights (S.58 + 63,64) provide a procedural obligation for the state to take operational measures and meaningfully investigate all credible information that suggests a person’s rights are being breached. Our joined-up efforts in respect of recognising, researching, sharing and escalating our response to “credible suspicion” of a A4 violation is crucial for the welfare of any victim, pursuit of offenders and to demonstrate that our efforts are effective, timely and does not rely on victim disclosure. We are supposed to implement sufficiently skilled approach to do the job where victims will not or cannot disclose / testify). Local authority personnel within the combined safeguarding and vulnerability agenda may well be the first, most skilled and best placed to raise credible suspicion and context that leads to investigation. Where this fails, victims may take legal action against the authorities for failing to adequately investigate. The pledge consequently seeks to maximise the chances that credible suspicions are raised sufficiently to enable a sound, joined up and timely tactical approach by the law enforcement community.

SUPPORTING DOCUMENTATION

Appendices:

1. Anti-Slavery Pledge
2. Anti-Slavery Statement of Intent

Background Documents

1. None



Anti-Slavery Pledge

Pledge to become a Slavery Free Community

As leaders in Brighton & Hove we, the undersigned, commit to doing everything in our power to make our city free of modern slavery. We will work proactively with national and local government, law enforcement agencies, business, the community and voluntary sector, faith bodies and our local communities to:

- Demonstrate strong leadership for anti-slavery initiatives;
- Raise awareness amongst our staff, associates and the people we service on a daily basis;
- Train our staff to recognise and respond appropriately to potential signs of slavery;
- Share intelligence and information to help detect slavery and ensure it cannot take root;
- Support victims and survivors in our communities;
- Remove slave-based labour from our supply chains;
- Contribute to building a prosperous and slavery-free economy.

In this way Brighton & Hove stands in support of the United Nations Global Sustainable Goal 8.7 to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour by 2030.

Dated: 24th September 2020

Signed:

Cllr. Phelim Mac Cafferty Leader of Brighton & Hove City Council	
Cllr. Nancy Platts Leader of the Labour Group	
Cllr. Steve Bell Leader of the Conservative Group	
Geoff Raw Chief Executive Officer	



Anti-Slavery Pledge

Declaration of intent to tackle modern slavery and human trafficking by Brighton & Hove City Council

Modern slavery includes human trafficking, domestic servitude, forced labour or criminality and sexual exploitation.

There are more slaves worldwide today than at the height of the Atlantic slave trade in the 18th Century. That includes over 13,000 modern slaves in the UK today - and the number is growing.

Modern slavery is a hidden crime, and it is closer than we think. It is happening in every corner of the country, and that includes here.

Brighton & Hove has a reputation for embracing and thriving on difference and is more recently famed for celebrating the diversity of its residents. As part of the City of Sanctuary national network, Brighton & Hove seeks to celebrate the contribution of those that have come here for safety and to reduce isolation, fear and exclusion. Brighton & Hove cannot deny its past and works hard to be a safe and welcoming city to all who come here.

Building on this, Brighton & Hove City Council is pleased to adopt this declaration of intent which will be the council's response to the horror of modern-day slavery and human trafficking and serve as the basis of future policies and procedures to tackle it.

1.	Brighton & Hove City Council abhors the vile and brutal crime of modern slavery and human trafficking in which people are treated like commodities and exploited for criminal gain. The council will do everything in its power to work with Sussex Police and other law enforcement agencies to help disrupt and bring to justice perpetrators of such crimes across the city.
2.	Brighton & Hove will adopt a victim-focused approach to modern slavery and human trafficking and endeavour to safeguard such individuals - whether they be children or adults – and provide for their health and wellbeing needs while they are in the care of the council
3.	Brighton & Hove City Council will do all in its power to avoid any element of modern slavery and human trafficking in its procurement process or its



Anti-Slavery Pledge

	procurement supply chain. In accordance with Section 54 of the Modern Slavery Act 2015 Brighton & Hove City Council will produce a Transparency Statement to this effect.
4.	Brighton & Hove City Council is fully aware of its designation as a First Responder Agency under the National Referral Mechanism and its responsibility to identify potential victims and refer cases to the UK Human Trafficking Centre Competent Authority of the National Referral Mechanism.
5.	Brighton & Hove City Council is aware of the need to train its staff to the highest possible level to ensure they are able to rescue and care for victims and refer them into the National Referral Mechanism should the victim consent to do so.
6.	Brighton & Hove City Council is working with the Sussex Anti-Slavery Network to ensure that all local authorities (including districts and boroughs) in this region agree to adopt the National Training Delivery Group training.
7.	Brighton & Hove City Council will train all its staff and elected members to ensure they are educated to the highest possible level in order for them to identify potential victims of modern slavery and human trafficking and how to engage with victims in order to ensure they obtain the best possible care and support for their needs.
8.	Brighton & Hove City Council will publish support guides and the Modern Slavery Helpline number and other helpful information on its corporate website in a variety of languages to help victims, staff and other citizens to report incidents of modern slavery.
9.	Brighton & Hove City Council will discharge its statutory duty to safeguard any children who they believe are a victim of modern slavery or who are being trafficked into, out of, or across the city.
10.	Brighton & Hove City Council will work with other statutory authorities and specifically Barnardo's Panel for the Protection of Trafficked Children (PPTC) to ensure they have in place robust standards to deal with missing child victims of modern slavery and human trafficking.
11.	



Anti-Slavery Pledge

	Brighton & Hove City Council will actively seek to work in partnership with government, Sussex Police, National Health Service, other law enforcement agencies, community and voluntary sector organisations, and any other bodies or organisations working to tackle modern slavery and human trafficking.
12.	Brighton & Hove City Council will work closely with the Anti-Slavery Commissioner to help improve the plights of victims, improve and enhance the support provided by the National Referral Mechanism, and seek to lobby Parliament to help bring changes to improve current legislation and encourage the development of new legislation should that prove necessary.
13.	Brighton & Hove City Council will work with Sussex Police to provide intelligence and to help engage with Sussex Police to disrupt modern slavery and human trafficking activity when and where the council become aware of it.
14.	Brighton & Hove City Council is fully aware that under Section 52 of the Modern Slavery Act 2015, it has a Duty to Notify in relation to anyone who is believed to be a victim – both adults and children – of human trafficking (including internal trafficking within the UK) and is willing and keen to do so.
15.	Brighton & Hove City Council is willing to share appropriate data with all agencies to help tackle this issue. To this end Brighton & Hove City Council will put in place any additional data sharing arrangements or Memorandum of Understanding as required as well as utilising powers under the Crime & Disorder Act 1988.
16.	Brighton & Hove City Council will create a Modern Slavery Steering Group to develop policy and procedures and oversee the Brighton & Hove City Council response to modern slavery and human trafficking at the highest level. This Group will be responsible for ensuring the delivery and implementation of the intentions set out in this document.
17.	Further to the items specified above, Brighton & Hove City Council is more than willing to take whatever further steps it deems fit to help address the whole issue of modern slavery and human trafficking and help protect victims, disrupt criminal activity and work closely with Sussex Police and other agencies to bring to justice perpetrators of this abhorrent crime.



Anti-Slavery Pledge

Dated: 24th September 2020

Signed:

Cllr. Phelim Mac Cafferty Leader of Brighton & Hove City Council	
Cllr. Nancy Platts Leader of the Labour Group	
Cllr. Steve Bell Leader of the Conserative Group	
Geoff Raw Chief Executive Officer	

Subject:	Rewilding of the former Waterhall Golf Course		
Date of Meeting:	24 September 2020 8 October 2020 – Policy & Resources Committee		
Report of:	Executive Director, Economy, Environment & Culture		
Contact Officer:	Name:	Ian Shurrock Kerry Taylor	Tel: 01273 292084 01273 292701
	Email:	ian.shurrock@brighton-hove.gov.uk kerry.taylor@brighton-hove.gov.uk	
Ward(s) affected:	Withdean		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 This report provides an update for TECC Committee, further to approval by Policy & Resources Committee on 23rd January 2020 to lease the former Waterhall Golf Course site. Approval was provided to lease the site to a Community Interest Company for a period of 25 years for rewilding, an events venue and education centre. There was strong support for rewilding to take place at the site.
- 1.2 As the Chairs Communication to the TECC Committee in June 2020 indicated, the preferred leaseholder had confirmed they would not be concluding lease arrangements. In addition, the Chair advised that Cityparks would assess if it was feasible for the service to undertake rewilding at the site. A report on the feasibility would be considered by this committee. Furthermore, consideration would be given to the options in relation to use of parts of the site which would be complementary to rewilding, including potential use of the clubhouse and other buildings located there.
- 1.3 This report requests approval for Cityparks to undertake rewilding at the Waterhall site. In addition, that a marketing exercise is undertaken of the remaining land and buildings not required for the rewilding to seek alternative uses.

2. RECOMMENDATIONS:

That the Tourism, Equalities, Communities & Culture Committee recommends to the Policy & Resources Committee that it:

- 2.1 Notes that the Community Interest Company (CIC) agreed by Policy & Resources Committee on 23rd January 2020 as the preferred leaseholder for the former Waterhall Golf Course site will not be concluding lease arrangements.
- 2.2 Agrees that the Council's Cityparks Service undertake rewilding at Waterhall and submit funding applications for Countryside Stewardship Grants to support this work. Community engagement will be a major part of the rewilding activities undertaken.
- 2.3 Agrees to a marketing exercise being undertaken of the buildings located on the site as per 3.12 and conclude lease agreements with preferred leaseholders, who will undertake activities which complement re-wilding.
- 2.4 Delegates authority to the Executive Director, Economy, Environment & Culture to implement the recommendations 2.2 and 2.3.

That the Policy & Resources Committee:

- 2.5 Notes that the Community Interest Company (CIC) agreed by Policy & Resources Committee on 23rd January 2020 as the preferred leaseholder for the former Waterhall Golf Course site will not be concluding lease arrangements.
- 2.6 Agrees that the Council's Cityparks Service undertake rewilding at Waterhall and submit funding applications for Countryside Stewardship Grants to support this work. Community engagement will be a major part of the rewilding activities undertaken.
- 2.7 Agrees to a marketing exercise being undertaken of the buildings located on the site as per 3.12 and conclude lease agreements with preferred leaseholders, who will undertake activities which complement re-wilding.
- 2.8 Delegates authority to the Executive Director, Economy, Environment & Culture to implement the recommendations 2.2 and 2.3.

3. CONTEXT/ BACKGROUND INFORMATION

Preferred leaseholder

- 3.1 Upon seeking to confirm the lease arrangements, further due diligence and the impact of the Covid-19 public health crisis led to the preferred leaseholder concluding that the former golf club house would not be financially viable as an events venue. The proposed leaseholder commissioned an industry expert to assess the potential for an events venue to generate income to assist with funding the proposals, but the market assessment was not positive.
- 3.2 However, the preferred leaseholder would still like to see rewilding take place at the Waterhall site and has already supported the council to achieve this aim by funding and instructing an ecological survey to progress the potential re-wilding process. This work is essential to determine the best conservation management plan for the site. Furthermore, this enables potential applications for Countryside Stewardship Grants to manage a variety of habitats including for species rich

grassland. This survey has been made available for the council to use at no cost which is a generous gesture.

Cityparks rewilding feasibility assessment

- 3.3 The council's Cityparks Service have undertaken an assessment of the feasibility for the service to undertake the management of the rewilding at the former Waterhall Golf Course. This is attached as Appendix 1.
- 3.4 In order to achieve the desire for rewilding at Waterhall Golf Course, it is proposed that Cityparks undertake the management of the land. Consultation had taken place with Natural England in respect of the funding streams available to help support the conservation works. To assist with rewilding by any party Cityparks have mapped and registered the land on the Rural Land Register. Natural England had advised that this is a pre-requisite to obtain payments from the Rural Payments Agency which administer the funding for Countryside Stewardship agreements.
- 3.5 A competitive process is undertaken for Countryside Stewardship funding which has an annual application window. Consultation has taken place with Natural England in respect of the most suitable payment options to achieve the desired conservation plan for the site. Cityparks already have a good working relationship with the relevant officer in Natural England due to their existing agreement and joint working on a partnership NHLF bid led by the National Trust. The application for Countryside Stewardship funding requires ecological feasibility surveys hence they have been undertaken. This will enable a thorough and full understanding of the species currently on the land ensuring the best type of management plan can be put in place.
- 3.6 The management plan will dictate the grants that can be applied for in the differing areas of the site, and so once this is established a better idea of the potential funding available will be known.
- 3.7 Cityparks already manages land on either side of the golf course for both public recreation and wildlife benefit. The combination of this with the golf course land will increase the impact of Waterhall both from an ecological and public recreation point of view and offer some economies of scale. CityParks have a proven record of managing a Higher-Level Stewardship agreement (the precursor of Countryside Stewardship agreements).

Clubhouse and outbuildings

- 3.8 If rewilding is undertaken by Cityparks they would require the use of one or two outbuildings. The clubhouse and remaining other outbuildings have the potential for other uses and to generate rental income for the council. Therefore, a further marketing exercise for these buildings would be undertaken over a minimum period of at least 4 months to enable a wide range of responses.
- 3.9 In addition to the clubhouse, the outbuildings on the site could have potential recreational and conservation uses that complement the rewilding in terms of

education use, bike hire, camping etc. These could also be included in any potential marketing exercise.

- 3.10 There is an opportunity to generate an income to help offset the loss of the previous golf management fee by leasing the various outbuildings and clubhouse to other uses that would be compatible and complementary with the land use and conservation objectives.
- 3.11 There is the ability to exclude some land surrounding the clubhouse from the rewilding and so this land could be included in the marketing of the clubhouse. It is proposed that this would be available as an option for any leaseholder. This would be flexible to not deter interested parties if they do not require the land. However, some uses may benefit from an area of land (the inclusion of land may now be even more important due to social distancing).

Marketing of Clubhouse and other buildings (see plan in Appendix 2)

- 3.12 To seek alternative use for the clubhouse and other buildings, it is proposed that the buildings are marketed as below with the potential of outdoor space available if complementary to the proposed building use, if required:
- The Clubhouse (including adjacent storage building)
 - The Outbuildings in the wooded area
 - The above as a combined proposal
- 3.13 During the previous marketing exercise (for the whole golf course), there were no proposals for just the use of the clubhouse. However, there have subsequently been a number of approaches to lease just the clubhouse itself. The criteria for selection of the successful leaseholder(s) would balance financial viability with encouraging wide community use.
- 3.14 The above marketing is with the aim of getting as many varied proposals as possible and capturing all interested parties. Some may only be interested in the clubhouse and do not want the extra responsibility of the outbuildings, or vice-versa.
- 3.15 Subject to the approval for Cityparks to undertake the rewilding, the remaining buildings will be offered to Cityparks for use as storage and welfare facilities (as per 3.8 above). These facilities will also be available to use by local volunteer and community groups connected to the rewilding.
- 3.16 If Cityparks do undertake the rewilding, there is the potential for greater flexibility for other leisure uses to be incorporated into the rewilded area. It would be very difficult to include such flexibility into an arrangement with an external leaseholder.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 As the previous marketing exercise for the whole Waterhall site was ultimately not successful in achieving a new leaseholder, it is considered that Cityparks would provide the best opportunity for desired use of rewilding to be achieved.

- 4.2 The range of options identified in 3.12 for the marketing of the clubhouse and other buildings is considered to provide suitable flexibility to potentially attract a range of interested parties and complementary uses.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 As indicated above, consultation has been on-going with Natural England and other bodies such as Rewilding Sussex (local branch of Rewilding Britain) regarding the potential for rewilding at the Waterhall site. Consultation has also been undertaken with the South Downs National Park Authority on the potential future use of the site.
- 5.2 It is proposed that an advisory committee is established which would be made up of experts and local stakeholders. Cityparks have extensive experience of working positively with volunteers across multiple conservation projects. Engagement with local community groups will be very important to ensure the views of interested parties can be given consideration for the rewilding.
- 5.3 The marketing exercise will use local advertising to ensure that interested parties in the Brighton and Hove area are aware of the opportunity.
- 5.4 The Local Access Forum has written to this Committee asking for the land to be declared as Statutory Open Access Land. The Cityparks rewilding does not restrict public access to the land on foot and the public will have similar access rights to those they would have on Statutory Open Access Land. However, it would remain within the control of the Council to alter this in the future.

6. CONCLUSION

- 6.1 The council's Cityparks Service undertaking the rewilding of the former Waterhall Golf Course would give this aim the most likely chance of success. This is heavily dependent on securing Countryside Stewardship funding from Natural England, as well as from other funding sources.
- 6.2 Marketing of the clubhouse and other buildings not required for rewilding would give the opportunity for potential income generation and complementary uses by the community.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The proposal to undertake rewilding at the Waterhall site could potentially be fully self-funded from external grant funding as set out both in the body of the report and in Appendix 1 with "limited cost to the council other than officer time" (Appendix 1, paragraph 6.1). The service have confirmed that there are a range of grants potentially available (Appendix 1, paragraph 6.2 – 6.4). There might also potentially be rental income from marketing the outhouses/ clubhouse as set out in the report.

- 7.2 As set out in the Financial Implications for the January 2020 Policy & Resources report, “mothballing” the site does result in the council incurring additional expenditure. It is assumed that until the buildings have been marketed and a new leaseholder is in occupation ongoing expenditure will be incurred. This expenditure is not currently included within 2020/21 budget assumptions and is therefore an additional service pressure.

Finance Officer Consulted: Jessica Lange

Date: 26/08/20

Legal Implications:

- 7.3 Decisions to dispose of land must be taken by Policy & Resources Committee. The Council is required to achieve the best consideration that can reasonably be obtained when disposing of land (s123 Local Government Act 1972).

Lawyer Consulted:

Alice Rowland

Date: 01/09/20

Equalities Implications:

- 7.4 If Cityparks undertake rewilding at the former golf course, enhanced public access could be achieved by not restricting access to the existing public rights of way. Such access would need to be compatible with the conservation and other uses of the area.

Sustainability Implications:

- 7.5 The focus at Waterhall Golf Course for rewilding would be on achieving a sustainable chalk landscape that would be for the benefit of the local community. Although there are some conflicts between wide ranging public access, a great deal of the wildlife that has evolved to live in a downland environment is tolerant of recreational disturbance. With management the biodiversity of the site can be increased and the creation of a large block of rewilded habitat will make a significant contribution to the management of the cities biodiversity.
- 7.6 Rewilding will help protect the chalk aquifer due to the minimal use of artificial inputs.

Brexit Implications:

- 7.7 None identified

Public Health

- 7.8 At present it is not known how the on-going uncertainty created by the Covid-19 pandemic may impact upon the progress of the proposals in this report.

SUPPORTING DOCUMENTATION

Appendices:

1. Cityparks rewilding feasibility assessment
2. Plan of buildings on the former Waterhall Golf Course

Background Documents

1. Report to Tourism, Development & Culture Committee dated 20th June 2019
2. Report to Tourism, Equalities, Communities & Culture Committee dated 16th January 2020
3. Report to Policy and Resources Committee dated 23rd January 2020

Subject:	Rewilding Waterhall Golf Course	
Contact Officers:		
Name:	Robert Walker	Tel: 01273 294349
	David Larkin	Tel: 07774 646761
Email:	robert.walker@brighton-hove.gov.uk david.larkin@brighton-hove.gov.uk	



Figure 1: Waterhall from 19 Acres

1 OVERVIEW:

- 1.1 CityParks has a solid track record providing Conservation Grazing over the last 10 years and are well placed to deliver conservation management at Waterhall Golf Course (WGC)
- 1.2 An independent Ecological Survey carried out over the summer identifies that
 - “Waterhall supports a high diversity of wildflowers including many specialist chalk grassland species. The habitat quality varies across the site with one exceptional area south of the clubhouse already meeting all the criteria for classification as species-rich chalk grassland. As a whole, the site was found to have high potential for restoration.”

- “Waterhall is highly suitable for chalk grassland restoration through a sensitive and sympathetic rewilding strategy which recognises not just its biodiversity potential but also its high levels of community use, exceptional landscape value and importance for carbon storage”.
- 1.3 It is proposed that the rewilding is managed as one compartment using “naturalistic management”, to mimic natural processes as far as is practical under the project title Wilding Waterhall.
 - 1.4 Adjacent areas already managed by CityParks as part of the Conservation Grazing project should be incorporated giving a total area of approximately 90Ha.
 - 1.5 Grazing animals will be introduced to live with minimum intervention allowing them to express more natural behaviour and provide more natural habitat drivers.
 - 1.6 CityParks experience with conservation grazing shows that it should be possible to manage the land on a cost neutral basis using Countryside Stewardship although some additional funding may be necessary for initial capital works such as perimeter fencing, which is already held in the Downland Initiative budget.
 - 1.7 The next submission date for Countryside Stewardship is May 2021 with a start date of January 2022. Some temporary grazing has been arranged for this autumn and some other preparatory work may be possible leading up to January 2022.
 - 1.8 The project should also attract additional funding which will allow a much enhanced project to be completed
 - 1.8.1 A draft project proposal has already been put to the Changing Chalk project board (necessary to meet the deadline for being included). This is a National Heritage Lottery Fund partnership project led by the National Trust that is currently in its development phase so stands a good chance of success
 - 1.8.2 The South Downs National Park have suggested bidding into their Landscape & Biodiversity Programme. The form of this bid will depend on the outcome of the Changing Chalk bid
 - 1.9 It also provides an excellent opportunity for wider working with Biosphere and Changing Chalk partners
 - 1.9.1 Sussex University are interested in doing research into the levels of carbon sequestration under pasture management.
 - 1.9.2 Kew Gardens can provide expertise in using existing wild flower areas to enhance ecologically poorer areas of the golf course
 - 1.9.3 There is potential to work with the National Trust in providing a wider public experience by linking with their Devils Dyke and Saddlescombe properties.
 - 1.10 CityParks have extensive experience at engaging volunteers and envisage creation of a dedicated volunteer group as well as drawing in volunteers from existing groups



Figure 2 New Forest Pony Grazing at 19 acres, Waterhall

- 1.11 It will also provide additional benefits that are not immediately measurable financially for example:
 - Improvements in biodiversity
 - Improvements in water quality
 - Carbon sequestration
 - An increase in the number and diversity of people utilising the space
 - An opportunity to engage people with nature and promote the objectives of the Biosphere
 - Improvements in public health leading to an overall reduction in health spending in the city
- 1.12 This proposal would contribute to council policy by:
 - taking action to redress biodiversity loss
 - taking action to limit climate change
 - supporting the objectives of the Biosphere.
- 1.13 It would contribute to government policy by:
 - contributing to the 25 year plan for wildlife
 - improving drinking water quality in the vulnerable Brighton aquifer
 - providing better access to natural landscapes.
- 1.14 The potential use of buildings on the site as part of the rewilding project, will be considered in conjunction with the outcome of the marketing of the buildings.

2 ANALYSIS & CONSIDERATION OF NATURALISTIC MANAGEMENT OPTIONS:

- 2.1 Naturalistic management allows natural processes to replace human management of sites where possible. It forgoes direct control of landscapes to achieve specific targets in favour of reaping the diverse benefits of allowing nature to act more freely. The benefits of naturalistic management can include biodiversity restoration and conservation, flood mitigation, carbon storage and sequestration, and space for recreation and physical and mental health recovery.
- 2.2 Naturalistic management can be implemented in a variety of ways, allowing management strategies to be tailored to specific site conditions and contexts.
 - 2.2.1 In its most ambitious form, true rewilding would see the return of all the species that are missing due to human influence. In South-East England this would include species from pine marten and wild cats to straight-tusked elephants, hippopotamus, and wolves. A fully restored animal community living in a large wilderness would deliver the important natural processes that created the conditions for all current native biodiversity to evolve. These conditions were last present in The Last Interglacial, ~125,000 years ago, when humans were absent from Britain and the climate was similar to today. This period offers a useful insight into what natural conditions would be today in the absence of people. Fossil beetles suggest abundant large herbivores living in a landscape of mixed vegetation structure consisting open grassland, shrub, savannah, and woodland. These are the conditions that are most likely to support the widest range of native biodiversity today. However, in the context of WGC this form of rewilding is not possible because:
 - some key species are extinct
 - some species would be too dangerous in an urban setting
 - some species require much more space than is available.

2.2.2 As a Passive strategy:

Management could be minimised or removed entirely and nature allowed to develop without any prior ecological remediation or ongoing management. The likely outcome of this would be similar to the land abandoned on the South Downs last century, the development of a relatively even aged scrub. While this might benefit a small number of species, it would be with the loss of many others and at the opportunity



Figure 3: Dense even aged scrub

cost of creating a more diverse vegetation structure that includes species rich grassland and scrub. “Total abandonment can produce a ‘succession paradox’, whereby plant diversity actually declines as scrub and woodland develop....Any rewilding scenario should ideally deliver enough grazing and disturbance to support all species”, Plantlifeⁱ

This form of rewilding would probably result in a loss of biodiversity as well as decreasing public access and loss of traditional open downland as dense scrub takes over.

2.2.3 An Active strategy:

Alternatively, some ecological remediation could be implemented in addition to reducing management. This could include ecological restoration (e.g. seeding native plant species, planting under-represented tree species) and species introduction to return some missing animals. We know that a natural landscape would have contained many species that are now absent, including large herbivores which can play a particularly important role. Therefore, naturalistic management at WGC could include the use of domestic herbivores in place of their wild ancestors, with humans taking the place of predators to control overall numbers and taking the place of the really big animals that cannot be reintroduced. By restoring large herbivores in a way that mimics natural herbivore communities, they could be instrumental in creating a diverse vegetation structure. Use of GPS collars will allow a seasonal pattern of grazing to be established creating a more varied pattern of grazing akin to larger systems like the Serengeti which in turn will result in greater species diversity. This will result in areas of grassland, scrub and woodland which develop over many years to contain a wide range of species and ages of growth, enhancing biodiversity and making them more resilient to disease and storm damage.

This is therefore the preferred option that is proposed for WGC as it has the greatest potential for increasing biodiversity as well as increasing public access and maintaining traditional open downland.

- 2.3 The council currently has a Conservation Grazing Project covering approximately 110Ha, largely using sheep but also using ponies (adjacent to WGC). This could be extended and adapted to include the naturalistic management of the golf course.



Figure 4: Crab Spider on Marjoram in grazed grassland

- 2.4 In order to mimic natural herbivory as far as possible grazers (e.g. horse, cattle), browsers (e.g. roe deer), and rooters (wild boar/pigs) should be represented where practical. Grazers, browsers and rooters would create a functionally diverse community of herbivores. Ancient breeds are generally preferable as these are better able to survive with little husbandry. This also helps conserve what are often rare breeds in themselves.
- 2.5 Naturalistic management is a better option than just planting trees. Planting trees creates a plantation not a woodland. While a plantation may sequester carbon quickly it is susceptible to disease (much of the ash planted after the storm in 1987 is now dying from ash dieback and the sequestered carbon being released) or wind throw, does not provide species diversity and incurs higher maintenance costs. A woodland arising from naturalistic management is diverse in age and species giving better long term carbon sequestration, also addressing the biodiversity emergency as well as the climate emergency. Areas of grassland also sequester carbon in the soil and add further to the species diversity. Converting grassland to woodland can result in a loss of carbon sequestrationⁱⁱ. However it may be beneficial to do some tree planting (using appropriate locally-native stock) in the preparation stage of the proposal to ensure that a diverse range of seed is available as the landscape develops.
- 2.6 A baseline study undertaken by an independent Ecologist this summer showed that
 - 2.6.1 “Waterhall supports a high diversity of wildflowers including many specialist chalk grassland species. The habitat quality varies across the site with one exceptional area south of the clubhouse already meeting all the criteria for classification as species-rich chalk grassland. As a whole, the site was found to have high potential for restoration.”
 - 2.6.2 “Waterhall is highly suitable for chalk grassland restoration through a sensitive and sympathetic rewilding strategy which recognises not just its biodiversity potential but also its high levels of community use, exceptional landscape value and importance for carbon storage.”
 - 2.6.3 “a simple restoration strategy is proposed based on the reintroduction of grazing livestock, the traditional management regime on the Downs”

3 BIOSPHERE IMPLICATIONS:

- 3.1 The Living Coast UNESCO world Biosphere region of Brighton & Lewes Downs designated due to its rich but rare chalk grassland core, has three objectives:
 - To conserve and enhance nature;
 - Support sustainable human development;
 - Promote environmental awareness, knowledge, learning and engagement.
- 3.2 This proposal could significantly contribute to all of these objectives, for example by protecting and enhancing already established habitats and strengthening their resilience; achieving biodiversity net gain; reducing negative environmental impacts associated with current operations (such as air emissions from grass cutting plant; water and soil degradation from chemical pesticide and fertiliser inputs; biodiversity reductions from herbicide and pesticide usage). Equally the proposal would present a major opportunity to develop these areas for more sustainable and equitable usage, by creating wider, free public access to external, natural spaces enabling both public health benefits to local communities and wider

residents of Brighton & Hove, and also increased learning opportunities both formal and informal.

- 3.3 Naturalistic Management of the golf course could be beneficial to the Biosphere partnership in providing opportunities for research and monitoring projects through our knowledge partnership with the Universities, for example, the current Wild Adventures Heritage Lottery Fund project bid led by University of Sussex and supported by The Living Coast Biosphere, specifically based on engaging young people with rewilding opportunities in Sussex.
- 3.4 Naturalistic Management would also enable a greater access to outdoor classroom opportunities, enhancing the ongoing delivery of the Brighton and Hove Environmental Education programme funded by the Property and Design team, and the Our Water Matters schools programme based on the water cycle processes of our chalk downland.
- 3.5 This proposal would provide a fantastic platform to demonstrate to residents of Brighton & Hove that the Council is taking seriously the current climate and biodiversity emergency, and taking visible and appropriate action to address these issues where and when opportunities arise.
- 3.6 As a Biosphere project there will be a strong public engagement element as part of the core objectives: environmental awareness, knowledge, learning and engagement.
- 3.7 Depending on the differing funding streams it is hoped that there would be opportunities for open public access and engagement, guided tours and school visits as well as volunteering opportunities monitoring the wildlife and livestock.

4 PUBLIC HEALTH IMPLICATIONS:

- 4.1 The golf course lies within the South Downs National Park which was designated following a review of the interpretation of the statutory criteria for designation of national parks, instigated by the then Environment Minister Michael Meacher MP primarily to take into account the modern needs for open-air recreation close to where people live. This proposal will significantly increase this provision close to the largest conurbation adjacent to the National Park.
- 4.2 There is a growing body of evidence to show that time spent in open green spaces provides significant benefits to physical, mental and social health, disease preventionⁱⁱⁱ mood and self esteem^{iv}.
- 4.3 Public Health England and National Parks England drew up an accord in September 2017 outlining their shared commitment to work towards achieving a broad range of public health outcomes by utilising the assets of our National Parks to provide opportunities for people to improve their overall wellbeing and specifically physical and mental health^v. The accord outlines how these benefits can be reaped by fully engaging with people from disadvantaged communities, providing volunteering and economic opportunities, tackling social isolation, providing physical activity and learning opportunities (including work with schools) and biodiversity and climate protection. The raft of benefits and action points outlined in the accord could be used to provide a framework for the revitalisation of the golf course land.
- 4.4 Access to good quality green open spaces has a disproportionately positive effect on the least well off in society and can be used to address health inequalities^{vi}. Greenspace also helps to create healthy and resilient communities and this could be utilised very effectively through managing this site for wildlife. As childhood

obesity continues to be an issue, and many children in the city are not achieving the recommended amount of physical activity each day; the provision of more accessible green spaces also creates the opportunity for learning and play outdoors. This is a position already agreed in Scotland which produced a National Outdoor Play Position Statement in 2018^{vii}.

- 4.5 Finally, there is strong evidence that the public demand for access to green spaces and outdoor participation opportunities is significant. Sport England figures^{viii} showed that 8.9m people nationally are already active outdoors but 2.8m want to do more and 18.2m of inactive people would like to participate in or re-engage with outdoor activities in the next 12 months.

5 COMMUNITY ENGAGEMENT & CONSULTATION:

- 5.1 Engagement regarding the council's conservation grazing project has taken place through public consultations on several sites (Wild Park, Ladies Mile, Whitehawk Hill) while not being for rewilding per-se, each of these consultations have shown support for the reintroduction of grazing animals for conservation. While there has always been a minority opposed to the reintroduction of livestock, experience has shown that this is minimised as people get used to the grazing and can understand, appreciate and enjoy its beneficial effects.

- 5.2 Further engagement opportunities could involve the provision of interpretation, outdoor classrooms, guided walks and "safaris" which would support the aims of the Living Coast Biosphere. This would be greatly enhanced by the appointment of an Education ranger, subject to external funding

- 5.3 Where management is needed to create a more naturalistic habitat, such as control of invasive species, thinning dense scrub, tree planting etc., this can be done by involving volunteers allowing the community to become directly involved.

- 5.4 The Food Partnership have submitted a proposal to the Changing Chalk partnership to develop the existing Sheep Share project that markets sustainably produced meat sourced from our conservation grazing project sites. This could help publicise this proposed rewilding work through sustainable meat sales, as well as highlighting the difference between meat produced in a sustainable way as opposed to more conventional farming practises.

- 5.5 There is strong support from partnership organisations including The South Downs National Park, Natural England, The Sussex Wildlife Trust, The National Trust, Sussex University, The Living Coast, The Aquifer Project (an £800,000 partnership water catchment initiative involving the Environment Agency, Natural England, Southern Water, the South Downs National Park and Brighton & Hove City Council) and the Brighton and Hove Food Partnership.

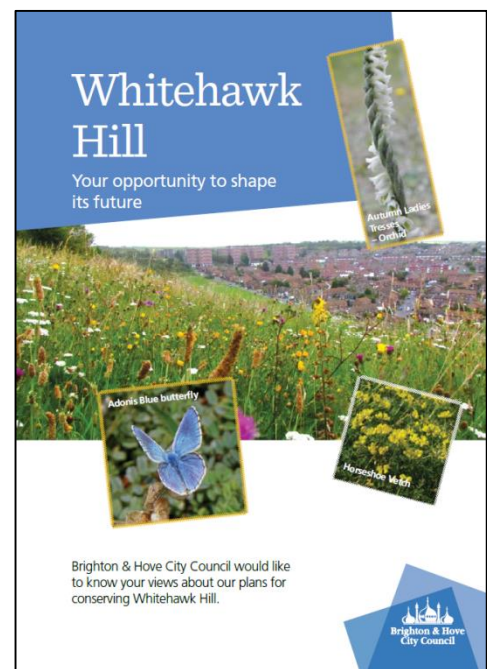


Figure 5: Whitehawk Hill Consultation

6 FINANCIAL & OTHER IMPLICATIONS

- 6.1 The council has an existing Conservation Grazing Project funded through the government's Higher Level Stewardship (HLS) scheme. Experience from the Conservation Grazing Project shows that the council could fund a basic rewilding project from a successful bid for this funding (now called Countryside Stewardship) with limited cost to the council other than officer time.
- 6.2 However the council has the opportunity to bid into several other funding schemes which would allow a more ambitious project. Subject to the success of these bids the projected expenditure over 5 years is estimated to be £467k and the projected income is estimated to be £492k. This includes
 - 6.2.1 £146k from Countryside Stewardship and Basic Farm Payment
 - 6.2.2 £77k from the South Downs National Park Landscape & Biodiversity Programme
 - 6.2.3 £232k from Changing Chalk NHLF bid
 - 6.2.4 £37k from S106 funding
- 6.3 Over the 5 years a surplus of £25k is projected
- 6.4 In addition the council may also be able to bid into the governments recently announced Green Recovery Challenge Fund or the National Lottery Climate Action Fund (which is aimed at projects delivering community-led climate action, including protecting and regenerating spaces and habitats leading to a deeper understanding of the landscape).
- 6.5 The cost of grazing is estimated from the current cost to graze 19 acres. The grazing contract is due for renewal so the actual cost will depend on the outcome of the tender process. With an increase in area to be grazed it is hoped that there will be some savings of scale
- 6.6 The accommodation required to facilitate this proposal will be reviewed alongside the marketing exercise for the buildings to enable the required storage and potential welfare/office space.
- 6.7 Impact on CityParks officer time. The ranger service has been working to become more efficient in how the conservation grazing project is delivered and should have freed up sufficient capacity to undertake this project by the project start date. This has been done by
 - 6.7.1 Erecting permanent fencing such as at Sheepcote. This greatly reduces the amount of time needed to set up grazing compartments and also increases security for the livestock.
 - 6.7.2 Providing a permanent water such as at 19 Acres. Where there is no water supply troughs are filled from a bowser, in warm weather where stock numbers are high this can involve daily trips. Permanent supplies not only reduce officer time they also reduce the carbon cost as regular journeys can be avoided
 - 6.7.3 Increasing use of more highly trained volunteers. In addition to using volunteers to check on sheep welfare we have begun to use volunteers to help set up grazing compartments and move sheep thus saving officer time and engaging more fully with local communities

7 EQUALITIES IMPLICATIONS:

- 7.1 This proposal would open the site for increased public access. School visits could be targeted to less well-off communities, which is a South Downs National Park priority for which they currently provide a travel grant^{ix}. Educational and access improvements would engage with a wider demographic than currently uses the site and initiatives could contribute to the National Parks Association goal of "one

night under the stars for all children” promoted by Julian Glover in his report on the state of the nation’s national parks^x and endorsed by the Environment Secretary.

8 SUSTAINABILITY IMPLICATIONS:

- 8.1 This proposal would provide multiple environmental benefits, helping to mitigate against the climate and biodiversity emergency.
- 8.2 DEFRA are currently considering the future direction of agri-environment funding and the Government have stated that they wish to move it towards public payment for public good so there is an underlying confidence that the long term future of the proposal would be secure.
- 8.3 This proposal would help achieve the Council’s aim to be carbon neutral by 2030, by reducing chemical and material inputs compared with current practice, enabling the recovery, protection and enhancement of established grassland habitat as a carbon sink; providing opportunities for biodiversity net gain, and providing environmental education and engagement opportunities. Restoring some habitats such as grasslands can help mitigate the causes of climate change by directly reducing greenhouse gas emissions, safeguarding carbon stores and in some cases re-starting sequestration. The sustainable management of habitats important for carbon storage therefore contributes to meeting targets for GHG emission reductions, including the carbon budgets set by the UK Climate Change Act. Grassland soils have the highest carbon stock of any UK broad habitat, with the species composition of grasslands influencing the amount of carbon in the soil. High-diversity grasslands store more soil carbon than monocultures, with legumes being the main contributors. While planting woodland can lock up carbon, so can restoring grassland. Research by Natural England shows that restoring unimproved grassland results in a net removal of 4.03 tCO₂-e per ha per year as opposed to afforesting it which only gives 0.37 tCO₂-e per ha per year^{xi}. This is largely due to the carbon locked up in the soils which are not disturbed through grassland restoration.
- 8.4 The rewilding proposal would support the Council’s Circular Economy principles by utilising some existing buildings, structures and services, prolonging the in use phase of carbon and materials already embedded within these spaces. Naturalistic land management with educational and leisure opportunities would present a low impact re-use of the space and facilities.

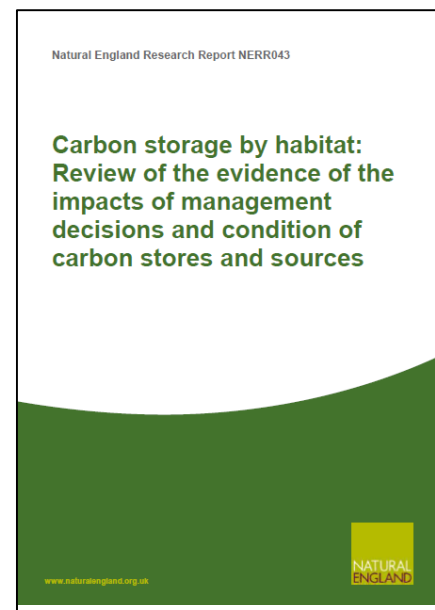


Figure 6: Carbon Storage Study

9 ANY OTHER SIGNIFICANT IMPLICATIONS:

Risk and Opportunity Management Implications:

- 9.1 If the site is rewilded in house the financial risk will fall on the council. However the financial risk is low as it is expected that the proposal should be funded from the

current system of agri-environment payments, therefore requiring little financial outlay from the council. There is some risk that the council may receive a financial penalty if it does not keep to the terms of its Countryside Stewardship agreement but complying with the management requirements should mitigate against this. This small risk should be considered against the opportunities to maximise the benefits from a positive change in the management of this site. The potential from increased and more diverse uses should not be underestimated, with a variety of income streams possible.

10 POLICY/ BACKGROUND INFORMATION:

Current and emerging policy provides a highly encouraging context for this 'rewilding' proposal. The following list some of the key drivers in this area:

10.1 On 13 December 2018 Brighton & Hove City Council

- (1) Declared its recognition of global climate and biodiversity emergencies;
- (2) Requested the Policy, Resources & Growth Committee to:

- 'consider how the Council can strengthen local protection and enhancement of species, habitats and ecosystems services under available powers'.

This proposal would allow the council to move towards these goals.

10.2 The City Downland Estate Plan

The council produced a downland initiative in 2006 to inform the way its downland estate was managed. This is now in the process of being updated to produce a City Downland Estate Plan. A draft vision for the plan, the result of officer workshops, include the following notes:

- Improving wildlife biodiversity across the Estate was a key element of the Downland Initiative and included proposals for working with Natural England to carry out habitat restoration. That initiative has not been as successful as first hoped, due to a number of factors including constraints on funding, and in the absence of enhanced funding being available, tenant farmers have largely delivered the minimum requirements to access funding through Entry Level or Higher Level Stewardship schemes;
- However, improving biodiversity across the Estate is something that those attending the workshop are strongly in favour of, and brings with it an opportunity to deliver a number of other objectives. A more biodiverse ecosystem will help to encourage more visits and increase 'dwell time' and this will help to deliver health and wellbeing objectives;
- Some of the lack of value or even awareness of the Downland Estate amongst residents might be attributed to the relatively poor levels of accessibility to the landscape.
- With some exceptions, most people attending the workshops felt that encouraging greater access to the Estate – including by sustainable modes of transport including public transport - should be the priority.

This rewilding proposal would address these emerging themes, in particular what is seen as one of the weaknesses of the current Downland Initiative: improving the wildlife and biodiversity of a large tract of land. By providing open public access and educational opportunities it would also help increase public awareness of the public estate and start to tap some of the potential of the landscape.

10.3 There are several species and habitats identified in the Brighton & Hove Local Biodiversity Action Plan^{xii} which will benefit from the proposal.

Habitats that would benefit include:

- Lowland Calcareous grassland
- Lowland Mixed Deciduous Woodland.

Species include:

- Hornet Robberfly, which requires a ready supply of livestock dung (ponies or cattle) from late June to the end of October;
- The Brown-banded Carder Bee, which requires large flower-rich sites;
- Dingy Skipper, which occur in open, sunny habitats such as chalk downland, where its main food plant, Bird's-foot-trefoil grow;
- Adder. In Brighton and Hove the adder is confined to the larger blocks of open, semi-natural grassland and scrub; and
- Dormice, which require a diverse, continuous shrub layer with a variety of food sources to enable them to feed throughout their active period.



Figure 7: Dormouse

Dormice are already present on the site and S106 funding has been provided to enhance areas for them in mitigation for the Toad Hole Valley Development

10.4 WGC is part of The Living Coast: Brighton & Lewes Downs UNESCO World Biosphere region, designated to be an exemplar of sustainable development and delivering environmental engagement and education, sustainable socio economic development and nature conservation with the focus of connecting people and nature to inspire a positive future, today.

The proposal could create a flagship project to build on what has already been achieved through the Biosphere partnership and enable greater opportunities for public engagement with and awareness of the natural environment, as well as Council led partnerships and programmes seeking to address the climate and biodiversity emergencies. It would enable stronger partnership working with and access to key stakeholders with current expertise in this area, such as South Downs National Park, Sussex Wildlife Trust, the National Trust and University of Sussex (specifically Sussex Sustainability Research Programme that has diverse expertise and could help guide the project).

10.5 The Downs around Brighton & Hove were managed for centuries by grazing which has given them their open aspect with far reaching views classified as “Open Downs” in the National Park’s South Downs Integrated Landscape Character Assessment^{xiii}. This recommends the following Broad Management Objective and Landscape Guidelines to maintain this character:

‘The overall management objective should be to conserve the vast open rolling upland character of the Open Downs and the strong sense of remoteness and tranquillity.

- Maintain and increase the species diversity of areas of semi-improved grassland, which act as a reservoir for more common chalk downland species.
- Consider removal of areas of linear scrub along fence lines where the fence is being removed to minimise conflict with the open and smoothly rolling character of the landscape.
- Protect and continue to manage (graze) the existing chalk grassland and chalk heath sites.
- Protect and manage all existing archaeological earthwork sites for their contribution to understanding and recognising the historic continuity in the landscape.
- Manage areas of scrub on steeper slopes to vary the age and species structure and to enhance the distinctive landform.
- Maintain the essentially open undeveloped character. Opportunities for built development are severely restricted in this remote and tranquil landscape.
- Conserve the open skylines that are particularly sensitive to any type of built development. The crest of the northern escarpment is especially important in relation to long views from the low lying landscape beyond.
- Consider opportunities for planting to soften the existing urban fringes. Planting should recognise and reveal the subtleties in the landscape and avoid a standardised approach. Woodland is usually confined to lower slopes while isolated woodland clumps are features of some ridgetops.
- Manage recreational use and ensure recreational facilities and signage are well integrated into the landscape by means of siting, materials and design.

The management option recommended in this proposal would make a positive contribution to most of those objectives

10.6 The government's 25 year Environment Plan^{xiv} (on which the new Environment Act has been underpinned) published on 11th January 2018 sets out the UK's ambition to develop a growing and resilient network of land, water and sea that is richer in plants and wildlife by:

- creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits;
- making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing;
- Taking action to recover threatened, iconic or economically important species and, where possible, to prevent human-induced extinction or loss of threatened species;
- Establishing a Nature Recovery Network.

The concept for the Nature Recovery Network is simple. Our existing protected sites constitute our best areas for wildlife and provide many other economic and social benefits. They should form the core of any future network.



Figure 8: Cattle grazing at Knepp

However, for nature to recover we have to also look beyond protected sites and take action to extend and link our existing sites, both to support wildlife and to recover the range of economic and social benefits that nature provides.

It recognises the rewilding at Knepp Estate specifically as an interesting example of restoration to recover nature and this proposal would make a big contribution to these goals.

- 10.7 In Making Space for Nature: A review of England's Wildlife Sites and Ecological Network, published in 2010, Professor Sir John Lawton stated "to make space for nature we need more, bigger, better and joined up sites to create a sustainable, resilient and more effective ecological network for England". This proposal provides a bigger, better solution that should be sustainable and resilient.
- 10.8 The governments Landscapes review: National Parks and AONBs (Sept 2019) sets out several proposals that this rewilding bid would contribute to, in particular:
- Proposal 7: A stronger mission to connect all people with our national landscapes, supported and held to account by the new National Landscapes Service
 - Proposal 8: A night under the stars in a national landscape for every child
 - Proposal 10: Landscapes that cater for and improve the nation's health and wellbeing
 - Proposal 11: Expanding volunteering in our national landscapes
 - Proposal 12: Better information and signs to guide visitors
 - Proposal 14: National landscapes supported to become leaders in sustainable tourism
 - Proposal 16: Consider expanding open access rights in national landscapes
 - Proposal 21: Welcoming new landscape approaches in cities and the coast, and a city park competition.
- 10.9 Designations:
- The golf course lies within the South Downs National Park;
 - The golf course includes areas identified for woodland improvement by the Forestry Commission.
 - It is a Local Wildlife Site.
- 10.10 Water Quality
- Waterhall is in Natural England's Water Quality Priority Area;
 - It is in the Environment Agency's Nitrate Vulnerable Zone;
 - It has areas in all 3 Source Protection Zones (SPZs) designated by the Environment Agency (Inner Protection Zone, Outer protection Zone and Total Catchment zone);
 - It comes within Natural England's Flood Risk Management priority zone;
 - Brighton & Hove Council is a lead partner in TAP (The Aquifer Project), whose project aim is to protect and improve the quality of groundwater in the Brighton Chalk Block as a valuable natural resource for public water supply.
 - The purpose of the original purchasing of much of the city's Downland estate was to protect the recharge zone of the chalk aquifer from where the city's drinking water is sourced.

The proposal will help alleviate flood risk by increasing rainwater holdup and percolation. It increases ground and surface water quality through reducing use of pesticides and fertilisers

- 10.11 The planning designation for the site is D2 which is the use for entertainment and leisure purposes. Introducing grazing would probably be seen as agricultural activity, enabling funding claims but planning permission may be needed. Planning permission may also be needed for any change of use with the buildings, depending on that use. The course is located within the South Downs National Park who are the planning authority who have expressed support for the proposal so any planning issues should be resolvable as these proposals are in accord with the twin purposes of National Parks (conserving natural beauty and providing opportunities for understanding and enjoyment).

11 CONCLUSION:

- 11.1 The rewilding proposal offers the opportunity to follow in the pioneering footsteps of the city's forefathers who purchased the land the golf course was built on and much of the surrounding land, as the only way to control development prior to the Town and Country Planning Act coming into power in 1947, as well as protecting the population's vital drinking water supply and providing for public access.
- 11.2 The recommendation is to pursue the option of naturalistic management.
- 11.3 This sits well with the Changing Chalk HLF funding bid that the National Trust are leading on which is now in its development phase. A pilot proposal has been prepared and the National Trust have indicated that they are keen to include it in the final bid.

12 SUPPORTING DOCUMENTATION:

Background Documents

1. Wilding by Isabella Tree, The story of the 'Knepp experiment' to 2018, published by Pan Macmillan, ISBN 9781509805099

ⁱPlantlife, 2019, **Plantlife research shows the value – and vulnerability – of Britain's last remaining meadows** <https://www.plantlife.org.uk/uk/about-us/news/plantlife-research-shows-the-value-and-vulnerability-of-britains-last-remaining-meadows?fbclid=IwAR3voPeFtibQHNGy-OiPwEtW6V6Ey15frM9h0mRQxaEpc5nZaANdRJNrDRc>

ⁱⁱ ALONSO, I., WESTON, K., GREGG, R. & MORECROFT, M. 2012. **Carbon storage by habitat - Review of the evidence of the impacts of management decisions and condition on carbon stores and sources**. Natural England Research Reports, Number NERR043.

ⁱⁱⁱ Houses of Parliament, 2016 '**Green Spaces & Health**' – Post note 538, www.parliament.uk/post

^{iv} 2005, **A Countryside for Health & Wellbeing** www.countrysidecreation.org.uk. http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ad=rja&uact=8&ved=2ahUKewjdppnqqqPIAhXZi1wKHZIPAukQFjAAegQICRAC&url=http%3A%2F%2Fwww.docs.hss.ed.ac.uk%2Feducation%2Foutdoored%2Fhealth_wellbeing.pdf&usg=AOvVaw2W84JUHbBao6wRiE8LdXaP

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- v 2017, **National Parks & PHE Accord** <https://www.gov.uk/government/publications/improving-health-and-wellbeing-through-our-national-parks> September 2017)
- vi (HEALTH AND NATURAL ENVIRONMENTS - An evidence based information pack, March 2012)
- vii **Outdoor play position statement Scotland:**
<https://www.greenspacescotland.org.uk/news/scotland-commits-to-life-enhancing-outdoor-play>.
- viii 2015, **Outdoors participation Report**, Sport England
- ix **South Downs National Park Travel Grant** <https://learning.southdowns.gov.uk/learning/travel-grant/>
- x Glover, J., 2018, **Landscapes review: National Parks and AONBs**,
<https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review>
- xi ALONSO, I., WESTON, K., GREGG, R. & MORECROFT, M. 2012. **Carbon storage by habitat - Review of the evidence of the impacts of management decisions and condition on carbon stores and sources**. Natural England Research Reports, Number NERR043.
https://www.researchgate.net/publication/277937100_Carbon_storage_by_habitat_Review_of_the_evidence_of_the_impacts_of_management_decisions_and_condition_of_carbon_stores_and_sources
- xii 2012, **The Brighton & Hove Local Biodiversity Action Plan** <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%20Hove%20LBAP%20ADOPTED%20VERSION.pdf>
- xiii **South Downs Integrated Landscape Character Assessment**
<https://www.southdowns.gov.uk/planning/planning-advice/landscape/>
- xiv **A Green Future: Our 25 Year Plan to Improve the Environment, 2018**
<https://www.gov.uk/government/publications/25-year-environment-plan>

Waterhall buildings

7.Storage shed
3.5mx4m



6.Large storage shed
16mx5m



1.Greenkeepers shed
2mx4m



2.Storage shed/garage
4mx5m



3.Storage shed
/garage 4mx5m



4. Single store divided in
two 5mx4m and 4mx4m



5.Pumphouse 5mx3m



8.Clubhouse (477sqm)

Subject:	FOOTPRINT – the responsible event for the UK Property Industry		
Date of Meeting:	24th September, 2020		
Report of:	Executive Director, Economy, Environment & Culture		
Contact Officer:	Name:	Ian Shurrock	Tel: 01273 292084
		Ian Taylor	01273 292711
	Email:	ian.shurrock@brighton-hove.gov.uk	
		ian.taylor@brighton-hove.gov.uk	
Ward(s) affected:	Brunswick & Adelaide		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 Outdoor events play an important role as a showcase for the city and provide an economic impact that is a boost to the local economy. The Outdoor Events Strategy seeks to develop the Outdoor Events Programme while looking to minimise the inevitable impacts particularly of major events.
- 1.2 This report is to consider the request from Brighton Design for the conference event 'FOOTPRINT' to take place on Hove Lawns on the 14th-17th September 2021. The Committee is asked to grant Landlord's Consent as the initial permission for the event.

2. RECOMMENDATIONS:

- 2.1 That the Committee grant Landlord's Consent for the event 'FOOTPRINT'.
- 2.2 That the Committee grants delegated authority to the Executive Director, Economy, Environment & Culture to undertake the necessary requirements for Landlord's Consent.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 FOOTPRINT brings the world stage to Brighton and Hove and is a development of Design Brighton. It is described as the "Responsible event for the UK Property Industry"
- 3.2 FOOTPRINT will provide Design Brighton with an expansive and international platform to showcase the innovation, creativity and collaboration in the Greater Brighton region. Design Brighton 1.5° will curate an exciting programme of events during FOOTPRINT, that will highlight the exceptional

talent within the region as a hub for innovative urban design and emerging technologies.

- 3.3 FOOTPRINT is intended to provide local authorities and developers with the forum to achieve their carbon-neutral ambitions and creates opportunities for collaborative relationships. Consultants will showcase state-of-the-art design and sustainability technologies in an environment of enquiry and commitment to change. FOOTPRINT is an opportunity to work together to accelerate action against climate change. The organisers state “The adoption of the principles of the circular economy and the goal of net zero carbon is the only way to create a sustainable future for our built environment.”
- 3.4 The organisers feel there is a pressing need for a forum where all the professions and corporate sectors working on the built environment can meet for honest discussions about environmental policy, technological developments and implementation methods. MIPIM (Le marche international des professionnels de l’immobilier) normally held in March in Cannes, is currently the one and only annual real estate event attended by all sectors of the built environment. They have calculated the carbon cost of attendance for the UK property industry is a massive 60,000 tonnes, hence the desire to stage a similar event in the country with Brighton and Hove as the desired venue.

Conference Themes

- 3.5 FOOTPRINT is a conference where there is an opportunity to learn about emerging technologies and see how they can be adopted in everyday practice to accelerate action against climate change. Knowledge will be disseminated to the people working on the ground at each authority and developer. All sessions will be livestreamed, filmed and broadcast to a global audience. Members of exhibitors’ teams will have remote access to become involved in the discussions wherever they are based. Four themes will be explored:

Materials and the Circular Economy.

This will be curated by Architect Duncan Baker-Brown from the University of Brighton.

Energy Provision

Curated by Hilson Moran Engineers, this will include a programme of discussion and education about energy generation and decarbonisation. This will focus on the National Grid and gas networks.

Energy in Use

Curated by double Stirling Award winning Max Fordham Environmental Engineers, the company is an employee owned business, and every one of the 120 partners is at the forefront of their field.

Ecology and Biodiversity

This will be curated by Nick White, Principal Advisor for Net Gain & Green Infrastructure at Natural England Developers and local authorities will be informed on how the requirements of Environmental Net Gain on developments can be met.

- 3.6 Brighton and Hove has extremely high environmental ambitions. The city has declared a climate emergency and an express ambition to reach net zero carbon emissions by 2030. Brighton and Hove's reputation for innovation and forward thinking is gaining more power as the city develops a route map to achieve a circular economy. It is the UK's testbed for active carbon neutral infrastructure projects. Seventy seven countries and hundreds of cities have committed to a net zero carbon pledge by 2050.
- 3.7 Brighton & Hove's new economic strategy to 2024 provides a blueprint for the city and the Greater Brighton region to become one of the UK's most productive and inclusive economies. The strategy urges businesses, entrepreneurs, educators and communities to be bold and to build on the city's international reputation for openness, creativity and innovation. The organisers believe that FOOTPRINT will play a significant part towards realising the city's Economic Strategy. In the uncertain economic context of the disruption caused by Covid-19, trade and inward investment are crucially important in economic recovery. This will include supporting business growth and innovation, together with creating and sustaining employment opportunities in both existing and emerging sectors.
- 3.8 FOOTPRINT will conduct a Careers Fair on the last day of the event for Year 9 students and older. 'STEPUP' will offer young people the opportunity to see all the different jobs available in the construction industry and meet industry insiders. FOOTPRINT will work with construction industry businesses to support a year-round project delivering inspiring talks and presentations to schools and colleges across the region. Connecting construction professionals with pupils as part of their careers, advice will inspire young people to get involved in an extremely important and rewarding industry.

Zero Waste Commitment

- 3.9 The show will be produced with a total commitment to zero waste. The majority of materials used to build the show are simply hired:
- the marquees
 - the power and lighting equipment
 - the stands
 - the furniture
 - the bars.
- 3.10 All of these resources are returned for re-use. The carpet used is 100% recycled EVO from Reeds Carpets. All food and beverage containers to be recyclable. FOOTPRINT will work with local cafes and catering businesses to create the on-site catering offered at the show. All the local food and beverage outlets will be required to use recyclable containers. Single use plastic will be banned. Delegates will be encouraged to bring their own drinks containers and water fountains will be available throughout the event. The show will be provided with recycling points and this segregated waste will be collected for recycling by a local licensed waste contractor.

Hove Lawns Location

- 3.11 The organisers stated reasons for requesting Hove Lawns are;

An ideal place for FOOTPRINT Brighton is Hove Lawns. It is elegant and glamorous, with sea views across the Channel to the wind farm, against the backdrop of some of the finest Regency architecture in the country. Hove Lawns is a pleasant walk from Brighton, Hove and Portslade Stations and close to many of the city's hotels, both familiar premium brands and the smaller boutique offerings. It is also only a short distance to the city's endless variety of enticing venues for private events".

- 3.12 The organisers do not want to consider any site other than Hove Lawns. Officers have explored other options such as Black Rock or moving the exhibition / conference into the Brighton Centre. These do not meet with the organisers' aspirations or logistical needs.

- 3.13 The total length of occupancy of the large majority of Hove Lawns (see plans in proposal) would be just short of a month. Loss of amenity is always, understandably, a contentious issue with local residents and visitors alike. The organisers are aware of these concerns and are working to keep the majority of the access paths running north to south open as much as possible.

- 3.14 There is also the risk of damage to the lawns with such a large installation, heavy footfall and length of stay. The organisers would be responsible for any re-instatement required and a considerable bond would be held against any works needing to be carried out which would be in addition to a commercial hire fee for the use of the lawns.

Funding for Infrastructure Improvements

- 3.15 As well as paying the commercial hire fee the organisers have committed to paying 5% of ticket sales for seafront infrastructure improvements. The fund will be paid each year, after the event, directly to the Council for allocation to the seafront budget. The commitment to spend the funds on the restoration of the Hove Lawns railings and other seafront infrastructure that is adjacent to Hove Lawns.

- 3.16 The organisers have recognised the impact of the scale of this commercial event (including the substantial set up and take down time) resulting in a significant temporary loss of this amenity, and have therefore pledged this additional financial support to improve the immediate local area.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 Alternative locations have been proposed to the organisers, but their request is for the Hove Lawns location.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 Consultation is taking place with Ward Councillors, Sussex Police, East Sussex Fire & Rescue Service, South East Coast Ambulance Service, NHS Trust,

Environmental Health & Licensing, City Parks, Civil Contingencies, Sustainability and Highways.

6. CONCLUSION

- 6.1 Landlord's consent is required for the staging of all major outdoor events on council land in Brighton and Hove.
- 6.2 Events continue to form an increasingly significant part of the council's overall tourism strategy. As well as bringing substantial economic benefits to the city, people experience civic pride when major recreational, sporting and entertainment events take place in their locality. This event is a welcome and important addition to the city's programme of events.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 As set out in the body of the report, the organisers would pay a commercial hire fee for the use of Hove Lawns and, in addition, a considerable re-instatement bond would be held against any potential damage caused to the site (paragraph 3.14). Any associated costs to Outdoor Events are covered by existing budgets.

Finance Officer Consulted: Name Jess Laing

Date: 27/08/2020

Legal Implications:

- 7.2 Brighton & Hove City Council is empowered under the East Sussex Act 1981 to close "parks and pleasure grounds" in its area for up to 28 days a year in order to facilitate the staging of major outdoor events. As the events are transient in nature it is unlikely that a "development" involving the need for a planning application would arise but in any event permitted development rights may apply, notably under Class B Part 4 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 allowing "the use of any land for any purpose for not more than 28 days in total in any calendar year...and the provision on the land of any moveable structure for the purposes of the permitted use". Should any event require road closures or certain other traffic management measures a traffic regulation order under the provisions of the Road Traffic Regulation Act 1984 or the Town Police Clauses Act 1847 will be required.

This Committee is authorised to exercise the Council's functions in relation to events and can grant the consent that is required in respect of the recommendations. A formal licence will be granted which will set out the terms on which the event can use the site.

Lawyer Consulted: Joanne Dougnaglo Date: 07/09/2020

Equalities Implications:

- 7.3 An Equalities Impact Assessment will be carried out for the event.

Sustainability Implications:

- 7.4 A full Environmental Impact Assessment and Action Plan will be required to be submitted for this event.

Brexit Implications

- 7.5 None identified

Public Health

- 7.6 At the time of this report it is not known what impact Covid-19 will have on the Events Industry in 2021. Any operational plan presented will need to adhere to Government guidance as appropriate. Public Health are also represented on the City's Safety Advisory Group which considers the operation of all the major events in the city.

Crime & Disorder Implications

- 7.7 All major event plans are submitted to the city's Safety Advisory Group for scrutiny and action.

SUPPORTING DOCUMENTATION

Appendices:

1. Proposal from the organisers

Background Documents

1. None

F O O T
P R I N T

FOOTPRINT

Meeting the Zero Carbon Challenge



FOOTPRINT: The time is now

The built environment is responsible for around 40% of the UK's total carbon footprint (UK Green Building Council).

The time is right for the property industry and local authorities to work together to achieve sustainability and carbon reduction.

We are at a tipping point. As thought leaders within the policy development sector, the Greater London Authority are making constructive moves. Recent initiatives include the Design for a Circular Economy Primer and the Whole Life-Cycle Carbon Assessments Guidance. This means that within the London boroughs major developments will need to address and meet minimum standards in these two areas in addition to commitments made in Energy Statements.

Whilst well-resourced umbrella planning organisations can assist planning policy developed by the local authorities they serve, the majority of planning authorities in the UK do not have access to the expertise and resources necessary to incorporate these initiatives. The initiatives need to be adopted and the required implementation knowledge

disseminated across the whole of the UK at Local Authority level.

FOOTPRINT is a UK focused show and conference providing a much needed platform to discover, discuss and exploit opportunities for carbon reduction in the built environment through:

- Team-working between developers, consultants and Local Authorities to develop energy and sustainability policies;
- Case studies of carbon-reduction solutions from sustainable best practice around the world.

FOOTPRINT provides local authorities and developers with the forum to achieve their carbon-neutral ambitions, and creates opportunities for collaborative relationships. Consultants will showcase state-of-the-art design and sustainability technologies in an environment of enquiry and commitment to change.

FOOTPRINT is an opportunity to step out of our silos and work together to accelerate action against climate change. The adoption of the principles of the circular economy and the goal of net zero carbon is the only way to create a sustainable future for our built environment.



"We are pleased to offer our support for the proposed Footprint Conference in 2021. We welcome the idea of the Footprint Conference in Hove. As a UK focused show providing a much needed platform to discover, discuss and exploit opportunities for carbon reduction in the built environment we think that our city is the perfect place to showcase this.



With our ambitious local environmental target of a zero carbon footprint by 2030, the built environment poses an enormous challenge in achieving this. So an educational conference which can provide a roadmap to achieving this is to be embraced.

The conference has taken on a new importance in the light of Covid-19 and the boost our local hospitality economy will need in order to recover from the huge hit it has taken. This conference can now bring trade and much needed business to the hotels, bars, restaurants and shops of the city and we can only see the council being thanked for achieving this."

Caroline Lucas
MP for Brighton Pavilion

Peter Kyle
MP for Hove
Shadow Minister for Justice

Vision



“The government has set an ambitious target to bring all UK greenhouse gas emissions to net zero by 2050.

The built environment presents an enormous challenge in achieving this goal.

Not only are new buildings built to existing regulations falling far short of this target, the existence of significant building stock that will not be rebuilt prior to 2050 compounds the difficulties faced not only by the industry, but each one of us.

The clock is ticking, and the property industry still has to make significant changes to policy and technology to achieve this goal. FOOTPRINT is the forum where the roadmap to a carbon neutral property industry will be drawn.”

Tim Pyne
Founder of FOOTPRINT

Contents

Vision	5
Contents	6
Why FOOTPRINT?	7
FOOTPRINT Round Table	8
FOOTPRINT Conference	9
Why FOOTPRINT Brighton?	10
Environmental Ambitions	11
FOOTPRINT Week	12
Economic Benefits to Brighton	13
Educational Benefits to Brighton	16
Location	17
Show Design	18
Good Neighbours	20
FOOTPRINT Fund	21
Zero Waste Policy	22
Nominated Charity	23
Green Coast	25
Timeline	26
Endorsements	27
Conclusion	29
The Team	30
App 1: Economic Impact Assessment	34

Why FOOTPRINT?

Developers are starting to include carbon emissions as an element in their calculations, and local authorities are setting higher and higher targets. But this complex subject is not being managed with coherent thinking across professional silos. Parties with different stakes are not adequately communicating with each other, with the result that regulations often confuse and contradict. There is a pressing need for a forum where all the professions and corporate sectors working on the built environment can meet for honest discussions about environmental policy, technological developments and implementation methods.

MIPIM, normally held in March in Cannes, is currently the one and only annual real estate event attended by all sectors of the built environment. We have calculated the carbon cost of attendance for the UK property industry is a massive 60,000 tonnes. Because it is an international event it isn't possible to address carbon emissions because each different country has wildly different building regulations and energy industries. This is why Footprint will focus solely on the UK.

The time is right for FOOTPRINT – the property and built environment show for our time, establishing itself as the focus of thought leadership for sustainability and the environment for the local situation in our country.

It's still by the beach – but more importantly, it's a lot closer to home.

FOOTPRINT Round Table

Footprint Round Table provides a forum for high level face to face discussion between regulators and implementers. Out of this, new agreements will undoubtedly emerge which assist the mutual ambition to reduce the carbon footprint of the built environment.

Round Table presents a unique opportunity for property professionals, politicians and all engaged parties to meet and hammer out the way forward for the construction industry in the face of the climate emergency and the crucial need to cut carbon emissions.

Whether it's new build or improvement of existing stock, this all needs to be agreed in a positive face-to-face problem-solving environment.

A critical issue which to be addressed is the cost associated with the provision of the 35% affordable housing which local authorities require of new developments. This has to be achieved while absorbing the financial implications associated with lowering embodied energy, reducing energy in use and the generation of onsite renewables, which are all increasing incrementally.

If the economic viability of the scheme is in question, the statutory nature of many of the requirements on a given development mean that the only remaining option is to reduce the percentage of affordable housing or Section 106 contribution. This situation needs to be resolved directly by developers and regulators working together; that's what Round Table is for.

The i-360, with its state-of-the-art conference facilities, is the perfect venue for these discussions. It has a sea view and access to the beach for cooling walks along the sea shore.

FOOTPRINT Conference

FOOTPRINT Conference is the place to learn about emerging technologies and see how they can be adopted in everyday practice to accelerate action against climate change. It's a complex and rapidly moving subject.

Knowledge will be disseminated to the people working on the ground at each authority and developer.

All sessions will be livestreamed, filmed and made available to a global audience. After the event, members of exhibitors' teams will have remote access to become involved in the discussions wherever they are based.

Three themes will be explored:

Materials and the Circular Economy

This will be hosted by Architect Duncan Baker-Brown from the University of Brighton. covering the issues of the embodied energy of materials, construction waste, the Circular Economy and closed-loop systems. The challenge is to balance the environment crisis against the needs of the population for more buildings and infrastructure. By switching to reusable construction materials lifetime emissions for

buildings can be slashed by 44% by 2050.

Zero Carbon Energy

Hosted by Hilson Moran Engineers, the Zero Carbon Energy stage will run a program of discussion and education about energy generation and decarbonisation of the National grid and Gas networks. When you walk back down to the beach and look over at the wind farm it will be with a completely different level of understanding.

Efficient Buildings

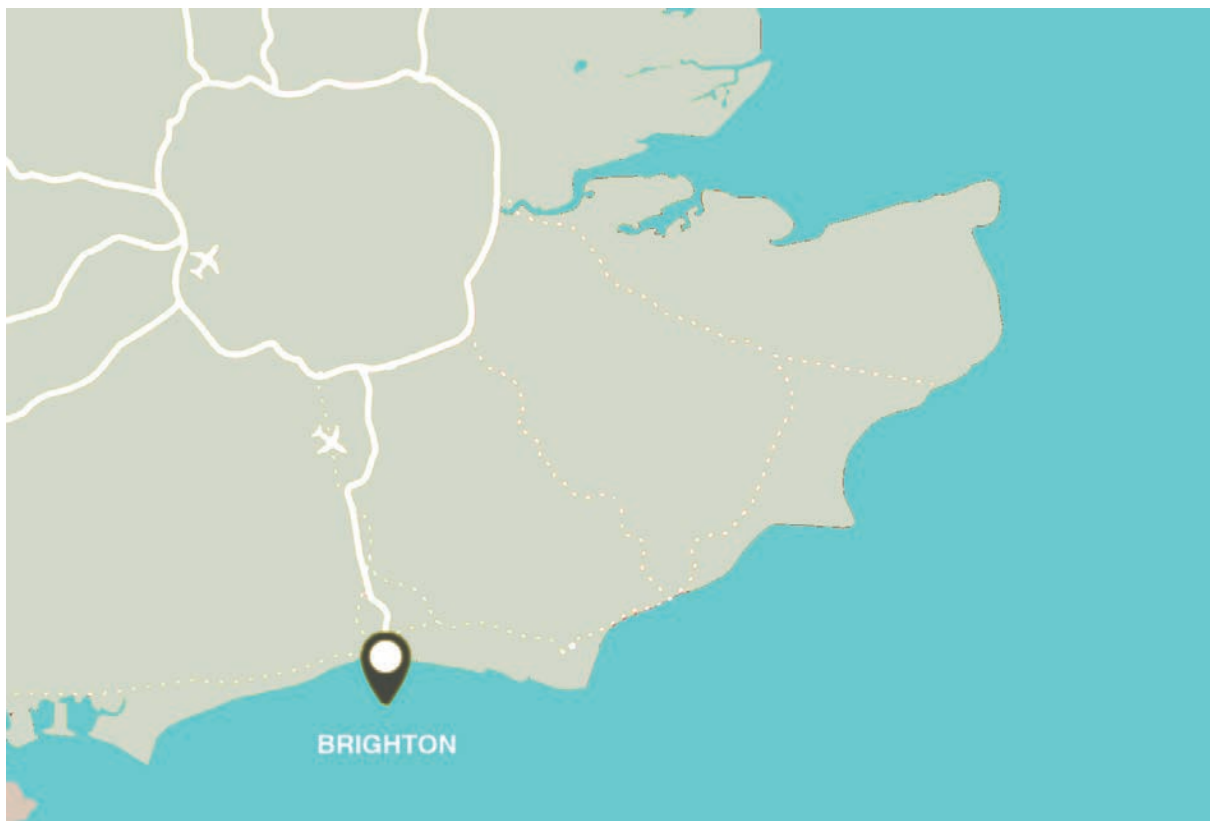
Hosted by multi environmental award-winning Max Fordham LLP, engineers who have been designing exemplar sustainable buildings for over 50 years. Efficient engineering is a founding principle and their programme will concentrate on state of the art developments within low-energy, passive design and efficient operation of buildings.

We are absolutely delighted to have all these experts on board.

Why FOOTPRINT Brighton?

Brighton & Hove is that rare and wonderful 'no brainer' choice for this event. Just 50 minutes by train from London, the centre of the UK property world, it benefits from direct rail routes to the whole country, and European connections are also excellent via Eurostar at St Pancras.

With more than 4000 hotel bedrooms and a great tradition of premium hospitality, the city is the stand-out option for all the right reasons.



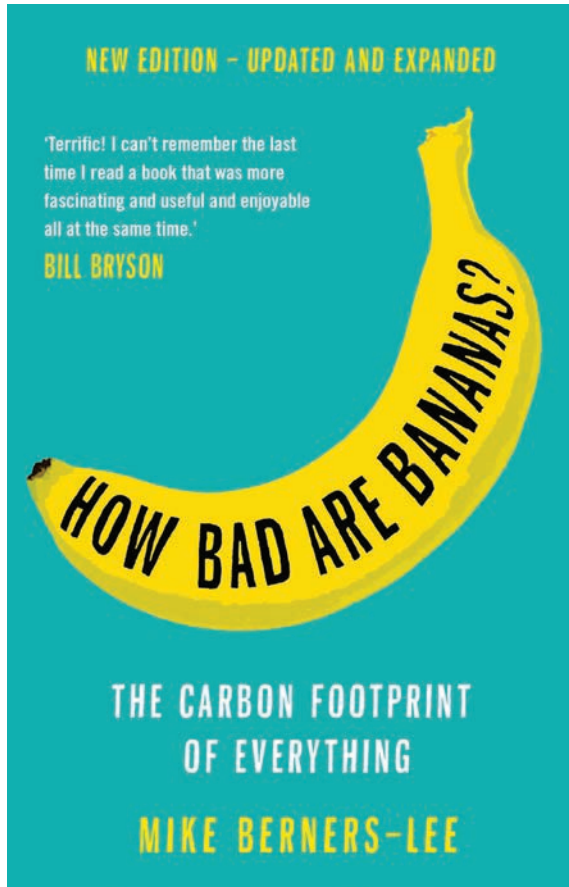
Environmental ambitions

Brighton & Hove has extremely high environmental ambitions. The city has declared a climate emergency and an express ambition to reach net zero carbon emissions by 2030.

Brighton & Hove's reputation for innovation and forward thinking is gaining more power as the city develops a route map to achieve a circular economy. It is the UK's testbed for active carbon neutral infrastructure projects.

Seventy seven countries and hundreds of cities have committed to a net zero carbon pledge by 2050. It's abundantly obvious that Brighton & Hove is already in pole position to lead a large and burgeoning movement.

FOOTPRINT Week



Mike Berners-Lee, author of bestsellers 'There is No Planet B' and 'How Bad are Bananas?', has agreed to curate an initiative called Footprint Week and Footprint Friday to take place across the whole of Brighton and Hove during the week of the show in September.

FOOTPRINT week will involve workshops and events that explore our collective responsibility to achieve a low carbon lifestyle.

This covers the food we eat, how we get around the place, where we buy flowers from, how we do the washing, even how we get buried. FOOTPRINT Week can involve every school, from infant to secondary. On the Friday the whole city should attempt to live it for a day. Zero Carbon is impossible; we'll aim for the 5 Tonnne lifestyle and see how we get on. This programme will be run by Design Brighton.

**DESIGN
BRIGHTON**

It will be a world first and attract a huge amount of media attention, putting Brighton & Hove firmly in the environmental driving seat.

We have to move fast. If we look to the future, the day can extend to a week, then a month, then it absolutely has to become permanent, or our planet will no longer support us.

Economic benefits to Brighton

Brighton & Hove's new economic strategy to 2024 provides a blueprint for the city and the Greater Brighton region to become one of the UK's most productive and inclusive economies.

The strategy urges businesses, entrepreneurs, educators and communities to be bold and to build on the city's international reputation for openness, creativity and innovation.

We believe that FOOTPRINT will play a significant part towards realising the city's Economic Strategy. In the first instance it will bring custom to local business, but it will also elevate the region's visibility and support employment opportunities throughout the area.

Brighton & Hove's long-standing identity is based on its status as one of the UK's leading visitor destinations, and as an open, lively and ethical city. But there is a perception that the city's reputation as a place for business could be stronger. FOOTPRINT will give Brighton & Hove and the surrounding region a significant platform at national and international levels, enabling it to improve its

identity, visibility and positioning and raise its game for the business sector.

Greater Brighton has the potential to be one of the UK's most compelling growth locations; its international standing and connections with the world will have an important role to play in defining the region's future performance.

In the uncertain economic context of the disruption caused by Covid-19, trade and inward investment are crucially important in economic recovery, supporting businesses' growth and innovation, and creating and sustaining employment opportunities in both existing and emerging sectors.

FOOTPRINT will play a major rôle in achieving these outcomes, internationalising the city and Greater Brighton City Region.

FOOTPRINT will bring much needed custom to the region's existing businesses. We have prepared a study of the event's immediate economic impact to illustrate the benefits of this direct investment.

(See Appendix 1).

Hospitality

FOOTPRINT enables UK property industry professionals to meet and collaborate. Key players host a variety of social events at which these more informal networking opportunities abound.

Brighton & Hove is blessed with a diverse hospitality industry. We

estimate that some 300 off-site events will be held during the course of FOOTPRINT, including breakfast meetings, lunches, drinks receptions and dinners. These will range from small and discreet gatherings to gala dinners and large and lavish parties. Brighton & Hove's best venues can anticipate huge amounts of custom.



Accommodation

We expect that over the duration of the event around 10,000 participants will come to FOOTPRINT, many of whom will stay for multiple nights. Plus more than 2,000 exhibitors will stay for a week or more. We have already mentioned that Brighton & Hove's broad range of accommodation can meet this demand like very few other cities in the UK.



Education benefits to Brighton

The construction industry offers a wide range of careers involving an unusual array of specialisms, weaving technical and creative skills together.

FOOTPRINT will conduct a Careers Fair on the last day of the event for Year 9 students and older. 'STEP UP' will offer young people the opportunity to see all the different jobs available in the construction industry and to meet industry insiders. From these contacts they will either be inspired to pursue college and university level education, or to join these companies directly for apprenticeships and learning on the job.

FOOTPRINT will work with construction industry businesses to support a year-round project delivering inspiring talks and presentations to schools and colleges across the region.

Connecting construction professionals with pupils as part of their careers advice will inspire young people to get involved in an extremely important and rewarding industry.

Location

An ideal place for FOOTPRINT Brighton is Hove Lawns. It is elegant and glamorous, with sea views across the Channel to the wind farm, against the backdrop of some of the finest Regency architecture in the country.

Hove Lawns is a pleasant walk from Brighton, Hove and Portslade Station, and close to many of the city's hotels, both familiar premium brands and the smaller boutique offerings.

It is also only a short distance to the city's endless variety of enticing venues for private events.

It is difficult to anticipate the eventual size of the event in today's environment. We have reduced it in size in response to concerns voiced by councillors. This suggested layout leaves ample lawns free for residents' use. We welcome the opportunity to discuss all this further with the council at a suitable time.

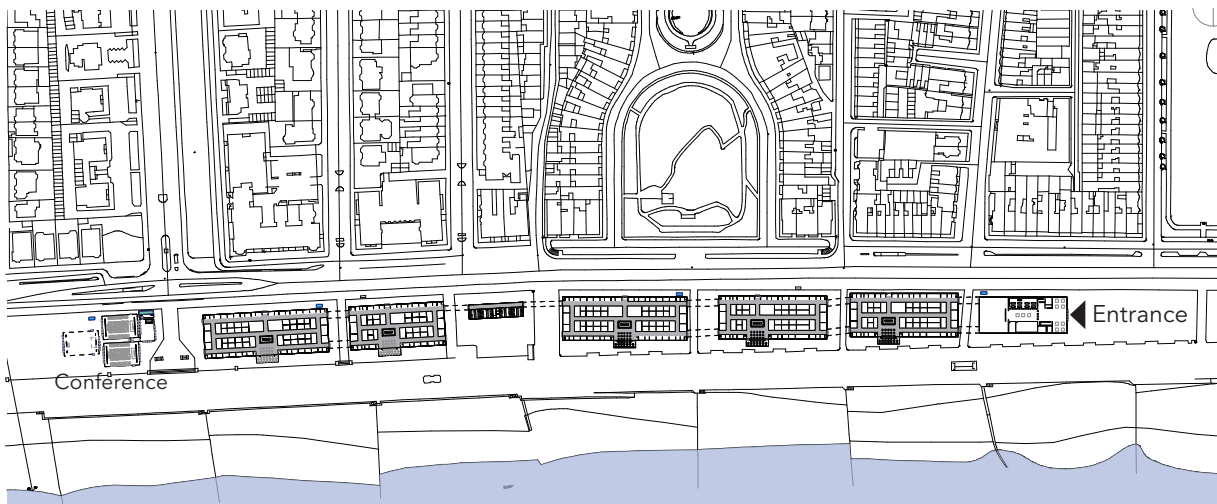


Possible marquee layout superimposed on aerial photo

Show design

The FOOTPRINT marquees are from a company which provides the highest quality temporary venues in the world, including the RHS Chelsea Flower Show and the Frieze Art Fair in Regent's Park.

We are showing a possible layout, with well-spaced naturally ventilated circulation throughout. There are cafe bars run by local suppliers in every marquee with open-air covered terraces addressing the sea.



Proposed layout of marquees on Hove Lawns

This is a view of the interior of one of the naturally lit marquees. It shows the wide aisles and modern, minimal stand design. All exhibitors will be provided with stands like these, to our specification.

Aisles will be wide, allowing comfortable social distancing.

Post Covid-19, natural ventilation and high air flow are becoming recognised as important in reducing transmission, so a naturally ventilated marquee venue with coastal breezes is ideal.

The aisles are all straight, removing the dog-legs and dead ends of many conventional exhibition halls, giving a sense of calm and an ease of progression around the show.

Colours will be muted and contemporary, the signage will be clear. FOOTPRINT, by its very nature, will be an entirely inclusive and accessible event.



View inside the exhibitor spaces

Good Neighbours

The FOOTPRINT team are committed to ensuring that the event is welcomed by the people of Brighton and Hove. We don't want to cause any undue interference or loss of amenity particularly to our neighbours living closest to the site; we live very close to the site as well.

We would like to make it clear that as a business networking show it is quite different from other events held on Hove Lawns.

Specifically:

- there will be no noise or public nuisance as there is no amplified music in the show during the day and the show largely closes at 6pm
- drinks receptions held between 6pm and 9pm will be limited in sound level as people are there to meet one another and talk so only background music will be played
- a team of security guards will be on the lawns round the clock during the build, the event and take down, so hopefully incidents of anti-social behaviour on the lawns will be reduced during this time
- there should be no impact to residents' parking as all attendees are asked to arrive by public transport or bike and we will make it clear that there is no parking at the event

• several lawns will remain clear for residents throughout and all walkways will remain clear to maintain public access from local roads to the promenade

On our website you will find a 'Community' page where additional information will be uploaded.

We welcome questions or suggestions about any practical aspect of the event, just click on the link on this page.

During our presence on site there will be a 24 hour Residents' Hotline for any queries and so that any problems can be sorted out quickly.

The Neptunus marquee company are experienced with building on grass, eg. in Regent's Park for the last 7 years, and will take all the necessary precautions to protect the lawns from tyre tracks and other marks. We undertake to restore the grass to the condition in which we find it.

FOOTPRINT Fund



We are committed to supporting causes which benefit both residents and businesses in Brighton and Hove.

FOOTPRINT pledges 5% of ticket sales to seafront infrastructure projects. The money will be paid directly to the Council each year after the event. It will be for allocation to the seafront budget, with a commitment to spend the funds on the restoration of the Hove Lawns railings and other seafront infrastructure improvements adjacent to Hove Lawns as soon as practicable each year.

Discussions are ongoing with local amenity, civic and residents' groups about how Footprint and Design Brighton can contribute to other improvements in the city's environment.

Zero Waste Policy

The show will be produced with a total commitment to zero waste.

The majority of materials used to build the show are simply hired:

- the marquees
- the power and lighting equipment
- the stands (emulsion painted timber)
- the furniture
- the bars.

All of it just goes back for re-use.

The carpet used is 100% recycled EVO from Reeds Carpets. They sell recycled pellets for reuse in the plastics industry contributing to the development of the Circular Economy.



Reeds Carpets are 100% recyclable

FOOTPRINT will work with local cafes and catering businesses to create the on-site catering offered at the show.

All the local food and beverage outlets will be required to use recyclable containers.

Single use plastic will be banned.

Delegates will be encouraged to bring their own drinks containers and water fountains will be available throughout the event.

The show will be provided with recycling points and this segregated waste will be collected for recycling by a local licensed waste contractor.



All food and beverage containers to be recyclable

Nominated Charity

We have approached The Clock Tower Sanctuary to be our nominated charity. Clocktower is small, local and dedicated to Brighton and Hove.

The Clock Tower Sanctuary is a drop-in day centre for homeless 16 to 25 year olds. They provide a network of support to help young homeless people move from crisis to stability.

We are in discussion with The Clock Tower Sanctuary to finance the building and running of a hostel for Clock Tower's clients. This hostel would be based on the model used at Shelter From The Storm in London. Tim has worked with Shelter From The Storm for many years and more recently with The Clock Tower.

Presently, The Clock Tower provides a shelter in the daytime, whilst Shelter From The Storm provides a nighttime shelter complete with dinner and breakfast.

We will establish an international design competition for the new hostel to incorporate the principles of the circular economy.



FOOTPRINT will connect the UK's local authority, developer, and broader delivery communities to start new projects and push the Zero Carbon industry forward.

FOOTPRINT is bold, adventurous, purposeful and fun. It is a very serious endeavour, in both business and environmental terms, and in putting Brighton & Hove in its rightful prominent position amongst the UK's top cities.

It represents an opportunity about which we are very excited, and which we firmly believe must be grasped with full enthusiasm.



Green Coast

FOOTPRINT, by virtue of its ambitions, will act as the catalyst which develops an Environmental Technology Hub along the south coast. We're calling it the Green Coast.

There is a lot of grant money available for start-ups; the chancellor Rishi Sunak has already announced that he's planning a 'green revolution' for the environmental sector to adapt and employ the redundant post-Covid workforce.

The Coast has plenty of available building stock for studios and workshops and it also has great worldwide access.

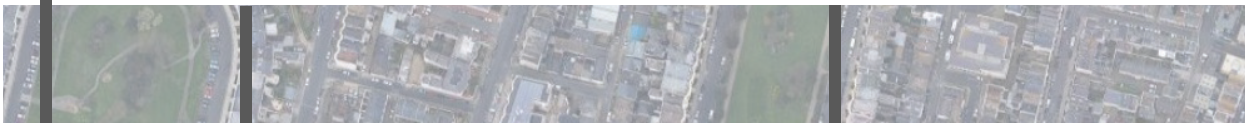
Environmental Technology is already a growth market worldwide, and there is no reason why the Green Coast shouldn't become the environmental version of Silicon Valley.



Timeline

September 2020

Press launch



September 2020

Start of sales to exhibitors



September 2021

Event opens



"As the City moves to create the 'new normal' post Covid, we have an unprecedented opportunity to re-write the rules around our environmental impact on the planet.

This conference not only does that, but also will help the economy rebuild with a total direct and indirect spend of £9.50 million in year one increasing to £19.00 million after year five. As well as creating 129 FTE jobs in year one rising to 259 after year five."

Gavin Stewart
Executive Director
Brighton & Hove Economic Partnership



"FOOTPRINT Brighton is an ambitious project that should be welcomed by Brighton and its community. It is key to the city's overarching Brand - A growing city/ an open city/ a talented city/ a fair city. Now is our time to adapt and develop in line with some of this vision. I have been actively involved in the visitor and hospitality economy and its development in Brighton for nearly two decades. Sustainability and circular economy have become key to many of my current projects .

We have a generous and innovative food and drink offering that needs to be supported and championed by business tourism and new thinking projects. My endorsement of this project is also an offer to work collaboratively to deliver the best possible presentation of the city, showcase it nationally and internationally as the forward thinking city it could be."

Olivia Reid
Chairperson
Brighton Restaurant Association



“With over 75% of UK citizens living in regions that have declared a Climate & Ecological Emergency as well as committing to being Net-Zero Carbon within a decade, Local Authorities are now facilitating an opportunity for smarter, leaner and (crucially) greener industries to flourish.

The construction sector in particular has a huge role in enabling Local Authorities to meet these ambitious targets as it is responsible for 50% of global CO² emissions, consumes 50% of all raw materials harvested annually, and creates 60% (120 million tonnes) of the UK's annual waste. I believe that Footprint will be one of the major events that facilitates the creative discussions and working relationships required to meet the demands that smart, green, zero-carbon living requires.”

Duncan Baker-Brown

Architect, Lecturer at University of Brighton &
Campaigner for Circular Economy

Conclusion

FOOTPRINT will confirm Brighton & Hove's reputation as the national innovator for our urban communities, building on the 2013 declaration as a One Planet City.

FOOTPRINT will provide:

- An injection of investment to the local economy of £9.5million in year one with a potential to grow sustainably to £19million;
- A powerful real life advert to investors of the passion and opportunity here in Brighton and as an obvious choice as a location for investment through sustainable development;
- The creation of an estimated 129 FTE jobs in 2021 likely to grow to 259 FTE jobs over five years;
- Unequivocal evidence of Brighton & Hove's national leadership in sustainability policy;
- An opportunity for the young people of Brighton & Hove to take the lead in the one of the country's most important industries;
- A powerful magnet for high-spending exhibitors and visitors to return year after year;
- The perfect vehicle to demonstrate to Europe and the world that Britain's commitment to a sustainable future is second to none;
- A catalyst to work with emerging government policy to establish the Green Coast as an environmental technology hub.

Britain and Greater Brighton both need FOOTPRINT.

The team



Tim Pyne
Creative Director

As founder and owner of WORK, Tim designed over £50m worth of the Millennium Dome exhibitions for New Labour, and won 2 RIBA awards for the 4 zones he designed. This included the Environment zone which used Brighton beach as a backdrop.

Tim was founding Creative Director of 100% Design and Detail in the UK, Tokyo and Moscow.

Other events include:

- Creative Director to The International Festival of Business in Liverpool 2014
- Creative Director of the London Boat Show
- Creative Director to the London Motor Show, the Blenheim Fashion Group and DMG Worldwide.
- Designer of London Fashion Week for several years
- Designer of large private and lottery funded museum and visitor-attraction projects including the National Maritime Museum, the Commonwealth Institute and the Science Museum.

Tim lives with his wife and daughter in Hove.



Sophie Law-Smith
Communications
Director

Sophie is a communications and events specialist with an extensive and strong network across the south coast.

Sophie has a strong background in the development business particularly marketing strategy and project management.

She delivered many thought provoking events exploring and discussing the future of the construction industry:

Design Brighton
Newhaven Design Platform
Constructing Excellence
Circular Brighton and Hove

As a founding Director of local design initiative 'Design Brighton', Sophie has been the driving force in moving Design Brighton from concept to realisation.

The team



Emily Day
Technical Director

Emily Day is a chartered architect with over 20 years of experience working on large scale projects.

Emily has worked with many key players within the industry; local authorities, developers and financial institutions which has given her a unique insight into the needs of the different parties.

Local authority clients have included:

- City of Nottingham
- London Borough of Hackney
- Royal Borough of Kensington and Chelsea
- Rutland Council
- North Devon District Council
- Cornwall Council

Projects completed include major residential developments and urban planning, mixed use developments, speculative office, hospitality, educational estates and community developments up to £6bn in value.

Emily lives and works in Hove.



Sam North
Commercial Director

Sam North was a founding shareholder in Clarion Events initial MBO and continued with the management team to transform the business, growing turnover from £10m to more than £300m and expanding its footprint into every continent.

He has experience across business to business and business to consumer markets and all event formats, including achieving the UK's largest ever business to consumer launch exhibition of over 80,000sqm. He has delivered campaigns with corporate clients including IBM, Salesforce, Barclaycard and SAP.

Sam has also acquired and integrated high growth organisations, and developed them into businesses of scale by accelerating performance and driving new event launches.

The team



Miriam Sigler
Operations

As Founding Director of Ways & Means Events, Miriam brings her vast breadth of industry knowledge to projects large and small. Miriam's long list of attributes include her uncompromising work ethic, attention to detail and 'work hard – play hard' attitude. Coupled with her love of teamwork and head-on attitude to problem solving, she has become a well-respected people member of the industry.

Her wealth of knowledge in all facets of events management has seen her direct countless successful projects including launches and re-brands as well as long standing successful event portfolios. With her deep understanding of what stakeholders require from each event, she is truly an asset to every event. Any project Miriam undertakes is creative, well-planned, detailed and colourful.

With more than twenty years experience working in events management, Miriam Sigler has seen it all.



Aidan Walker
Conference

Aidan's MA in History from Cambridge University was a highly appropriate education, he claims, for his 'first career' in furniture design and cabinet making – itself an admirable preparation for 20 years of writing for, editing and directing design magazines. He has editorially directed almost all the professional UK design magazines.

As Fellow of the Royal Society of Arts and director of Aidan Walker Associates, he now creates, curates, presents and chairs conference and seminar programmes such as 'Art for Tomorrow' for The New York Times and the conference programmes for the London Design Festival's Global Design Forum, Design Shanghai, Design China Beijing and Grand Designs Live.

Aidan lives in rural Sussex with his family, his dogs, his Ducati racing motorbike and his guitars.

The team



Andy Paul
Logistics

Andy Paul is the director of Teem Services. Andy and his team provide support and expertise in all areas concerning the running of Exhibitions and Events. Andy has 20 years experience in the industry and is a qualified Health & Safety manager, winning the award at the Association of Event Organisers for best operational staff 2016-17. Alongside Andy and his co-director, Andrew Abbotts, is an experienced team of staff who continue to strengthen their broad knowledge set enabling the company to take on different challenges.

Teem Services clients include:

- William Reed
- MTA
- Mach Brooks
- Rapid New
- Clarion Events
- National Boat Shows
- Brintext
- MCI
- Event Shaper
- Tarsus
- FESPA
- Upper Street Events

Appendix 1: Economic Impact Assessment

Prepared by Marshall Regen

A headline economic and visitor economy impact of
FOOTPRINT Brighton - A responsible real estate event for the
property industry



INTRODUCTION

The aim of this paper is to provide a headline economic and visitor economy impact of the proposals by FOOTPRINT Brighton to establish the UK's first responsible real estate event for the property industry. The economic model has been developed by Marshall Regen Ltd using forecasts developed by the FOOTPRINT Brighton team based on their extensive knowledge and experience of the events industry market.

STRATEGIC ALIGNMENT

FOOTPRINT Brighton has the potential to be a game changer in the real estate event industry. It can be delivered in one of the UK's leading sustainable cities, with close proximity to London and, in Gatwick Airport, worldwide markets. The City Council declared a climate emergency and has set out its climate change ambitions including:

- A 2030 net zero carbon emission ambition
- Developing a route map to achieving a circular economy
- Being the UK's testbed for active carbon neutral infrastructure projects

FOOTPRINT Brighton will help deliver the economic ambitions as set out Brighton & Hove's Economic Strategy (2018 to 2024) which provides a blueprint for the city and the Greater Brighton City Region to become one of the UK's most productive and inclusive economies. The strategy urges businesses, entrepreneurs, educators and communities to be bold and build on city's local reputation for openness, creativity and innovation.

The factors that will define the city's future economic success that FOOTPRINT Brighton could help secure include:

- **Improving identity**, visibility and positioning - Brighton & Hove has a long-standing identity based on its status as one of the UK's leading visitor destinations, and as an open, lively and ethical place. Despite this, there is a perception that the city does not have a strong identity as a place for business.
- **Internationalising the city and City Region** - Greater Brighton has the potential to be one of the UK's most compelling inward investment and growth locations; its international standing and connections with the world will have an important role to play in defining future performance. In uncertain economic times, trade and inward investment are integral in supporting businesses growth and innovation, and creating and sustaining employment opportunities in existing and emerging sectors.

FOOTPRINT Brighton will firmly place the city and the City Region on world's property and investor map. It will promote the development of a circular and sustainable economy to minimise waste and pollution by reducing, reusing and recycling.

FOOTPRINT Brighton will also help deliver the city's Visitor Economy Strategy [2018 - 2023] by develop a world-wide real estate and property events '**place brand**' that will build on the values in the city's destination brand. The event will help meet the city targets of a 5% annual growth in value of conferences from a baseline of £53 million; and 3% annual growth in bed nights and overnight visitor spend per annum – achieved through attracting more higher spending visitors and extending the length of trips.

It will fill the '**target market of international conferences**'. There is relatively low awareness of most UK cities among international buyers outside London. Using the city's proximity to London

creates a unique opportunity to win business in new international markets. That means targeted activity with intermediaries, agents, professional conference organisers and buyers with direct routes into Gatwick Airport.

ECONOMIC AND VISITOR ECONOMIC IMPACTS

The headline economic and visitor impacts are based on the input data received from FOOTPRINT Brighton; Business Events Delegate Spend Research, VisitBritain 2017; VisitBrighton Economic Impact Study 2018 and the assumptions set out in Annex A.

Given that FOOTPRINT Brighton is a new real estate and property event for Brighton & Hove, it is fair to assume that not all of the proposed outputs and economic / visitor economy impacts will be delivered from year one. Therefore the assessment summary table below provides a forecast economic and visitor economic impacts based on 50% delivery and occupancy in year one rising by 10% each year to reach 100% delivery and occupancy after year 5.

Economic and Visitor Impact	100% Impact and Occupancy		Year one - 50% impact and occupancy	Year two - 60% impact and occupancy	Year three - 70% impact and occupancy	Year four - 80% impact and occupancy	Year five - 90% impact and occupancy
Delegate Spend							
Day delegates	618,000		309,000	370,800	432,600	494,400	556,200
Overnight delegates	2,552,000		1,276,000	1,531,200	1,786,400	2,041,600	2,296,800
Exhibitor/Organiser Spend							
Exhibitors	2,467,465		1,233,733	1,480,479	1,727,226	1,973,972	2,220,719
Hospitality	2,400,000		1,200,000	1,440,000	1,680,000	1,920,000	2,160,000
Hire and Build	4,925,000		2,462,500	2,955,000	3,447,500	3,940,000	4,432,500
Contractor spend	1,009,120		504,560	605,472	706,384	807,296	908,208
Overall Visitor/Exhibitor Spend							
Delegate Spend	3,170,000		1,585,000	1,902,000	2,219,000	2,536,000	2,853,000
Exhibitor/Contractor Spend	10,801,585		5,400,793	6,480,951	7,561,110	8,641,268	9,721,427
TOTAL DIRECT SPEND	13,971,585		6,985,793	8,382,951	9,780,110	11,177,268	12,574,427
Tourism Multiplier	5,029,771		2,514,885	3,017,862	3,520,839	4,023,816	4,526,794
TOTAL SPEND (DIRECT & INDIRECT)	19,001,356		9,500,678	11,400,813	13,300,949	15,201,084	17,101,220
Number of gross jobs created	352		176	211	246	282	317
Number of FTE jobs created	259		129	155	181	207	233

Note: The estimates above do not inflation or any costs incurred with the use of Hove Lawns, licencing or other professionals fees associated with securing permissions.

Summary

FOOTPRINT Brighton has the potential to deliver significant economic and visitor economy impacts including:

- Direct spending of £6.99 million in year one increasing to £13.97 million after year five.
- Tourism multiplier of £2.51 million in year one rising to £5.03 million after year five.

- Total direct and indirect spend of £9.50 million in year one increasing to £19.00 million after year five.
- Creating 129 FTE jobs in year one rising to 259 after year five.

FOOTPRINT Brighton - Input Data		
Open days	4	Organiser supplied (presentation)
Attendance Nights	5	Organiser supplied (presentation)
Exhibitor Nights	7	Organiser supplied (email)
Stands	394	Organiser supplied (email)
Contractors	50-500	Organiser supplied (email)
Exhibitors	2210	Organiser supplied (email)
Spend/day delegates	£103	Business Events Delegate Spend Research. Visitbritain. 2017
Spend/night overnight delegates	£319	Business Events Delegate Spend Research. Visitbritain. 2017
Hospitality events	300	Organiser supplied (email)
Average hospitality spend	£8,000	Estimated based on organiser email
Day Visitors/day	1500	Organiser supplied (email)
2 day visitors	1500	Organiser supplied (email)
3 day visitors	1000	Organiser supplied (email)
4 day visitors	500	Organiser supplied (email)
Number contractors two days prior	500	Organiser supplied (email)
Number contractors 3 weeks to 2 days	50	Organiser supplied (email)
Spend/night by B&H visitor	£95.20	2018 Visitbrighton Economic Impact Study

Assumptions		
Tourism Multiplier	0.36	Based on similar studies
Delegate and Exhibitor Spend in local area	100%	
Exhibition design and build retained in local area	25%	
Exhibitor spend half of delegate spend	50%	
Exhibitor stand design, build and space	£50,000	Estimated

F O O T P R I N T

B R I G H T O N

Date	Revision
14.09.20	1.1

Subject:	Urban Design Framework Supplementary Planning Document – Draft for public consultation		
Date of Meeting:	24 September 2020		
Report of:	Executive Director Economy, Environment & Culture.		
Contact Officer:	Name:	Paula Goncalves	Tel: 01273 292352
	Email:	paula.goncalves@brighton-hove.gov.uk	
Ward(s) affected:	All Wards		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 This report provides an update on the preparation of the Urban Design Framework Supplementary Planning Document (UDF SPD) and seeks approval to consult on the Draft Supplementary Planning Document prior to its final adoption planned for early next year.

2. RECOMMENDATIONS:

That the Tourism, Equality, Communities and Culture Committee:

- 2.1 Notes the background information provided regarding the preparation of the Urban Design Framework Supplementary Planning Document (UDF SPD); and
- 2.2 Approves the Draft Urban Design Framework Supplementary Planning Document for public consultation for six weeks and authorises the Executive Director Economy Environment & Culture to make any necessary minor amendments to the Draft SPD in consultation with the Chair of TECC Committee prior to the public consultation.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The Urban Design Framework (UDF) is specifically referred to in Policy CP12 Urban Design in the adopted City Plan Part One. It is also signposted in the Spatial Strategy and a number of the other city-wide and Development Area policies of this Plan. It is also referred to in the Proposed Submission City Plan Part Two policies (approved by council April 2020 for further consultation) that set out criteria for assessing design quality of places and buildings.
- 3.2 The aim of the UDF SPD is to illustrate how good urban design is vital to the delivery of inclusive, accessible, sustainable and climate resilient development that will help to deliver better buildings, spaces and places for the city; its residents and visitors. As such, it will also help to achieve many of the objectives set out in the Council Plan 2020-23 – A Fairer City with a Sustainable Future.

- 3.3 The UDF has been prepared in the form of a Supplementary Planning Document (SPD). A SPD is one of a series of documents used by the council to provide guidance and information to planning applicants and landowners about how to successfully implement adopted and emerging policies in the City Plan Parts One and Two. It cannot make new or change existing policies but it can assist the council in delivering the amounts and types of development being proposed by City Plan Part One and Two in more innovative ways and through better quality design, illustrating good practice.
- 3.4 The Draft SPD builds upon the outcomes of earlier stakeholder consultation (undertaken in 2018 as 'Issues and Options') and input from key council officers and design advisors. It has been prepared to inform a city-wide consultation and takes account of the [National Design Guide - Planning practice guidance for beautiful, enduring and successful places published in 2019](#). (NDG 2019). The SPD demonstrates how good design:
- can help the city to achieve its ambition of becoming carbon neutral by 2030;
 - should respond to the city's limited spatial opportunities and challenging physical and environmental constraints;
 - helps to meet the city's significant housing needs through high quality higher density development together with development for other land use needs;
 - secures improvements to the city's physical, social and environmental infrastructure;
 - uses innovative, contemporary architecture to enhance the reputation of the city and creates places that improve health and well-being; and
 - reflects positive engagement with all involved in the planning process.
- 3.5 The SPD looks at opportunities to support constructive design discussions between applicants, designers, planning officers, councillors and communities by outlining potentially appropriate solutions and illustrating best practice in the city and elsewhere. This document is structured in three main sections that build on national and local design policy and guidance:

A. Local priorities

This section focuses on design issues that are particularly important and relevant to Brighton & Hove and sets out design recommendations and principles to illustrate how the council would like to see local policy interpreted. The advice in this section is applicable to all types of development across the city. Local priorities are developed under three key design priorities: context, spaces between buildings and buildings.

B. Tall buildings

This section sets out additional design considerations that are particularly relevant to development that is 18 metres or more in height and significantly taller than its surroundings. It also provides design advice for each of the identified tall building areas in the city as set out in policy CP12 Urban Design in the adopted City Plan Part One. If adopted, this section of the UDF SPD will replace guidance currently set out in Supplementary Planning Guidance SPGBH 15 Tall Buildings.

C. Planning Process

This section describes the council's preferred approach for engaging with applicants to resolve design issues both prior to the submission of a planning application and during the application process.

D. Appendices

These provide additional information about some of the issues discussed in the guidance and also provide an extended list of policies and documents that should be read in conjunction with the SPD.

- 3.6 Each section of the guidance identifies the relevant City Plan policies, sets out key design principles and recommendations to help applicants achieve better planning outcomes and signposts good practice examples from the UK and beyond to illustrate how multiple design priorities can be achieved through good design (e.g. high quality urban design together with a range of biodiversity and sustainability outcomes).

4. COMMUNITY ENGAGEMENT & CONSULTATION

- 4.1 In order to inform the preparation of the Draft SPD, an early stage of stakeholder engagement aiming to gauge views on the type of guidance to be provided was conducted in 2017- 2018. This included inviting hard to reach groups to assess the quality of public spaces in the city and asking individuals and organisations to provide feedback on Issues & Options set out in a discussion paper and Draft City Plan Part Two design policies.
- 4.2 The council received 154 responses. The detailed findings of this consultation are set out in the consultation report that forms part of the Appendices to this report along with a table demonstrating how comments were addressed in the Draft SPD. Across all those consulted there was support for guidance that:
- Provides enough detail without being too prescriptive;
 - Ties in with other planning policy, strategies, studies and guidance;
 - Promotes engagement with local professionals and communities;
 - Creates places that are accessible to all; and
 - Draws attention to good practice examples in the city and elsewhere.
- 4.3 Stakeholder consultation was then followed up through engagement with key council officers and Design South East panel advisors, to assess how best to provide the level of detailed guidance favoured by stakeholders, in particular with regard to:
- identifying opportunities to optimise density and build on character areas as identified in the city's Urban Characterisation Study;
 - providing more clarity about criteria for the assessment of tall building area proposals (i.e. definitions, locations, height ranges and facilities needed);
 - setting out standards/assessment criteria for building design (i.e. internal spaces, architectural detailing, sustainability, amenity, balcony treatment, acoustics, light pollution, air quality and health);
 - integrating walking/cycling and public transport connectivity with transport services, nature-based green infrastructure and sustainable water and waste management solutions; and
 - identifying strategic views to be protected and consideration of impact criteria, particularly in regard to tall buildings.
- 4.4 Dedicated workshops involving key officers and design advisors were used to refine the structure and content of the document and help to identify additional design priorities and principles for selected tall building areas.

- 4.5 The council's Statement of Community Involvement (SCI) sets out policy and standards for engaging residents, local groups, stakeholders and statutory consultees in the preparation of planning-related documents, including supplementary planning documents.
- 4.6 Stakeholder organisations and individuals, including residents, developers, landowners, local ward councillors, planning agents and amenity groups registered in the Planning Policy database will be invited to comment on the Draft SPD during a six-week public consultation to be held in Autumn 2020. Consultation documents will be made available on the council's website. Due to Covid-19 restrictions, consultees will be invited to comment using the council's consultation platform and attend a consultation event using a virtual platform.
- 4.7 The Council will then consider the comments received before amending the SPD that is expected to be brought back to this Committee to seek its adoption in early 2021.
- 4.8 The UDF SPD was subject to a screening exercise at an early stage of preparation to assess the need for a Strategic Environmental Assessment (SEA). The screening was subject to consultation with statutory consultees who agreed with the conclusion that the SPD did not require a SEA.

5. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 5.1 As part as the Issues & Options consultation, options were put forward ranging from a 'business as usual' City Plan policies only approach; a broad brush SPD to identify and summarise existing information available and a more detailed SPD that provided as much detail as possible were all tested.
- 5.2 As the early stakeholder consultation report shows, overall, consultation respondents favoured a detailed SPD approach.

6. CONCLUSION

- 6.1 The main purpose of the Draft SPD is to ensure detailed, clear advice and guidance is available to all those responsible for, or with an interest in improving the design quality of new development in the city.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The cost of officer time, document production and consultation associated with the recommendations in this report will be funded from existing revenue budget within the Planning service. Any significant financial implications arising from the outcome of the consultation and production of the Supplementary Planning Document will be reported in future committee reports.

Finance Officer Consulted: Name Jess Laing

Date: 27.08.2020

Legal Implications:

- 7.2 The contents of a SPD are governed by The Town and Country Planning (Local Planning) (England) Regulations 2012. To be lawful, a SPD must be limited to statements regarding “any environmental, social, design and economic objectives which are relevant to the attainment of development and use of land” which “the local planning authority wish to encourage during any specified period” [Regulation 5. (1) (a)]. The Regulations provide that prior to adoption an SPD must be publicised and a period of at least four weeks allowed for representations to be made. The usual requirement that SPDs are made physically available for inspection at Council offices and elsewhere has been suspended for the period 16 July 2020 to 31 December 2020 by the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020.
- 7.3 Once adopted a SPD will be a material planning consideration in the determination of relevant planning applications.

Lawyer Consulted:

Name Hilary Woodward

Date: 28.08.20

Equalities Implications:

- 7.4 Equalities issues relevant to this SPD have been considered during the Health & Equalities Impact Assessment (HEQIA) undertaken on City Plan Part 1, particularly those identified for policies CP12 Urban Design and CP13 Public Streets and Spaces. The assessment did not find any particular sensitive groups that were affected by these policies. The Planning and Communities Engagement Teams have engaged early with some equality groups and will continue to do so as part of the various stages of consultation on the SPD.

Sustainability Implications:

- 7.5 Sustainable development is given a very high priority in the SPD. The guidance aims to help planning applicants to meet, and if possible exceed, City Plan sustainable development targets, foster high-density, mixed use development and deliver acceptable development in way that positively responds to the city's sensitive landscape, historic built environment and local priorities.

Any Other Significant Implications:

Crime & Disorder Implications:

- 7.6 The preparation of the guidance set out in the SPD will allow for more detailed consideration regarding layout and design features which could help deter crime or disorder and the fear of crime. SPD will consider issues of Secured by Design.

Risk and Opportunity Management Implications:

- 7.7 The UDF SPD will provide guidance on implementing City Plan Part One Policy CP12 Urban Design and other relevant policies in the Plan and the emerging City Plan Part Two Policies. Responses received as part of the consultation at the

Draft SPD stage will help inform the final version of the SPD. The SPD is intended to improve the quality of design in new development and facilitate the successful delivery of higher density and sustainable development.

Public Health Implications:

- 7.8 Development across the city is expected to support sustainable and healthy lifestyles. The production of the SPD can help support the timely provision of necessary infrastructure to support sustainable and mixed use communities across the city. The ways in which good design can help minimise noise and other traffic impacts have been considered in the Draft SPD and will be duly discussed as part of the consultation.

Corporate / Citywide Implications:

- 7.9 The council is committed to promoting high quality, higher density, mixed-use development. High quality design is the key to achieving acceptable development in a way that respond successfully to the city's high housing demands, significant spatial constraints and sensitive landscapes. As such, the Draft UDF SPD presents a major opportunity to:
- Establish constructive dialogue with local communities and those with a stake in the planning system on the key design principles to help deliver development in the city and particularly in more sensitive locations; and
 - Provide greater clarity and confidence for elected members, the council's Development Management team and the development sector to help unlock investment in and speed up the delivery of housing and other much needed development in the city.

Any Other Significant Implications:

- 7.10 None identified.

SUPPORTING DOCUMENTATION

Appendices:

1. Draft Urban Design Framework Supplementary Planning Document (UDF SPD)
2. Early stakeholder consultation report
3. Early stakeholder consultation report appendices

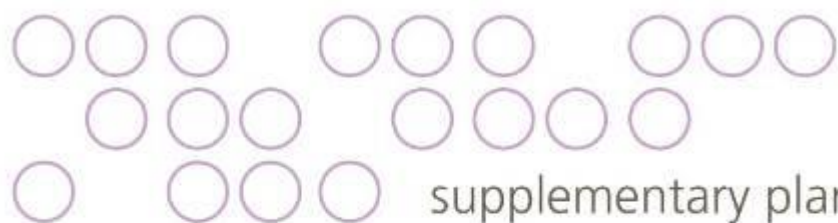
Documents in Members' Rooms

None

Background Documents

City Plan Part One

Submission City Plan Part Two



spd 00

supplementary planning document

DRAFT Urban Design Framework



Contents

About this SPD	03
National Planning Policy	04
Local Planning Policy	05
SECTION A: Local priorities	06
1. Context	07
1.1. Environmental conditions	08
1.2. Neighbourhood character	9
1.3. Composition of street scene	11
1.4. Views and landmarks	13
1.5. Opportunities for masterplanning	15
2. Spaces between buildings	16
2.1. Active and inclusive travel	17
2.2. Outdoor amenity	19
2.3. Landscaping, biodiversity and water	21
2.4. Mix of uses and active frontages	23
2.5. Artistic element	25
2.6. Materials and management	27
2.7. Phasing development	29
3. Buildings	30
3.1. Resource performance and use	31
3.2. Designing at density	33
3.3. Housing types and mix of uses	35
3.4. Greening	36
3.5. Materials and maintenance	37
3.6. Waste storage and collection	38
3.7. Deliveries and servicing facilities	39
SECTION B: Tall buildings	40
4. Definition	41
5. Tall Building areas	42
5.1. Area 1: Brighton Marina	43

5.2. Area 2: Brighton Station / New England	45
5.3. Area 3: Central Seafront	47
5.4. Area 4: Eastern Road / Edward Street	49
5.5. Area 5: Hove Station	51
5.6. Area 6: Lewes Road corridor	53
5.7. Area 7: London Road / Preston Road	55
5.8. Area 8: Western Seafront/Kingsway	57
5.9. Area 9: Shoreham Harbour	58

6. Tall Building Statements **59**

SECTION C: Planning process **61**

7. Pre-application process	62
7.1. Vision and site strategy	63
7.2. Conceptual design options	65
7.3. Preferred design concept	67
7.4. Detailed design	69
8. Design advice services	71
9. Communicating design ideas well	71
9.1. A day in the life	74

SECTION D: Appendices **75**

10. Extended list of policies and documents	76
11. Neighbourhood sensitivity to change and priorities for enhancement	78
12. Strategic viewpoints and landmarks	84
12.1. Viewpoints	84
12.2. Strategic approach points	91
12.3. Landmarks	91
13. Tall Buildings Statement guidelines	92
13.1. Context	92
13.2. Spaces between buildings	95
13.3. Buildings	96

About this SPD

This Urban Design Framework Supplementary Planning Document (UDF SPD) has been prepared to help 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.

The SPD illustrates how good design is vital to the delivery of inclusive, sustainable and climate-resilient development that:

- helps the city to achieve its ambition of becoming carbon neutral by 2030;
- responds to the city's limited spatial opportunities and challenging physical and environmental constraints;
- helps to meet the city's significant housing needs through high quality higher density development together with development for other land use needs;
- secures improvements to the city's physical, social and environmental infrastructure;
- uses innovative, contemporary architecture to enhance the reputation of the city and creates places that improve health and well-being; and
- reflects positive engagement with all involved in the planning process.

It provides guidance on good design that can be used by:

- planning applicants and their design team when preparing planning applications;
- planning officers when assessing applications;
- councillors when making planning decisions; and
- residents, amenity groups and other organisations when commenting on planning applications.

This document is structured in three main sections that build on national and local design policy and guidance:

A. Local priorities

This section focuses on design issues that are particularly important and relevant to Brighton & Hove and sets out design recommendations and principles to illustrate how the council would like to see local policy interpreted. The advice in this section is applicable to all types of development across the city.

B. Tall buildings

This section provides guidance on those additional design considerations that are particularly relevant to development that is 18 metres or more in height and/or significantly taller than its surroundings.

C. Planning Process

This section describes the council's preferred approach for engaging with applicants to resolve design issues prior to the submission of a planning application and during the application process.

D. Appendices

These provide additional information about some of the issues discussed in this guidance and also provide an extended list of policies and documents that should be read in conjunction with the SPD.

Each section of the guidance identifies the key City Plan policies, sets out key design principles and recommendations to help applicants achieve better planning outcomes

and signposts good practice examples from the UK and beyond to illustrate how multiple design priorities can be achieved by good design.

National Planning Policy

The [National Planning Policy Framework \(NPPF 2019\)](#) and its [Practice Guidance](#) recognises the importance and value of good design as an essential component of sustainable development. Chapter 12 'Achieving well-designed places', promotes a proactive, contextual approach to the creation of high-quality buildings and places that respond to the aspirations of local communities.

The [National Design Guide - Planning practice guidance for beautiful, enduring and successful places](#) (NDG 2019) provides a high level framework of design guidance that establishes expectations on place making and design quality to guide individual development proposals. It expects local authorities to build on this framework by setting 'specific, detailed and measurable criteria for good design' at the local level. It sets out what constitutes good design based on ten characteristics for well-designed places summarised below. It provides details regarding how that can be incorporated into proposals as well as a useful glossary. This guidance builds on the principles of good design set out in NDG, focusing on what makes Brighton & Hove distinctive and the priorities and cross-cutting policy 'wins' that are of particular relevance to its context.



Ten characteristics of well-design places.

The [Living with Beauty: promoting health, well-being and sustainable growth \(2020\)](#) report recommends developing a planning framework that asks for beauty; refuses unadaptable, unhealthy and unsightly development and promotes stewardship of the built and natural environment. It advocates that these aims should be embedded in the planning system to support a more integrated approach to design, in which all matters relevant to placemaking are considered from the outset and subjected to a democratic or co-design process.

Local Planning Policy

[Brighton & Hove City Plan Part One](#) (adopted in 2016) Policy CP12 Urban Design is the key and overarching policy regarding development design along with CP13 Streets and Open Spaces that focuses on the design of spaces between buildings. These policies seek to raise the standard of and achieve excellence in sustainable design and construction of buildings and external spaces in the city.

There are also a number of retained policies in Chapter 3 of the [2005 Brighton & Hove Local Plan](#) that deal with design issues. These policies set out how good design in new development can help to create interest, diversity and a more pleasant environment.

The retained 2005 Local Plan policies will be superseded by [Brighton & Hove City Plan Part Two](#) (CPP2) which is at a late stage in its preparation. The UDF provides supplementary guidance relevant to some of these policies, in particular DM18 High quality design and places. This policy requires an integrated, design-led approach to proposals where place making and sustainable development are considered as one.

[East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan](#) (2013) Policies WMP3a-e set out the strategy for managing waste in new development. Policy WMP3d Minimising and Managing Waste During Construction, Demolition and Excavation looks at design measures to minimise or prevent waste from occurring and Policy WMP3e Waste Management to incorporate recycling infrastructure into new development.

[Shoreham Harbour Joint Area Action Plan](#) (2019) relates solely to the Shoreham Harbour and South Portslade area of the city and includes Policy SH9 Place making and design quality that seeks to promote high design quality that maximise the waterfront setting, respect local character and form/enhance public spaces.

The council has adopted a series of [Supplementary Planning Documents \(SPD\)](#) and [Guidance \(SPG\)](#) to aid the implementation of design policies set in the City Plan and other Development Plan documents.

Some of the key City Plan Part One policies relevant for the UDF include:

SS1	Presumption in Favour of Sustainable Development	CP10	Biodiversity	CP15	Heritage
DA	Development Areas 2, 3, 5 and 6	CP12	Urban Design	CP16	Open Space
CP8	Sustainable Buildings	CP13	Streets and Open Spaces	CP18	Healthy City
CP9	Sustainable Transport	CP14	Housing Density		

Some key relevant saved policies in Local Plan include:

QD5	Design - street frontages	QD15	Landscape design	QD27	Protection of Amenity
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Some key relevant policies in Draft City Plan Part Two include:

DM18	High quality design and places	DM20	Protection of amenity	DM22	Landscape design and trees
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Some key relevant supplementary guidance and other documents include:

SPD 12	Design Guide for Extensions and Alterations	UCS	Urban Characterisation Study	PLPS	Public Life Public Spaces
TBS	Tall Building Study	CS	Character Statements for Conservation Areas	SDG	Streetscape Design Guidelines

SECTION A: Local priorities

Brighton & Hove has long been recognised as one of the UK's most distinctive cities. Situated between the South Downs and the sea, the city has an undulating landscape of valleys and slopes. It is known for the spirit and diversity of its people, for its unique retail, leisure and cultural offer and for its world-famous seafront, natural and heritage assets. More recently it has become recognised for the strength of its small business economy and as a genuine hub of creativity, innovation and enterprise.

Brighton and Hove is an area with a high demand for development but a very constrained land supply. Competition for land for housing and other uses is intense and affordability issues are acute. The City Plan sets challenging housing and other land use targets and the council has set an ambition to become carbon neutral by 2030.

In order to meet, and if possible exceed, these targets, the council is committed to promote and foster high-density, mixed use development. High quality design is fundamental to delivering development that positively responds to the city's sensitive landscape, historic built environment and local priorities.

In Brighton & Hove, the quality of new development is determined by how well the design:

- **Makes the most of site conditions and existing buildings to support the city's aims to become zero carbon and reduce resource use and waste.**
- **Uses the identified character of the city's neighbourhoods as a starting point to inform design development.**
- **Delivers the type and amount of development required and contributes to delivering infrastructure needs.**
- **Supports accessibility and the ease of daily activities aiding connectivity and active travel for all users.**
- **Enhances nature and helps to make the city more climate-resilient.**
- **Positively promotes health and well-being, providing appropriate level of public and private amenity for all users.**
- **Accommodates higher density to make the best use of limited opportunities.**
- **Preserves or enhances key views and the settings of landmarks.**
- **Enables appropriate and adaptable buildings and open space typologies that respond to the changing needs of users.**

Local priorities are developed further under the following three key design priorities:

1. Context;
2. Spaces between buildings; and
3. Buildings.

For each priority, the council has set out a set of design principles for applicants to prioritise when preparing proposals. Supporting information is also provided which applicants are encouraged to take into consideration when applying the design principles.

Good design decisions can address multiple policy objectives. Links to policies where good design decisions can lead to addressing other policies are provided along with considerations that may be relevant to all high density development in the city.

1. Context

Applicants are expected to look beyond the site boundary and consider how the design of a development will respond to its location and surroundings.

Contextual attributes and considerations that are particularly relevant to Brighton & Hove include:

- Environmental conditions;
- Neighbourhood character;
- Composition of street scene;
- Views and landmarks; and
- Opportunities for masterplanning.

These are explained in more detail in the sub-sections below.



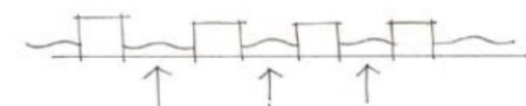
Developed valleys with views out to surrounding downland



Steep slopes allowing for city-wide panoramas



Undulating landscape allowing glimpses to the countryside beyond



Gently sloping landscape allowing glimpses down to the sea



Extract from Brighton & Hove Urban Characterisation Study highlighting relationship between the city's undulating topography and landscape character.

1.1. Environmental conditions

The key to designing low carbon, resource-efficient buildings and spaces is to take best advantage of the environmental conditions of a site, in particular local climate. In a city of undulating valleys and slopes, it is important to assess how environmental conditions (i.e. prevailing wind and sun path), landscape (i.e. access, outlook and hydrology) and existing features (i.e. buildings, trees and vegetation) within a site can contribute towards reducing emissions, resource use and heat island effect.

In a dense city it is also important for early context appraisal to fully scope and identify particular site features so that siting options avoid unacceptable impact upon the amenity of neighbours. The [Design Guide for Extensions and Alterations Supplementary Planning Document 12](#) signposts amenity issues that are relevant to the local context, in particular for small sites and householder development.

The following design considerations should be prioritised in proposals:

- Consider orientation, layout and massing of existing and proposed development to ensure internal and external spaces receive appropriate levels of sunlight, outlook and protection from harsh weather conditions to maximise user comfort and reduce use of resources, particularly energy.
- Use landform to reduce the volume and rate of surface water run-off going into the city's drainage system and/or aquifer.
- Retain existing protected and other mature trees and seek to add more.
- Look to improve biodiversity and secure net gains.



Policy links

CPP1: CP8, CP10, CP12, CP13, CP16.

Saved Local Plan: QD15, QD27

CPP2: DM18, DM20, DM22

Western Harbour development in Malmö, Sweden. More exposed coastal public spaces with sea views and a mix of uses contrast with sheltered residential spaces. Narrow openings are used to create shelter from the elements and a development that functions throughout the year.

1.2. Neighbourhood character

An analysis of the character and identity of Brighton & Hove and its neighbourhoods is set out in baseline studies such as the [Urban Characterisation Study \(UCS\)](#) and also within [Conservation Area Character Statements \(CACS\)](#).

Building on the UCS, the council has considered each neighbourhood in terms of sensitivity to change and likelihood to largely be conserved; be suitable for localised, incremental development and enhancement; and those which require major enhancement. Conservation areas in the central area of the city have not been included as these must be preserved or enhanced according to their identified character and appearance. This assessment is explained in more detail in Section 11. The map below illustrates which neighbourhood falls into each grouping. In those parts of the city that are not covered by character analysis, applicants will need to identify the key neighbourhood characteristics and priorities for improvement. A more detailed version of this map is available to be viewed and downloaded [\(hyperlink to be added\)](#).

Where a proposal is promoting a clear departure from the established neighbourhood character, the council will expect this to be robustly justified through a design and where appropriate heritage statement (see Section C Planning process for further information).

The following design considerations should be prioritised in proposals:

- Build on a sound understanding of neighbourhood characteristics identified in the UCS and CACS as a starting point for design.
- Wherever possible, retain and re-use buildings.
- Consolidate and improve established pedestrian and cycling routes and formalise informal ones.
- Allow existing levels to guide layout options and optimise effective pedestrian and vehicle access.
- Where possible align external routes and spaces along utility easements for ease of access and consider re-routing services which preclude efficient layout options.
- Favour innovation and contemporary design while avoiding or mitigating conflict with surrounding built form.

Extract from Urban Characterisation Study illustrating character areas identified for the Sackville neighbourhood in Hove. More background information and descriptions of the four areas are provided in the Study.

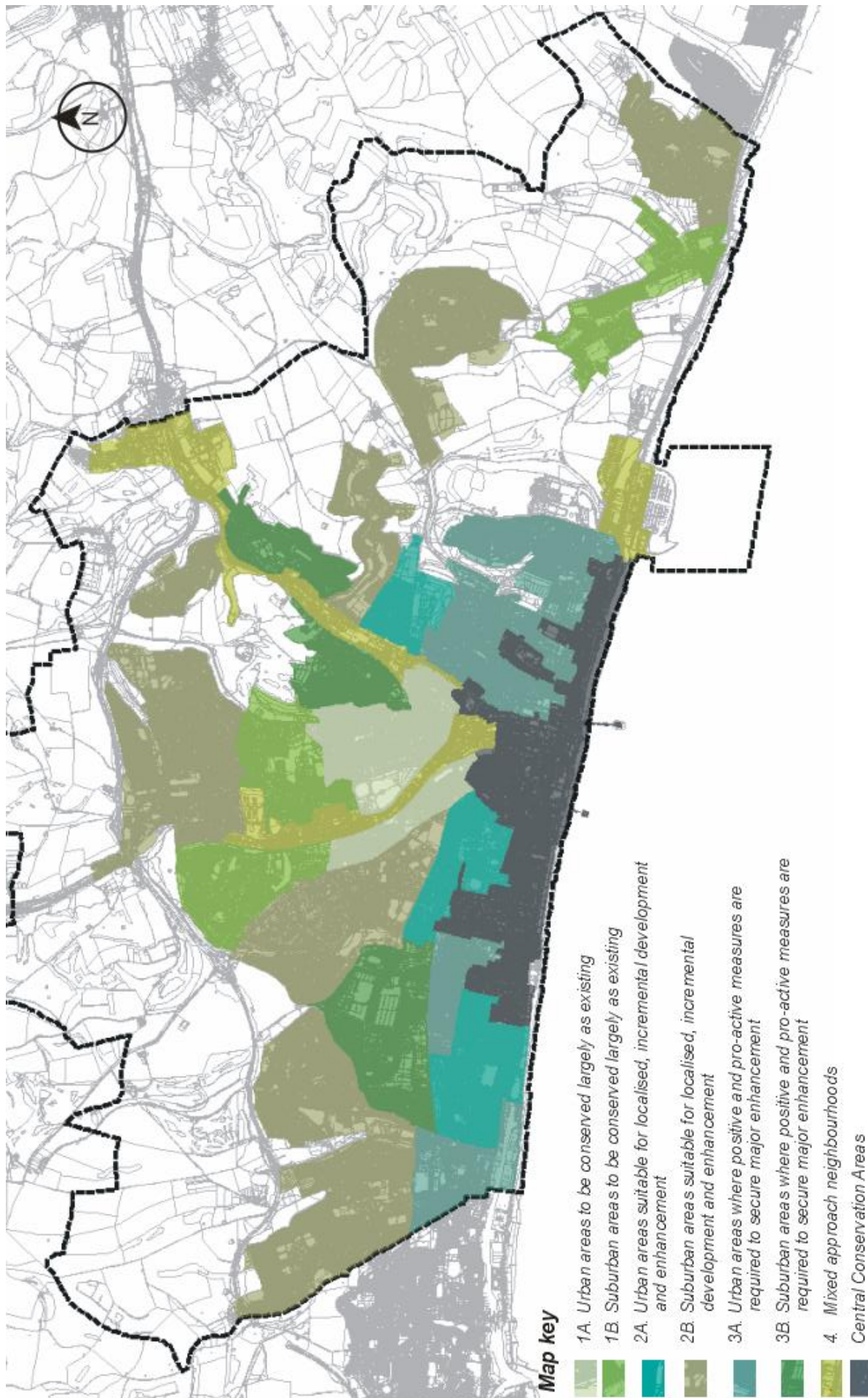
Policy links

CPP1: CP8, CP10, CP12, CP13, CP14, CP15, CP16.

Saved Local Plan: QD15.

CPP2: DM18, DM26.





Urban Characterisation Study neighbourhoods according to sensitive to change . A more detailed version is available [to be viewed and downloaded \(hyperlink to be added\)](#).
 For more details please see Section 11.

1.3. Composition of street scene

Streets are an invaluable asset to life in the city and constitute the majority of our public spaces. The way they look and feel is critical to the character of an area. Design features that are visible from the street or highway will be particularly important in the assessment of development proposals.

The following design considerations should be prioritised in proposals:

- Reference existing building lines, height, rhythm and proportions of frontages, windows and doors.
- Create opportunities for those inside buildings to see out on to the street/public space.
- Ensure buildings front on to streets and other public spaces, creating perimeter blocks.
- Frame streets and spaces and consider how facades turn around corners and are presented to street elevations.
- Avoid blank facades facing streets and other public areas to improve passive surveillance.
- Optimise provision of electric charging points and avoid letting parking dominate the street scene.
- Maintain or extend tree cover and incorporate soft landscaping to improve comfort, enhance biodiversity, provide opportunities for food growing and reduce heat island effect.
- Create obstacle-free and sight impaired-friendly routes and shared spaces for pedestrians and cyclists.
- Incorporate features to help reduce water run-off and manage water quality.
- Reduce visual clutter and provide good levels of lighting while avoiding unnecessary pollution.
- Provide ease of access for deliveries, removals, and refuse collection.
- Provide refuse storage facilities that are not visible from the street.



Corner House, 14 Talfourd Place, Southwark, London. Contemporary interpretation of a Victorian suburban townhouse that draws on established rhythms and decorative motifs of the surrounding area. [Southwark Council](#) application 17/AP/3083.



Policy links

CPP1: CP8, CP10, CP12, CP16.

Saved Local Plan: QD15

CPP2: DM18, DM22, DM33, DM36, DM43.

Marmelade Lane, Orchard Park Flexibly designed street and shared car parking and garden with food growing and overflow car parking court. [South Cambridgeshire Council](#) application S/3223/15/FL.

1.4. Views and landmarks

In a city with an undulating landscape of valleys and slopes, it is important to consider the relationship between topography, views and landmarks. The council has identified key strategic and local views and landmarks to aid the assessment of design proposals.

Strategic views are generally distant views from elevated locations, mostly on the periphery of the built-up area, and include some panoramic views. They also include both distant and intermediate views from and along the seafront. In determining the strategic views the key factors are:

- the degree to which the view illustrates the relationship between the built up city and the Downs and/or the sea;
- the prominence of key ridge lines;
- the extent to which the view reveals the typical pattern of past development; and
- the presence of any notable landmarks.

A series of 'unfolding views' has also been identified, on key approaches to, and from arrival points in, the city. The viewpoints are all from public land within the city boundary and relate to an identifiable feature or road junction. Approximate location of strategic viewpoints and landmarks are signposted on the map below and illustrated in more detail at Section 12. Applicants will need to agree fixed points for verified views with the council.

Local views and landmarks that may be used for wayfinding and as route markers are identified in the [Urban Characterisation Study \(UCS\)](#) and [Conservation Area Character Statements \(CACS\)](#). Vistas towards the sea from the main east-west routes are also important across the city. There are likely to be other views that may be important to local communities. Applicants may want to identify these in consultation with the council and local communities. It is important to ensure that newly identified views are available from a viewpoint on accessible public land that is well used.

The following design considerations should be prioritised in proposals:

- Consider the implications of identified views and landmarks for the design and demonstrate how they would be protected or enhanced by the proposals.
- When engaging with neighbours, local communities and the council, take opportunities to identify any additional views, including locally cherished views, to inform the development of proposals.
- Assess visual impacts that are more evident during winter when trees are bare and take into account the cumulative impact of different schemes including proposed developments in the submitted verified view images (rendered, wireline and/or 3D modelling).

Extract from Urban Characterisation Study illustrating identified local views (left) and landmarks (right) for the Round Hill neighbourhood. More background information and detail are provided in the Study.

Map key



Landmarks

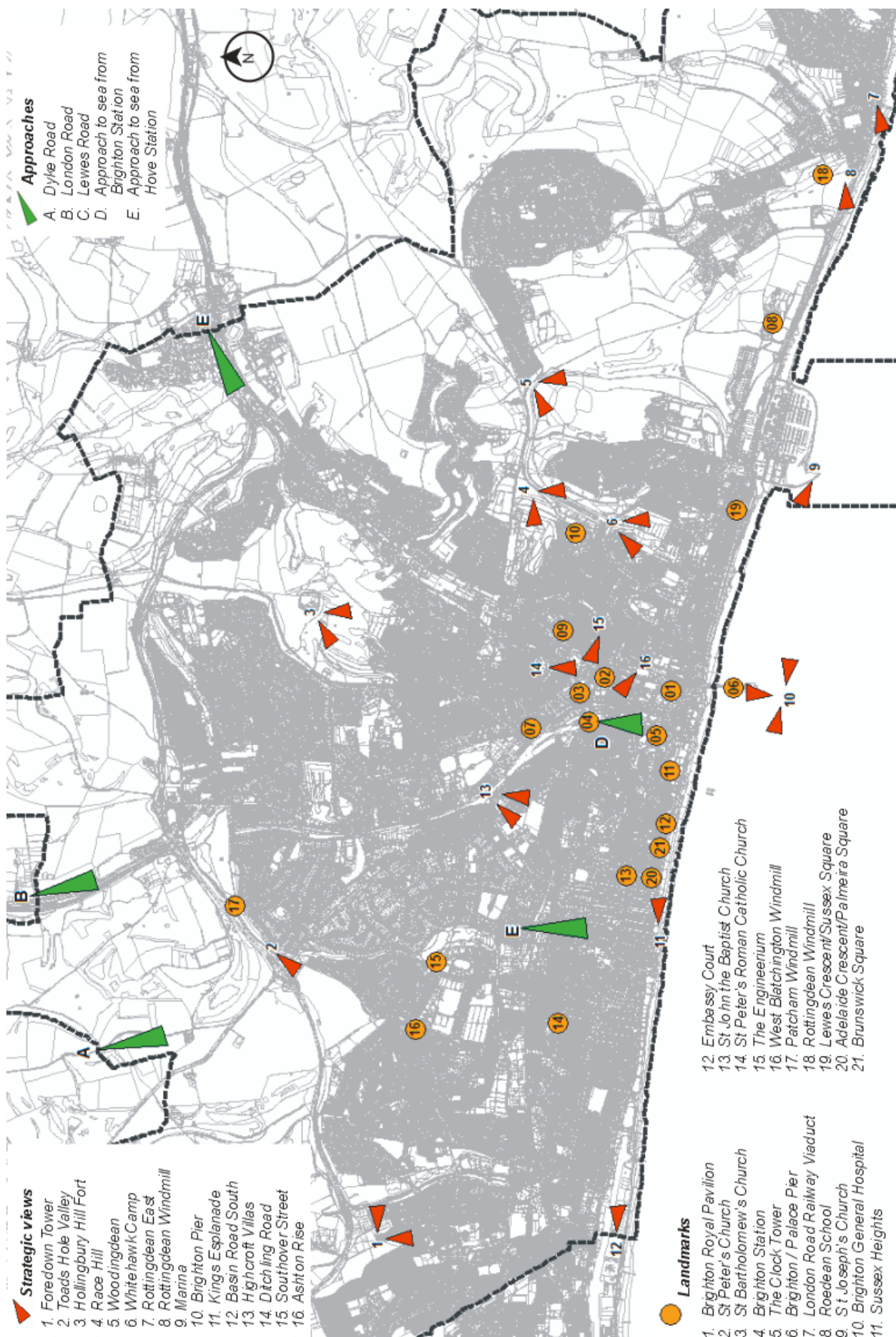


Views and vistas

Policy links

CPP1: CP12





Strategic viewpoints and landmarks. A more detailed version is available to be viewed and downloaded ([hyperlink to be added](#)). For more details please see Section 12.

1.5. Opportunities for masterplanning

A masterplan-led approach can assist the preparation of proposals for many developments and there are certain circumstances where the council will consider the submission of one as being more appropriate.

The council would recommend proposals are supported by a masterplan-led approach where, for example:

- The impact of a major high density and/or mixed use development and/or the cumulative effect of a series of small developments is likely to be significant.
- Development is likely to be delivered by multiple developers or landowners.
- It can inform the phasing of the development, including the release of a range of uses alongside residential development.
- A structured, integrated spatial framework is needed to drive regeneration particularly for complex projects.
- Significant historic and/or environmental assets need to be protected.



Above: QuarterMile development in Edinburgh. A masterplan was developed to drive the regeneration of the Edinburgh Royal Infirmary site. The scheme involves the refurbishment of existing and introduction of new buildings that are contemporary in appearance but sit well alongside listed heritage assets and elevating the character of the surrounding area. [Edinburgh Council](#) application 02/01662.

Below: A masterplan for City Plan Part One's Strategic Allocation 125-163 Preston Road within the New England Quarter and London Road Development Area 4 was commissioned by an applicant for the Anston House site. The masterplan identified opportunities for introducing a landscaped zone along Preston Road to make the road look like an extension of Preston Park. [Brighton & Hove Council](#) application BH2016/02499. See 5.7 Tall Buildings Area 7: London Road / Preston Road for further details.



Policy links

CPP1: CP12,
CP13.

2. Spaces between buildings

Spaces between buildings include streets, open spaces and uses that are accessible to people living, working and visiting buildings.

Well-designed outside spaces sit well within the landscape and are created for people rather than buildings. They take on different characteristics as a result of the different groups of people who use them and the activities they accommodate. Some are vibrant and commercial, some are focussed around play while others are civic, peaceful and/or relaxing.

Defining how the spaces between buildings will function early in the design process can help inform the siting and design of buildings, hard and soft landscaping, the distribution of uses and infrastructure services that will frame the network of spaces within a development. In Brighton & Hove accessible open space is limited. The city is tightly constrained between the sea and the Downs and is already densely developed in more central areas.

The council supports landscape-led proposals where design makes the best use of the spaces between buildings having regard to combining and integrating the following priorities:

- Active and inclusive travel;
- Outdoor amenity;
- Landscaping, biodiversity and water;
- Mix of uses and active frontages;
- Artistic element;
- Materials and management; and
- Phasing development.

These are explained in more detail below. The level of consideration will depend on the scale and type of the development.



2.1. Active and inclusive travel

Active travel refers to journeys made by physically active means, for example, walking, cycling and scooting. Inclusive travel needs to be addressed by taking account of the different needs of whole community, including children, older people and people with disabilities to provide access for all. Creating safe and enjoyable spaces as part of new development, that successfully integrate into the city's network of linked, publically accessible routes and connections is key to improving health, lowering carbon emissions and improving air quality, reducing congestion and promoting social interaction.

The [Public Life, Public Space Study \(PLPS\)](#) sets priorities for improving the legibility and quality of the public realm and the liveability of different types of public realm and links across the city. These range from improving legibility in and between the city's neighbourhoods to make movement easier for pedestrians and cyclists to supporting new development that overlooks and animates public spaces. General design concepts that can be applied to various types of routes within the city's hierarchy are provided. Further guidance on principles for street design is provided in the [Manual for Streets 1](#) and [2](#).

There is a wealth of information about the layout and hierarchy of the city's [network of roads, highways, footpaths](#) and [cycle routes](#) adopted by the council and [Highways England](#). Information about existing patterns of movement for all modes of transport, in particular pedestrian and cyclists is available in free online sources like [DataShine Commute](#). Guidance on how to implement an active and inclusive environment is available from [Sport England](#) and [National Institute for Health Protection](#) and on how to carry out [Health Impact Assessments](#). The [Parking Standards SPD](#) and [Streetscape Design Guidelines](#) set out minimum standards and recommendations regarding standards and materials.

The following design considerations should be prioritised in proposals:

- Improve and/or create publicly-accessible routes through neighbourhoods, particularly where partial routes exist, pedestrian/cycle desire lines are available and/or to allow for future permeability between adjacent development sites.
- Provide cycle parking facilities that are easily accessible from the street, close to the building entrance, well-lit, secure and can be used by users of all ages.
- Low car parking ratios with adequate, easily accessed disabled car parking facilities.
- Provide continuous, step-free access links to and across the public transport, pedestrian and cycling networks.
- Avoid cul-de-sac layouts, dead ends and backs of properties facing the public highway.
- Provide legible, level-access entrances to buildings that are aligned with peoples' movement patterns and desire and sight lines within a site/area.
- Specify materials that can be re-used and recycled whilst harmonising with adjoining public realm materials.
- Incorporate wildlife-friendly planting and sustainable drainage to make routes more climate-resilient, attractive and comfortable for users.
- Provide workplace showers, lockers and changing facilities.
- Make movement through and around the development intuitive and legible to reduce need for signage.

Policy links

CPP1: CP8, CP9, CP11, CP12, CP13, CP16.
CPP2 DM33, DM36, DM37, DM44, DM46.

High density considerations

Consider low car and car-free development options while avoiding putting pressure on on-street parking in the surrounding area. Shared facilities should provide sufficient, safe, secure and easily accessible cycle, parking and storage by all users.

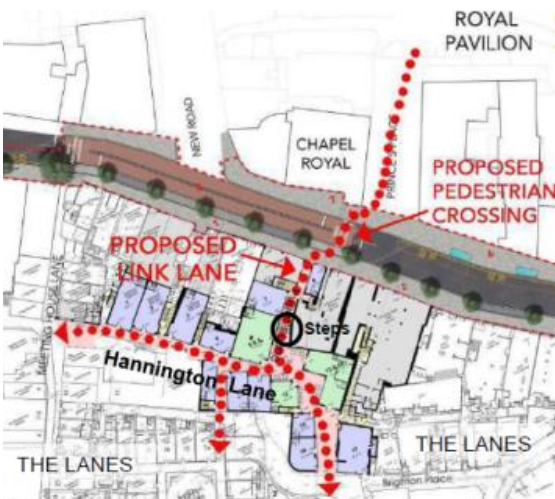


Above top: PLPS-compliant improvements to Little East Street in central Brighton

Above: Wide pavements and road crossings with continuous, clutter free pedestrian corridors in Victoria Circus, London. [Westminster Council](#) application 08/08205 (left). Cycle store located in area convenient and prominently located that support different types of cycling (right).

Left: Use of ramps and handrails can help to make routes more accessible.

Below: New link created to increase permeability and create access to Hannington Lane and the Lanes area of Brighton. Unfortunately it is not step-free. [Brighton & Hove Council](#) application BH2015/00575.



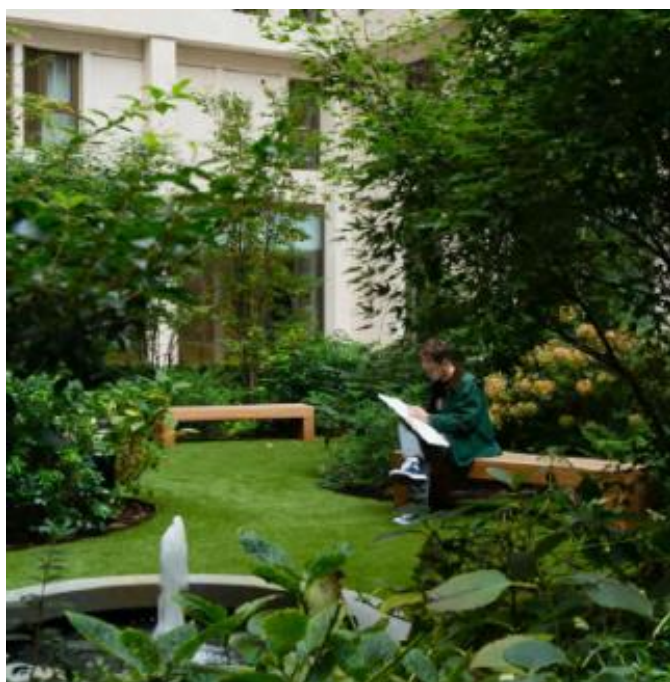
2.2. Outdoor amenity

Outdoor amenity spaces take on different roles as a result of the different groups of people who use them and the activities they accommodate. From private amenity space like courtyards and gardens to communal facilities public squares and parks, it is important to define the location, nature and use of these spaces early on in the design process to inform the siting and design of buildings, hard and soft landscaping proposals and the distribution of uses across the development.

The Updated [Food Growing and Development Planning Advisory Note 6 \(PAN 06\)](#) provides guidance on how food growing can be successfully incorporated into new development to help achieve multiple policy benefits (i.e. space for growing healthy food, outdoor activity and encouraging biodiversity).

The following design considerations should be prioritised in proposals:

- Locate outdoor amenity spaces to maximise sunlight and daylight and provide shade during the summer and provide appropriate lighting of spaces and building thresholds.
- Accommodate the differing needs of people that are expected to use the space including areas with greater levels of activity for sports, play and/or temporary events and cultural activities and quieter ones for rest and relaxation.
- Introduce defensible spaces that create a sense of privacy and retreat within the home and other indoor private spaces.
- Clearly delineate areas that are accessible to the general public, shared by or for exclusive use of occupants with well-defined boundaries and no leftover areas.
- Maintain good levels of natural surveillance while avoiding unreasonable overlooking.
- Provide inclusive seating and other amenities that can be easily used by older people and people with different needs, including the deaf and visually impaired.
- Optimise planting and food growth for well-being/comfort of users and biodiversity and incorporate formal and informal play space that facilitates interaction with nature.
- Prepare a landscape management plan to inform long-term maintenance.



Examples of shared/communal facilities with quiet seating area, water features, food growing, biodiversity-friendly soft landscaping and incidental play incorporated into the design.



Above: Jubilee Square, Brighton example of publically accessed flexible, multi-functional square that enables a range of activities to take place at different times of the day and throughout the year.

Above right: Basketball and skateboarding facilities incorporated into public realm that feature seating while functioning as flood water collection pools in rainstorm conditions.

Right: Central courtyard that provides good levels of natural light, overlooking and defensible space at ground level for units around the perimeter.

Below: Urban furniture that encourages social interaction.



Policy links

CPP1: CP5, CP12, CP13, CP16

CPP2: DM22, DM37, DM43, DM44.

High density considerations

Design communal amenity spaces to be used flexibly to maximise use throughout the day (e.g. children play during daytime and social activities during the evening). Incorporate communal garden areas that provide scope for privacy for residents as well as social interaction. Management is essential for the good use of communal spaces/facilities. Consider incorporating concierge/onsite management facilities that have good visibility from the main entrance lobby or key routes around the building.

2.3. Landscaping, biodiversity and water

The design of spaces between buildings should incorporate soft and hard landscaping that can contribute to reducing emissions, deliver biodiversity net gains, manage rainfall and flooding and counter heat island effects.

A green network formed of the city's public open spaces, routes and protected landscapes that connect wildlife habitats across the city has been identified. The [Interactive City Plan Map](#) layer for Nature Improvement Areas identifies opportunities for new development to contribute towards connecting up and improving links across this network.

This map also provides information about the areas of the city most at risk from flooding from the sea (see National Flood Zones 2 and 3). Information about areas at risk from [surface water flooding](#) is also available. [Supplementary Planning Guidance 16 Sustainable Drainage \(SPD16\)](#) identifies opportunities for new development to use landscape-led sustainable drainage techniques to manage flood risk, reduce pollution and maintain the quality of the groundwater aquifer that provides drinking water for the city and provide opportunities for enhancing biodiversity

The [Local Biodiversity Action Plan for Brighton & Hove](#) provides, among other things, a list of suitable plant species that can be used. The council is also preparing a [Tree Strategy](#) that promotes greater diversity of species and provides a plant list of species that are appropriate to the city's environment.

The following design considerations should be prioritised in proposals:

- Create landscapes that make a positive contribution to the city's green infrastructure network and introduce street trees where possible, improving environmental comfort.
- Use locally suitable and climate resilient plant and tree species to help deliver multiple policy gains (e.g. biodiversity and edible landscaping) and ensure capacity for their growth to full maturity.
- Incorporate continuous soil volumes and capacity to ensure the health of newly planted wooded areas.
- Incorporate nature conservation features to support biodiversity (e.g. bird/bat boxes and bee bricks).
- Use native planting that includes interesting texture, colour and scent and /or also explores the use of plants for food growing (edible landscaping).
- Adopt nature-based/sustainable drainage solutions to reduce surface water run-off and risk of contamination of the city's aquifer and flooding from the sea.
- Ensure good levels of sunlight and daylight to optimise planting opportunities.
- Incorporate composting facilities reducing waste sent to landfill and reducing the need to use fertiliser.



Above: before (left) and after (right): Grey to Green public infrastructure improvements on Bridge Street, Sheffield City Council.



Above: Tasinge Plads, Copenhagen, Denmark. Before and after climate proofing initiative. Underused road space was transformed into a vibrant, green square for resident use, spill out space for shops, sprung floor that generates energy to pump water away and children play space.

Right: One Brighton, a high-density residential development incorporates rooftop allotments that require continued and robust management scheme.

Below: Front garden in Hove that uses planting native to the seafront environment. Wooded slats used as windbreakers that provide shelter slowing down wind speed (left).



Policy links

CPP1: CP8, CP10, CP11, CP12, CP13, CP16.

Saved Local Plan: QD15

CPP2: DM22, DM37, DM43.

High density considerations

Providing food growing space in balconies, small gardens or areas in communal outdoor spaces provides opportunities for improving physical and mental health, fostering socialization and learning about food and diet. Consider the use of green roofs and walls to improve sustainable drainage and urban cooling.

2.4. Mix of uses and active frontages

The mix of uses integrated at the edges of spaces between buildings can help to provide a sense of enclosure, define inside and outside spaces and activate frontages along the perimeter edge.

A building provides active frontage if the ground floor includes windows and openings and provides a variety of uses which contribute to the visual and physical relationship between the building and the spaces at ground level.

Empty shops and blank facades lack vitality which can seem a negative feature, particularly where fronting the street and/or public spaces. In addition, areas that do not benefit from adequate levels of overlooking can be perceived as unsafe.

The following design considerations should be prioritised in proposals:

- Present a human scale of development at street level comprising an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level.
- Enhance and enliven public spaces with a mix of uses so that residents' basic, day-to-day needs can be met within a 15-minute walk of their homes.
- Locate public uses at the street level including shops, childcare, cafes and community rooms maximising use of windows and entrances to increase visual and physical connections between the interiors of buildings and adjacent open space.
- Design streets and open spaces flexibly to accommodate a range of formal and informal activities (e.g. parking and vehicle movement, informal play, temporary markets, meanwhile uses and community events) which help to animate and activate these spaces at ground level throughout the day and evening.
- Avoid creating blank walls, continuous garage doors, dense planting and recesses to ground level frontages that could allow concealment around the perimeter of the open space.
- Wherever possible, provide public toilets and/or site accessible toilets in shops and restaurants near the entrance to the building from the open space.



Jubilee Street, Brighton. Active ground floor uses overlooking the street help to increase safety, interest and activity.



Above: Active uses at street level that contribute to public life at a local and city level.

Below: Jubilee Street development in Brighton. Mix of uses with active frontages at street level.



Policy links

CPP1: CP8, CP10, CP11, CP12, CP13, CP16.

Saved Local Plan: QD5, QD15.

CPP2: DM12, DM14, DM16, DM18.

High density considerations

Where delivering a large scheme with multiple buildings, a masterplan led approach should be used to create a more comprehensive arrangement of uses in streets and spaces.

2.5. Artistic element

The artistic tradition of Brighton & Hove is an important part of its identity. The provision of public art can create and enhance local distinctiveness in the public realm and help develop a sense of place and improve access and legibility.

Incorporating artistic elements that members of the public can access and appreciate is one way in which new development can contribute towards an engaging and distinctive public realm. It also provides opportunities to involve the local community and local artists and makers.

Artistic elements can form part of the structure or finish of buildings, landscapes and streetscapes and take the form of fixed artworks that are sited in areas accessible to the public, whether outside or within buildings.

Temporary artworks can be used to engage local communities and/or identify aspects of the development site and its history that can inform the design proposals.

Further guidance on the commissioning of artistic elements can be sought from the council.

The following design considerations should be prioritised in proposals:

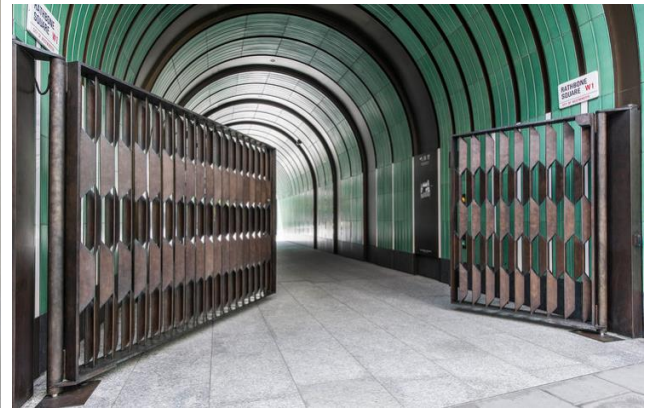
- Incorporate artistic element at an early stage of the design process, including artists/public art professionals as part of the design team.
- Provide a co-ordinated approach to the design of artistic elements relating to the local context and identity of an area.
- Incorporate artistic elements into the design of buildings and public spaces that are not just functional, but create places that reflect the life, identity and aspirations of a particular community or place.
- Involve local residents in the development of the artistic element.
- Consider how the artistic elements might change over time due to light, positioning and material choices to ensure ongoing interest for viewers.



Artistic elements that take the form of fixed artworks.

Left: Happenstance Archway, The Level, Brighton.

Above: The World Turned Upside Down, London School of Economics, London.



Artistic elements that form part of the structure or finish of buildings.

Above left: *An Age An Instant*, pedestrian passage and gate, Regent Street, London. [Westminster Council](#) application 10/00362

Above right: *Infinite Geometry*, pedestrian passage and gates, Rathbone Place. [Westminster Council](#) application 14/05706

Right: *Stone Drawing*, façade and internal walls, St John's College, Oxford. [Oxford Council](#) application 14/02399.

Below: *Platanus*, façade, part of site-wide public art strategy, Nine Elms development, Battersea, London. [Wandsworth Council](#) application 2015/6813



Policy links

CPP1: CP5, CP8, CP9, CP10, CP12, CP13, CP15.

Saved Local Plan: QD15

CPP2: DM18, DM37.

High density considerations

Developing a strategy to identify opportunities for incorporating artistic elements throughout the scheme can be a good way of creating a distinctive place and engaging the local community.

2.6. Materials and management

The spaces between buildings should be designed, constructed and maintained in a way that enables them to maximise their value to users while minimising maintenance costs. From inception, design should incorporate appropriate measures for the efficient and low carbon management of water, waste and energy resources, integrating these into the initial design to increase effectiveness and reduce conflict. Embedding circular economy principles of reducing waste through salvage, use of recycled materials, modularity, ease of repair and re-use can also contribute towards reducing emissions.

[Brighton & Hove's Streetscape Design Guidelines](#) is a useful source of information for designers given that it benefits from consultation with a wide range of local stakeholders including disability organisations.

The [Open Spaces Strategy](#) identifies preferred surface materials to be used in parks and streetscapes. These are generic in nature and subject to exemptions for conservation areas, high profile projects and where frequent reinstatement of underground services is not anticipated. Applicants are encouraged to consult the council's Sustainable Transport team to seek advice on streetscape surface materials suitable for different road types in the city. Proposals which include streets and open spaces that are likely to be managed by the council in future are strongly encouraged to engage as early as possible with the council's Sustainable Transport and City Parks teams.

To support the council's smart city aspirations, applicants should consider how proposals may contribute to and integrate with active digital hubs within the city.

The following design considerations should be prioritised in proposals:

- Achieve good design, workmanship and consistency of standards that can be sustained in the long-term.
- Use a simple, limited palette of hard wearing, durable, recycled and recyclable materials that are easy to clean and repair, in particular in road and communal areas of the development.
- Consider opportunities for modular and/or off-site construction to reduce costs and complexity of construction and waste and disturbance to existing residents.
- Prepare a management plan for communal indoor and outdoor spaces including, for example, cycle storage, rainwater collection systems and long-term maintenance of materials.
- Major developments, street works and improvements to the public realm should consider wired and wireless connectivity, open access communication networks and smart technology.
- Use water porous rigid and unbound aggregate surfaces around existing and proposed street trees.

Policy links

CPP1: CP8

High density considerations

Hard wearing, durable materials better withstand higher levels of foot and cycle traffic in densely populated areas.



Above: Wide granite kerbs used to define edges of pedestrian realm and the carriageway and withstand level of intensity of pedestrian or heavy vehicle movements and resist damage and misuse. Brighton Station bus interchange, Brighton.

Left: Lewes Road. Asphalt footway surfacing can be a good option if well implemented and framed by high-quality kerbstones. These can help to minimise the risk of trip hazards and reduce maintenance costs (and disturbance during construction).

Below: Hard wearing, contrasting surface materials for space designed to accommodate a range of uses and functions. Valley Gardens project, Brighton.



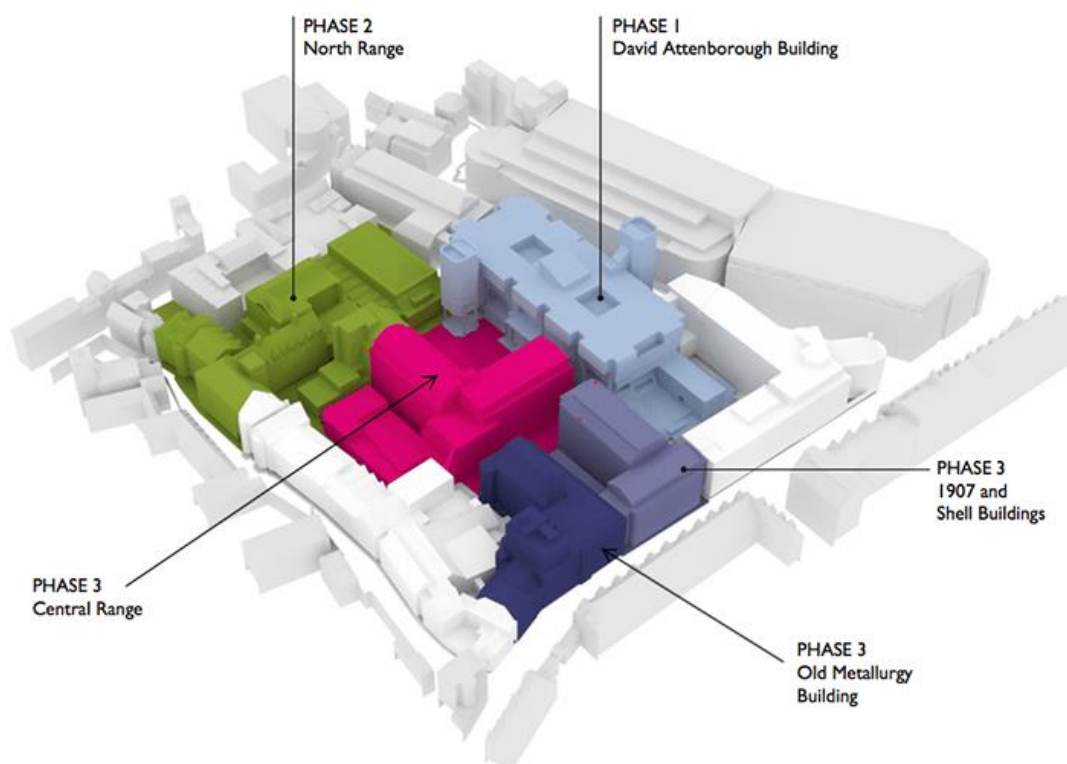
2.7. Phasing development

The phasing of development is often needed to be able to bring forward larger and more complex development sites and may also be required to facilitate financial viability for these types of development. For example, a first phase may need to generate funding for a subsequent phase.

Proposals that involve delivery as part of a phased approach will be expected to ensure appropriate levels of infrastructure and social amenities are provided at each phase so that new and existing residents can benefit from the changes to the site and its surroundings incrementally.

The council will expect proposals to show how within the phasing:

- Appropriate levels of affordable and private housing, open space and amenity is provided for each phase throughout the process.
- Which parcels of land will be brought forward within the development.
- Existing and proposed access/egress routes into the site, internal circulation routes and links with the existing neighbourhoods and street networks will be delivered.



Phasing strategy to inform the masterplan for the New Museums Site in the University of Cambridge. This approach aims to help coordinate work with the local council and Historic England and minimise planning and delivery risk.

Policy links

CPP1: CP8, CP12, CP13, CP16

High density considerations

Sufficient new infrastructure will need to be in place before density is significantly raised in order to protect the well-being of existing and future residents/occupants.

3. Buildings

Designing, constructing, refurbishing and maintaining buildings with improved environmental performance is an essential part of the city's ambition to become carbon neutral by 2030 and more resilient to the impacts of climate change.

The need to meet the city's challenging housing targets also means that development should make the best use of opportunities provided by a site.

This is not just about the number of units but also about the quality of life for future users/occupiers of buildings. It is about well-designed buildings that can positively support community cohesion, physical and mental health and well-being, biodiversity and environmental enhancements.

Residential development, in particular, should consider how it can support the changing needs of individuals and families at different stages of life including when households spend greater periods of time in the home.

The council will support proposals where design makes the best use of the site by combining and integrating the following priorities:

- Resource performance and use;
- Designing at density;
- Housing types and mix of uses;
- Greening;
- Materials and maintenance;
- Waste storage and collection; and
- Deliveries and servicing facilities.

These are explained in more detail below.

The advice provided is general and the level of consideration will depend on the scale and type of the development.



3.1. Resource performance and use

Facilitating the transition to a zero carbon and more climate-resilient city will require new development to at least meet and wherever possible exceed minimum standards set out in Part L of the Building Regulations and other resource efficiency targets set out in national and local policy or legislation. Opportunities for low and zero carbon energy generation, including district heating, have been identified and are set out in the city's [Renewable and Sustainable Energy Study](#).

In assessing the achievement of standards in developments in the city, the council will consider technical feasibility and financial viability.

The following design considerations should be prioritised in proposals:

- Avoid demolition of existing buildings and consider re-use and retrofit.
- Avoid deep and/or single aspect north facing units, in particular in residential development.
- Optimise provision of dual aspect units to achieve natural cross ventilation and good daylight/sunlight and natural ventilation whilst minimising the risk of overheating.
- Adopt a fabric-first approach and integrate onsite renewable energy production, storage and use into building design.
- Reduce construction waste through salvage and off-site modular construction systems.
- Consider resource use through the life cycle of a building by using durable materials and ensuring ease of disassembly and component reuse at the end of its life.
- Incorporate electricity and renewable heat generation and energy saving measures.
- Incorporate rainwater harvesting to help maintain soft landscaping and/or for non-potable water uses (e.g. window washing or toilet flushing).
- Specify re-used and recycled materials.
- Support sharing economy access to goods and services to help reduce costs, consumption and facilitate social interaction.
- Consider exceeding minimum standards for insulation, in particular in residential development from noise from corridors, communal amenity spaces and other uses.
- Incorporate discreet waste storage to reduce clutter.
- Provide space and facilities for composting to reduce food waste.



Non-certified PassivHaus residential development in Hove. [Brighton & Hove](#) application BH2013/00588.



Above: Zero carbon homes. Detached 3-bedroom house in Lloyd Close in Hove (left - winner of the RIBA Downland Prize 2011 and Green Apple Award (right) for Architecture 2016) and Grantham Road in Brighton. [Brighton & Hove](#) applications BH2006/00453 and BH2010/02162 respectively.

Left: Royal Alexandra Quarter in Brighton. Part conversion of former Victorian children's hospital into flats, part construction of new flats. [Brighton & Hove](#) application BH2010/03379.

Below: Existing building and trees used to drive design approach. Angel building in London where concrete frame of existing building was re-used, extended and wrapped with energy-efficient glazed skin. Newly landscaped public realm set around existing mature trees and new shops and restaurants to bring activity to main street frontage. [Islington Council](#), application number P072615.



Policy links

CPP1: CP8.

CPP2: DM37,
DM44, DM45,
DM46.

High density considerations

Take advantage of the volume of construction and number of users to consider circular economy principles of re-use of materials to reduce costs over the lifespan of the development. Explore opportunities to reduce neighbouring units carbon emissions by providing electricity and/or heat generation/distribution facilities beyond the perimeter of the development

3.2. Designing at density

This section focuses on density issues in schemes that are less than 18 meters in height (approximately 6 storeys). Additional guidance on taller development is set out in Part C Tall Buildings.

In the context of the Brighton & Hove City Plan, density is generally measured by the number of dwellings per hectare (dph) for residential development. This reflects the numbers of people living within a given area. The City Plan identifies locations that are suitable for higher density and mixed use development in its Development Area policies and Strategic Allocations. Policy CP14 Housing density sets an expectation that new residential development should achieve a minimum density of 100 dph within the identified Development Areas and 50 dph in other parts of the city. Development below 50 dph may be considered acceptable in some circumstances but all proposals should aim to avoid under-development.

Designing high-quality, high-density development well is less about the number of units and/or higher-rise formats of development and more about creating attractive buildings and places which can offer users/occupants significant benefits from this type of living. It is about providing an attractive choice which offers, for example, shorter journeys to work and school, easy access to community services and creates homes that can evolve as needs change.

However, the greater the density and height of a development, the greater the expectation for the benefits that can compensate for any perceived inconveniences of living in smaller spaces, in particular when it comes to residential development.

The following design considerations should be prioritised in proposals:

- Take advantage of the volume of construction to embed low carbon energy consumption and circular economy opportunities and principles (e.g. re-use of materials) to reduce costs over the lifespan of the development.
- Consider delivering district heating projects at a neighbourhood level or futureproof to connect or act as anchor loads to enable network development.
- Provide dedicated, shared internal and external facilities to encourage social interaction with neighbours (e.g. spaces for events, office/work space) in particular in residential and student accommodation.
- Provide private and communal external amenity to homes which ensures sufficient scope for privacy, sociability, storage and space for drying clothes for all residents.
- Avoid internal layouts with long double-banked corridors and single aspect residential units and minimise the number of units per stair core.
- Provide useable private amenity space and adequate storage facilities within residential units including additional storage for larger items within the development.
- Provide adequate accommodation/facilities for staff who will be responsible for the regular upkeep of internal and external spaces.
- Ensure community facilities are well integrated and accessible to those that will use them.
- Co-locate childcare facilities with other communal uses or homes for the elderly to help foster intergenerational interaction and improve mental and physical wellbeing.



Above: Chester Balmore affordable, low energy in situ residential scheme, Camden, London. Mixed tenure development providing 53 residential units, 500m² of commercial space and public circulation routes. Fully compliant with Lifetime Homes, Housing Quality Indicators and Code for Sustainable Homes standards.

Below: Agar Grove, Camden. Balconies assist in the composition of building elevation, enliven its frontage and provide private amenity space. Double height communal entrances offer direct views out and through the building. Stairwells and corridors are naturally ventilated.



Policy links

CPP1: CP1, CP8, CP12, CP14.

CPP2: DM1, DM8, DM18.

Waste & Minerals Plan: MP23a.

High density considerations

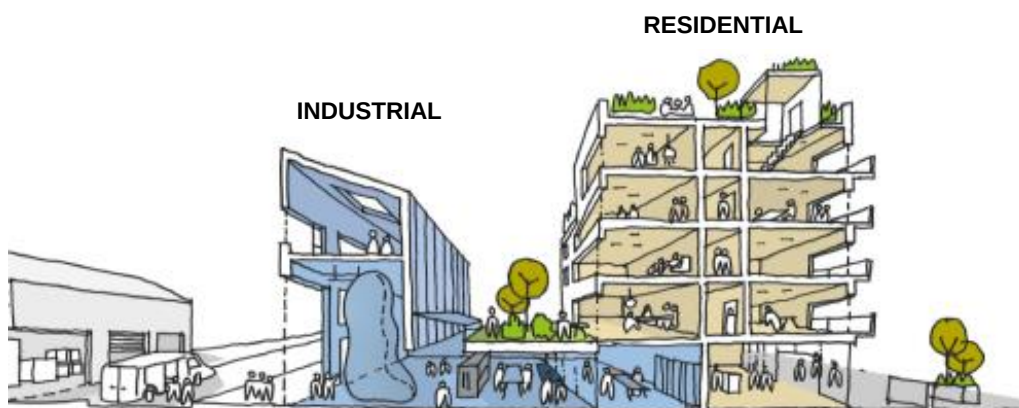
Ensure good levels of privacy and avoid unreasonable overlooking onto neighbouring properties and between windows of the same building by, for example, staggering windows. Design built-to-rent accommodation to meet the start of other types of residential development.

3.3. Housing types and mix of uses

The design of residential development should provide flexible and adaptable homes to meet the city's identified needs regarding mix of sizes, types and tenures. The provision of affordable housing to meet local needs is a key priority for the council. Co-locating housing and other uses is one way in which to deliver compact forms of development that help reduce the need to commute and/or use cars, promote a critical mass of activation, increase and enhance the sense of place.

The following design considerations should be prioritised in proposals:

- Incorporate, and where possible aim to exceed, the government's nationally described minimum space standards for residential development.
- Include a mix of housing typologies (i.e. flatted, townhouses, maisonettes).
- Ensure that all residential development meets minimum accessibility/adaptability standards (currently set out in Building Regulation M4 (2)).
- Establish a clear distinction between the front and back of properties according to the functions they perform (i.e. residential, shopping and/or light industrial) and orientate active uses (i.e. entrances, reception areas, offices) toward the street frontage.
- Provide adequate private amenity space in the form of gardens and/or inset balconies that face away from areas of poor air quality and unacceptable noise levels.
- Locate family homes ideally on the lower floors with private amenity space in the form of a terrace or garden.
- Internal layouts should be designed to accommodate change over time such as from ageing, illness and impairment.
- Provide sufficient internal storage space to enable waste separation, in particular in residential units.
- In the case of mixed use development, combine functions within a cohesive building form and ensure the layout of adjacent uses seek to limit the transmission of noise, in particular to sound sensitive rooms within dwellings.
- Consider flexible design features for commercial floorspace to allow for reconfiguration of internal space to suit a range of occupiers including ground floor access systems.



Example of how interlocked mixed-uses can respond to varied site edge conditions with clear distinction of the functions each edge performs in relation to the public realm
[London Legacy Development Corporation](#)
 application 16/00685/FUL.

Policy links

CPP1: SA4, CP19, CP20
 CPP2: DM11.

High density considerations

Consider access requirements and vehicle types. Allow for legibility of functions and entrances.

3.4. Greening

Buildings can be designed to incorporate green roofs and walls, courtyards and gardens to help increase food provision, improve the health and wellbeing of residents, support biodiversity and pollinators and reduce the need to cool and heat buildings mechanically.

The following design considerations should be prioritised in proposals:

- Incorporate well-sized green/brown roofs and green walls that create habitats for wildlife and food growth and have a good management/maintenance regime incorporated.
- Consider green walls in appropriately lit and maintainable locations where there is a need, for example, to elevate the appearance of an otherwise blank façade.
- Favour plant species appropriate to the city's coastal and downland environment, in particular in exposed positions such as roofs.
- Provide adequate access to sunlight and sufficient irrigation, for example, through rainwater harvesting.
- Ensure that growing substrates contain sufficient nutrients and water run-off is not polluted.
- Incorporate composting facilities.
- When using the roof for amenity purposes ensure provision of improved safety and security measures such as, for instance, higher balustrades.
- Ensure sufficient soil volumes for the health of planted areas.
- Consider ways that renewable energy and water management systems can integrate with planted surfaces (e.g. biosolar roofs).
- Avoid monoculture planting which limits biodiversity.
- Ensure tree planting pits have suitable root space so trees selected can grow to their full size.



Above: Biosolar roof at The Ark, Noah's Ark Children's Hospice in London (left). [London Borough of Barnet](#) application 16/5151. All England Lawn Tennis Club, Wimbledon, London (right). Green walls provide habitat for wildlife and helps to insulate and make buildings more aesthetically attractive. They can also give space at ground level to enable greater ease of movement across the site).

Policy links

CPP1: CP10, CP18

CPP2: DM22.

High density considerations

Where there is limited availability of outdoor space, external surfaces and roofs provide good opportunities for greening, like rooftop allotments. It is also important to provide sources of healthy, local and affordable food by protecting and maintaining allotments, garden plots, small-scale agriculture and market stalls.

3.5. Materials and maintenance

The city's coastal environment means that robust building materials need to be used and more care taken when designing and detailing their use of these in order to ensure durability, flood and wind hazard resistance and to reduce maintenance costs for users and owners. In the long-term, corrosion and decay resistance will also need to be considered. In the case of major development the council will require that a maintenance plan and indicative construction details are provided.

The following design considerations should be prioritised in proposals:

- Select materials, detailing and finishes that reference the local context to help create a sense of place and are easy to install, maintain and repair.
- Limit the palette of materials to ensure a clear logic for choice (e.g. local materials, neighbourhood characteristics)
- Re-use and/or recycle materials, including those arising from onsite construction, demolition and remediation works.
- Consider how much waste the proposal is expected to generate, and how and where the waste will be handled.
- Enable building materials, components and products to be disassembled and re-used at the end of their useful life.
- Take opportunities for managing as much waste as possible on site.
- Provide adequate and easily accessible storage space to support recycling and re-use.



Policy links

CPP1: CP8, CP12.
CPP2: DM18.

High density considerations

Standardisation makes for easier maintenance by reducing the range of parts required and replicating repair processes. Modern Methods of Construction (MMC) can reduce construction programmes and disturbance to existing residents.

3.6. Waste storage and collection

New development should provide sufficient space to separate waste and recyclables and allow for the easy manoeuvring of waste collection vehicles. Applicants should have regard to the detailed guidance provided in [Planning Advice Note 5 – Design Guidance for the Storage and Collection of Recyclable Materials](#) and any subsequent revisions.

Where waste and recycling is collected through on-street communal bins, consideration should be given to where on-site provision could be provided in future should the local authority's waste collection arrangements change.

The following design considerations should be prioritised in proposals:

- Appropriately integrated recycling and waste disposal, storage that works effectively for residents and meets the city's requirements for waste management and collection services.
- Storage designs should be attractive but discreet and robust to cope with the domestic or commercial bin activity around them.
- Provide sufficient waste storage capacity from the outset to avoid capacity shortfalls or inadequate services and help improve recycling and reduce residual waste.
- Space should be incorporated at street level within the building envelope for temporary storage of bins for collection.
- Communal container enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface.



Screened bin storage facility close to collection point (left). Waste store has room for bulky waste and specialised items including lightbulbs and batteries in high density development (right).

Policy links

Waste & Minerals
Plan: WMP3e.

High density considerations

Provide easily accessible, well-ventilated specialised facilities for various types of waste to avoid overflowing bins and disruption to standard waste collection.

3.7. Deliveries and servicing facilities

Delivery of goods and servicing needs to be carefully considered and, wherever possible, shared facilities, arrangements and timing of deliveries should be designed to avoid disrupting highway safety or traffic flow.

Needs to note last mile freight – shift from combustion engines/HGV's to electric vehicles / cargo bike delivery and freight logistics/hubs. So need charging consideration for vehicles or access for these types plus emergency access.

The following design considerations should be prioritised in proposals:

- **Locate servicing facilities, in particular in residential uses, within the building envelope to avoid obstruction of the public highway and excessive nuisance.**
- **Base the design of service areas on the maximum number of vehicles likely to use the area at any one time.**
- **Provide adequate storage facilities for permanent service staff, including cleaning, maintenance and places to rest.**



Concierge facilities (left) and secure basement storage lockers for residents (right).

Policy links

CPP1: CP8.

CPP2: DM36.

High density considerations

Regular upkeep of a high density building requires full time staff and contractors who have special requirements. Consider providing staff facilities and/or access to water at key points, places to store equipment and to rest. Provide extra storage and dedicated room for collecting, storing and returning deliveries near the main entrance and consider providing facilities for concierge services.

SECTION B: Tall buildings

This section provides additional guidance on issues that are particularly relevant to the assessment of any building of 18 metres or more in height and significantly taller than surrounding buildings.

Taller developments tend to be more visible, put further pressure on infrastructure, require more extensive management and are harder to maintain than low-rise development.

The council will expect tall buildings to integrate well with the surrounding context, embrace principles of sustainability and deliver public and social benefits.

The council will require applicants to provide a coherent explanation of any tall building proposal as part of a comprehensive design-led Tall Building Statement (see Section 13 for more detailed guidelines).

In Brighton & Hove, in addition to the general considerations set out in Section A Local Priorities, the quality of tall building development is determined by how well the design:

- **Provides tangible public and social benefits proportionate with the visual, cumulative, functional, or environmental impact caused.**
- **Makes a positive contribution to the city's urban form and skyline, its continued regeneration and the health and well-being of its residents.**
- **Achieves excellence in sustainable design and construction.**
- **Delivers improvements to connectivity and public realm and functions well at ground floor level.**
- **Minimises impact upon the microclimate and amenity of the application site and the surrounding area.**

Additional considerations that are relevant to the assessment of tall buildings include:

- Definition;
- Tall building areas; and
- Tall Building Statements.

Supporting information that the council would like applicants to prioritise when preparing proposals for tall buildings is also set out in this section.

4. Definition

In Brighton & Hove, a tall building is defined as any building of 18 metres or more in height and that is significantly taller than the prevailing height of surrounding buildings (whichever is less).

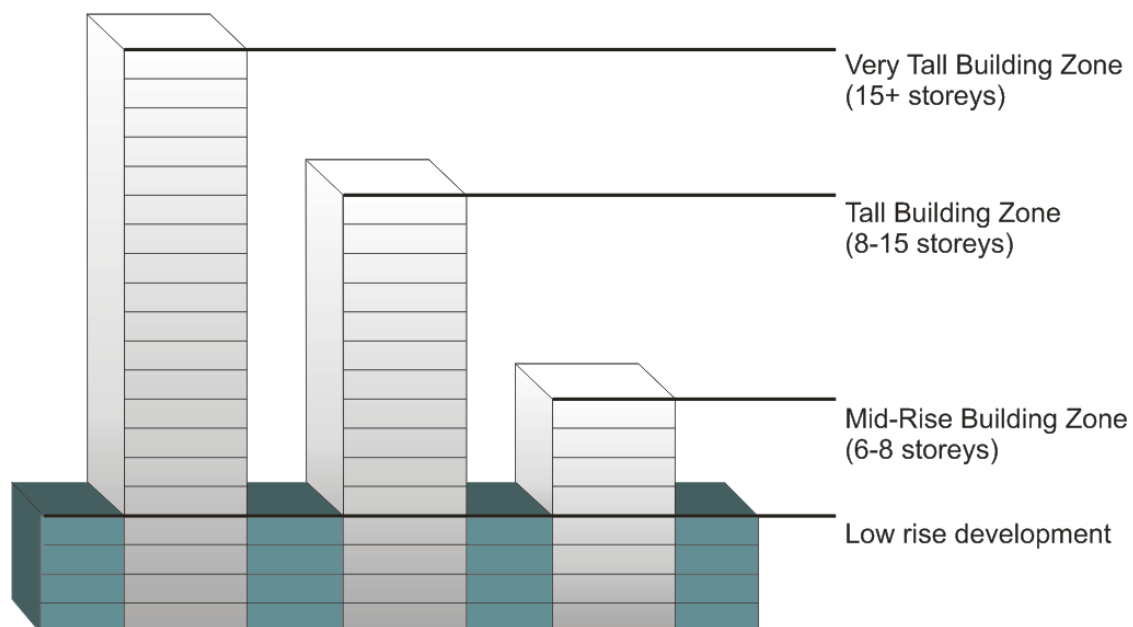
Significantly taller buildings are those in excess of 15% taller than mean height of surrounding development within a radius of 100 metres in all directions from the proposed footprint.

As a rule of thumb, an assessment of the mean height of surrounding existing development extending to 100 metres in all directions from the proposed footprint would be needed to establish whether a building is significantly taller.

For avoidance of doubt it is the height of the building in the context of building heights throughout the 100 m zone that will determine whether a building is significantly taller and not its relationship to buildings that immediately adjoin the proposed development.

This means that a proposed development may be 'significantly taller' and yet not the tallest building within the zone.

The city council will look at the evidence provided by applicants on this issue to determine whether a building is 'significantly taller'. The diagram below illustrates the three height ranges for tall buildings identified.



5. Tall Building areas

The areas considered suitable for taller development are identified in City Plan Part One Policy CP12. Many of these fall within the Development Areas identified in the City Plan.

Sites within these areas have varying degrees of suitability for taller development and not all sites within these areas will necessarily be suited to a tall building.

Sites outside these areas may also potentially be suited for tall buildings. However the threshold to prove the positive contribution of a tall building to the local townscape and community outside these areas is higher. In general conservation areas, elevated areas and urban fringe/low rise suburban areas are unlikely to be suitable to accommodate tall buildings.

Areas with potential to accommodate tall buildings are identified on the map below. A more detailed version is available to be viewed and downloaded [\(hyperlink to be added\)](#).

More details about each area including indicative boundaries, height ranges, design principles and priority for improvements for each area are set out in the sub-sections below.

Guidance on boundary and height is an indicator of appropriateness. However, this is dependent on the individual site's compliance with policy and a visual impact assessment that should be conducted as part of the planning application process.



Indicative tall building areas . A more detailed version is available to be viewed and downloaded [\(hyperlink to be added\)](#)

Map key

 CPP1 Development Areas (DA)	 CPP1 Special Area (SA)	 Indicative area with potential for tall buildings
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Indicative areas with potential for tall buildings

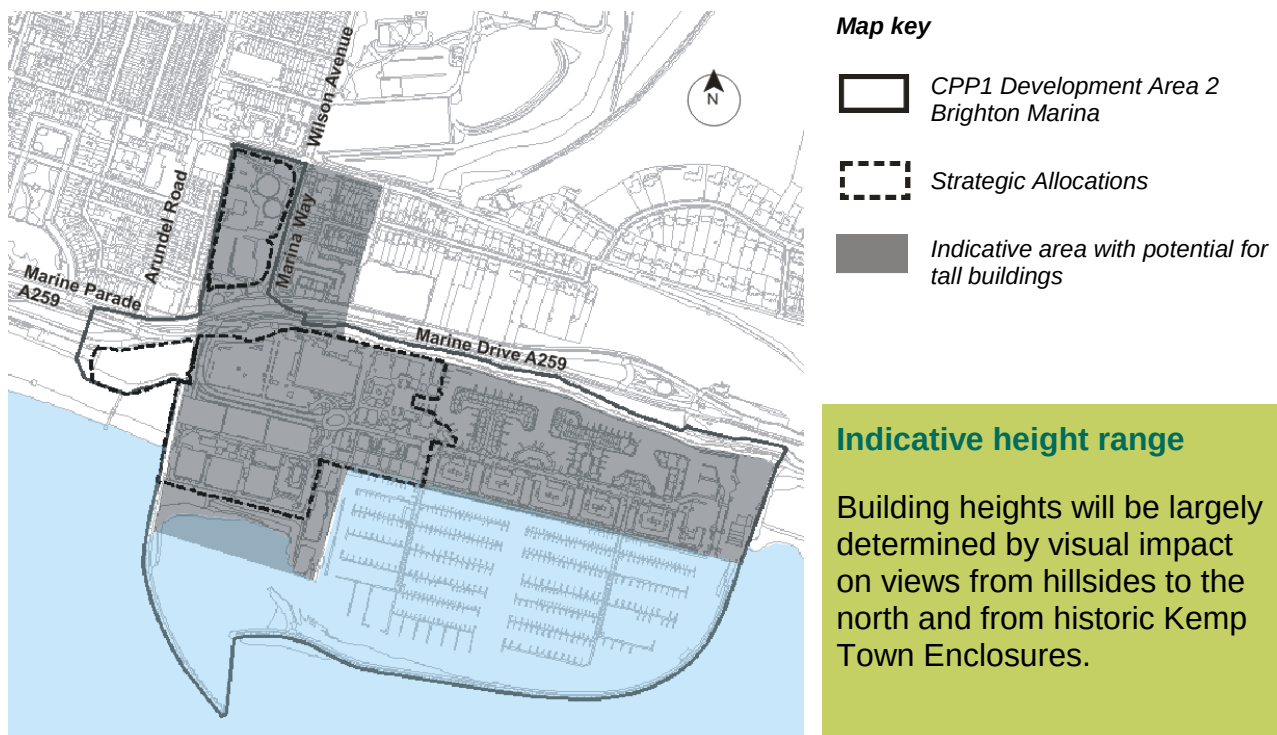
1 Brighton Marina	4 Eastern Road/ Edward Street	7 London Road / Preston Road
2 Brighton Station/ New England Quarter	5 Hove Station	8 Western Seafront/ Kingsway
3 Central Seafront	6 Lewes Road	9 Shoreham Harbour

5.1. Area 1: Brighton Marina

The Marina, mainly because of the topography and the existence of shopping facilities in the complex, has potential for tall buildings.

The cliffs to the north of the area are able to mitigate, up to a certain height, the visual impact of tall development on surrounding areas. Its seafront location would readily offer amenity for residents and occupiers of any tall building by providing links to extensive open spaces. Its role as a commercial and leisure destination and the opportunity to 'bookend' the urban edge of the city contribute to the tall building opportunity within this area.

There are particular sensitivities for development due to the relative proximity to Kemp Town conservation area and housing on the adjacent hillside, which provide challenges for designers. [Brighton Marina masterplan Planning Advice Note 04](#) signposts visual impact considerations and sets out priorities for improving the public realm, active travel and emergency service connections and provision of affordable housing.



The following design considerations should be prioritised in proposals:

- Have regard to visual impact on heritage assets and the residential areas to the north of the cliffs and overall composition when viewed along the coast.
- Seek to resolve poor connections to Madeira Drive, Marine Parade, areas north of A259 and the city centre as this area has the least developed transport services and infrastructure of all the tall building areas.
- Contribute towards a continued, generous, fully public boardwalk along the water's edge and seawall with appropriate landscape treatment for a highly exposed environment.
- Create routes across the site that help to draw people towards the boardwalk/water's edge.
- Incorporate design features that help to minimise the risk of flooding from the sea and surface water.



Above: Examples of continued, generous, fully public boardwalk and routes leading up to it where a range of activities for residents and visitors can take place.

Below: New York's Big U project. Coastline open spaces designed to accommodate floodwater during storms and/or as a result of sea level rise.

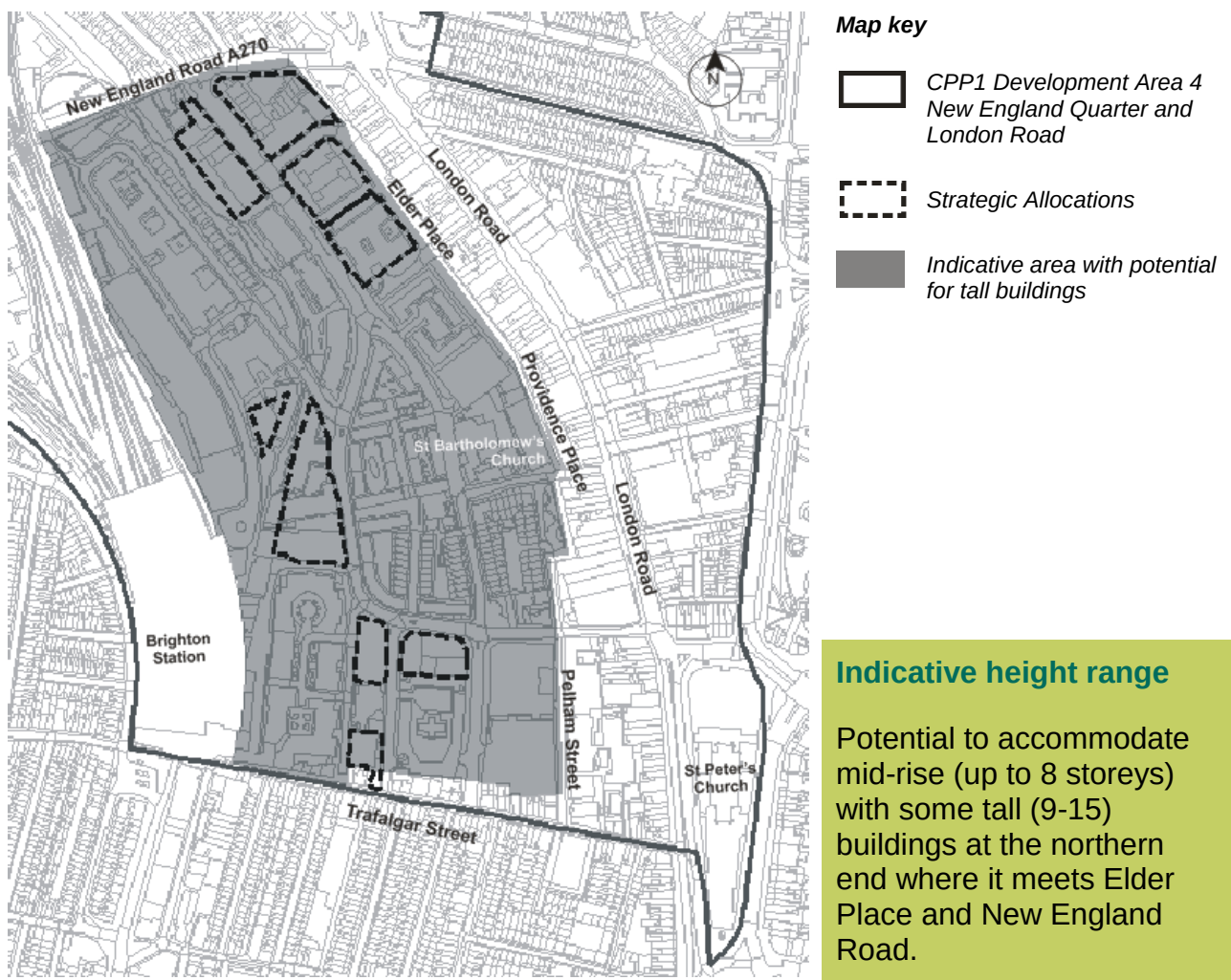


5.2. Area 2: Brighton Station / New England

This area includes the New England Quarter and provides an opportunity for tall buildings in proximity to the retail and commercial core of the city. It has the potential to invigorate this part of the city with a high quality public realm and to support the development approved and in part already constructed on former station land.

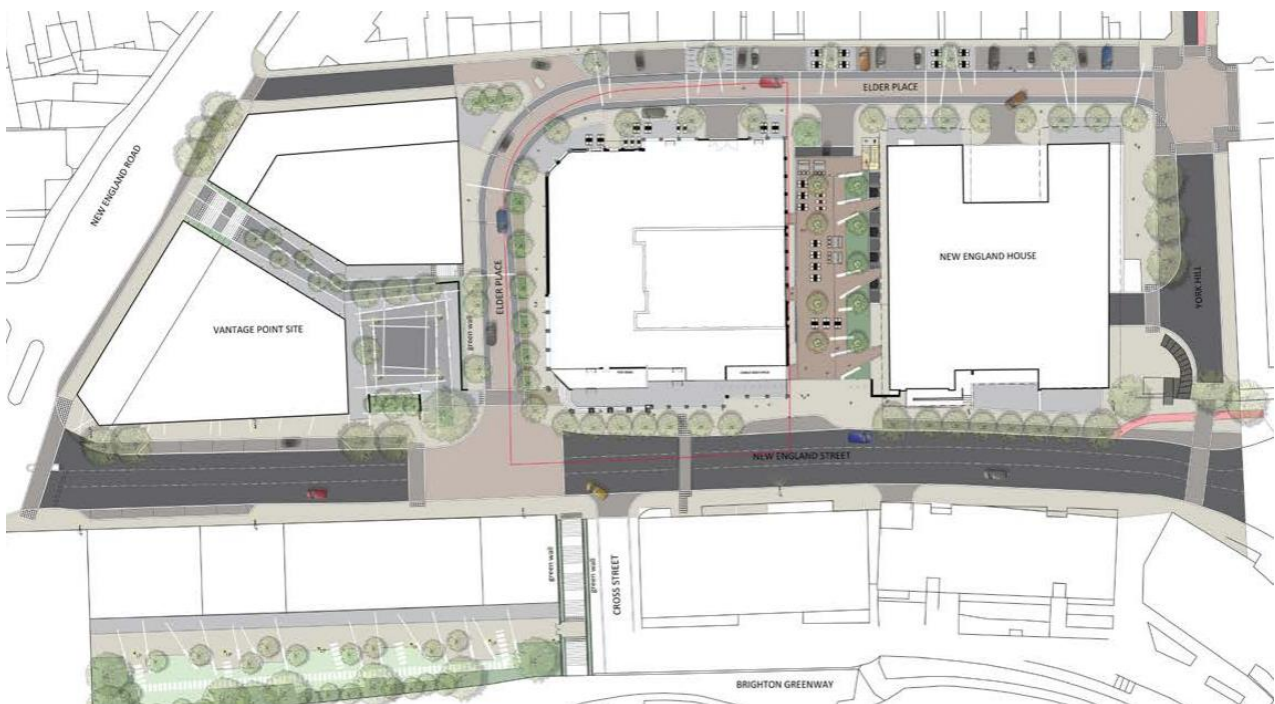
The area is well placed to capitalise on the excellent transportation links provided by Brighton Station. However it raises a number of sensitivities, which require detailed analysis in order to fully appreciate the potential impact and acceptability of tall buildings in the area. The interface with the North Laine conservation area requires particular attention when considering tall buildings in this area. Similarly, visual impacts on heritage assets such as St. Bartholomew's Church, St Peter's Church, the viaduct, railway station and on views from the Valley Gardens Conservation area and from across the valley will need to be considered in detail. The housing tower block, Theobald House, north of Trafalgar Street, and the buildings that form part of the New England Quarter should not be used as a guide to height, or building typology appropriate to future developments in this area.

[London Road Central Masterplan SPD 10](#) sets out how new development can contribute towards infrastructure improvements, the establishment of a secondary circuit of activities and attractions, improvements to London Road bus interchange and provision of east-west pedestrian/cyclist priority links across the area.



The following design considerations should be prioritised in proposals:

- Deliver public realm improvements to service yard areas such as Elder Place to reduce volume of traffic, discourage rat running, encourage social interaction and improve pedestrian and cycling connectivity from Brighton Station to London Road and from New England Road to the North Laine area.
- Strengthen the role of the Greenway as a north-south link to Brighton Station by bringing activities to eastern edges and increasing access to it.
- Take advantage of the level difference to activate frontages and provide separate entrances to different uses (i.e. residential, commercial) and service access.
- Introduce landscaping, calming measures and street trees to provide improved pedestrian and cycling links, improved air quality and provide inter-connected green infrastructure/biodiversity across the area.
- Ensure individual schemes contribute to a coordinated public realm strategy.



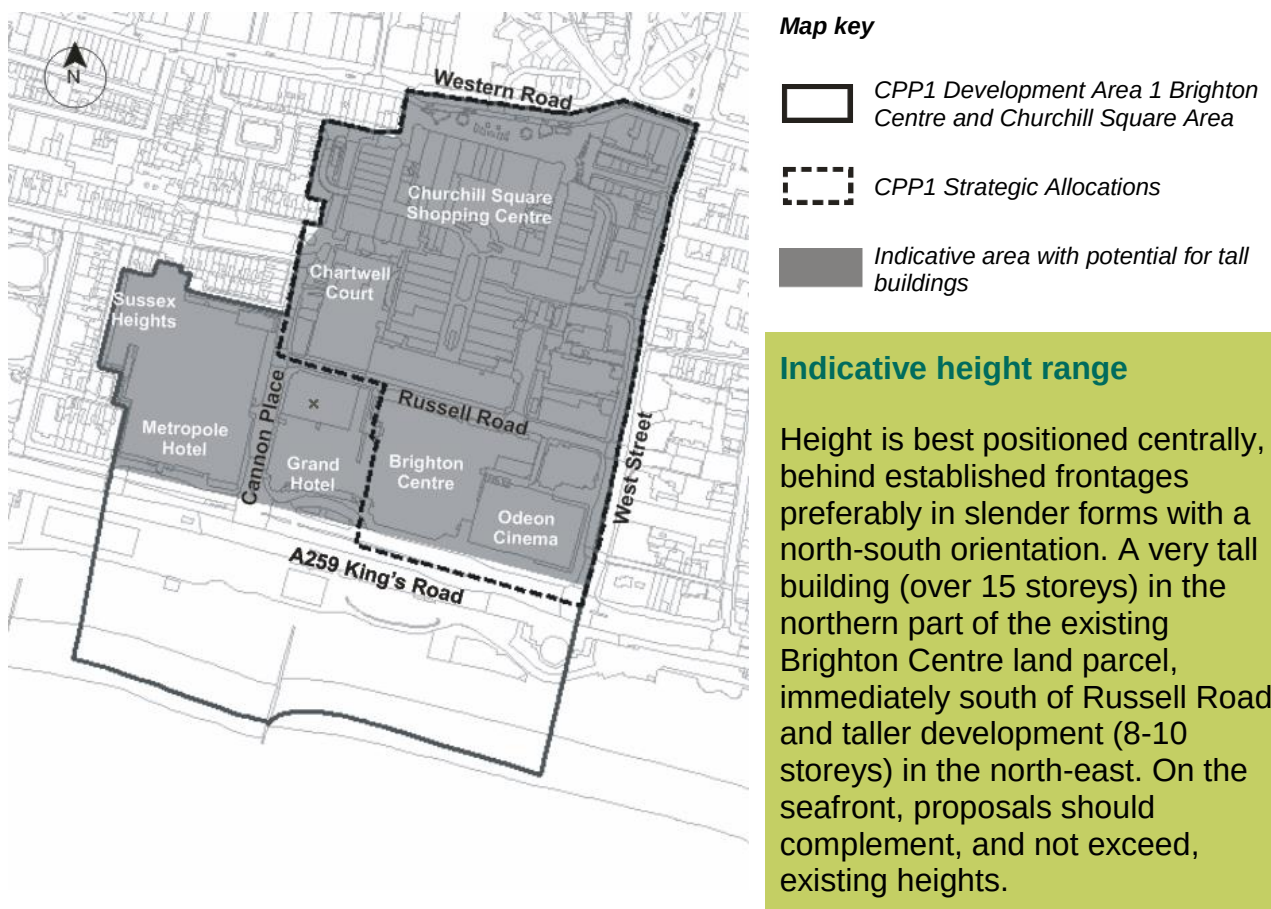
Above: Examples of public realm improvements to Elder Place and new links from New England Road to the Greenway and Brighton Station. [Brighton & Hove Council](#) application BH2011/02886.



5.3. Area 3: Central Seafront

Located in the cultural, retail and commercial core of the city this is a 'natural' location for additional high quality tall buildings. This area is made up of a small strip of land east of Sussex Heights, and includes Churchill Square, the Brighton Centre and the Odeon Cinema. It is characterised by a variety of building types and styles including tall development, the most notable of which is Sussex Heights. A number of sites in the area, such as the Brighton Centre and Odeon Cinema, are underutilised and/or are of poor architectural quality.

A new vision statement and accommodation brief should be developed in collaboration with the council, main landowner, developer, operators and stakeholders that takes into consideration the commercial viability of elements of the vision.



The following design considerations should be prioritised in proposals:

- 'All round' visual impact assessment of middle and long distance views along the seafront, on the visual prospect on arrival from Brighton Station and on adjacent Old Town and Regency Square conservation areas, which include many listed buildings, and other adjacent heritage assets.
- Improvements to the seafront that better accommodate north-south pedestrian movement, slower traffic and complement the character of the beach, promoting this stretch of King's Road as an exemplar for the benefit of the wider city.
- Assess 'last mile' movements associated with retail and leisure developments in order to consider opportunities for rationalisation of multi-modal movements that can significantly reduce onsite car parking provision, re-route some bus services along the seafront and reduce the impact on Churchill Square.

- Improve pedestrian and cycle north-south connectivity particularly from the station and Churchill Square to the seafront with different approaches taken to West Street, Cannon Place and one new, central, open-air friendly route.
- Provide public and social benefits, such as a new public open space and active frontages in key locations for footfall generation such as cultural and arts venues.
- Provide mixed-use and flexible conference centre venue capable of co-locating wide ranging uses and explore options for a more constrained, but taller building, that helps to unlock important space for public realm.

King's Road and seafront

- Active frontage with uses for the public and local residents, such as services, restaurants or leisure on ground, first and roof level as a minimum.
- Building line aligned with the existing line of the Kingswest building to continue the balance on the seafront and provide sufficient public realm.

Northern boundary

- Reduce volume of public transport, enhance public realm and open up to sea views.
- Consider establishing entrance into the shopping centre via a new central street to define the character of this frontage.
- Provide a greater sense of enclosure to Churchill Square and enhance the public realm through taller development with residential above ground, alongside a larger open space and continuity of levels with the surrounding urban context.

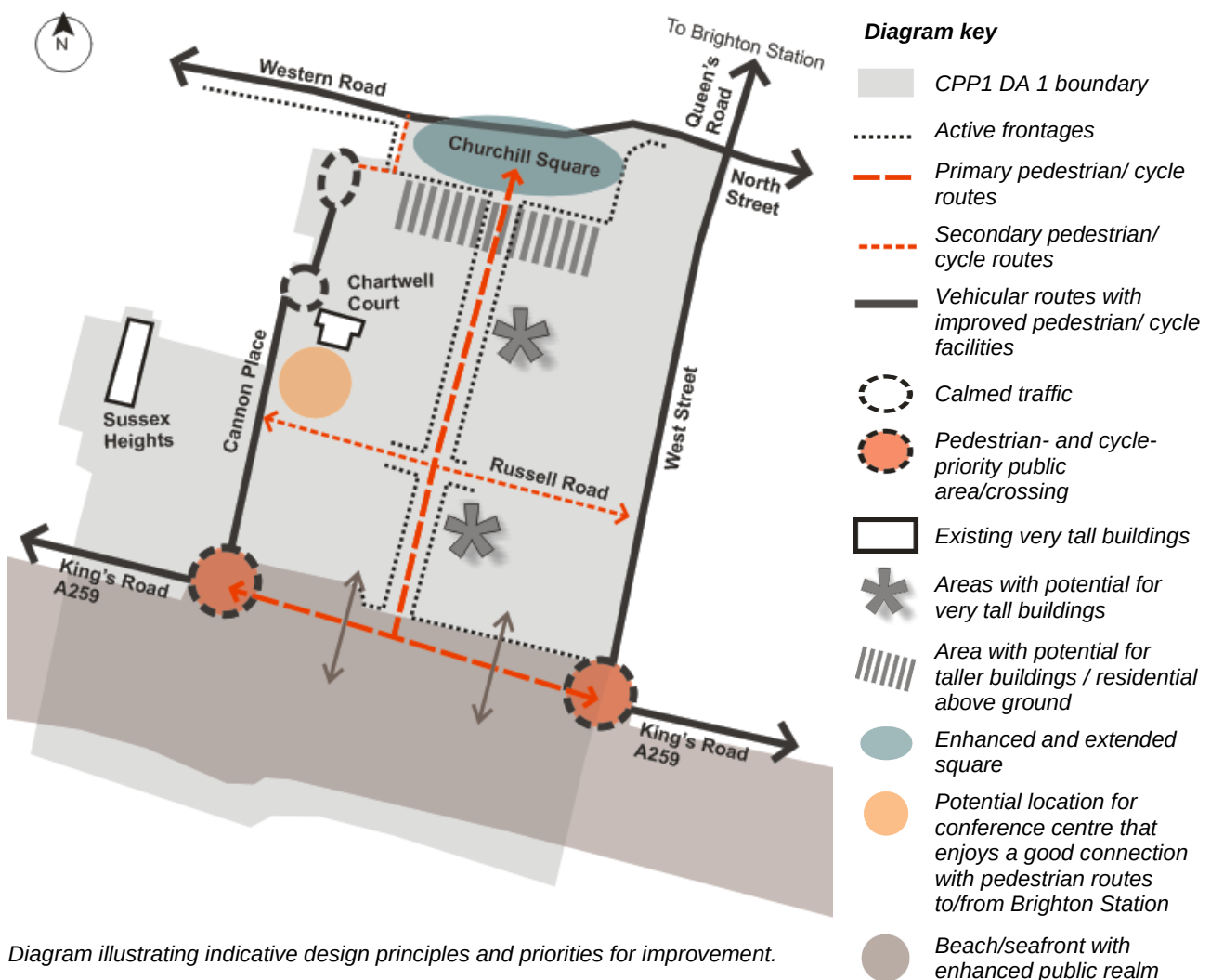
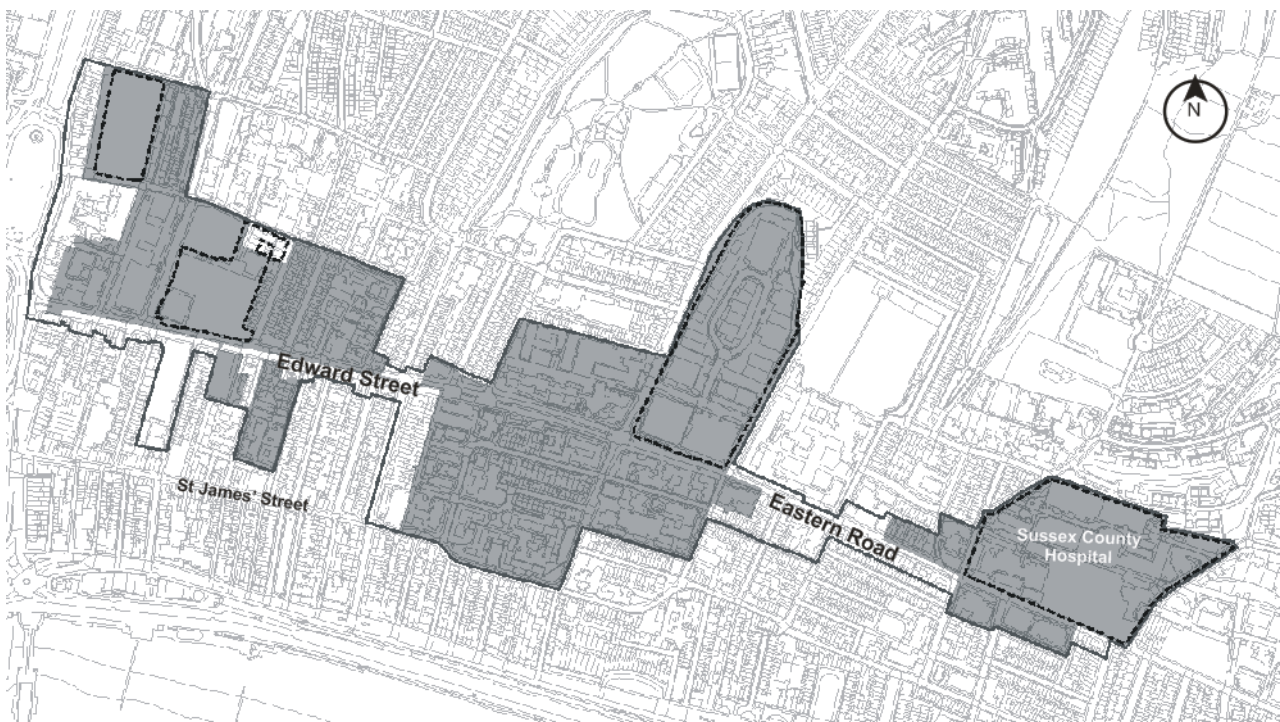


Diagram illustrating indicative design principles and priorities for improvement.

5.4. Area 4: Eastern Road / Edward Street

This corridor provides an opportunity for new tall development and the refurbishment of existing tall development. It is linear in form and it can be broadly defined as the corridor between William Street in the west and Bristol Gate in the east. The area incorporates several existing tall buildings and is in close proximity to the existing St. James' Street district shopping centre.

Existing tall buildings particularly those at the Sussex County Hospital, provide unique opportunities to develop small clusters of tall buildings along the corridor, albeit of significantly lesser height than those existing residential tower blocks in this area.



Indicative height ranges

Mid-rise (up to 8 storeys) with limited tall (9-15 storeys) buildings in areas that do not harmfully impact on designated heritage asset settings.

Map key

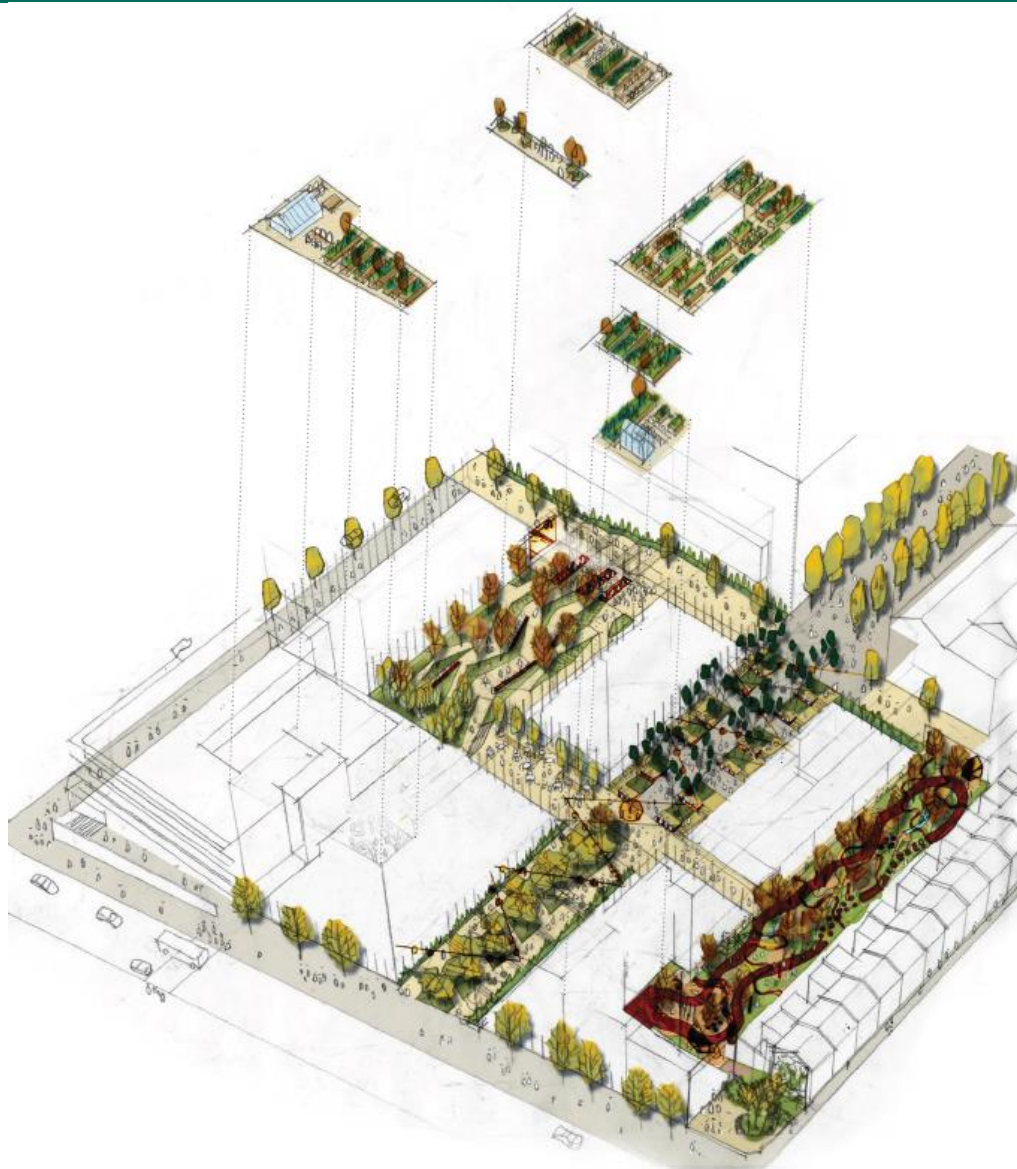
-  CPP1 Development Area 5 Eastern Road and Edward Street
-  CPP1 Strategic Allocations
-  Indicative area with potential for tall buildings



Above: Opportunities to repair urban edge along Edward Street. [Brighton & Hove Council](#) application BH2011/02886.

The following design considerations should be prioritised in proposals:

- Assess impact of tall development on the East Cliff, College and Queens Park conservation areas and the settings of listed buildings in the vicinity.
- Consider reducing the negative impact of intrusive existing tall buildings by contributing to development of small clusters of more attractive tall buildings.
- Public realm, pedestrian and cycling infrastructure improvements to Eastern Road and Edward Street sustainable transport corridor, in particular road crossings.
- Provision of community facilities.
- Work with the topography and orientation to provide exceptional outward sea views.
- Repair the urban edge of the Eastern Road/Edward Street corridor, introducing frontages to streetscape.
- Improve pedestrian and cycling links between existing and additional open space provided in new development, Queen's Park, Dorset Gardens and the beach.
- Introduce soft landscaping and tree planting to improve the environment of Eastern Road/Edward Street and highlight key pedestrian routes.



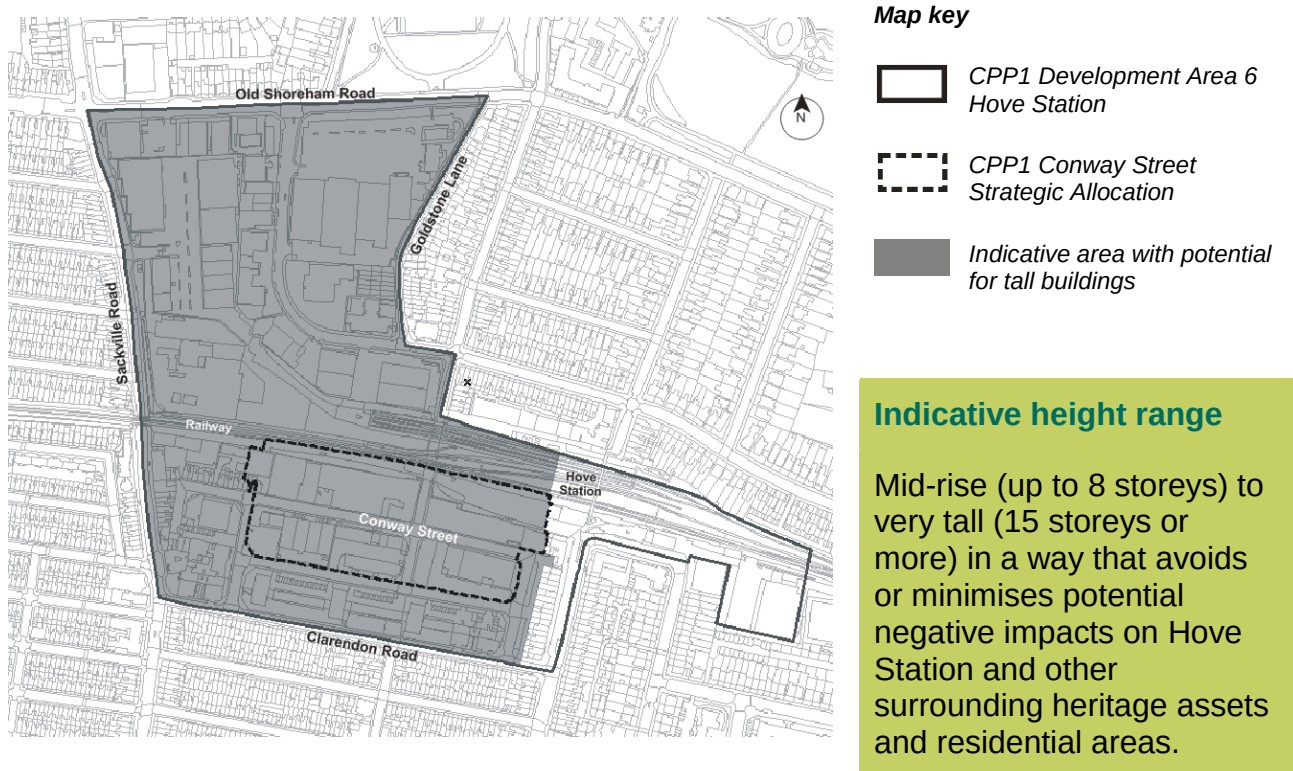
Above: Landscape strategy indicating how soft landscaping and planting will help define different functions for outdoor spaces at ground and roof levels. [Brighton & Hove Council](#) application BH2018/00340.

5.5. Area 5: Hove Station

Existing tall buildings, strong linear linkages to the seafront, proximity to the city's second largest rail station, good bus and rail services, proximity to Hove Park and a number of under-utilised sites provide opportunities for redevelopment and provide the area with opportunities for tall building development. Hove Station itself is a listed building and other designated heritage assets adjacent to the area require that key views be carefully considered in order to preserve or enhance their settings. Substantial parts of the area are allocated as employment sites and tall buildings may represent an opportunity to contribute to the delivery of the council's employment policies.

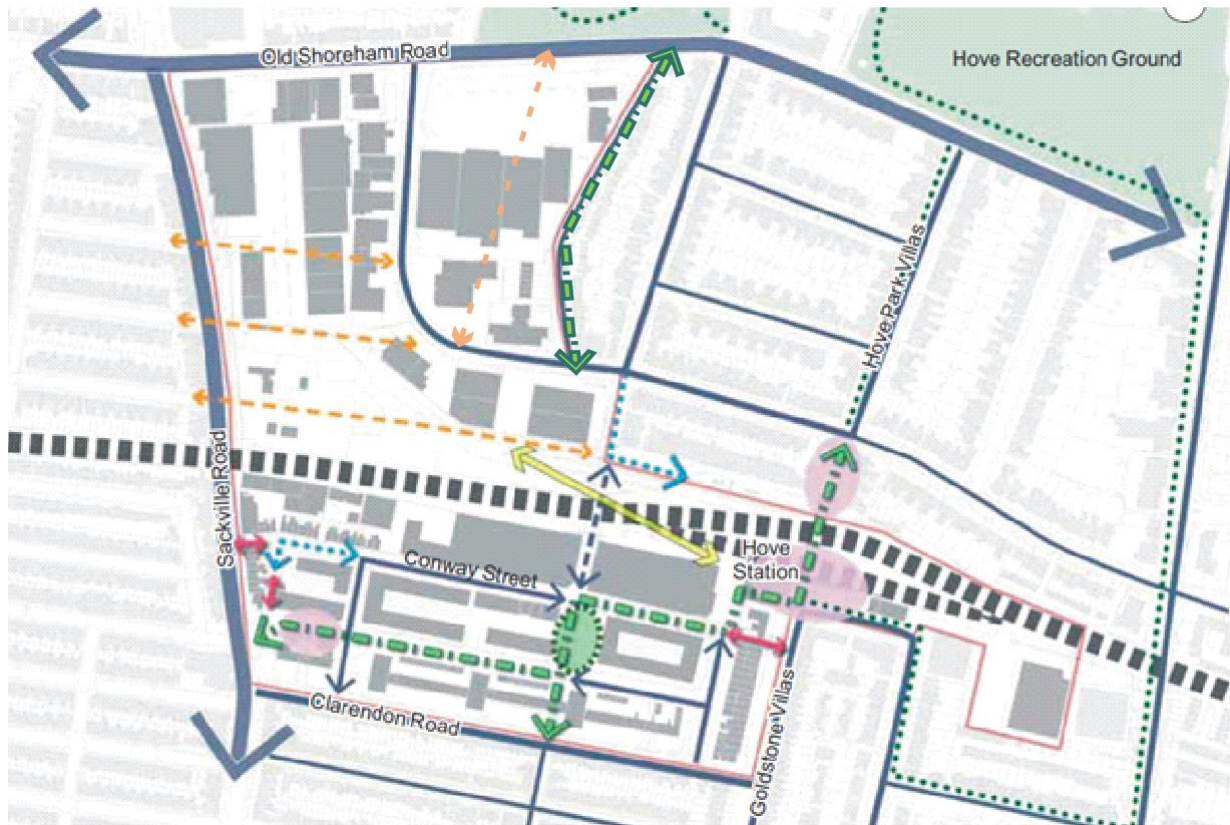
A development framework for new tall buildings for the area south of the railway is set out in the [Conway Street Industrial Area Masterplan Supplementary Planning Document](#). It identifies buildings heights and key views, land use requirements, infrastructure and public realm improvements, and how new development can support local communities and businesses.

The [Draft Hove Station Neighbourhood Plan](#) supports, in principle, tall development (8-15 storeys) in this area.



The following design considerations should be prioritised in proposals:

- Reduce volume and speed of vehicular traffic through the area and provide greater space for pedestrians and cyclists.
- Improve existing pedestrian footbridge over railway by introducing lifts.
- Improve pedestrian and cycling routes from Old Shoreham Road/Hove Park through Fonhill Road tunnel to Clarendon Road and east-west links to Hove Station.
- Improve public realm, introducing greening and open spaces for communal activities.

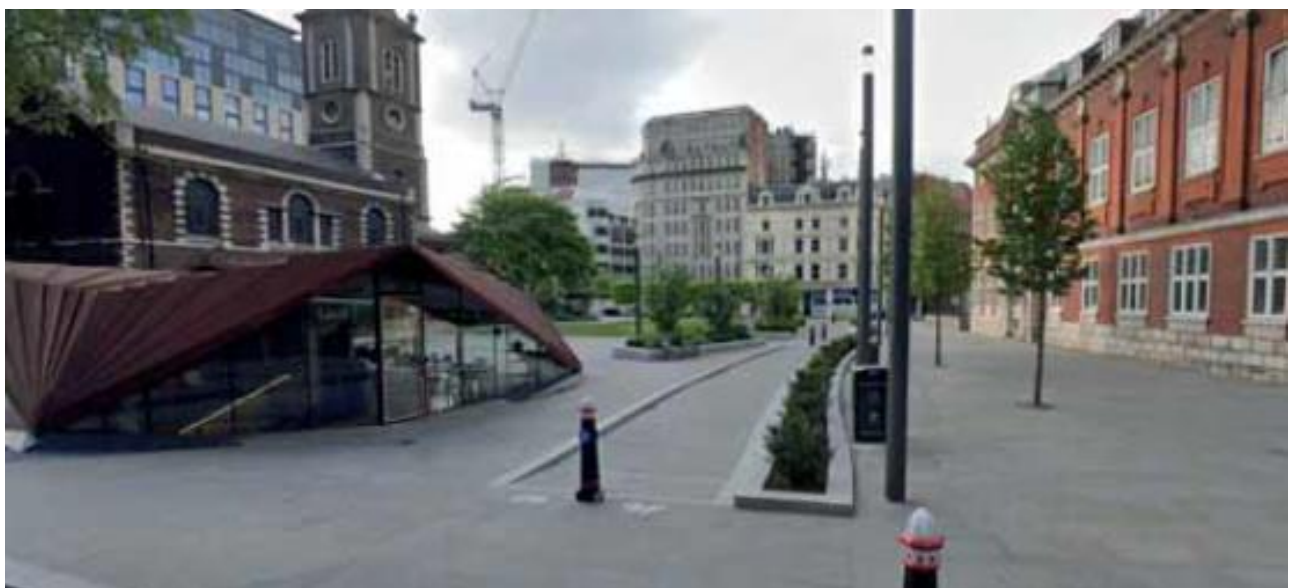


Map key

	Vehicular route		Improved pedestrian links		Regional cycle route
	Priority flow vehicular route		Key pedestrian/cycle priority route		Focal green space
	Access only vehicular route		Indicative pedestrian/cycle links		Key area of public realm
	Potential pedestrian/cycle bridge over railway line (illustrative alignment)				

Above: Extract of Draft Hove Station Masterplan SPD signposting indicative public realm improvements to support active travel across the area.

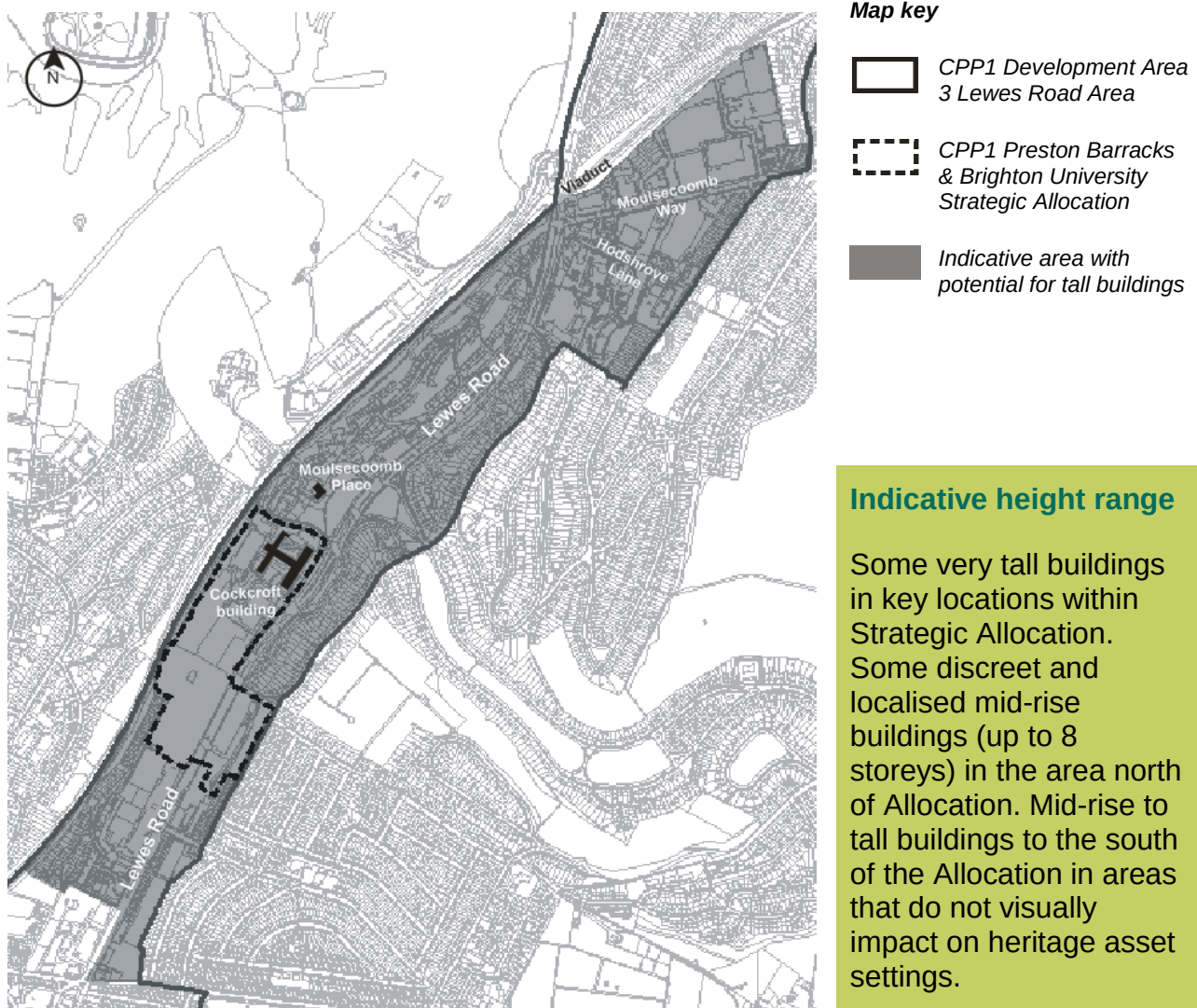
Below: Public realm improvements to cycle lane and introduction of greening and sustainable surface water drainage features. Aldgate Square, London.



5.6. Area 6: Lewes Road corridor

Centred on the Preston Barracks & Brighton University Strategic Allocation this is an academic corridor and major route into the city. It has the ability to build on excellent bus and rail services, university facilities, existing tall buildings along the valley bottom and limited heritage constraints to become a focus for tall building investment.

The Cockcroft building and grade II listed Moulsecoomb Place function as the transition point from a dense urban grain bounding central Lewes Road to a more landscape-led and green character in the northern suburban area. This transition point is a key public realm node that provides east-west connectivity across the valley.

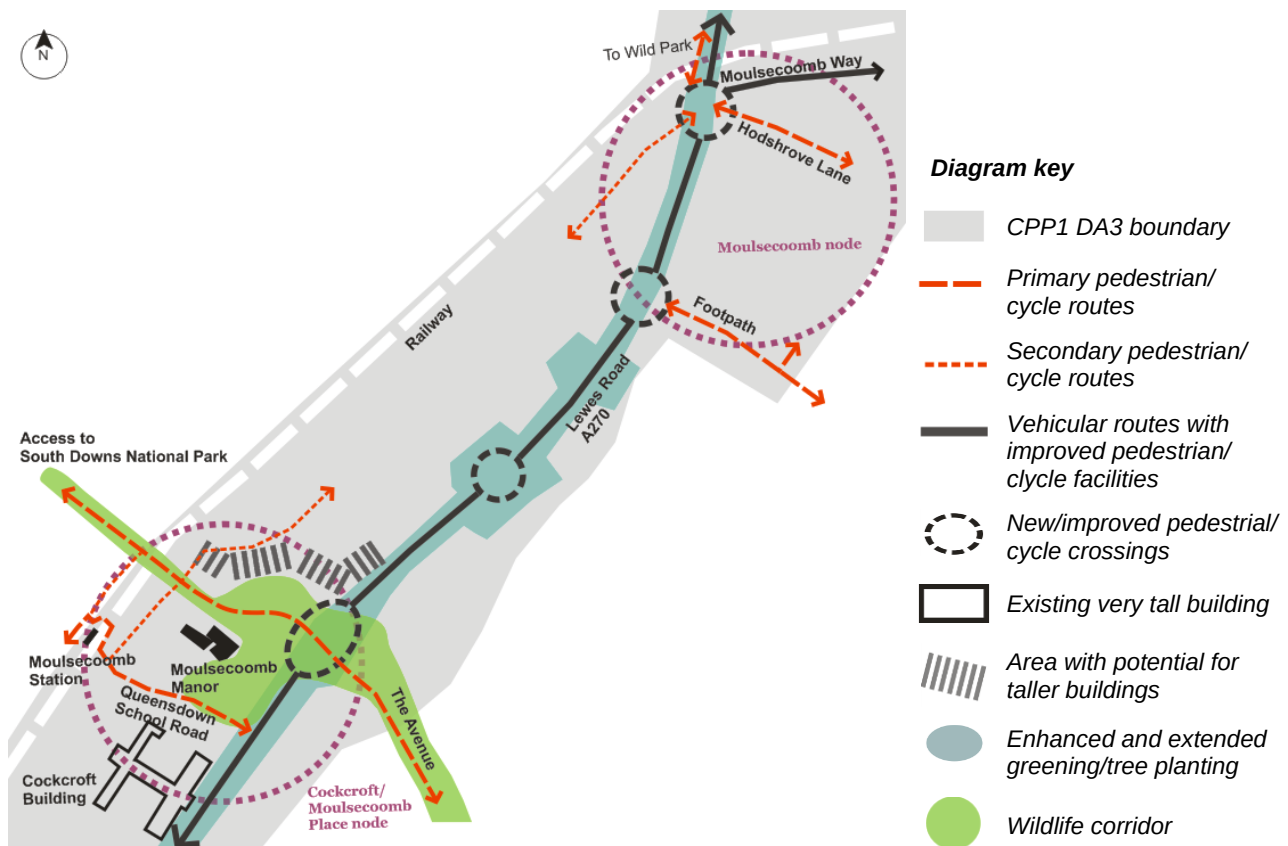


The following design considerations should be prioritised in proposals:

- Enhance the look and feel of the Lewes Road approach into the city from the northeast and re-inforce its character as a continuous street with a strong green and active travel character (e.g. slow vehicles, multimodal movement, inter-connected green infrastructure).
- Recognise and relate to the valley topography and presence of the South Downs in approach to form, density and massing.
- Safeguard downland views and the setting of the South Downs National Park and take care not to impact the horizon line.

Area north of Cockcroft building/Moulseccomb Place transition node

- Increase density in areas closer to transport links creating a tighter urban grain and maximising the use of open spaces (i.e. for play, food growing, community activities, biodiversity).
- Replace road environment with one more fitting to a gateway location.
- Improve and/or create safer and more legible road environment and east-west strong green pedestrian and cycle connectivity with safe road crossings and connections to existing green spaces and
- Optimise the use of community facilities in the Hodshrove Lane area.



Above: Diagram summarising indicative placemaking opportunities identified for the area north of the Cockcroft/Moulseccomb Place node.

Right: Road improvements that contribute to enhancing green character and providing generous, safer and more attractive pedestrian crossings Illustration from [Better Greenway Project](#), Southend-on-sea.

Below: Before (left) and after (right) example of low-rise intensification of occupied valley rise areas. [Croydon Council Draft Suburban Design Guide](#).



5.7. Area 7: London Road / Preston Road

Situated along the A23/London Road corridor this area incorporates two separately defined stretches of existing 'mid-rise' tall buildings that front respectively the western edge of Preston Park; and Surrenden Field and Withdean Park. Unique aspects include typologies that range from blocks of tall residential and office development through to high quality low-rise residential settings within Preston Village and Preston Park conservation areas.



Map key

-  CPP1 Development Area 4
New England Quarter and
London Road
-  CPP1 Strategic Allocation
125-163 Preston Road
-  Indicative area with potential for
tall buildings

Indicative height range

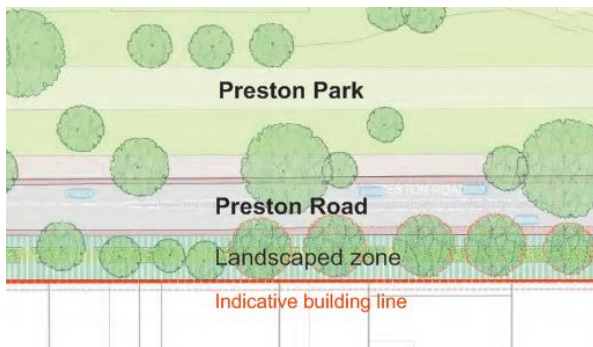
Mid-rise (up to 8 storeys) with tall (9-15 storeys) in key landmark or gateway locations.

The following design considerations should be prioritised in proposals:

- Enhance and mend the green character of the A23 to create a boulevard and establish better connectivity across it to parks and open spaces
- Improve facilities for pedestrians, cyclists and bus users (e.g. crossings, cycle lanes and parking).
- Respect the green residential character of the area, through a pattern of tall buildings and open spaces that emphasise the linear form of the corridor and provide a more unified approach to built form.
- Reinforce the existing tall buildings and utilise the significant level change to the west to better integrate tall buildings within the townscape.

Strategic Allocation 125-163 Preston Road

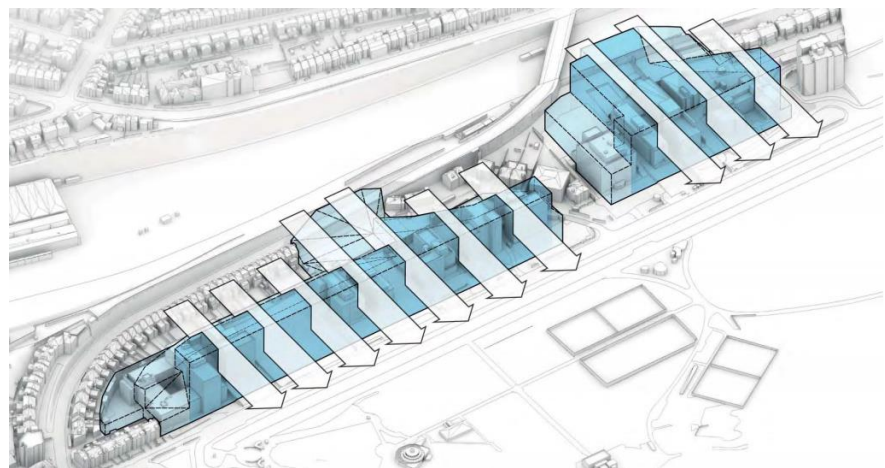
- Enhance the appearance of the existing tall building frontage to the west of Preston Park, whilst respecting the Park's setting as a heritage asset.
- Introduce a landscaped zone with continuous building set-back from Preston Road that enhances promenade of trees, provides generous pedestrian areas with raised planting and seating and improved cycling facilities.
- Leave gaps between built elements to maintain visual permeability between townscape and Preston Park valley bottom.
- Introduce courtyards and open spaces to create opportunities for amenity and animate ground floor and street edge.



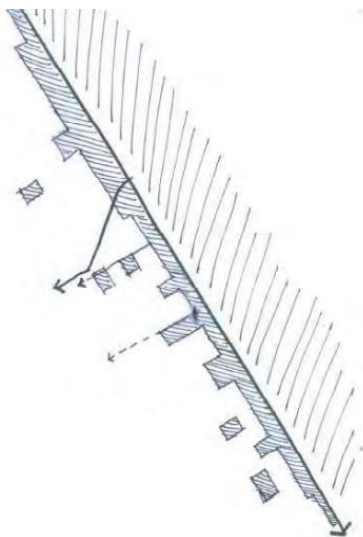
Above: Introduction of landscaped zone with enhanced planting, seating, cycling and public transport facilities along Preston Road.

Right: Gaps between buildings to safeguard views down to Preston Park and across the valley.

Below: Courtyard and open spaces used to animate ground floor and street edge.



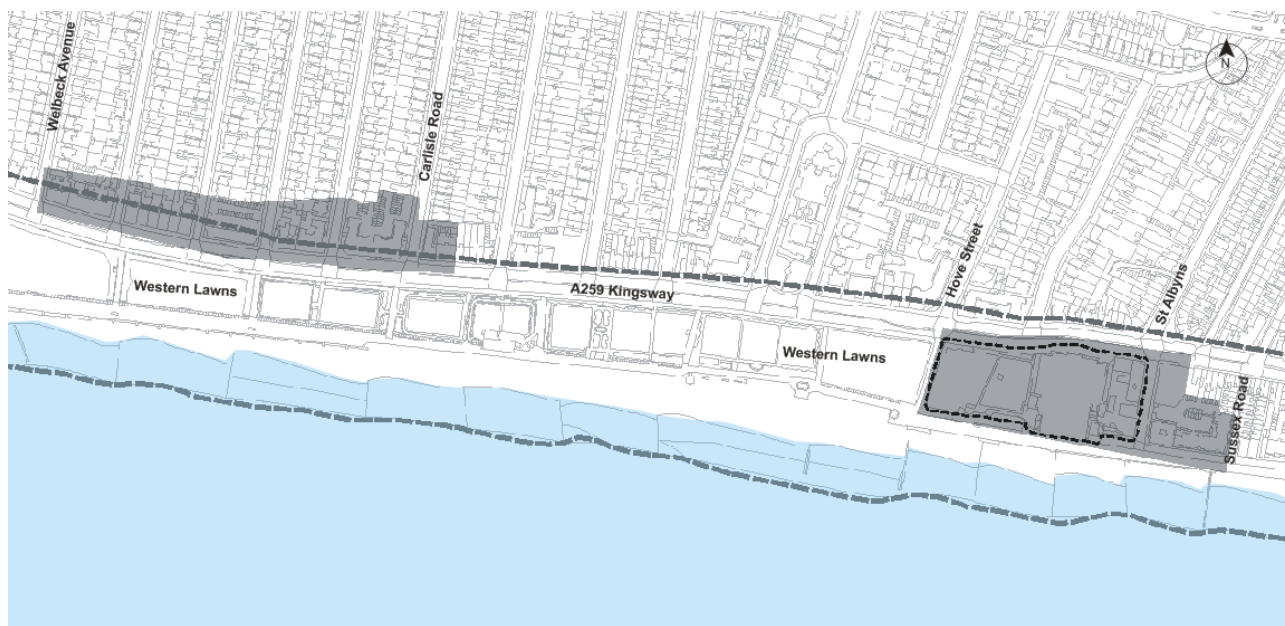
[Brighton & Hove Council](#)
application BH2016/02499.



5.8. Area 8: Western Seafront/Kingsway

Kingsway is designated as a sustainable transport corridor and has scope for public transport improvements. The stretch overlooking the Western Lawns is characterised in the main by residential buildings of varying heights and styles that range in quality from exceptional to poor. Opportunities exist here to replace poor building stock with taller 'mid-rise' buildings, following an existing changing pattern of growth.

The King Alfred Strategic Allocation is unique in that it is the only part of the seafront to have some development right up to the seafront's edge. This affords opportunities for different taller 'landmark' development form, potentially creating a prominent and distinctive 'endstop' to Hove's Western Lawns.



Indicative height ranges

Mid-rise (up to 8 storeys) along Kingsway and tall (9-15 storeys) to very tall (over 15 storeys) in key locations within King Alfred Strategic Allocation.

Map key

-  CPP1 Special Area 1 The Seafront
-  CPP1 King Alfred Strategic Allocation
-  Indicative area with potential for tall buildings

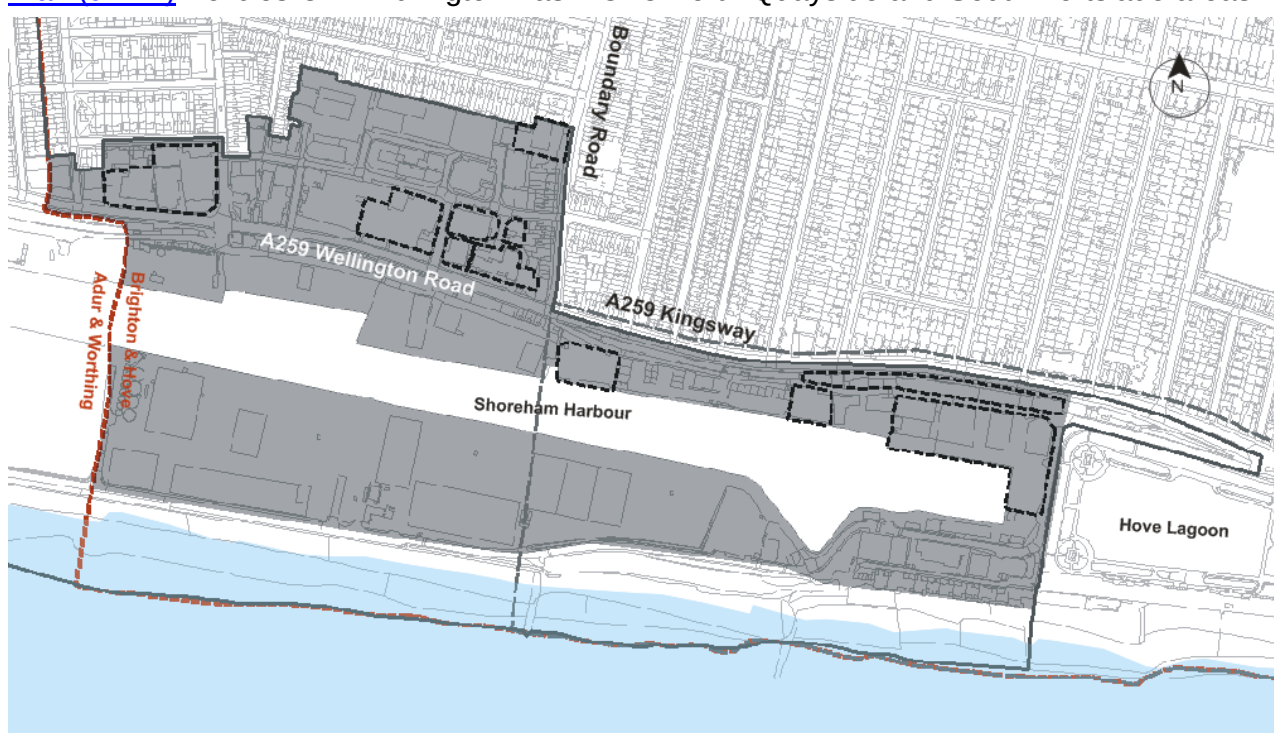
The following design considerations should be prioritised in proposals:

- Contribute to creation of a more consistent height, form and scale on the north side of Kingsway to ensure a coherent streetscape that is neighbourly and maintains public access and local views to the seafront.
- Respond to the distinct characters of the Kingsway, with its taller buildings and lower-scaled conservation and/or residential areas with mainly two-storey houses to the north.
- Capitalise on the views to the sea and the open space in the Western Lawns.
- Improve pedestrian and cycling connectivity along and across the A259.
- Improve leisure facilities in the Western Lawns (e.g. landscaping, seating and maintenance).
- Use landscape solutions to ensure privacy at ground level for residential uses.

5.9. Area 9: Shoreham Harbour

The Shoreham Harbour area represents one of the largest brownfield regeneration opportunities in the city. The multiple waterside edges and strong industrial heritage provides good opportunities for redevelopment to meet the city's future housing and employment requirements. Its utilitarian character offers significant opportunities for development that maximises the use and potential of this brownfield asset.

The area is focused on the eastern most area of the harbour within the Brighton & Hove City boundary and includes both the docksides and the commercial area north of Wellington Road. It is bounded in the west by the local authority boundary between Brighton & Hove and Adur and comprises a number of site allocations within the [Shoreham Harbour Joint Area Action Plan \(JAAP\)](#) Policies CA2 Aldrington Basin CA3 North Quayside and South Portslade areas.



Indicative height ranges

Mid-rise (up to 8 storeys) along the Kingsway.

Map key

- CPP1 Special Area 1 The Seafront
- JAAP Site Allocations Aldrington Basin CA2 AB 1-4 and North Quayside and South Portslade SP1-7.
- Indicative area with potential for tall buildings
- Brighton & Hove boundary

The following design considerations should be prioritised in proposals:

- Improve connectivity along Kingsway/Wellington Road (A259) - Boundary Road/Station Road junction and England Coastal Path through Aldrington Basin area, in particular safer facilities for pedestrians and cyclists.
- Accommodate mix of uses and protect /encourage employment generating uses.
- Improve legibility, permeability and connectivity to Boundary Road/Station Road district retail centre, New Church Road and along Wellington Road.
- Minimise flood risk and reduce the impact of noise and air pollution.
- Introduce landscaping along A259 and improve connections with existing green spaces to help enhance biodiversity and habitat links.

6. Tall Building Statements

Proposals that trigger the tall buildings design guidance will be required to include a thorough and detailed Tall Buildings Statement (TBS).

This will indicate how the proposals have responded to the guidelines, described in Section 13. This submission must include written and illustrative supporting information and justification for the chosen uses and proposed built form, which includes the following:

- a survey plan and calculations illustrating the proposal's relationship to the mean height of all surrounding development for a distance of 100m.
- a plan illustrating the relationship of the proposed site to one of the tall building areas.
- a statement describing how the proposal addresses the guidelines in Section 13 and would provide a safe, positive and attractive addition to the city.
- evidence of exploration of the viability and appropriateness of other forms of high density development
- an urban design assessment, including a 3D modelling and analysis, within the proposal's area of visual impact to support the appropriateness of the site for taller development.

An Environmental Impact Assessment (EIA) may be required. This will depend on the amount of development proposed, the site location, and the sensitivity of environmental receptors, such as landscape, ecology, heritage assets and people.

Where EIA is required in order to avoid duplication, it will be acceptable for applicants to include responses to the tall buildings guidelines within the EIA provided that all the information required to be included in the TBS can be adequately addressed in the EIA. The [national EIA guidance](#) explains the way in which the EIA process operates.

Applicants may be required to submit a screening report as to the necessity for an EIA.

Major tall building developments are also likely to require a separate transport assessment as referred to in City Plan Part One Policy CP9 Sustainable Transport.

SECTION C: Planning process

This section of the guidance describes the council's preferred approach to applicant engagement with the local planning authority and other stakeholders prior to the submission of a planning application.

Design is a collaborative process involving a range of people from different disciplines and with varying levels of design skill at all stages.

From the beginning, a design project can present complex challenges which could benefit from constructive conversation with council officers and other key stakeholders including design professionals, advisory bodies, the local community and neighbours.

The council as a Local Planning Authority (LPA) holds a responsibility to ensure that design proposals are of high quality and align with policy objectives.

The council takes a stance in favour of sustainable development and wants high quality design proposals to succeed.

To ensure that your design is of high quality and aligns with our policy objectives, the council recommends:

- **Identifying key local stakeholders, including neighbours, and allocating resources and time to consult and respond to their feedback prior to submitting a planning application.**
- **Identifying relevant policies, site allocations and guidance and showing how these have informed the scheme.**
- **Engaging its design advice services as early as possible, preferably prior to submitting a planning application and before a preferred design option is chosen.**
- **Building into the work programme the time and costs of engaging the council's design advice services.**
- **Presenting a concise, clear design statement illustrating the parameters that informed the design options using drawings and illustrations that can be easily understood by people with basic or no design skills.**
- **Using 'a day in the life' scenarios to test and illustrate how the development will be used.**

7. Pre-application process

It can be difficult to know how early to start the design conversation with the local planning authority.

Early engagement is important. Problems can often arise when applicants progress their design proposals in detail to establish floor plans, or prepare expensive architectural and/or engineering drawings prior to engaging with the council and other stakeholders like neighbours.

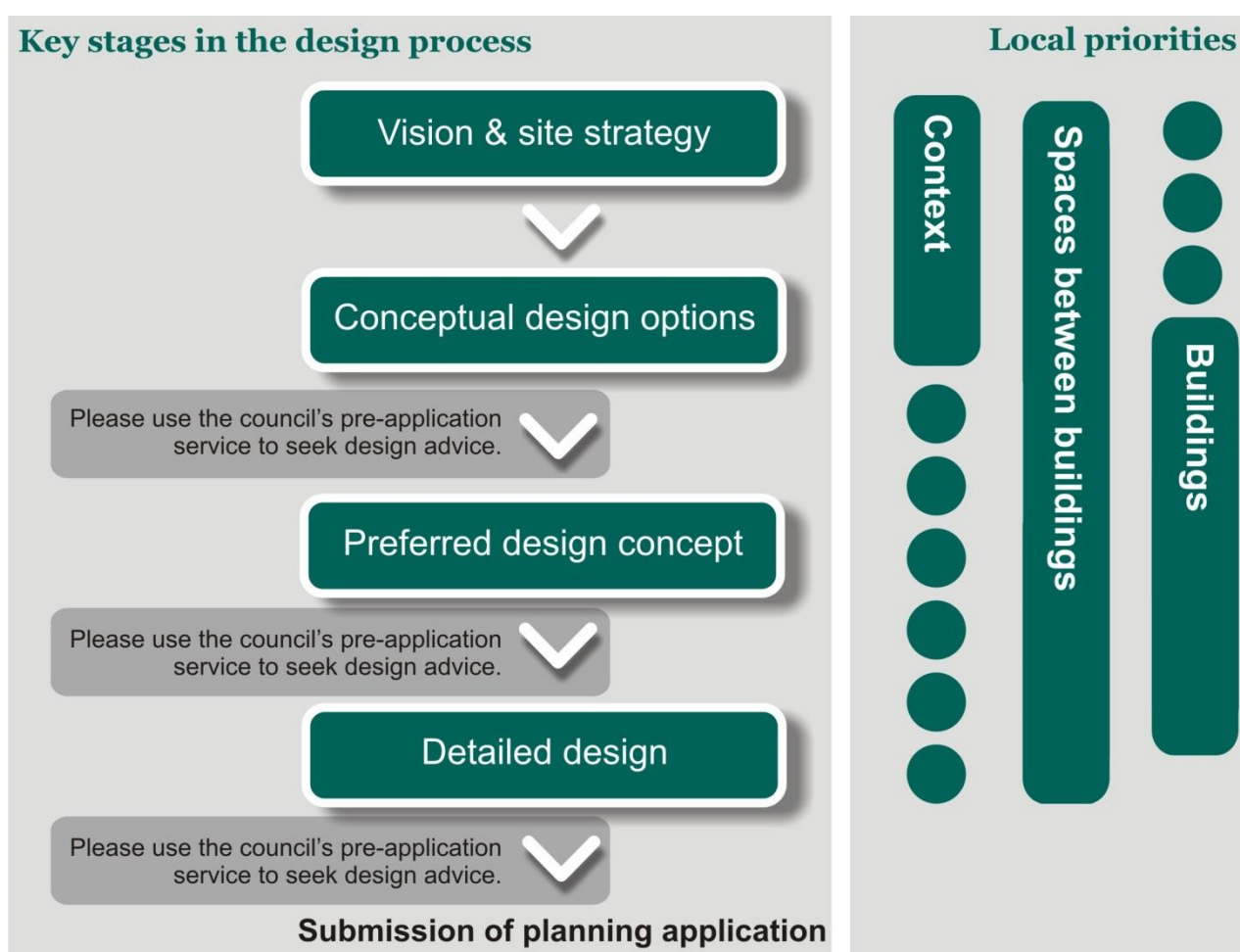
In line with NPPF paragraphs 39-46, our advice is that you involve us as early as possible prior to the submission of a planning application.

Preferably, your proposals should be at an advanced enough stage in the design process to allow constructive feedback, but not so advanced as to risk reductive work.

For the purpose of this guide, the diagram below identifies indicative stages in the design development process and signposts instances when applicants are encouraged to seek design feedback from the LPA prior to submitting a planning application.

The diagram also indicates approximately how consideration of local design priorities may align with this design process. More detailed information on this can be found in the chapters following the diagram.

More detailed information about the council's design advice services and how to access these is provided in Section 8.



7.1. Vision and site strategy

This is the stage when contextual analysis of the development site and its surroundings is carried out and positive ambitions and parameters are established in the form of a vision and site strategy to inform design proposals.

The vision describes key ambitions and design principles derived from contextual analysis addressing local priorities set out in Section A, community engagement, the client's development brief and the designer's own creative response to site. It should address quantitative and qualitative design attributes and should be used as a point of reference throughout the design process.

The site strategy is derived from site constraints and opportunities in response to contextual analysis, policy objectives and local priorities set out in Section A. It sets out key physical parameters including points of access, primary routes, location of buildings and spaces between them, zones where height may be concentrated, indicative uses and building fronts and backs.

At this stage, applicants are expected to submit design information as part of a design statement to include as a minimum:

- Clear and concise contextual analysis communicated using satellite imagery, photography, diagrams and text (see Section 9).
- Site constraints and opportunities diagrams which round up the contextual analysis into clear and graphical site plans.
- A vision statement to guide design development, including the approach to stakeholder engagement and key outcomes.
- A site strategy, presented as an indicative site plan.
- If a masterplan is appropriate, a diagrammatic plan indicating areas outside of the development red line that are fundamental to the masterplan and why.

At this stage, the council would look to assess with regard to local design priorities:

Context

- Does contextual analysis meaningfully inform the development vision?
- Has meaningful stakeholder engagement been undertaken or planned, in particular with neighbours, and how have/will outcomes inform the vision?
- In instances such as those set out in section 1.5, is a masterplan being developed to ensure a holistic design approach?

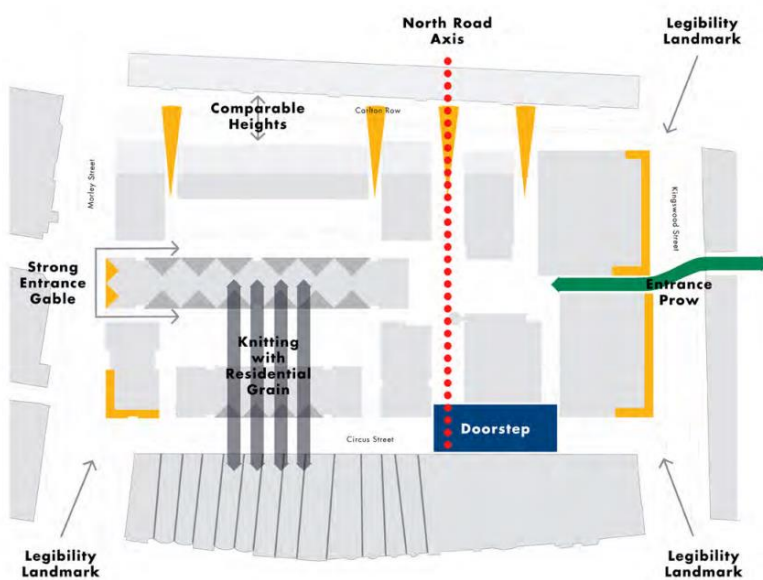
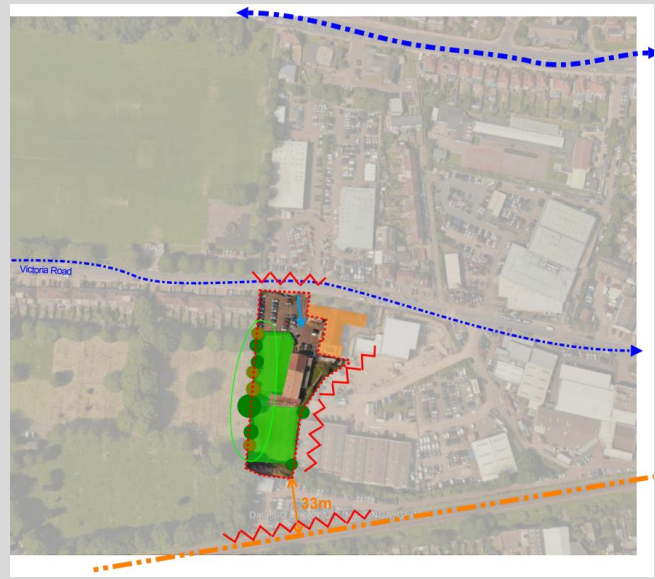
Spaces between buildings

- Do site constraints and opportunities meaningfully inform the site strategy?
- Is the site strategy the foundation of a landscape-led design approach providing base parameters with regard to site layout and land use that are appropriate to context?
- Does the site strategy enable a climate resilient development with regard to environmental comfort?

Buildings

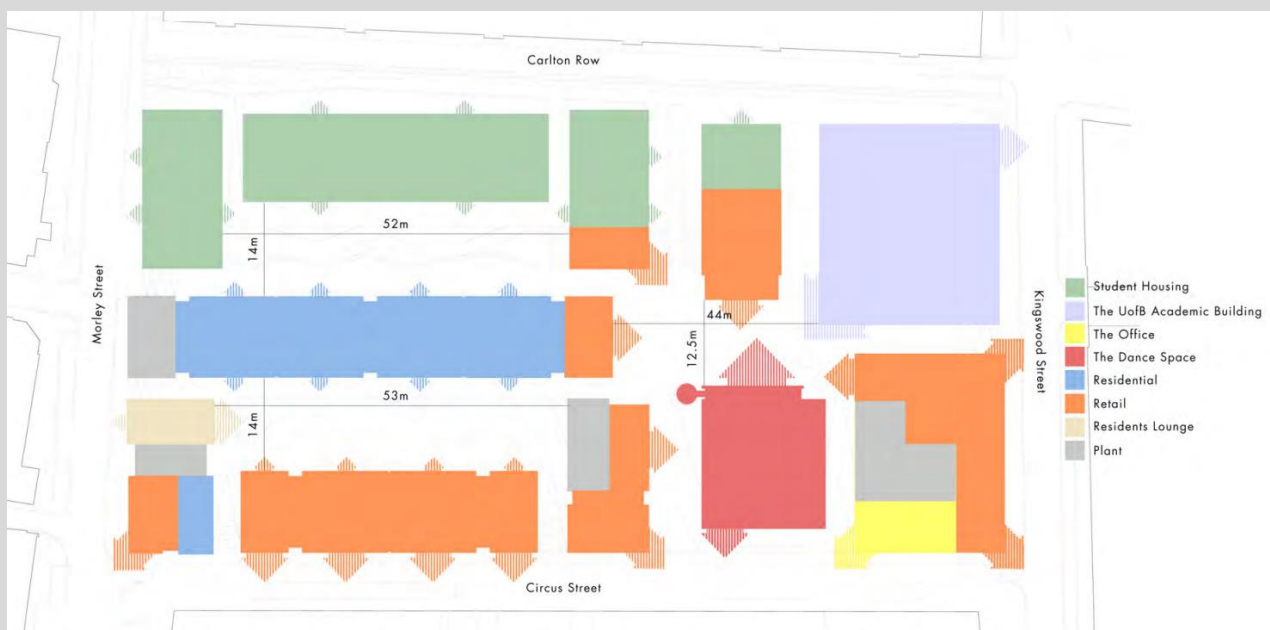
- Are identified building zones and/or areas where height may be concentrated appropriate to wider context?
- Are buildings oriented appropriately to optimise passive design solutions, outlook, and neighbourliness?
- Are building locations, uses, fronts/back, access and servicing facilities appropriate in relation to adjacent land and building uses?

Good practice



Above: Site constraints and opportunities diagram which can inform the site strategy and design development. [Brighton & Hove Council](#) application BH2019/02578.

Left and below: Combination of site plans illustrating the Site Strategy for the Circus Street development in Brighton. The Site Strategy addresses primary routes, focal buildings, points of access, built form, uses and fronts and backs. [Brighton & Hove Council](#) application BH2013/03461.



7.2. Conceptual design options

This stage involves the development of creative solutions which build on the vision and site strategy to generate a design concept that will influence the layout, form, appearance and details of a proposed development.

Conceptual design options should demonstrate an understanding of competing contextual influences and should be developed from the site strategy and address the development vision. Along with the vision, conceptual design options should be loose enough to allow the design to develop organically, and should remain a constant point of reference throughout the design process.

Conceptual design options should present a creative response to contextual analysis achieving innovation in design.

At this stage, design information the council would expect applicants to submit as part of a design statement include, as a minimum:

- A storyboard of stages in design development leading to a number of conceptual design options.
- Figure ground studies, plans, sections, elevations and, if possible, 3D images and/or models to clearly indicate site layout, scale and massing and illustrating the ratio and rhythm of built footprint to open space, elevation profile set against wider streetscape, how the ground plane functions through internal and external spaces, how mixed uses are positioned on the site, and servicing plans.
- Relevant identified strategic and local views and views from within the development that are relevant to the assessment of proposals.
- Analysis of 'a day in the life' of future occupants. See section 9.1.

At this stage, the council would look to assess with regard to local design priorities:

Context

- Do conceptual design options holistically address contextual influences and are they successfully developed from the vision and site strategy?
- Do they positively contribute to the streetscape and how?
- Do they sensitively address strategic and local views?

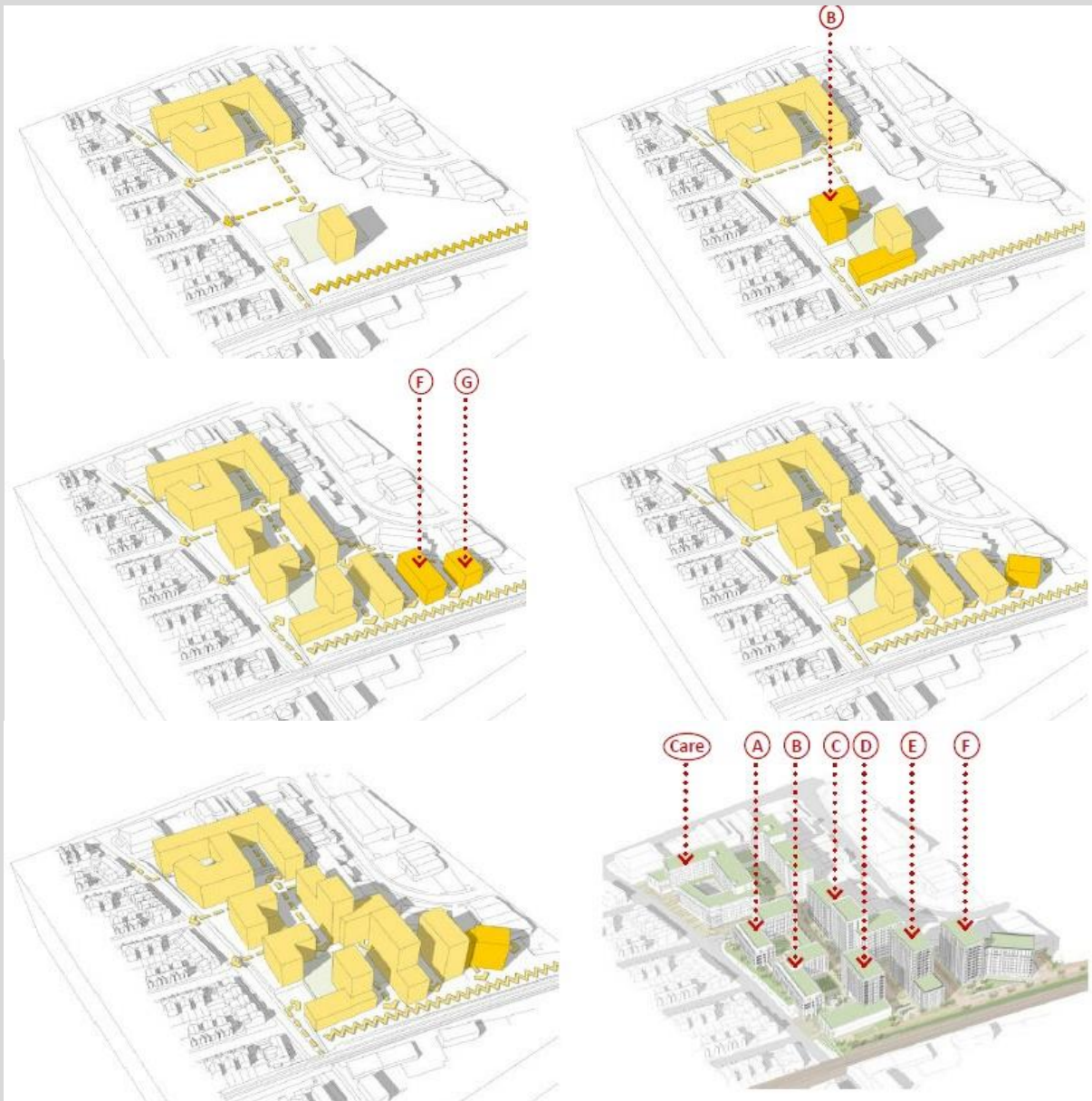
Spaces between buildings

- Do conceptual design options focus primarily on the spaces between buildings, exploring the hierarchy and functionality of routes and spaces and considering their character?
- Do they successfully define between public and residential areas?
- Do they integrate green infrastructure and active transport networks?
- Has a public realm strategy been developed to support proposed functionality of spaces?

Buildings

- Do conceptual design options ensure proper functionality and appropriate adjacencies to public and private landscape areas?
- Do they consider building performance?
- Do they consider uses, focal or landmark buildings, building servicing, fronts and backs, primary entrances and/or gathering points?

Good practice



Above: 3D storeyboarded stages in design development leading to a conceptual design option.

Below: Conceptual design options exploring site plan in relation to context. [Brighton & Hove Council](#) application BH2019/02578.



7.3. Preferred design concept

This stage sees the selection of one or a combination of several conceptual design options that represents the most holistic creative response to overall ambitions and design principles and which best responds to context.

The preferred design concept should provide further detail regarding landscape and building layouts, sustainability, form, appearance and materiality. At this stage, the site layout is formalised and set, and the design concept solidifies and becomes less flexible leading to detailed design.

Design information the council would expect applicants to submit as part of a design statement includes, as a minimum:

- Preferred design concept presented in a similar format to the conceptual design options.
- Drawings presented in greater detail at a larger scale; to include the ground floor site plan, parking plans, typical floor plans, sections, sectional perspectives and layered elevations at a variety of scales showing the relationship of proposed buildings to the ground plane and neighbouring trees and buildings.
- More detailed 3D images and/or models, and images describing the proposed appearance and materiality of buildings.
- Landscape proposals presented as part of the site plan or separately, accompanied by images describing proposed materiality.
- Sustainability strategy developed for landscape and buildings which addresses building performance targets, operational and embodied carbon, circular economy principles, water management and biodiversity gains.
- Placemaking and public realm strategy describing the functionality and social benefit of proposals.
- More detailed analysis of 'a day in the life' of future occupants. See section 9.1

At this stage, the council would look to assess with regard to local design priorities:

Context

- Is the preferred design concept the most appropriate response to contextual attributes and components of the built environment, particularly in instances where it may not be appropriate to reflect existing character, form and scale?
- In selecting or developing a preferred design concept, have opportunities been taken to refine proposals relative to context?
- How has the community engagement process progressed and how has it informed the development of a preferred design concept?

Spaces between buildings

- Is site layout and landscape design the most holistic, creative and successful response to combined local priorities?
- Are routes and spaces defined and developed in line with a public realm strategy to a level of detail concurrent with developing building design?
- Is the landscape design developed to a level of detail which is indicative of layout, surface treatments, drainage strategies and planting typologies and does it achieve nature enhancement and biodiversity gains?

Buildings

- Are building layouts developed to indicate housing type, mix, orientation, aspect and provision of private and communal amenity as well as the arrangement of commercial uses?
- Is the servicing of buildings developed and functioning well?
- Is appearance and materiality developed to a level of detail which is indicative of architectural form and roof scape, elevational composition and fenestration design, balcony typologies and materiality?
- Has a sustainable buildings strategy been prepared? Has it included operational and embodied carbon, as well as circular economy principles?

Good practice

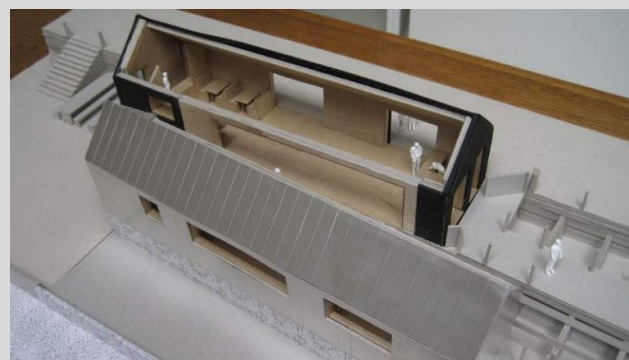


Above: A rendered elevation illustrating fenestration composition, materiality, form, scale, depth and planting more clearly than a simple line drawing. [Brighton & Hove Council](#) application BH2013/03461.



Left: A preferred design concept presented in a similar manner to conceptual design options, illustrating that the design solution is the most holistic response to contextual influences. [Brighton & Hove Council](#) application BH2019/02578.

Below: A physical model illustrating the true scale, form, materiality, internal layout and interaction with public spaces. [Brighton & Hove Council](#) application BH2015/01649.



7.4. Detailed design

This phase sees the preferred design concept progress to a level of detail sufficient to submit a planning application. Details of landscape design include planting plans, hard surface details and street furniture specification. Details of building design include fully realised internal layouts, elevational compositions, fenestration design and materiality.

Special areas such as primary public squares or residential entrances, as well as typical cladding systems, boundary treatments and balcony typologies should be identified and developed further to show a level of detail which would be visible in reality.

Sustainability strategies are fully developed.

At this stage, design information the council would expect applicants to submit as part of a design statement include, as a minimum:

- Plans, sections and elevations at a range of scales to show proposals within context and at a level of material detail which will be visible in reality.
- 3D visualisations and/or models to convey the atmospheric and visual qualities of proposals and show a level of material detail which will be visible in reality.
- Details and 3D bay studies of special and typical components of the landscape and building design, presented at a scale of between 1:20 and 1:5.
- Fully-realised and calculated sustainability strategies which address operational and embodied carbon, water management and biodiversity gains.
- A Design Statement or Design & Access Statement which collates previous design stages to tell the story of design development leading to final detailed proposals.

The council would look to assess with regard to local design priorities:

Context

- How has materiality, planting, architectural form and elevational composition been further refined to positively respond to neighbourhood character and sense of place or generate a new character and identity?
- Are brick patterns, stone paving, native tree species or eaves details clearly identified?

Spaces between buildings

- Do landscape proposals identify planting typologies, materials and street furniture with regard to functionality, climate resilience, inclusivity and longevity in accordance with local priorities?

Buildings

- Do internal layouts ensure user comfort and proper functionality?
- Is elevational composition fully realised and do proposals indicate the treatment of feature or landmark buildings?
- Is materiality fully realised and specified?
- Are proposed structural materials specified (e.g. cross-laminated timber or low-emission concrete frame)?
- How will the sustainable buildings strategy be implemented? Will accreditation from a well-known sustainable building design assessment method be sought?



Above: A collection of 3D visualisations illustrating materiality at a level of detail which would be visible in reality, as well as the atmospheric qualities of key external spaces. [Brighton & Hove Council](#) application BH2013/03461.

Left: Rendered bay studies at a large scale illustrating material detail and specification such as brick patterns, balustrades and windows. [Brighton & Hove Council](#) application BH2017/00492.

Below: A rendered elevation showing specified materiality and streetscene context. [Brighton & Hove Council](#) application BH2018/03651.



8. Design advice services

Design review is supported by the National Planning Policy Framework (NPPF) as a useful means of ensuring high standards of design in new development.

Applicants for major schemes¹ are encouraged to use the council's DesignPLACE panel review service while those for non-major schemes are encouraged to seek advice from the council's Design Advisor.

These are chargeable services paid for by applicants as outlined in the council's [DesignPLACE](#) and [Pre-application](#) webpages respectively.

To make the most of the council's review services it is important to keep in mind that conversations around design tend to produce better results when:

- undertaken as early as possible prior to the submission of a planning application;
- applicants are open to reviewing what they are doing and making changes; and
- reviewers take a constructive approach to the review process.

This can be a good means to incrementally improve the scheme and resolve issues early on which can help to speed up the overall application assessment process.

9. Communicating design ideas well

For schemes of all sizes, graphical communication and description of key design principles will be essential in conveying your design for assessment by the Local Planning Authority.

To communicate design ideas well, applicants should produce informative and expressive text and graphics which represent the design concept and are a legible conclusion to the design development process.

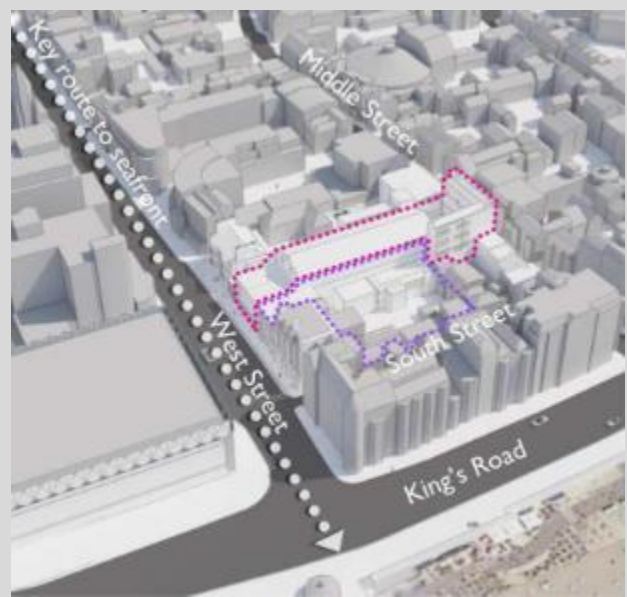
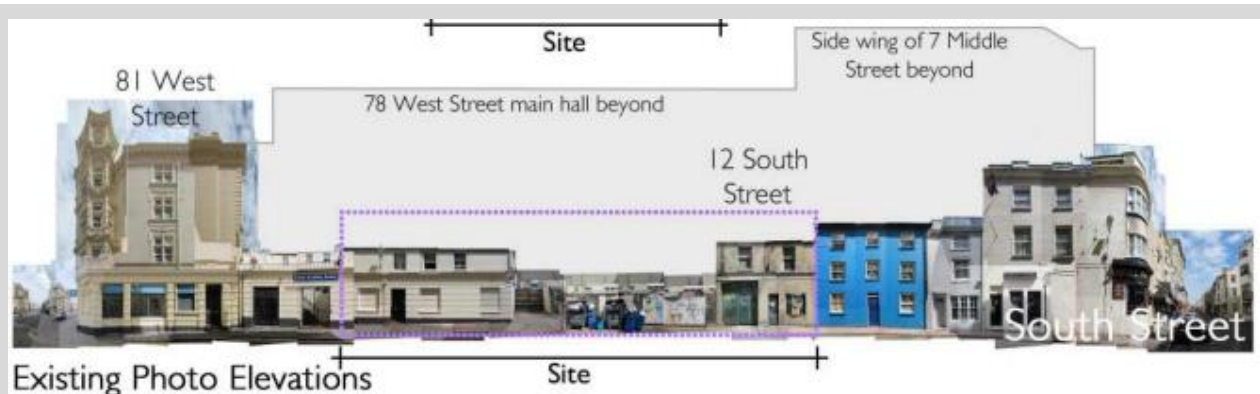
This should be communicated as part of a design statement or, where applicable, Design & Access Statement. This is a written report setting out how the design is rooted in the site and wider context and how it addresses experiential and atmospheric qualities as well as the physical attributes that influence the layout, form, appearance and details of a proposed development.

Having a clear and concise design statement can help to aid pre-application discussions, speed up the assessment of a planning application and/or provide the basis for an appeal statement.

The submitted design information should provide clarity, legibility, variety and artistic expression.

¹ Major schemes are, as defined in article 2 of the Town and Country Planning (Development Management Procedure (England) Order 2015, those that involve 10+ dwellings / over half a hectare / building(s) exceeds 1000m²; office / light industrial - 1000+ m² / 1+ hectare; general industrial - 1000+ m² / 1+ hectare; retail - 1000+ m² / 1+ hectare; Gypsy/Traveller site - 10+ pitches; and/or site area exceeds 1 hectare.

When preparing design proposals, planning applicants may want to consider the good practice examples identified below by officers assessing applications as well as those identified in previous chapters.



Above: Rendered, layered visualisations can offer the opportunity to show realistic streetscape elements and materiality and how the development site sits in relation to the wider street profile. Below: Indicative densities of development site and surrounding sites prior to site redevelopment. Three-dimensional images can convey information more acutely than two-dimensional line drawings. [Brighton & Hove Council](#) applications BH2015/04575 and BH2015/04577.

Below: Detailed line drawings, whilst not illustrative of materiality, accurately convey scale, elevational composition, and functionality. [Brighton & Hove Council](#) application BH2013/03461.





Above: a rendered 3D visualisation can successfully illustrate material and atmospheric qualities of proposed spaces, as well as social activities, and can demonstrate how the proposals would appear at different times of the year. [Brighton & Hove Council](#) application BH2017/00492.

Below: A physical contextual model very clearly illustrates scale, form and density against existing urban grain, and can illustrate materiality as well as indicate focal buildings and functionality. [Brighton & Hove Council](#) application BH2013/03461.



9.1. A day in the life

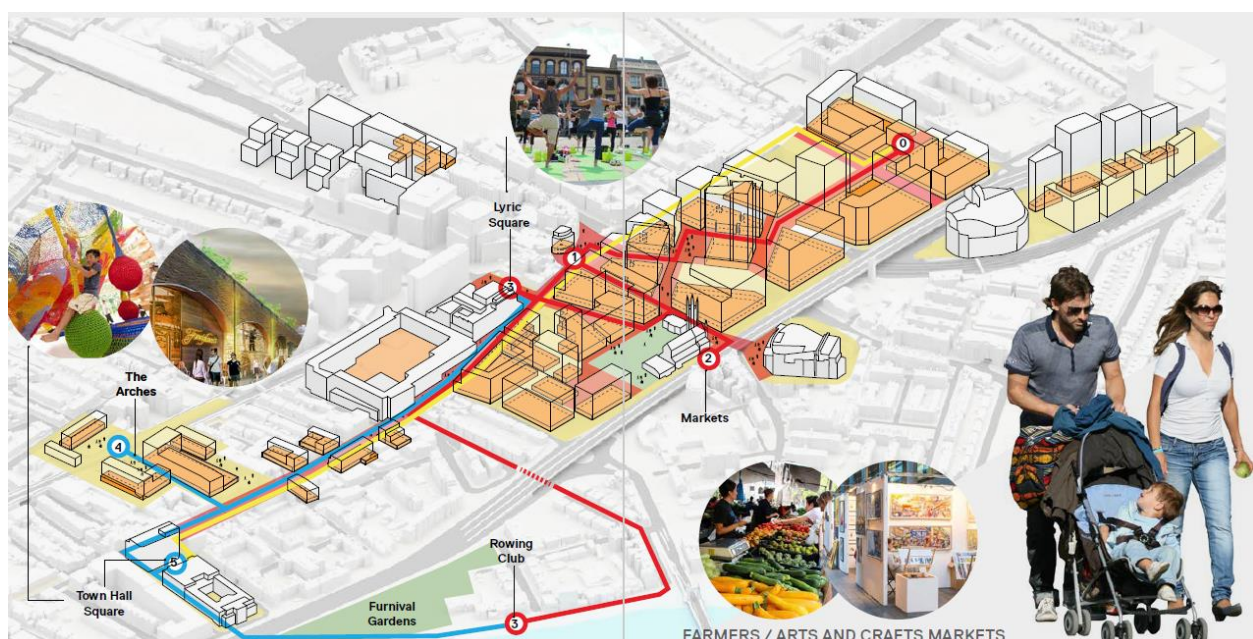
The sequential unfolding of spaces that make up a new development and links to its surroundings will determine the quality of the daily life of residents and users within and around the development.

It is important that applicants describe and illustrate how different residents/users will live in the new development and how their experience has informed design ideas.

A helpful technique for reviewing how well a design concept or detailed design will work and bring to life design discussions with stakeholders is to consider 'day in the life' scenarios of users.

This involves thinking through the spaces in and between buildings and sequence of activities that future occupiers (i.e. a resident, wheelchair user, office worker, cleaner and/or visitor) will go through from first approaching these spaces to carrying out their designated role and leaving afterwards.

It entail asking questions to test how it would feel to be a user such as, for example, how easy it would be for a wheelchair user to move in, around and out of the development site and access surrounding facilities?



>RESIDENTS: Families (WEEKEND)

1. Grab a morning coffee at Hammersmith Arrival Square
2. Go down Queen Caroline Street to the Flyover farmers' market
3. The mother goes for a yoga lesson at the Lyric Square and the dad takes the kids to the rowing lesson at the Furnival Rowing Club
4. Later they all meet up at the Arches for a nice lunch
5. In the afternoon they pass the temporary playful sculpture at the Town Hall Square, and after they return home walking along the new vibrant high street.



Extract of [Restoring the Heart of Hammersmith - Delivering a Fly-Under](#) setting out key routes users can use to travel through the development and access nearby services and facilities during weekends.

SECTION D: Appendices

10. Extended list of policies and documents

New development is expected to demonstrate how the requirements of national and local planning policy can be met with the aim of producing consistently high quality design outcomes. The following provides an overview of the key policies as they relate to design.

Brighton & Hove City Plan Part One (adopted in 2016)

CP12 Urban Design is the key and overarching policy regarding development design along with **CP13 Streets and Open Spaces** that focuses on the spaces between buildings.

The UDF is also referenced in a number of policies across the Plan including:

- SS1 Presumption in Favour of Sustainable Development;
- DA2 Development Areas Brighton Marina, Gas Works and Black Rock Area;
- DA3 Lewes Road;
- DA5 Eastern Road and Edward Street;
- DA6 Hove Station Area;
- CP1 Housing Delivery;
- CP5 Culture and Tourism,
- CP8 Sustainable Buildings;
- CP14 Housing Density; and
- CP15 Heritage.

Design however is a cross cutting issue and guidance provided in the UDF can be relevant to most, if not all policies in this Plan.

Brighton & Hove Local Plan (adopted in 2005)

There are a number of retained Local Plan policies that deal with design issues.

Most form part of Chapter 3 and cover a range of issues including, for example, QD27 Protection of Amenity, QD14 Extensions and alterations and QD14 Landscape design.

These policies will be replaced through Brighton & Hove City Plan Part Two which the council expects to adopt in 2021.

Given that design is a cross cutting issue, the UDF guidance can be relevant to most policies in this Plan, including:

- DM16 Markets;
- DM18 High quality design and places
- DM19 Maximising Development Potential
- DM20 Protection of Amenity;
- DM22 Landscape Design and Trees;
- DM33 Safe, Sustainable and Active Travel;
- DM35 Travel Plans and Transport Assessments;
- DM36 Parking and Servicing;
- DM37 Green Infrastructure and Nature Conservation;
- DM38 Local Green Spaces;

- DM40 Protection of the Environment and Health – Pollution and Nuisance;
- DM42 Protecting the Water Environment;
- DM43 Sustainable Urban Drainage;
- DM44 Energy Efficiency and Renewables;
- DM45 Community Energy; and
- DM46 Heating and cooling network infrastructure.

Supplementary Planning Documents (SPD) and Guidance (SPG)

The Adopted City Plan and retained Local Plan Policies are supported by a range of detailed guidance on how these will be implemented. If adopted, the UDF SPD will form part of this set of planning documents.

Some of the relevant guidance already provided by the council on design include:

- SPD01 - Brighton Centre: Area Planning and Urban Design Framework;
 - SPD02 - Shop Front Design;
 - SPD03 - Construction and Demolition Waste;
 - SPD06 - Trees and Development Sites;
 - SPD07 – Advertisements;
 - SPD09 - Architectural Features;
 - SPD10 - London Road Central Masterplan;
 - SPD11 - Nature Conservation and Development;
 - SPD12 - Design Guide for Extensions and Alterations;
 - SPD13 - Shoreham Harbour Flood Risk Management Guide;
 - SPD14 - Parking Standards;
 - SPD15 - Toad's Hole Valley; and
 - SPD16 - Sustainable Drainage Systems.
-
- SPGBH 2 External paint finishes & colours;
 - SPGBH 9 A guide for Residential Developers on the provision of recreational space and Ancillary Update Document – Updated Open Space Contributions Calculator ;
 - SPGBH 10 King Alfred/RNR Site: Planning brief;
 - SPGBH 11 Listed Building interiors;
 - SPGBH 19 Fire Precaution Works to Historic Buildings; and
 - SPGBH 20 Brighton Marina "An Urban Design Analysis" and Brighton Marina "Development Brief".

Planning Advice Notes and site briefs

Design advice is also available in the form of advice notes and development sites. More information on strategic council projects is available on the council's [Major Developments webpage](#).

11. Neighbourhood sensitivity to change and priorities for enhancement

The council's Urban Characterisation Study (UCS) of 2009 provides a comprehensive understanding of the diversity and quality of the city's urban character and the pressures affecting it.

That study identified 32 distinct neighbourhoods within Brighton & Hove, in addition to the central conservation areas. These are shown on the map at Section 1.2. A more detailed version is available to be viewed and downloaded [\(hyperlink to be added\)](#).

Each of these neighbourhood has now been considered in terms of their sensitivity to change and the need for any positive intervention, having regard to the following matters:

- Topography;
- Landscape character (as defined in the UCS);
- Townscape type (as defined in the UCS);
- How many separate character areas each neighbourhood contains;
- Broad existing density;
- Townscape and public realm quality assessment (as described in the UCS);
- Inclusion of or proximity to designated constraints (e.g. National Park, Conservation Area, Historic Park or Garden, Scheduled Ancient Monument, Site of Special Scientific Interest);
- Whether the neighbourhood includes a tall building area;
- Whether the neighbourhood includes one of the Development Areas set out in the City Plan Part One;
- Number of potential residential sites and potential residential units identified in the Strategic Housing Land Availability Assessment;
- The presence within a neighbourhood of any employment sites suitable for mixed use development (as identified in the City Plan Part One).

Based on these factors each of the city's neighbourhoods has been assessed on a scale of 1 to 3 for sensitivity to change (where 1 is the most sensitive) and split into those that are predominantly urban or predominantly suburban in character (suffix A or B).

Four neighbourhoods have been categorised as very mixed areas which do not fall into the above assessment and which require a more specific policy approach.

The central conservation areas have not been included, as each of these conservation areas must be preserved or enhanced according to its identified special character and appearance. Conservation area character statements for each area should guide future change.

The following table sets out which neighbourhood falls into each sensitivity grouping and what each typology broadly means with regard to the potential for future development and enhancement.

Ref.	Typology	Neighbourhoods
1A	Urban areas to be conserved largely as existing.	Preston Round Hill Tivoli & Prestonville
1B	Suburban areas to be conserved largely as existing.	Ovingdean Rottingdean Surrenden Westdene & Withdean
2A	Urban areas suitable for localised, incremental development and enhancement.	Bear Road West Hove Wilbury
2B	Suburban areas suitable for localised, incremental development and enhancement.	Bevendean Coldean Hangleton Hollingbury Mile Oak & Portslade Village Patcham Saltdean Tongdean Woodingdean
3A	Urban areas where positive and pro-active measures are required to secure major enhancement.	East Brighton Hanover & Elm Grove Pankhurst & Craven Vale Portslade-by-Sea Sackville
3B	Suburban areas where positive and pro-active measures are required to secure major enhancement.	Hollingdean Knoll Moulsecoomb West Blatchington
4	Mixed approach areas.	Black Rock Lewes Road London Road University

The character of each neighbourhood typology is briefly summarised below. For each of the neighbourhood typologies there are a number of common or shared urban design issues that warrant the provision of a consistent approach to development proposals. In this way such proposals, where appropriate, will make a positive contribution to local character and distinctiveness or help to maintain or establish a strong sense of place in neighbourhoods.

In assessing appropriate density of residential development, consideration must be given to the prevailing density of the neighbourhood and the specific characteristics of the site. The following general ranges will apply (as net density):

Range	Net dwellings per hectare (dph)
Very Low	Up to 30dph
Low	30 – 50 dph
Medium	50 – 100dph
High	Over 100 dph
Very High	Over 200 dph

Design issues that are relevant for each neighbourhood type are set out in more detail below.

1A - Urban areas to be conserved largely as existing

These are predominantly residential neighbourhoods, mainly low rise but of medium to high density, with a tight-knit urban grain and historic and fairly rigid street patterns but clear local landmarks. Townscape is cohesive and attractive and has a planned appearance, with mature street and garden trees often a notable feature. Housing is varied but building lines are consistent and terraced forms are most typical. The topography often affords attractive views. Significant areas of public open space are readily accessible. These neighbourhoods are very legible.

Future development will be modest in scale and will be expected to maintain or reinforce these positive qualities and to be of similar density. This may include infilling unsightly gaps in street frontages or replacing poor quality buildings. Opportunities for higher density development may exist where site-specific conditions and amenity issues allow. Backland or garden development will rarely be appropriate.

1B - Suburban areas to be conserved largely as existing

These are low density outlying neighbourhoods whose suburban form relates strongly to the topography and landscape, being generally developed from the base of a valley or valleys up the sloping sides and responding positively to the contours. They developed around historic rural cores and some have heritage sensitivities. Unfolding views are common. Development is spacious and low rise on mostly generous plot widths, with a preponderance of detached and semi-detached forms. Townscape has pleasing variety and contrasts, arising from development that has evolved over time, unified by scale and materials. Commercial or civic/community clusters are notable and give the neighbourhoods a focus. Local landmarks aid navigability.

There are few identified opportunities for future development on any significant scale and little scope for increased density without harming the positive characteristics of the neighbourhoods. However there may be scope for medium density development around cores of commercial or community uses. Development should respond positively to the contours of the site, respect the adjacent Downland and reflect the prevailing stepping of rooflines on the valley sides. The spacious layout of streets should be maintained and particular emphasis given to spacing between buildings and visual permeability. Existing plot sizes are important and it will not generally be appropriate to combine plots to form a single larger plot.

2A - Urban areas suitable for localised, incremental development and enhancement

These neighbourhoods generally have a tight-knit urban grain and medium to high range density in mixed residential form, with a fairly cohesive townscape and mature street trees. Building lines are consistent and terraced forms are most typical. There are pockets of larger scale commercial and civic/community uses on primary routes, as well as some taller apartment or institutional blocks, which depart from the prevailing urban form without adversely affecting the overall coherence of the areas. These neighbourhoods have significant public open space and good accessibility to services and are largely legible.

The street pattern and tight knit urban grain of the residential streets should be maintained and continuity of building line and rhythm of facades respected. . There is little scope for sympathetic backland development. Opportunities to increase density should be taken for redevelopment in mixed use parts of the neighbourhood, on or adjoining main transport corridors or fronting public open space, where this would enhance the coherence of townscape. Such locations may be appropriate for contemporary, innovative designs. However, landmark developments are not necessary to aid legibility or enhance townscape. Development of up to 6 storeys in height may be appropriate where clusters of taller buildings already exist and where the width of the road and original plot size enable the height and massing to be in proportion to the street scene.

2B - Suburban areas suitable for localised, incremental development and enhancement

These are residential neighbourhoods on the periphery of the built up area and the edge of the National Park, which consequently have strong physical and visual links with the Downs. They are low to medium density and predominantly low rise on the valley slopes and sometimes along the ridges. Development is often spacious with generous plot width and demonstrates deliberate planning in form and layout. Grass verges are common. Detached and semi-detached housing dominates. Townscape is fairly consistent but can lack local landmarks or navigable features. Pockets of commercial development vary considerably in scale and quality and are not always well integrated into the typical suburban grain.

Particular emphasis should be given to spacing between buildings and visual permeability and development should respond positively to the contours of the site, respect the adjacent Downland and reflect the prevailing stepping of rooflines on the valley sides.

Residential density should be medium density wherever compatible with the site context, and particularly where this would strengthen the townscape at local shopping centres/community centres or local parades, provide a legible local landmark (where this is currently lacking) and help to support local services. Buildings over 3 storeys in height should in other cases be confined to the lower valley slopes or where there are any existing clusters of such building heights.

Development should pay particular attention to the potential to introduce new, or enhance existing, pedestrian and cycle links to local services, public open space and transport facilities. The scope for some small scale backland or back garden development could be explored where such land or gardens are especially large and are not being used effectively.

3A - Urban areas where positive and pro-active measures are required to secure major enhancement

These are, to varying degrees, mixed and fragmented neighbourhoods where development in parts shows clear planning and in other parts has evolved in a piecemeal manner and often isolated manner, usually as a result of later 20th century development and redevelopment.

Overall street pattern and urban form are consequently fractured. Height and scale of buildings are variable, residential form is mixed and the neighbourhoods include some notably taller buildings in the form of apartment blocks, civic or commercial buildings.

Residential density is medium to very high and access to good quality and usable public open space is variable but generally deficient. The public realm lacks coherence and is often poorly maintained.

New development should actively seek to reinstate the historic street pattern and urban grain of the area or, where no such precedent existed, to create a clearly defined street pattern that forms legible links to surrounding streets and services.

Residential density should be high unless this would cause visual harm to a street of coherent townscape. In particular, opportunities to increase density should be taken for redevelopment in mixed use parts of the neighbourhood, on or adjoining main transport corridors or nodes, around local community facilities or fronting public open space. Opportunities for clusters of taller buildings exist in most of these neighbourhoods. Major development should seek to enhance the quality and functionality of existing open space so that it better meets the needs of the local communities in conjunction with a more efficient use of available land.

3B - Suburban areas where positive and pro-active measures are required to secure major enhancement

These are, to varying degrees, mixed and fragmented neighbourhoods (part urban and part suburban) that are predominantly on lower valley slopes. They include areas of clearly planned, and often cohesive and attractive, residential development that is mainly medium density. But there also significant areas of commercial or civic/community uses and sometimes also higher density residential blocks, which generally relate poorly to the prevailing urban form and which have an often piecemeal character. Access to local open space, particularly of a functional or recreational value, is variable and physical permeability or visual legibility within neighbourhoods can be poor.

New development should seek to help stitch the fragmented areas of the neighbourhood together through street pattern, urban grain and building line.

Density should be generally medium but opportunities for high density development exist on the lower level land around existing commercial or community uses. Buildings in these areas can be medium rise and there are opportunities to create local landmarks as part of a wider approach to enhancing the legibility of the neighbourhoods.

Major development should seek to enhance the quality and functionality of existing open space so that it better meets the needs of the local communities in conjunction with a more efficient use of available land.

4 - Mixed approach neighbourhoods

4a - Black Rock

This neighbourhood is split very clearly, in character terms, between the Roedean area and the Marina. Roedean is a low density and low rise residential area set on the cliff top and with setting of open downland. It falls into typology 2B as a suburban area suitable for localised, incremental development and enhancement.

The Marina is a mixed use, mixed scale and mixed form area of 20th century development on reclaimed land. The public realm is very much car dominated. It falls into typology 3A as an urban area where positive and pro-active measures are required to secure major enhancement.

4b - Lewes Road and 4c - London Road

These share the characteristic of being linear corridors rather than true neighbourhoods and they form two major routes into the city along the main valley floors. Each is marked by a transition in character from outer suburban through inner suburban to urban form and act as gateways into the city as they move from inner suburban to urban. Density, building line and scale of buildings reflect this transition.

Future development has particular opportunity to enhance the inner suburban segments of each corridor, where the built form is mixed and lacks a clear relationship to the road and where land is not always used efficiently or effectively. High density development, with taller buildings and a mix of uses, would enable these segments to fulfil their potential and create more attractive routes and more legible gateways into the city.

4d - University

This is a unique neighbourhood on the fringe of the city mainly comprising the two university campuses either side of the A27 but with a small 'island' of civic and commercial buildings between the A27 and the railway line.

The original University of Sussex campus is unified 1960s composition, containing eight listed buildings, with a close relationship to the downland and utilising a limited palette of materials. As development on the campus has moved northwards in later years that coherence has gradually been eroded. The buildings of the University of Brighton are architecturally mixed; they follow the contours but with a much less coherent layout and in a less generous landscape setting.

Both campuses are expected to significantly expand to cater for greater student numbers, for both teaching and residential buildings, and in each case development should be at a higher density than existing in order to use the campuses efficiently, whilst avoiding an urbanisation of the neighbourhood and respecting the downland setting.

12. Strategic viewpoints and landmarks

12.1. Viewpoints

Maps in this section will be improved prior to start of public consultation.



1. Foredown Tower

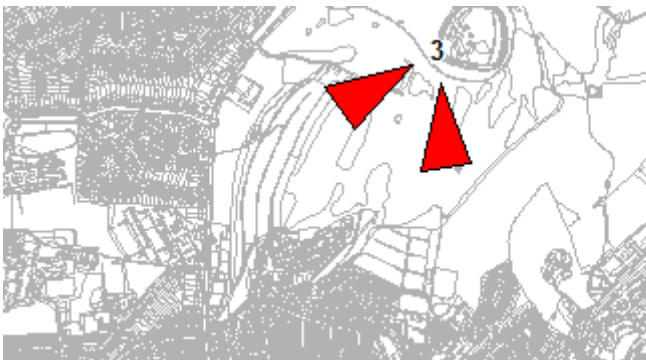
Above: Foredown Road (north of tower) 90 degree panoramic view south and south east.



2. Toads Hole Valley

Below: From north end of King George VI Avenue – looking south west.

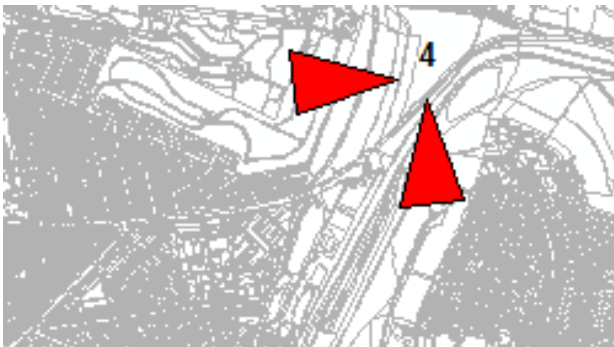




3. Hollingbury Hill Fort

Above: From track to south – a wide arc view south to south west.

This view is from within the South Downs National Park.



4. Race Hill

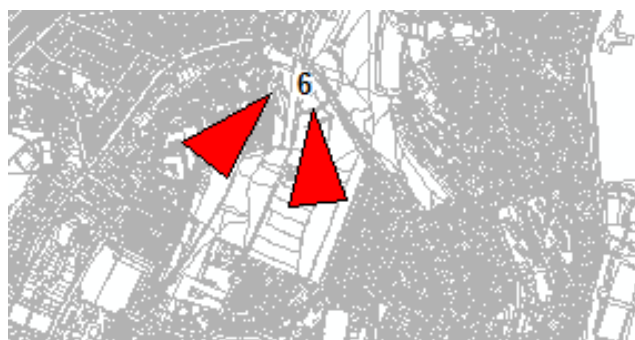
Above: From Warren Road – a wide arc view south and west.





5. Woodingdean

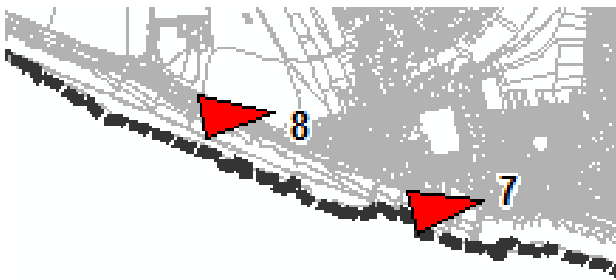
Above: from Warren Road / Downland Road – a wide arc view south and south west.



6. Whitehawk Camp

Below: Whitehawk Hill Road – a wide arc view south to south west.



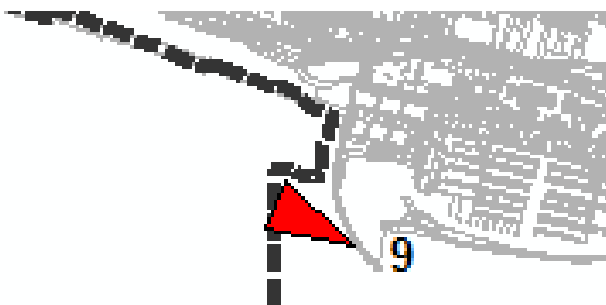


7. Rottingdean East

Above: Coastal path (near Chailey Avenue) - looking west.

8. Rottingdean Windmill

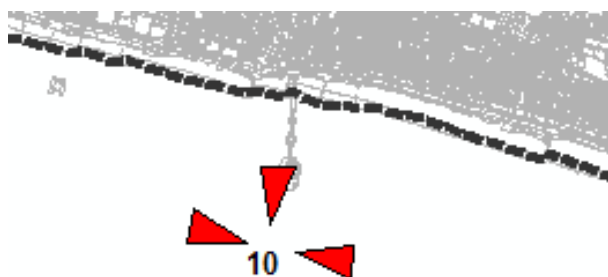
Below: 180 degree panoramic view south.



9. Marina

Below: Western breakwater– looking north west.



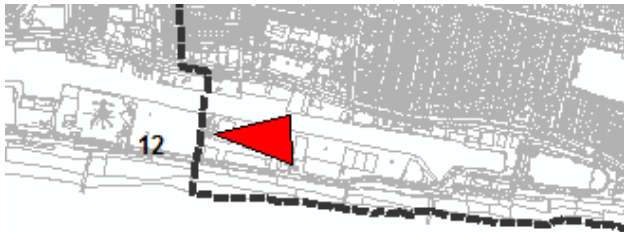
Photos of view 10 Brighton Pier to be inserted**10. Brighton Pier**

Above: 180 degree panoramic view north.

**11. Kings Esplanade**

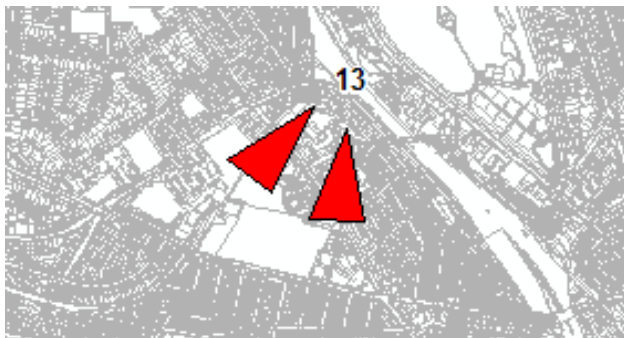
Below: East of Courtney Gate – a seafront view eastwards.





12. Basin Road South

Above: At Brighton & Hove boundary – a coastal view eastwards.



13. Highcroft Villas

Below: At point where road straightens – a wide arc view south east to north east.





14. Ditchling Road

Above: Junction with Bromley Road - a narrow view southwards towards St Peter's Church.

15. Southover Street

Below: junction with Ewart Street - a narrow view north-westwards towards the Viaduct.

16. Ashton Rise

Bottom of the page: Junction with John Street – looking north-west towards St Peter's Church



12.2. Strategic approach points

The following strategic approach points have been identified where there will be a series of unfolding views:

- A. Dyke Road approach;
- B. London Road approach;
- C. Lewes Road approach;
- D. Approach to sea from Brighton Station; and
- E. Approach to sea from Hove Station.

In the case of the vehicular approaches (a, (b and (c, the nature of this visual experience usually involves a broad shifting view along a major route, part suburban and part urban, likely with numerous focal points and a variable edge condition along the way.

In the case of rail route approaches d) and e), the view is typically of a contained urban view type which involves the viewer with a round view of cohesive urban experience. Focal points serve to strengthen the overall visual experience. Views towards the sea as these emerge should be protected or enhanced. Station sites also offer the opportunity to improve first impressions of space upon arrival.

12.3. Landmarks

Identified strategic landmarks are:

1. Brighton Royal Pavilion;
2. St Peter's Church, York Place, Brighton;
3. St Bartholomew's Church, Ann Street, Brighton;
4. Brighton Station;
5. The Clock Tower, Queens Road, Brighton;
6. Brighton / Palace Pier;
7. London Road Railway Viaduct, Preston Road/Beaconsfield Road, Brighton;
8. Roedean School, Marine Drive, Brighton;
9. St Joseph's Church, Elm Grove, Brighton;
10. Brighton General Hospital, Elm Grove;
11. Sussex Heights, St Margaret's Place, Brighton;
12. Embassy Court, Kings Road, Brighton;
13. St John the Baptist Church, Church Road, Hove;
14. St Peter's Roman Catholic Church, Tamworth Road, Hove;
15. The Engineerium, Woodland Drive, Hove;
16. West Blatchington Windmill, Holmes Avenue, Hove;
17. Patcham Windmill, Mill Road, Brighton;
18. Rottingdean Windmill, Nevill Road, Rottingdean;
19. Lewes Crescent/Sussex Square, Brighton;
20. Adelaide Crescent / Palmeira Square, Hove; and
21. Brunswick Square, Hove.

13. Tall Buildings Statement guidelines

The council will require applicants to provide the following information as part of a Tall Buildings Statement

The [Tall Building Study](#) provides supporting information that applicants may also find helpful about the guidelines below.

13.1. Context

Visual Impact

Tall buildings should be sited in areas of the city that have minimal visual impact on sensitive historic environments. Retaining and enhancing key strategic views through the careful siting of tall buildings is a key objective. They should protect and complement, not compromise, strategic views and important vistas in the city.

Applicants will need to provide:

360 degree evaluations of the potential visual impact of the proposal on the city's urban, marine and downland context must be provided. These may be illustrated through computer visualisations and photomontage techniques that consider, but are not limited to, the following:

- The built and natural environment;
- Key strategic views and approaches; and
- Heritage assets and settings.

A detailed urban design analysis of surrounding areas that details the positive and negative contributions that the proposed tall building makes to the visual quality of the area must be provided; the taller the building the more extensive the area of analysis.

Illustrations must be of a high quality, and capable of being easily understood and suitable for public consultation; they should illustrate any perceived negative as well as positive visual impact.

Key strategic views and approaches are set out in more detail in Section 12.

Siting of buildings

Groups of tall buildings should be staggered or stepped to respond to natural slope contours and not mask natural valley formations, or block strategic or important local views within and across the city.

Applicants will need to:

Demonstrate, by means of a townscape/landscape impact assessment, how the proposal sits within the existing townscape and landform.

Describe the extent to which the proposal contributes to the creation of an attractive cluster of tall buildings or creates an individual landmark.

The construction of a scale model will often be helpful in assessing this impact. The proposal should also have regard to its likely impact on the future of adjoining buildings and possible future new developments in the near vicinity, and on local topography.

Climatic Impact

Tall buildings over a certain height can adversely affect the environmental quality of surrounding areas through the diversion of high speed winds to ground level and through the overshadowing of adjacent residential buildings including public/private garden spaces. The impact of both of these elements can be mitigated through good design and sensitive siting. The impact of sunlight and shadows at different times of the day and throughout the year will need to be assessed.

Applicants will need to:

Describe how the design has considered the local climate.

Explain how the proposals address the climatic effects of the proposal on its surroundings. Issues to be considered will include:

- Extended overshadowing;
- The diversion of high speed winds to ground level; and
- Glare reduction.

The use of architectural devices such as screens, terraces and awnings and also facade setbacks can be adopted to minimise the effects of high speed wind at the bases of tall buildings. Individual proposals should seek to create well orientated and lively spaces that contribute positively to the wider public realm.

Infrastructure

Development proposals must contribute to the provision of new facilities where there is a proven deficiency. The sequence/time scale of delivery of infrastructure in relation to new higher density developments must be made clear.

Applicants will need to:

Assess the current capacity of local public infrastructure and facilities to support the increase in local population that the development will bring to the city (i.e. road network, waste water/sewage disposal systems, public transport services, open spaces, playgrounds, schools, and child and health care facilities).

Identify additional infrastructure and facilities required as a result of the proposed development, and how these will be achieved and delivered.

Streetscape

Tall buildings increase pressure on ground floors with more plant equipment, servicing and parking. Hence, there is a need to create meaningful spaces at ground level.

Applicants will need to:

Describe how the proposal contributes to the streetscape in particular in relation to:

- Active frontages and natural surveillance;
- Legible entrances;
- An understanding of the relationship of the proposal to the existing streetscape; and
- A definition of the public realm.

Describe how the proposal responds positively to any characteristic alignment and setbacks of surrounding buildings.

Describe its effect on surrounding context and local views, in particular at podium level.

New tall buildings should make reference to their surroundings through footprint, setback and street and building alignment. Aligning tall buildings to terminate visual axis or frame scenes can create a strong reference point, which enriches urban legibility and aids navigation.

They should reflect their surroundings through the definition of their upper storey setback and by reinforcing the articulation of the streetscape. Any car parking should not be located in front of buildings, but contained within the development or located behind buildings.

Conservation

In general new tall buildings in Brighton and Hove should not be within conservation areas, nor should they visually impinge on the setting of/or important views of listed buildings or conservation areas. This particularly applies to the backdrops of groups of historic buildings or the visual envelope surrounding single buildings such as churches

Applicants will need to:

Demonstrate, through a heritage impact assessment, that the surrounding area's character or appearance or the setting of any listed building or historic park or garden will be preserved or enhanced.

In areas adjoining conservation areas where new tall buildings may be appropriate, tall buildings should, in general, relate well to the unique urban grain, visual axes, general context, sense of place, and topography of surrounding conservation areas, and this should be tested through detailed character and impact assessment. Conservation Area Character Statements should be referenced.

Mix of uses

Applicants will need to:

Describe the land use mix.

Describe how the proposed mix of land uses supports and complements the surrounding land use pattern and local community needs, and assists in delivering relevant housing and/or employment opportunities.

Amenity of neighbours

Applicants will need to:

Describe and analyse the impact of the proposals on neighbouring properties in particular aspect/outlook, privacy, daylight, sunlight, noise and light glare.

13.2. Spaces between buildings

Active travel

In the interests of achieving an efficient urban form, intensification of development should occur in areas that are within walking distance of either rail stations or major bus routes.

Applicants will need to:

Describe existing transport services such as rail stations, bus routes, or sustainable transport corridors within walking distance.

Assess the suitability of local transport infrastructure and services to accommodate the needs derived from new developments and identify means by which transport deficiencies will be overcome.

Provide a transport assessment/statement and travel plan (for non-residential development) demonstrating how the development will contribute to improvements to surrounding streets or the travel network within 500m.

Describe the measures incorporated in the proposal which will help to reduce private vehicle use, improve permeability and access to public transport.

The council has identified a number of sustainable transport corridors. These corridors are main routes into the city that will be altered to increase access for public transport users and by cyclists and pedestrians.

The aim is to reduce reliance on the car in the city by reducing the required levels of parking associated with new development in central areas, encouraging shared use of vehicles (e.g. through car clubs) public transport use and greater trips on foot or by cycle.

Public realm and open space

The City Plan outlines requirements for the provision of open space within new developments.

Applicants will need to:

Describe how the proposal has been designed to create high quality public spaces within the site and nearby, in particular with regard to:

- High design quality;
- Climatic comfort and water management;
- Need for light, sun and shade;
- Landscaping, biodiversity and ecology;
- Adjacent uses;
- Quality and durability of materials; and
- Arrangements for long term maintenance and management.

Explain how the proposal meets or exceeds the City Plan requirement for the provision of public and private open space.

Demonstrate how the proposal delivers biodiversity gains and Nature Improvement Areas.

Describe how the proposed development maximises provision of outdoor and indoor communal and private amenity space.

Demonstrate that their proposal will provide equal access for all.

To a certain extent these might be accommodated through roof terraces, balconies and internal courtyards, providing occupants with high quality green space. Some of the open space requirements could be accommodated through the development of private external spaces. However these elements may not be sufficient to ensure that all residents and other users have access to adequate open space.

As a result, tall building developments may be required to contribute a proportionate financial sum to the enhancement of the existing public realm and parks in the vicinity. Location of tall buildings near open parkland must nevertheless not harm the peaceful enjoyment of the park/public open space by others, or reduce its sense of space.

13.3. Buildings

Sustainability

Applicants will need to:

Describe how the proposal contributes to social inclusion, environmental health and to the economic vitality of Brighton and Hove.

Provide a sustainability statement outlining how the proposal will apply best sustainable practices. Particular consideration should be given to:

- Maximising the efficient use of brownfield land (including an explanation of the density of dwellings that is to be achieved for residential development)
- resource management;
- energy and thermal performance;
- green infrastructure and biodiversity gains;
- materials specification;
- waste management; and
- a recognised method must be used to assess a proposal's sustainability (e.g. BREEAM).

Scale and massing

The perception of the scale of new tall buildings is an important key in integrating the new development into an established urban pattern and grain. New tall buildings should respond positively to surrounding building heights and depths and street frontages and provide an appropriate scale compatible with their surroundings.

Applicants will need to:

Describe the strategy employed to integrate the building with the scale of its context.

Indicate how the proposed design ensures a feeling of human scale at street level.

Describe the massing strategy of the proposal.

Describe how the massing of the proposal is integrated into surrounding development.

Illustrate how the massing of the proposal creates an appropriate overall form.

New tall buildings should have regard to the existing built form massing and maintain the area's sense of place. In general, bulky, dominant massing of new tall buildings should be avoided.

Form

Applicants will need to:

Provide a statement that describes in detail the rationale for the form of the proposal.

In the case of 'landmark' buildings the statement should take into account the following key points:

- Inspiration
- Silhouette
- Articulation
- Cultural and climatic reference
- Describe and illustrate how the form of the roof top enhances the skyline of the city.

Accessibility and public access

Tall buildings must be fully compliant with all aspects of disability discrimination legislation.

Applicants will need to:

Describe how their proposal will provide equal access for all.

Explain how proposed tall buildings which comprise mixed or commercial uses will encourage public access to foster a more positive perception of the building and contribute to a stronger sense of community.

Attention should be paid to means of evacuating disabled people from the building in emergencies, and providing alternative means of access if a lift fails.

New tall buildings should strive to be as accessible as possible to all people through the provision of ramps, lifts, gentle rising steps with landings, clear signage and branding, sensitive and appropriate lighting schemes, non-slip surfaces, contrasting colour and texture schemes, automatic opening doors, appropriately placed seating, and clear and legible internal layouts.

Materials and maintenance

Building and maintaining a tall building is expensive.

Applicants will need to:

Describe how enough investment has been factored into early feasibility studies and

viability appraisals that will support ongoing maintenance of the building
Describe high specification of materials and details for tall buildings.

The Council will seek to ensure that enough investment has been factored into early feasibility studies and viability appraisals that will support ongoing maintenance of the building.

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

Urban Design Framework

Supplementary Planning Document

Early stakeholder consultation report

January 2019

Contents

1. About this report	1
2. Summary of findings	2
3. Engagement with hard to reach groups	4
4. Issues & Options consultation	6
5. Draft City Plan Part Two draft design policies	9

Appendices

Engagement with hard to reach groups

- A. Summary of site assessments by site type
- B. Transcript of Speakout comments on site assessment tool

Issues & Options consultation

- C. UDF SPD Issues & Options paper
- D. Transcripts of workshop responses
- E. Transcript of Consultation Portal responses
- F. Transcripts of email responses

1. About this report

- 1.1. This report summarises the findings of the early stakeholder consultation on the Urban Design Framework Supplementary Planning Document (UDF SPD) conducted by Brighton & Hove City Council's Planning team.
- 1.2. The early stakeholder consultation is the first step in the preparation of this planning guidance referred to in City Plan Part One Policy CP12 Urban Design.
- 1.3. The purpose of the consultation was to understand the type and extent of supplementary guidance that was required to support the delivery of Policy CP12 Urban Design and other relevant policies in City Plan Part One and to guide the consideration of any planning application in the city.
- 1.4. The findings of this consultation will inform the preparation of the Draft SPD that will be subject to city-wide consultation scheduled to take place in Summer 2019.

2. Summary of findings

- 2.1. The consultation included:
- an early round of engagement in 2017 that invited **hard to reach groups** to assess the quality of public spaces in the city; and
 - a ten-week consultation from 5 July to 13 September 2018 that invited individuals and organisations to provide feedback on **Issues & Options** set out in a discussion paper and
 - a ten-week consultation from 5 July to 13 September 2018 that invited individuals and organisations to provide feedback on **Draft City Plan Part Two design policies**¹.
- 2.2. Overall, the council received 154 responses.
- 2.3. Below a summary of all responses received is provided.
- 2.4. A more detailed breakdown of responses received via each consultation is provided in Section 3 'Responses received' of this report.

All responses

'Don't want [it to be] too prescriptive but [to provide] clear criteria.'

'... in favour of ... learning from previous design and development in the city'

'... high density ... can be and [is] achieved by low-rise buildings.'

'Declutter pavements, in particular around bus stops.'

- 2.5. Overall there was support for guidance that:

Comments	Number of responses
Provides enough detail without being too prescriptive	38
Ties in with other planning policy , strategies, studies and guidance	31
Promotes engagement with local professionals and communities	19
Creates places that are accessible to all	18
Draw attending to good practice examples in the city and elsewhere	18

¹ These included DM18 High quality design and places, DM19 Maximising Development Potential, DM20 Protection of Amenity and DM21 Extensions and Alterations.

2.6. Overall, respondents suggested that guidance should in regard to:

Priority Areas for Enhancement and Design Guidance

Comments	Number of responses
Identify opportunities to optimise density , set density thresholds and identify land uses and facilities to meet the need of different areas/neighbourhoods	24
Identify character areas based on Urban Characterisation Study and/or City Plan (e.g. Seafront, Urban Fringe, Development Areas)	16
Identify areas/sites in need of proactive masterplanning	7
Prioritise and provide more detailed information for Development Areas and Strategic Allocations in the City Plan	6

Accommodating taller development

Comments	Number of responses
Provide clarity about criteria regarding impact assessment (for example context, heritage, design) as well as definitions, locations and facilities needed	58
Set out densities , height thresholds and/or preferred locations	7
Use 3D modelling to aid assessment and ensure accuracy	6

- In regard to impact assessment, some respondents suggested these could be cross-referenced with criteria set out in regard to Building Design, Public Realm Design and Views and Vistas.

Building design

Comments	Number of responses
Set out standards/assessment criteria including for internal spaces, architectural detailing, sustainability (water, energy, waste, materials), amenity, balcony treatment, acoustics and light pollution	24
Assess impact and promote design that supports public health objectives (improving air quality and health facilities)	15
Support contemporary, innovative design that takes account of context but adds to the area, including 'out of character' options	8
Include checklist	5

Public realm design

Comments	Number of responses
Design in and integrate walking/cycling, public transport movement/connectivity with transport services (road safety, level surfaces, wide/unobstructed pavements, disability-friendly shared space and Public Rights of Way)	36
Design in green infrastructure by incorporating nature-based and water and waste management solutions (water fountains, community gardening, tree replacement) and deliver added benefits (biodiversity, public art, play)	34
Ensure streetscape improvements and delivery of well-designed public spaces that are well integrated into the city's fabric	21
Design out crime and anti-social behaviour creating safe and secure spaces by using, for example, visually-impaired and heritage-appropriate lighting and deterring graffiti	10
Ensure design solutions aim to minimise maintenance requirements and costs and take account of continued, long-term upkeep	9

Views and vistas

Comments	Number of responses
Revisit and/or identify strategic and local views to be protected and consider impact criteria including in regard to tall buildings	32

Other issues

- Focus on **implementation** in particular on ensuring guidance is adopted by council teams including Sustainable Transport and Cityclean (public realm design); and
 - Some responses expressed concern over the **balance between Heritage and Design** considerations and considered there was the need to give greater weight to the first over the second.
- 2.7. Some respondents flagged up a range of useful good practice examples that could be used in the guidance as well as potential areas where further, more detailed guidance may be needed.
- 2.8. Two respondents suggested the preparation of a Local Cycling and Walking Infrastructure Plan and guidance on Food for the city should be prioritised.

3. Responses received

3.1. The council received:

- 6 responses from organisations representing **hard to reach groups** in the city (5 reports on the findings of site assessments and 1 email response making recommendations to improve assessment tool);

- 81 responses to the consultation on the **UDF SPD Issues & Options** paper (21 via the council's consultation portal; 52 via dedicated workshops and 8 via email); and
- 67 representations made by individuals and organisations who responded to the consultation on **Draft City Plan Part Two design policies** DM18 High quality design and places (26); DM19 Maximising Development Potential (18); DM20 Protection of Amenity (14); DM21 Extensions and Alterations (9).

1.1. Stakeholder groups who responded to the early engagement were:

- Brighton & Hove LGBT Switchboard;
- Brighton & Hove Speakout;
- Friends, Families and Travellers;
- Hangleton & Knoll Project;
- Possability People; and
- Trust for Developing Communities.

1.2. Responses from 37 individuals and the stakeholder groups listed below were received as part of the consultation on the UDF SPD Issues & Options paper and City Plan Part Two design policies raising potential implications to the UDF SPD:

- ArchAngles Architects;
- Bricycles and Cycling UK;
- Brighton & Hove Community Land Trust;
- Brighton & Hove Food Partnership;
- Brighton & Hove Local Access Forum;
- Brighton & Hove Planning Agents Forum;
- Brighton & Hove Strategic Housing Partnership;
- Brighton Marina Group;
- Brunswick Town Association;
- Churchill Square;
- Green Group of Councillors;
- Highways England;
- Hove Civic Society;
- Kingscliffe Society;
- Kingsway and West Hove Residents' Association;
- Montpelier and Clifton Hill Association;
- Moulsecomb Community Forum;
- North Laine Community Association;
- NTR Planning;
- Nub Brighton;
- R H Partnership Architects;
- Saltdean Residents' Association;
- Save Hove;
- Sussex County Football Association
- Sussex Wildlife Trust;
- The Brighton Society;
- The Regency Society;
- The Round Hill Society;
- Trust for Developing Communities;
- University of Brighton;
- University of Kent;
- University of Sussex;
- Warwick Mount Residents' Association; and
- West Hill Community Association.

4. Engagement with hard to reach groups

‘Obstacle-free paths through pavements without A-boards, bollards and street furniture such as tables and chairs ...’

‘... resting areas along steep road ...’

Methodology

- 4.1. As part of the early steps to prepare the UDF SPD the council sought to engage with certain groups to understand how existing spaces in the city work (or not) for different communities. In particular disability and minority groups whose views may be under-represented in planning consultations.
- 4.2. This work was undertaken between July 2017 and January 2018. It was commissioned by the council's Community Engagement Team and targeted representatives that form part of the Commissioned Community Engagement Partners group.
- 4.3. It involved briefing representatives about the role of the UDF SPD in the planning system and the placemaking approach to urban design. Training was provided on an assessment tool that could be used to help participants to identify design priorities and aspirations to be incorporated into the guidance.
- 4.4. They were also asked to ‘test drive’ and suggest improvements to the tool.
- 4.5. A report template to help organisations summarise findings and officer support was made available to support participating organisations if needed.

Responses

- 4.6. The following organisations reported the findings of site assessments carried out by members:

Organisation	Space(s) assessed	Site type
Brighton & Hove LGBT Switchboard	St James' Street	Shopping area and bus corridor
Friends, Families and Travellers	Churchill Square	Shopping area and bus interchange
	Carden Park	Suburban park
Hangleton & Knoll Project	Knoll Park	Suburban park
Possability People	Queen's Park (Egremont Place entrance)	City Centre park
	Brighton Seafront Promenade (outside i360)	Seafront promenade
	George Street (Blatchington Road entrance)	Shopping area
	Moulsecoomb Train station (Westbound platform)	Train station
	Valley Gardens (redevelopment plan)	Major transport corridor
Trust for Developing Communities	Victoria Recreation Ground, Portslade	Suburban park

- 4.7. In addition to the site assessments, Brighton & Hove Speakout along with the Hangleton & Knoll Project and Trust for Developing Communities suggested improvements to make the assessment more user-friendly in future. These included:
- reducing the number of questions, simplifying wording and/or rephrasing the questions to make these more easily understood by respondents, in particular young people; and
 - using graphics to help to make it more user-friendly to people with learning disability.
- 4.8. A brief summary of the issues or challenges regarding the public spaces as reported by each organisation that did site assessments, made recommendations for improvements and suggested partners for implementation is provided below.
- 4.9. This engagement was delivered via the council's Communities Engagement Team with the support of the Planning Policy, Projects & Heritage Team.
- 4.10. As part of the early engagement, the council received 6 reports from local organisations representing disability and/or minority groups setting out their views and findings of site assessments carried out by their members in sites across the city.
- 4.11. The reports provided an overview of the design features assessors liked the most and suggestions on how to improve those they liked the least.
- 4.12. The site assessments provide an insight into design priorities and principles that could be addressed via the UDF SPD, in particular in regard to public realm design. These included:

Comments	Number of responses
Remove obstacles to enable greater ease of movement for wheelchair/mobility users	23
Spaces for activities for different age groups and families	11
Clearer directional signage	10
More, comfortable, visible, accessible seating and rest areas	8
Better maintenance	7
More disabled parking facilities	6

- 4.13. A summary of findings by site type is provided in Appendix A. A transcript of suggestions to improve assessment tool by Speak Out is provided in Appendix B.
- 4.14. Transcripts of reports received from organisations that carried out site assessment with their members can be made available upon request to planningprojects@brighton-hove.gov.uk.

5. Issues & Options consultation

‘[The guidance is] a positive good step forward for further dialogue.’

‘... we hope that the Council will take the question of obstructions [and visually impaired friendly lighting] in the public realm seriously ...’

Methodology

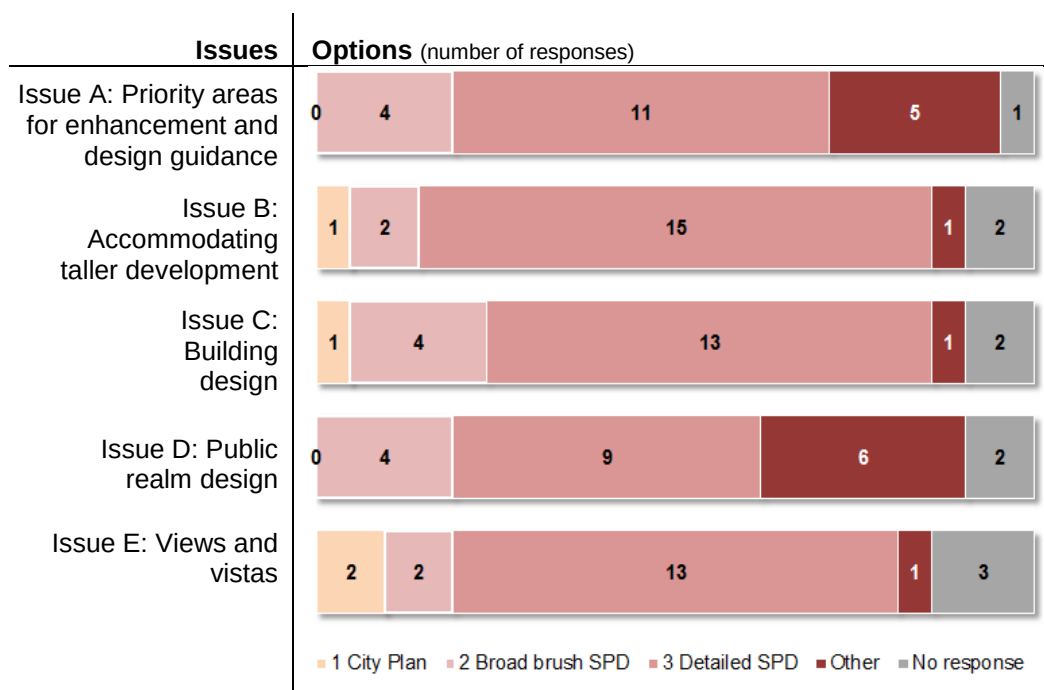
- 5.1. This consultation was guided by the council’s adopted Statement of Community Involvement and an Issues & Options paper prepared by the council highlighting policy issues and outlining options regarding the level of guidance that might be needed for each issue (see Appendix C).
- 5.2. Invitations to participate in the consultation were sent to via email to statutory consultees and around 400 individuals and organisations that signed up to be informed of planning policy consultations.
- 5.3. This consultation ran concurrently with the consultation on the Draft City Plan Part Two. In order to avoid consultation fatigue, the council took opportunities to consult jointly whenever possible.
- 5.4. Stakeholders were made aware of the consultation and/or invited to comment on the document via:
 - the council’s online Consultation Portal;
 - dedicated workshops²;
 - local partnership and board meetings³; and
 - Draft City Plan Part Two consultation workshops and events (see Section 6 of this report).
- 5.5. Some responses were also received via email and these were processed as part of the consultation.

Responses

- 5.6. As part of the Issues & Options consultation, the council received 81 responses of which 21 were via the council’s consultation portal; 52 via dedicated workshops and 8 email responses via email.
- 5.7. As the graph below indicates, responses received via the council’s consultation portal favoured a Detailed SPD approach for all 5 issues identified in the paper.

² Two workshops (one officer and one stakeholder) took place at Hove Town Hall on Monday 23 July 2018.

³ Presentations to gather feedback and raise awareness of the consultation were delivered to meetings of the Brighton & Hove Economic Partnership (4 September 2018), Brighton & Hove Planning Agents Forum (6 September 2018); and Brighton & Hove Strategic Housing Partnership (24 July 2018).



- 5.8. As part of the table discussions that took place during the dedicated workshops, participants favoured a combination of a Broad brush and Detailed SPD approach to address most issues set out in the paper.
- 5.9. The only exception was in regard to Issue B - Accommodating Tall Buildings where a Detailed SPD approach was preferred.
- 5.10. One respondent found the content of the Issues & Options paper not fit for purpose and suggested that it is reviewed, broadened and linked back to the list of criteria set out in City Plan Part One Policy CP12 Urban Design instead.
- 5.11. Full transcripts of responses received via dedicated workshops, the council's Consultation Portal and email are provided in Appendices D, E and F respectively.

6. Draft City Plan Part Two draft design policies

'... concerned about planning applications that seriously affect the form of the local environment and without due consideration for the historic character of the area.'

'The aim should be to create a sense of harmony and visual continuity between new and old.'

'...densities quoted [in policy] are generally too low.'

'...we need to think about how we can accommodate play equipment etc within new, higher density developments.'

Methodology

- 6.1. A statement setting out the methodology of the consultation on the Draft City Plan Part Two has been produced by the council and is available to be viewed and/or downloaded from the [council's website](#).

- 6.2. This section of the report focuses on representations made by individuals and organisations on the Plan's policies that could benefit from advice being included in the UDF SPD. These include Policies DM18 High quality design and places, DM19 Maximising Development Potential and DM20 Protection of Amenity.
- 6.3. It takes account of comments/suggestions made that could be more appropriately addressed via guidance rather than via policy.
- 6.4. The aim is to incorporate into the UDF SPD (adoption expected in late 2019) advice that can aid the implementation of these policies in advance of the Plan's adoption (expected to be adopted early 2021).

Responses

- 6.5. The issues and concerns raised by respondents that could be addressed from advice incorporated into the UDF SPD included:
 - city can accommodate densities that are higher than minimum in City Plan Part One Policy CP14 and opportunities to do so should be considered including in mixed use development;
 - need to design in green infrastructure and flexible, multi-function public spaces that are well integrated into the city's fabric and sustainable transport network;
 - how to optimise the use of roof spaces and allow space for cooking, fresh food storage, edible planting and communal gardens via building design; and
 - clarifying definitions and assessment criteria such as, for instance, amenity levels in relation to location and/or context.
- 6.6. For full transcripts of responses on Policies DM18 High quality design and places, DM19 Maximising Development Potential and DM20 Protection of Amenity and DM21 Extensions & Alterations available to be viewed and/or downloaded from the [council's website](#).

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Urban Design Framework

Supplementary Planning Document

Early stakeholder consultation report

Appendices

January 2019

Contents

Engagement with hard to reach groups

- | | |
|---|----|
| A. Summary of site assessments by site type | 2 |
| B. Transcript of Speak Out comments on site assessment tool | 10 |

Issues & Options consultation

- | | |
|---|----|
| C. UDF SPD Issues & Options paper | 11 |
| D. Transcripts of workshop responses | 36 |
| E. Transcripts of Consultation Portal responses | 43 |
| F. Transcripts of email responses | 50 |

A. Summary of site assessments by site type

(in alphabetical order)

CHURCHILL SQUARE, BRIGHTON

Site type: city centre square and bus interchange

Assessment delivered by: **Friends, Families and Travellers**

Date/Time of assessment: **Run up to Christmas 2017**



All 10 members of the Traveller community who participated in this site assessment were familiar with the area. Most visit the area regularly, using mainly to shop and/or meet friends/socialise.

Busy area, great for shopping

- Shops are lower than street and visibility of retail frontage is difficult;
- So busy at times, local people avoid it (Christmas);
- Not much for children and elders; and
- Crossings are far apart and no central reservation to help people cross road between buses.

Liked:

- Easily accessible (all buses go through it or stop nearby);
- Variety of shops and places to eat;
- Street performers & buskers; and
- Cover from the rain.

Improvements:

- More/Comfortable/Accessible seating for disabled people and children (not linked to food outlets);
- Clearer signage;
- Make it easier for wheelchair/mobility users to move in the area;
- More colour (flowers, decorations);
- Make it more people and child friendly;
- More places to chill out;
- More/Better/Safer crossings along Western Road;
- Space for community/ performance activities;
- Rubbish collection (planted areas);
- More parking and more shops; and
- Make it less commercial.

Suggested partners for implementation

- Not identified.

CARDEN PARK, BRIGHTON

Site type: suburban park

Assessment delivered by: **Friends, Families and Travellers**

Date/Time of assessment: **Not specified**



The majority of the 9 young Irish Travellers who participated in this site assessment were familiar with the play facility located next to the Old Boat Corner Community Centre. Most having used it to play in, meet friends or wait around for dance classes to start in the centre. Four participants had never been to this place and/or knew it was there.

Fun open area

- Lots of children in the summer time;
- Good for playing with friends and family;
- Large open space; and
- Playing with my friends and family.

Liked:

- Community centre activities, in particular dance classes;
- Rope climbing frame.
- Play area for kids;
- Café, seating area / benches;
- Feels safe when with parents;
- Space to kick the football around.

Improvements:

- More/Better seating;
- Grass a bit long.
- More/Better equipment (swings, climbing wall, seesaws, slides);
- Bigger sandpit.
- Football/ basketball court / area for teenagers;
- Better signs
- More lighting More parking;
- More direct buses;
- Pedestrian crossings on busy road.

Suggested partners for implementation

- Not identified.

GEORGE STREET, HOVE (Blatchington Road entrance)

Site type: shopping area (pedestrian only during daytime except on Sundays)

Assessment delivered by: **Possability People, Get Involved Group (GIG)**

Date/Time of assessment: **October-December 2017**



A total of 10 city residents ranging from ages 21 to 72 with a lived experience of disability, long-term health condition or impairment participated in the site assessment across all 4 sites assessed.

Great pedestrianised area

- Busy during the day
- Can feel dangerous at night; and
- Gated drains are a hazard for people using walking sticks.

Liked:

- Great transport links;
- Plenty of seating along the road;
- Lots of space to walk through when pedestrianised;
- Good range of shops;
- Sense of community;
- Friendly space, quieter than its surroundings ; and
- Most of the shops that we looked at had level or ramped access with wide open doors, which is very accessible for most people.

Improvements:

- Provide more flat, level pavement throughout but specially on Blatchington Road approaching George Street;
- More seating and make existing seating more visible from entrance;
- Remove obstacles to movement around dropped curbs (large bins and vegetable stands) in particular at times when street is open to cars;
- Change drain covers so not a hazard for walking sticks;
- Better lighting specially at night;
- Obstacle-free paths through pavements without A-boards, bollards and street furniture such as tables and chairs, in particular when street is open to traffic;
- More on-street car parking, including blue badge spaces;
- Accessible toilets; and
- Make George Street traffic-free until 7pm (instead of 4pm);
- More events but leave space for people to move easily between stalls.

Suggested partners for implementation

- Possability People and other charities having a presence, giving information to passers-by;
- City College or community group 'Men in Sheds' to make benches; and
- Volunteers to plant and look after flowers.

QUEEN'S PARK, BRIGHTON (Egremont Place entrance)

Site type: city centre park

Assessment delivered by: **Possability People, Get Involved Group (GIG)**

Date/Time of assessment: **October-December 2017, 2pm on a Wednesday**



A total of 6 city residents ranging from ages 21 to 72 with a lived experience of disability, long-term health condition or impairment participated in the site assessment across all 4 sites assessed.

Beautiful, peaceful place

Liked:

- Direct bus route with good access to park from bus stop near entrance;
- Fresh air in crowded city;
- Plenty of birds;
- Duck pond and tennis courts; and
- Well-kept tactile dropped kerbs in the area around gate.

Improvements:

- Signage from main road;
- Park information board with map to mark entrance to park and signpost events, cafe and toilet location;
- Better parking facilities;
- Widen pavement and remove residential bins on upper bus stop;
- Even out pavement around large tree (roots breaking pavement);
- Care and upkeep (toilets);
- Make it safer at night time;
- Replace white building (appears no to be in use) with seating/rest area for people walking up the hill;
- Access point for work vehicles constitutes a trip hazard and needs to be made more accessible;
- Railing along path is good but stops half way down;
- Gates that are lighter and wide enough to accommodate large wheelchair or mobility scooter;
- Path into the heart of the park is very steep and fallen leaves can make it slippery; and
- Indoor sitting area in café

Suggested partners for implementation

- Friends of Queens Park group;
- Hanover & Elm Grove residents;
- Local MP;
- Local businesses;
- Chamber of Commerce;
- Sussex Police; and
- Organisations concerned about drug use.

KNOLL PARK, HOVE (area outside café)

Site type: suburban park

Assessment delivered by: **Hangleton & Knoll Project, Multi-Cultural Women's Group**

Date/Time of assessment: **5 October 2017, 10.30am**



A total of 14 females, including some from ethnic minorities, ranging from ages 29 to 70 participated in this site assessment. Roughly half of the respondents were not familiar with the park and/or indicated their day-to-day activities are limited because of a health problem or disability. Approximately one third of respondents resided on the edge of or near the park.

Traquil, valuable place with amazing potential

Liked:

- Cleanliness;
- Potential for a community café;
- Lots of green, open space;
- Calm and quiet despite being close to residential spaces;
- Big open space surrounded by trees;
- General atmosphere;
- Grass is well maintained and no litter;
- Community managed building;
- Children's play space; and
- Café.

Improvements:

- Signage from main road and bus stop so people can see where the park/playground is located;
- Visibility of entrance (looks like private garage access to nursery);
- More/Comfortable seating;
- Equipment and maintenance raised to match standards of other parks in the city like Hove Park and Queen's Park;
- More lighting;
- More planting /flowers;
- Make it safer at night time, discouraging anti-social behaviour and drug use;
- Fix/Replace notice board and use it to advertise community activities;
- Water fountain;
- More activities;
- Introduce play equipment for young people (basketball hoops, skate park);
- Café should open more than once a week;
- Community building could be used more;
- Fix broken notice board;
- Introduce activities to attract young people, seniors and children and/or involving gardening, food growing;
- New bins;
- Provide dog bins;
- Accessible public toilets;
- Repair broken mosaic;
- Recycling bins; and
- Some people discouraged to use park because of dogs moving around freely.

Suggested partners for implementation

- Local schools;
- Local community groups; and
- Council.

MOULSECOOMB RAILWAY STATION, BRIGHTON (Westbound platform)

Site type: Public transport facility

Assessment delivered by: **Possability People, Get Involved Group (GIG)**

Date/Time of assessment: **October-December 2017**



A total of 5 city residents ranging from ages 21 to 72 with a lived experience of disability, long-term health condition or impairment participated in the site assessment across all 4 sites assessed.

Good access, if you can get to it

- Train station inaccessible to disabled people (disappointing as large college next door with a lot of users);
- Very run-down and in need of refurbishment; and
- Lots of slippery wet leaves on the way to the platform.

Liked:

- Sheltered waiting area on platforms;
- Good, well-lit information and signage.
- Help point at entrance to platforms; and

Improvements:

- Signage from Lewes Road and to indicate Eastbound platform is accessible (up sloped road via the bridge, away from steps);
- More parking close to station;
- Introduce pavement and resting areas along steep road linking Lewes Road bus stops and station;
- Create disabled parking area with a drop off point at the bottom of allotments allowing access into the train station on the Eastbound platform;
- Introduce wheelchair access to platform (possibly with lift);
- Paint edges of stairs up to Westbound platform;
- Improve/Update lighting up steps; and
- Put in place better arrangements in a unstaffed station in which people have to rely on the train guard for support when getting on and off the train.

Suggested partners for implementation

- Possability People to suggest ways to make it more accessible; and
- Local artists providing art work to enhance the feel of community.

SEAFRONT PROMENADE, BRIGHTON (outside i360)

Site type: Seafront public realm

Assessment delivered by: **Possability People, Get Involved Group (GIG)**

Date/Time of assessment: **October-December 2017**



A total of 6 city residents ranging from ages 21 to 72 with a lived experience of disability, long-term health condition or impairment participated in the site assessment across all 4 sites assessed.

Good transport links, if you have a car

- Upper promenade can be very busy, especially with the entrance to the i360 being so close, which can be noisy/disorientating on busy road.

Liked:

- Location by the sea, fresh air;
- Underground and off street parking nearby (Regency Square);
- Many pedestrian crossing points on to the promenade which are of high quality with cones for people with visual impairments and clear pictures and sounds;
- Wide, flat walkway along upper promenade with good quality paving;
- Platform lift between upper and lower promenade;
- Lower promenade is far more accessible than before the recent development; and
- Well-designed accessible toilet in lower promenade.

Improvements:

- Better bus links (most bus stops up the hill on Western Road);
- Provide dedicated cycleway to reduce risk of bikes crossing paths with pedestrians in particular visually impaired people and those with limited mobility;
- Places to shelter;
- Introduce signage indicating location of nearest lifts and toilets in upper and lower promenades;
- Provide information about who to alert when platform lift is not working and/or how long repairs will take;
- Toilets were impossible to see and there is a 30p charge to use them;
- Ensure accessible toilet in lower promenade is open throughout the year; and
- Widen distance between bollards in lower promenade to allow ease of movement of wheelchair users.

Suggested partners for implementation

- Collaboration with local artists, food manufacturers and musicians to make the space more vibrant and aid grass roots economy.

ST JAMES' STREET, BRIGHTON (from the bottom leading up to Wentworth Street)

Site type: High street and bus corridor

Assessment delivered by: **Brighton & Hove LGBT Switchboard's LGBTQ Disabilities Project**

Date/Time of assessment: **7 March 2018 from 16.00 to 18.00**



A total of 4 people between the ages of 23 and 57 from the local LGBTQ community who have disabilities sites carried out the assessment.

Cosmopolitan and has LGBTQ visibility.

- Excluding bikes, 47 objects including signs and badly placed bollards, were identified in the way up and down the street;
- Most shops are inaccessible due to steps and/or narrow aisles;
- Bottle-necks at bus stops; and
- Different at night.

Liked:

- Variety of shops;
- Lots of thing to do; and
- People in the cafes are friendly and community-minded.

Improvements:

- Declutter pavements, in particular around bus stops;
- Ramps into shops;
- Lowered kerbs and ramps to facilitate movement across road;
- More colour;
- Less bikes blocking pavements;
- Remove graffiti; and
- Murals on boarded shops.

Suggested partners for implementation

- None identified.

VICTORIA RECREATION GROUND, PORTSLADE

Site type: suburban park

Assessment delivered by: **Trust for Developing Communities**

Date/Time of assessment: **9 and 23 February 2018, 16.00 to 17:00**



All 14 young people who participated in this site assessment were from culturally and ethnically diverse (BME) backgrounds and live nearby. Their age ranged between 10 and 18 years old and there was an even split between male and female. Many have been born in the area.

Part of an attractive neighbourhood

- Busy and best in good weather;
- Nice wide-open space;
- Used by all sorts of people; and
- Easy to get to.

Liked:

- Family activities like picnics;
- Play area for younger family members;
- Somewhere near to play (informal and sports); and
- Peaceful sometimes, good for relaxing with friends.

Improvements:

- Comfortable seating;
- Signage;
- Child safe facilities;
- More in the play area;
- Kiosk selling healthy snack / somewhere to get decent cup of tea;
- More greening and colour (flower beds, hedgerows);
- Care and upkeep (refuse collection and dustbins);
- Family-friendly environments; and
- Safer public space (without hidden corners/ places people could conceal themselves).

Suggested partners for implementation

- Local residents.

B. Transcript of Speak Out comments on site assessment tool

- B.1 [I have sent you] some guidelines for making information more accessible for people with learning disabilities. I hope it gives you some ideas for ways you can put together your forms. If you have any questions please don't hesitate to contact me. ...
- B.2 Thanks for sending me the [site assessment] form. I think that the questions and information need to be separated more so that the form is not so overwhelming. E.g. different pages for personal information, rating the space, identifying opportunities, the place and you. Are you planning on using the same form for everyone or having an accessible easy read version for people with learning disabilities? [Additionally, below] is a copy of an easy read equal opportunities form to give you an idea.

Please tell us a bit about you so we know we are working with all types of people.
You do not have to answer these questions if you do not want to.
Circle or write your answers.

Are you happy for us to store this information confidentially on our database? Yes ☐ No ☐

 How old are you?

Are you:  Male  Female
Please also circle here if your gender has changed:
(You are transgender) 

Which people are you attracted to?
(Your sexual orientation)

 Men  Women
 Both  None

Which ethnic group do you or your family come from?

 White  Asian  Black  Mixed Race (your parents are each from different ethnic groups)

Any other ethnic group? Which one?

Which religion describes you best?

 Christian  Buddhist  Hindu  Jewish  Muslim  Sikh  No religion

Another religion? Which one?

Do you have a disability or a long-term illness? ☒ ☐

If you do then please circle the ones that apply to you:

 Sensory  Physical  Mental Health  Learning Disability  Illness

C. UDF SPD Issues & Options Paper

U r b a n D e s i g n Framework Supplementary Planning Document

Issues & Options paper

June 2018

Consultation on this document takes place between 5 July and 13 September 2018.

To respond to this consultation please visit www.brighton-hove.gov.uk/spd



Contents

1. Introduction
2. Purpose of the Issues & Options paper
3. SPD Issues & Options
 - A. Priority areas for enhancement and design guidance
 - B. Accommodating taller development
 - C. Building design
 - D. Public realm design
 - E. Views and vistas
4. Appendices

1. Introduction

“Good design is not just about the aesthetic improvement of environment, it is as much about improved quality of life, equality of opportunity and economic growth.”

The value of good design, CABE

Good design does not just happen.

It is the result of a creative process that involves good designers and a commitment from key decision makers to achieving it.

High quality design transcends subjective issues of personal taste, style or architectural fashion. It is about creating places that are well built, work well and look good.

The Urban Design Framework Supplementary Planning Document (UDF SPD) will be used by the council to provide additional guidance to planning applicants and landowners on design policies set out in the City Plan Parts One and Two.

Fundamentally, these policies intend for good design to be seen as the norm, rather than the exception in Brighton & Hove. This demands that buildings and the spaces between buildings are designed around principles of good place making and sustainability.

Working on these principles will help deliver more successful places and need not add expense to the project, if considered early in the development process.

By setting out the processes and principles that are expected to be addressed by proposals for buildings and the spaces between them, the UDF SPD will help create sustainable places that deliver a good quality of life and prevent costly poor design.

What is an SPD?

Paragraph 153 of the National Planning Policy Framework states that SPDs ‘should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.’

A SPD cannot make new policy or change existing policies but can help demonstrate how policy requirements, such as targets for new homes and other uses, can be successfully met.

Local communities will be consulted at different stages in the preparation of the UDF SPD to make sure that they have a chance to comment on this guidance. This helps the council identify local priorities and aspirations, as well as engage with local partnerships.

The council will consider the issues and themes raised through the consultation to help to inform the SPD. A diagram summarising the stages in the preparation of this SPD is provided in Appendix 1.

What are the policy guidelines for the UDF SPD?

City Plan Part One Policy CP12 states that the UDF will be a city-wide document that will seek to identify and set out:

- Areas which should be largely be conserved and/or enhanced;
- Priorities for planning design guidance;
- Strategic views; and
- Area- and site-specific design principles.

It will also aim to:

- Provide clarity about areas that can accommodate taller development;

- Support public realm improvements that create pedestrian-cyclist friendly spaces that accommodate the needs of all people and achieve consistent aims and standards;
- Be informed by relevant studies, in particular the Urban Characterisation Study and Historic Character Assessment report; and
- Contribute towards the implementation of Public Spaces Public Lives, Streetscape Design Guidelines and other relevant strategies.

The preparation of the UDF SPD will look at opportunities to support constructive design discussions between applicants, designers, planning officers, councillors and communities and by outlining potentially appropriate solutions and illustrating best practice in the city and elsewhere.

Detailed information about the policy context informing the preparation of this SPD is provided in Appendix 2. A glossary is provided in Appendix 5.

2. Purpose of the Issues & Options paper

“Good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people”.

National Planning Policy Framework, paragraph 56.

The purpose of this ‘Issues and Options’ paper is to promote discussion and build consensus on the type and content of guidance prepared to support the delivery of Policy CP12 Urban Design and other relevant City Plan Policies.

The paper sets out some of the key design challenges and outlines options for how these could be addressed through a:

- **City Plan policies only** approach - City Plan policies provide sufficient guidance and no further guidance is needed;

- **Broad brush SPD** approach - to identify and summarise the parameters, supporting evidence and basic analysis that would be required as part of a planning application. Based primarily on information already available (e.g. via existing studies and approved planning applications); and/or
- **Detailed SPD** approach – the SPD frontloads design and masterplanning issues that could facilitate the submission of a planning application (e.g. identifies broad locations for particular land-uses, higher densities, height ranges, key landscape/access/movement links and infrastructure).

The options are not mutually exclusive. A combination of approaches could be considered as the most suitable way forward. For example, for some issues the guidance in the policy may be sufficient, but other issues may require more detailed supplementary guidance or a masterplanning approach. Consultation may also propose alternative approaches to address an issue.

This consultation paper will guide a series of discussions and workshops to gather stakeholders’ views on the identified issues and options at an early stage in the preparation of the SPD.

The outcome of this consultation will inform the preparation of a Draft UDF SPD. A city-wide consultation exercise for the Draft SPD is expected to take place Summer 2019.

3. SDP Issues & Options

The challenges identified have been grouped into 5 issues. For each issue this paper sets out:

- a brief summary of the current approach and what the City Plan expects from the UDF SPD; and
- the options illustrating the level of detail for the reader to choose from.

Issue A: Priority areas for enhancement and design guidance

Brighton & Hove's population could reach nearly 290,000 by 2021¹, creating challenges for meeting the city's housing and other land use needs. The city therefore needs to make the best use of its existing land resource and one way of doing this is to increase density - the degree to which land is used or occupied.

Higher densities can be a contentious issue for local communities concerned about the legacy of past mistakes in urban regeneration. However, lessons have been learnt about the ways in which good design can help to deliver more high-quality buildings and spaces while creating the critical mass to support better and more diverse local shops and services and improved social, environmental and transport infrastructure.

City Plan policies actively promote high-density, mixed-use development and view high quality design as key to delivering acceptable development in a city with high housing demand, significant spatial constraints and sensitive landscapes.

The council's [Urban Characterisation Study](#) (UCS 2009) provides a comprehensive understanding of the diversity and quality of the city's urban character and the pressures affecting it. This study identified 32 distinct neighbourhoods, in addition to the central conservation areas.

Further work is required to illustrate whether and how those neighbourhoods could satisfactorily accommodate higher densities and to identify pro-active measures that could help to secure major enhancements to their built environment and public realm.

City Plan policies highlight the need for the UDF SPD to identify and set out:

- areas of the city which should largely be conserved or are suitable for positive incremental or major enhancement;
- priorities for public realm improvements; and
- priorities for preparing planning briefs and guidance.

Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

A1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

A2 Broad brush SPD

- Using a neighbourhood approach as set out in Urban Characterisation Study and Character Assessments to evaluate scale of sensitivity to change and shared urban design issues that warrant the provision of a consistent approach to development proposals.
- Identify opportunities for increasing density and priority areas for masterplanning and public realm improvements.
- Provide guidance on design principles to guide new development based on approved planning applications and DesignPLACE panel advice (see Example A2 below).

A3 Detailed SPD

- Through a more detailed masterplan approach identify priority areas for change and design priorities on a thematic basis (see Example A3 below).
- Provide further guidance on densities, public space potential and urban design principles.

¹ [Brighton & Hove City Snapshot – Summary of Statistics 2014](#)

Example A2: Design principles for Strategic Allocation based on masterplan set out in approved planning application – [Masterplanning study submitted as part of planning application BH2016/ 02499](#) (Anston House).

Anston House is one of a number of sites that form part of City Plan Part One's Strategic Allocation 125-163 Preston Road within Development Area 4 (New England Quarter and London Road Area).

During the pre-application stage, the applicant commissioned a masterplan to establish a clear and well-defined design response for a development that would set the tone for future development in the Preston Road and Strategic Allocation area.

The masterplan was submitted to and received feedback from the South East Design Review Panel and forms part of the planning application approved in late 2016.

This approach to development design was actively encouraged by the Local Planning Authority.

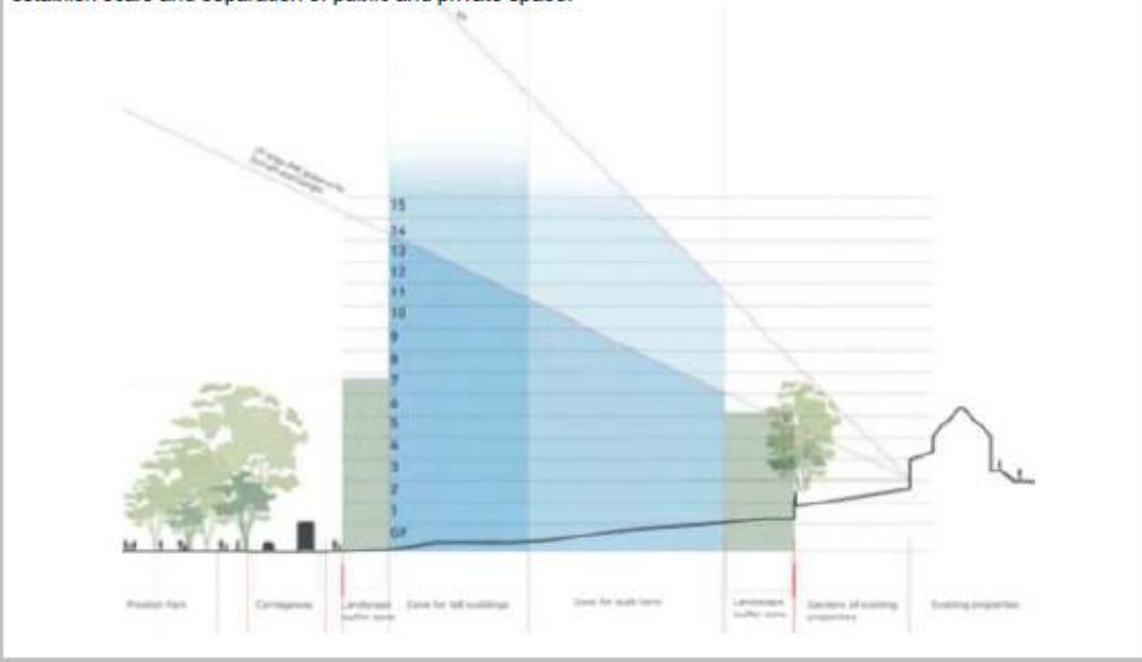
The 6 design principles identified in the masterplan are summarised below. For more information about masterplan content please refer to the Design and Access Statement (in particular parts [1](#), [2](#) and [3](#)) available in the '[Documents](#)' webpage for this application.

A broad brush UDF SPD could signpost area and/or site-based design principles and enhancement priorities established as part of approved planning applications.

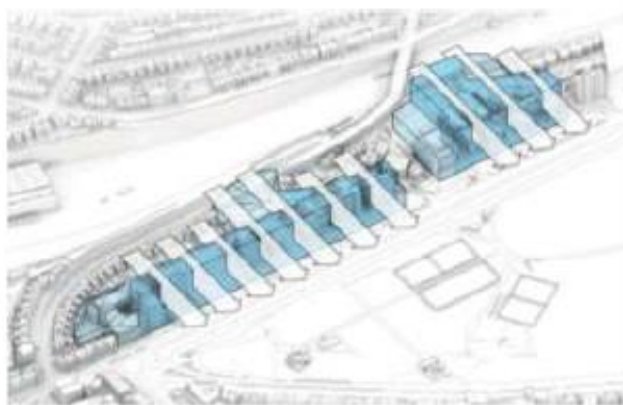
Principle 1 - Introduction of a landscaped zone along Preston Park: the principle seeks to create a boulevard through the Introduction of a landscaped zone along Preston Road to enhance and mend the greenway.



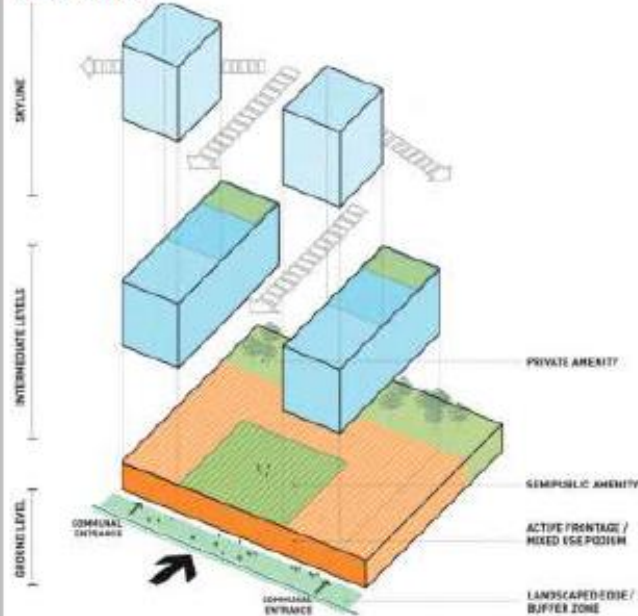
Principle 2 - Layering from (Preston Road) front to (residential properties at the) back: a hierarchy of defined zones establish scale and separation of public and private space.



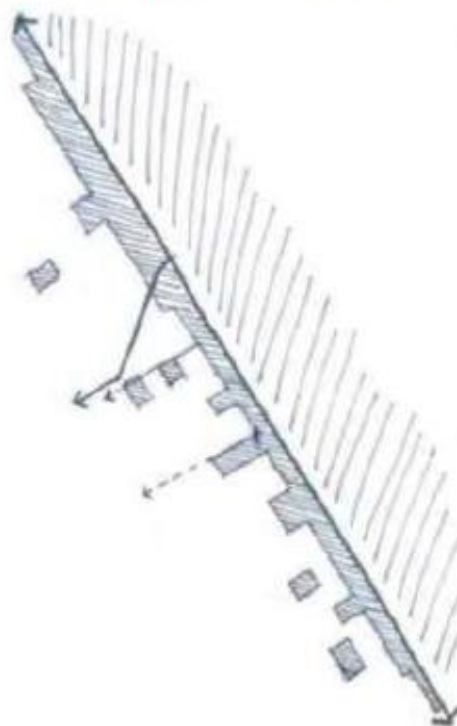
Example A2 (continued): Design principles for Strategic Allocation based on masterplan set out in approved planning application – [Masterplanning study submitted as part of planning application BH2016/ 02499](#) (Anston House).



Principle 5 - Vertical layering of uses: creates a hierarchy of privacy and defines a reduction in mass as height increases ranging from a defined continuous ground floor to broken skyline mass elements.



Principle 6 - Introduction of courtyards and small open spaces on the west side of Preston Road: creates opportunities for ground floor activity and amenity spaces to promote activity on site.

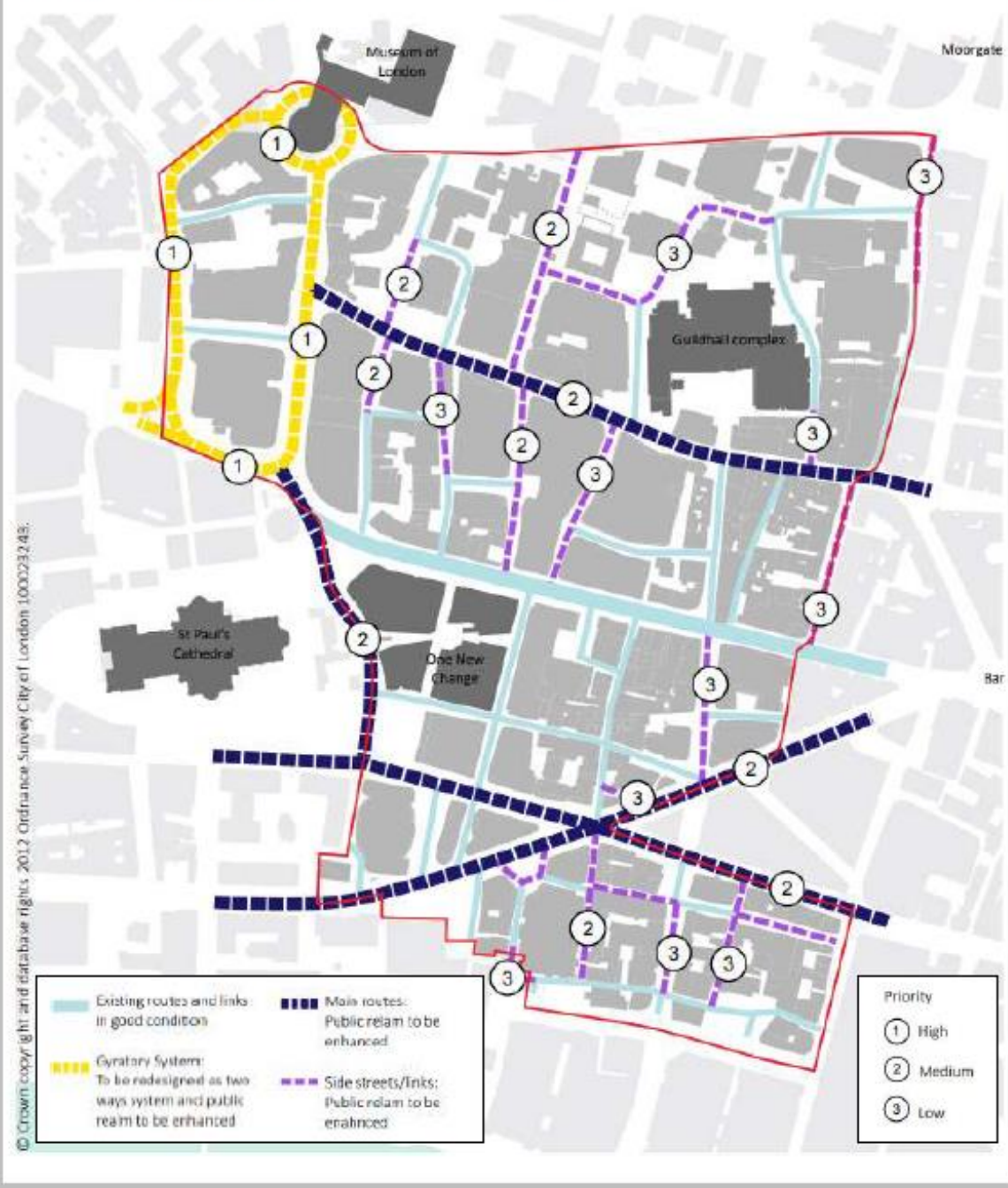


Example A.3: Guidance identifying areas for transport and public realm enhancement and improvement - [City of London's Cheapside & Guildhall Area Enhancement Strategy](#)

In order to deliver projects that support the objectives of its planning policies, the City of London has developed an area-based approach to enhancement strategies. The strategies deal almost exclusively with the enhancement of highways and the public realm under the City's Highway Authority or Open Spaces stewardship.

The map shown below illustrates proposed public realm enhancements for the Cheapside & Guildhall area.

A detailed UDF SPD could adopt a similar thematic approach to identify key objectives and priorities for Development Areas.



Issue B: Accommodating taller development

City Plan Part One Policy CP14 Housing Density encourages higher densities in appropriate locations across the city. In some areas, this will include the potential to accommodate taller buildings.

Following a detailed analysis of Brighton & Hove carried out at a strategic level as part of the [Tall Buildings Study](#) (2003), area-based opportunities for taller buildings have been carefully identified. These are defined as buildings of 18 metres or more in height (approximately 6 storeys).

The areas considered suitable for taller development are generally visually recessive on the valley floors or the seafront; have limited impact on heritage settings; are well served by sustainable transport; support local commercial/shopping centres; relate to existing taller building clusters; and are in the vicinity of open space.

Many of these areas, which take the form of either nodes or corridors, fall within the City Plan's identified Development Areas. They are described in City Plan Part One Policy CP12 Urban Design (see Appendix 3).

Proposals for new tall buildings in and/or outside these areas will trigger the guidelines set out in [Supplementary Planning Guidance Note \(SPGBH\) 15 Tall Buildings](#).

Planning applicants are asked to address the assessment criteria set out in SPGBH15 via the submission of a Tall Buildings Statement (see Appendix 4).

City Plan policies identify the need for the UDF SPD to identify and set out:

- the boundaries of the tall building areas;
- appropriate height ranges for tall building areas; and
- strategic design criteria for new tall building development.

Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

B1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

B2 Broad brush SPD

- Consider options to incorporate area boundaries and zones suitable, potentially suitable or not suitable for tall buildings set out in 2003 Tall Buildings Study (see Example B2 below).
- Identify height limits for each area/zone using the ranges set out in SPGBH15.
- Incorporate criteria-based approach set out in SPGBH15 for assessment of proposals inside and outside tall building areas into SPD.

B3 Detailed SPD

- Through a more detailed masterplan, 3D-based approach delineate, in map form, tall building area boundaries and zones.
- Provide guidance on densities, public space potential and key urban design principles to guide development (see Example B3 below).
- Explore opportunities to review criteria-based assessment set out in SPGBH15 for proposals inside and outside tall building areas.

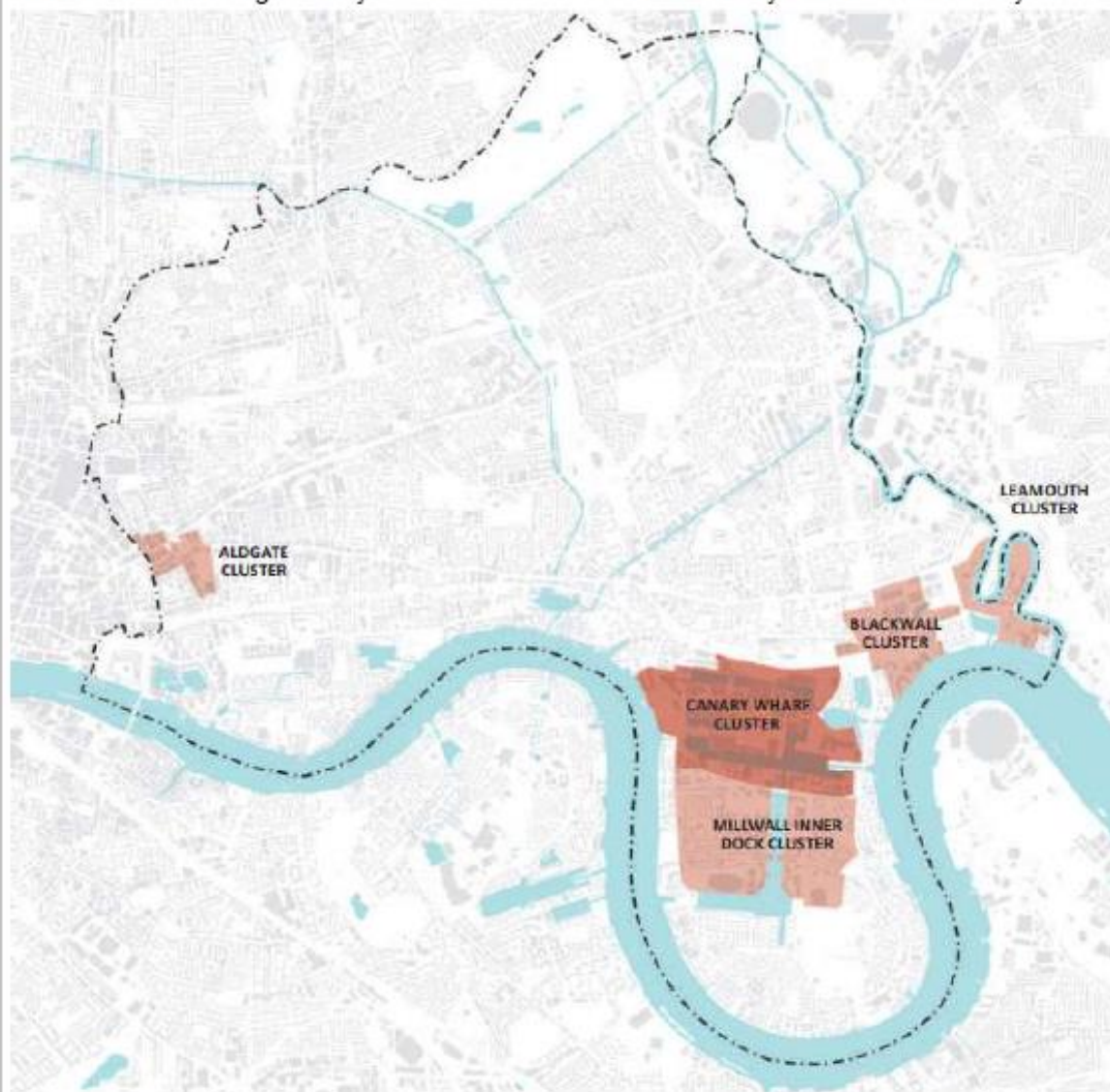
Example B2: Draft report outlining tall building zones - [London Borough of Tower Hamlets Tall Buildings Study Draft Report](#)

This 2017 study sets out 12 high-level design principles that any tall building proposal would need to consider anywhere in the borough; identifies 5 locations/zones where tall buildings are considered to be appropriate and provides advice on potential heights for tall buildings for each zone.

The design principles include understanding of context, response to heritage assets, approach to landmarking, tall building clusters, land uses, architectural quality, relationship to public realm, impacts on the local environment and recent tall buildings activity.

The analysis and recommended strategy emerging from this and the 2004 Brighton & Hove Tall Buildings Study are remarkably similar. Recommendations regarding zone boundaries and height ranges for each zone were not progressed into SPGBH 15 Tall Buildings.

A broad brush UDF SPD could, in the light of recent tall building activity, revisit and/or review study findings to signpost more clearly boundaries and preferred height ranges for each of the tall building areas identified in City Plan Part One Policy CP12.



Example B3: Masterplan-based guidance setting out building heights, density, massing and urban form - [London Borough of Brent's South Kilburn SPD](#).

This SPD identifies generic and site-specific design principles and parameters to guide future development in the South Kilburn Growth Area of the London Borough of Brent.

The guidance seeks to provide greater clarity regarding the form and quality of acceptable development, including opportunities for taller buildings in an area where the predominant building height is 4 to 8 storey. Examples of locations where greater height might be appropriate are provided. Opportunities for buildings to go slightly higher in locations such as corners, ends of vistas and frontages on principal streets are also identified.

The extract from the map below sets out indicative heights and densities across the area. The images in the next page show indicative 3D massing and heights for the area with details provided for the Queen's Park & Cullen House Site Allocation.

Building on the findings of the Brighton & Hove Tall Buildings Study, a detailed UDF SPD could contain indicative boundaries, height ranges and/or densities. It could also signpost locations and/or instances where new development could be modestly higher than prevailing building height.



Heights and densities

	Regeneration sites		10+ Storeys
	Podium		Density 450 - 700 HRH
	1-3 Storeys		Density 750 - 900 HRH
	4-5 Storeys		Density 900 - 1200 HRH
	6-7 Storeys		Density 1200+ HRH
	8-10 Storeys		

HRH is a density benchmark that is based on workforce-to-population ratio method. For example, a health worker-to-population ratio estimates the current workforce density or supply, compared against an identified threshold density that is assumed to correspond with a health system's ability to deliver essential health services.

This aerial photograph shows the Queens Park area. A red circle highlights a specific site. An inset map shows the site's location within the broader urban context. A north arrow is present.

Issue C: Building design

National policy requires that planning applications for major development² and, in some instances, for development in Conservation Areas be accompanied by a Design and Access Statement. This statement should be used to explain the design principles and concepts that have been applied to the development proposed with the level of detail being proportionate to the complexity of the application.

City Plan Part One Policy CP12 and other policies seek to ensure that proposals are based upon a good understanding of site characteristics and the wider context. This means a site appraisal process is required that establishes design principles around which the scheme will be developed.

Design principles to be considered in formulating proposals for extensions and alterations to buildings and for tall buildings in the city are currently set out in [SPD12](#) and [SPGBH15](#) respectively.

These would include, for example, building layout and frontages, focal points, views in and out and main routes/connections.

This approach risks a piecemeal approach to development that fails to make the best of sites or address the needs and aspirations of local communities.

Identifying design principles and priorities for masterplanning early on in the design process is one way to provide greater clarity to everyone involved in the development and planning process, in particular when it comes to areas of the city where growth is expected.

City Plan policies identify the need for the UDF SPD to:

- identify area- and site-specific design principles; and
- set out priorities for planning guidance.

Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

C1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

C2 Broad brush SPD

- Set out best practice principles for neighbourhoods that could be followed by different types of development to demonstrate that the proposal is based upon a clear appreciation of the site and its wider context (see Example C2 below).
- Identify benchmarks that could be used to assist in the assessment of proposals, including design review and/or existing design industry standards such as, for example, [Building for Life](#).

C3 Detailed SPD

- Work up development principles for areas and/or sites where the potential for masterplanning to raise quality and unlock development has been identified. For example, City Plan Development Areas and Strategic Allocations.
- Set out the place making principles that can be used for assessing development proposals and some principles appropriate for different scales of development, including proposals of less than 10 dwellings (see Example C3 below).

² Development involving 10 or more housing units; a site having an area of 0.5 hectares or more; the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or development carried out on a site having an area of 1 hectare or more. For a more detailed definition please see [Town and County Planning Act 1990](#).

Example C2: Design guidance for development that includes checklist - [Wakefield District Council's Residential Design Guide SPD – Part 1: Guidance for housebuilders](#)

This guide sets out best practice advice to help add value and design quality to residential design proposals. It outlines generic principles that collectively can have a positive impact upon neighbourhood design and contains a checklist that reminds designers of how these can be combined to help deliver a range of policy objectives.

Diagrams like the one shown below are used to illustrate how this might be achieved. For instance, designing development that encourages walking and cycling by making

streets easy to cross and pleasant to walk by using planting that provides shade, interest over the seasons, enhances biodiversity and help absorb pollutants.

Building on the findings of the Brighton & Hove's Urban Characterisation Study, a broad brush UDF SPD could identify generic design principles and signpost integrated building design best practice that can achieve multiple policy objectives for the development and the wider neighbourhood context.



Example C3: Design guidance for regeneration area - [Wakefield District Council's City Centre Urban Design Framework SPD](#)

This SPD complements the city-wide guidance referred to in Example C2, focusing on how the Wakefield city centre can successfully accommodate new development, in particular housing. The guidance sets out 9 overarching placemaking principles to help ensure the area is developed harmoniously, maintaining a balance between the built environment and its people.

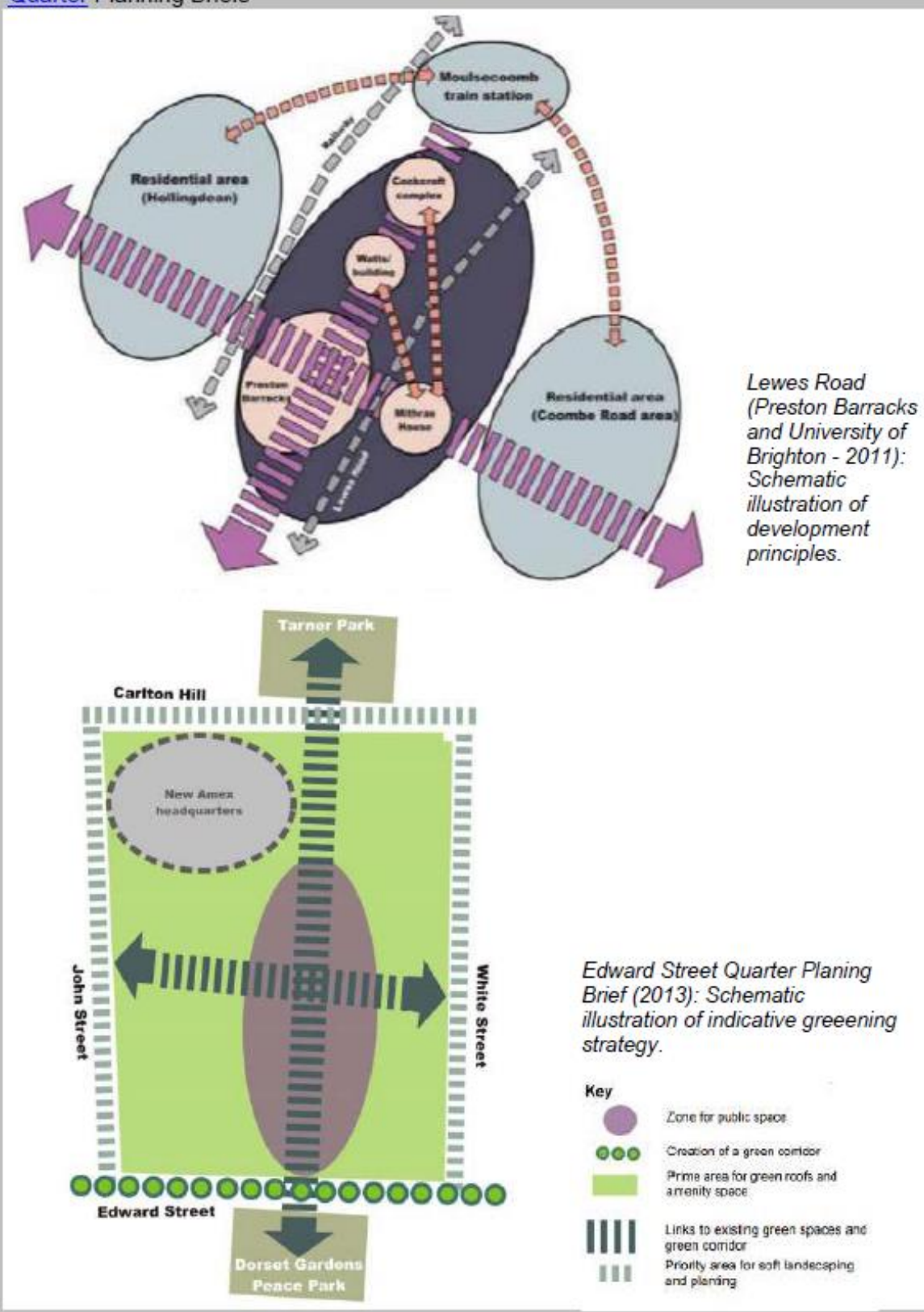
Using a high-level masterplanning approach, it also identifies design priorities for clusters of sites identified for development (see example of north of Ings Road sites below).

A detailed UDF SPD could adopt a similar approach to identify placemaking principles for the city as a whole and/or Development Areas and/or Strategic Allocations identified in City Plan Part One.

This approach has been used in the city to support the delivery of strategic sites including [Edward Street Quarter](#) and [Preston Barracks and University of Brighton](#) (see schematic masterplan on the next page).



Example C3: Design guidance for regeneration area – [Lewes Road](#) and [Edward Street Quarter](#) Planning Briefs



Issue D: Public realm design

Excellence in public realm design is about creating the right conditions to make places in the city work well.

Brighton & Hove's public highways, parks and gardens, cycle and walkways and private land that is accessible to the public provide the means for people to move quickly and safely through the city as well as providing places for socialising, sitting quietly, sightseeing, entertainment and enjoying outdoor events.

Policy CP13 Public Streets and Spaces and other City Plan policies seek to aid the evolution and enhancement of public realm in new development by, among other things, setting standards of excellence in public realm design.

The city's future attractiveness and competitiveness is partly dependent on using best practice design principles to create streets and public spaces that are functional and safe, and which enhance the quality of life for all users.

This means encouraging planning proposals to adopt a robust design

approach that shows an understanding of the role of the place, movement and other functions of the city's public realm (e.g. open space, sports provision, health, water management and habitat enhancement).

The [Public Space Public Life Study](#) identifies a hierarchy of routes that could make the experience of moving through the city more continuous and consistent. The [Streetscape Design Guidelines](#) sets out standards of design and installation specifications for street furniture and surface materials.

City Plan policies identify the need for the UDF SPD to:

- ensure that public realm improvements create pedestrian-cyclist friendly spaces that accommodate needs of all people;
- achieve consistent aims and standards in public realm design and delivery;
- identify area- and site-specific design principles; and
- set out priority for planning guidance.

Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

D1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

D2 Broad brush SPD

- Identify opportunities to better integrate land use, water management, green network, health and transport policy objectives into public realm in order to deliver a simpler and less cluttered appearance with high quality materials and low maintenance requirements (see Example C2 Edward Street Quarter greening strategy in page 16).
- Set out urban design best practice principles and standards and provide guidance for priority areas for public realm improvements that respond to the needs of the local community, including businesses and visitors.

D3 Detailed SPD

- Through a more detailed masterplan approach identify placemaking principles and minimum standards that will be used for assessing public realm proposals as well as management and maintenance issues to ensure that long-term quality is achieved (see Example D3 below).

Example D3: Public realm guidance identifying design principles according to street and/or space type - [Southampton's Streets and Spaces Framework](#)

This framework provides strategic guidance for the city's network of streets and spaces. The map extract below represents a hierarchy of the network that includes primary roads and public spaces (level 1) and remaining public spaces and streets (level 2).

It identifies 12 key integrated design principles that can be applied to the different elements within the network and sets out aspirations for Level 1 routes. Below is a summary of aspirations for the Green Mile, a primary route into Southampton.



04. The Green Mile — From the Central Parks via Queensway to Queens Park.

The framework also contains a checklist to help assess streets and spaces enhancements. See extract below.

Building on the Brighton & Hove's Public Spaces, Public Lives strategy, Streetscape Design Guidelines and recent public realm improvements, a detailed UDF SPD could set out indicative design principles for different types of public realm areas across the city and/or in Development Areas and/or Strategic Allocations identified in City Plan Part One.

GREEN MILE

KEY ASPIRATIONS

- To make a major contribution to the greening of the city; a key aspiration of the CCAP
- To increase the opportunity for reducing surface water run-off by the minimising of hard surfacing
- To increase street tree planting to improve the city's micro-climate
- To implement a major sustainable urban drainage scheme

Performance Checklist for streets + spaces enhancements (extract)

DESIGN + APPEARANCE

6. Does the street or space respond to local distinctiveness and context?
7. Is the street or space defined by a well-structured building layout?
8. Does parking add to or detract from the street scene?
9. Does the street or space integrate with existing roads, streets, paths and/or the surrounding development?
10. Do buildings, street and spaces take priority over the roads and parking so that highways do not dominate?

ENVIRONMENT

11. Does the "place fit the space"?
12. Does the place positively exploit the existing buildings, landscape and topography?
13. Is the street or space overlooked and does it feel safe, both night and day?
14. Is there shelter from the wind, weather and noise?
15. Has the street or space been designed to reduce its environmental impact?

Issue E: Views and vistas

Views play an important role in shaping people's appreciation and understanding of the city. The existence of particular views adds to peoples' enjoyment of places and particular views can become cherished because of their distinctiveness with important buildings and landscapes.

Due to the topography of Brighton & Hove long views from elevated points are common and a number of these will have city-wide implications. A number of strategic views from specific points within Brighton & Hove have been identified in the [Tall Buildings](#) and [Urban Characterisation](#) Studies.

These are generally distant views from elevated locations, mostly on the periphery of the built-up area, and include some panoramic views.

In determining the strategic views the key factors are: the degree to which the view illustrates the relationship between

the built up city and the Downs and/or the sea; the prominence of key ridge lines; the extent to which the view reveals the typical pattern of past development; and the presence of any notable landmarks or heritage assets.

These views will be particularly relevant in assessing the merits of proposals for taller buildings or for larger scale developments in elevated locations.

The Local Planning Authority (LPA) will require applicants to highlight those views that are relevant to their application and to demonstrate that the relevant views would be protected or enhanced by their proposals in accordance with policy CP12 Urban Design.

City Plan policies identify the need for the UDF SPD to:

- **identify and set out strategic views.**

Options

These potential options have been drafted to stimulate debate for the early stakeholder consultation stage. They do not necessarily represent current or future council policy.

E1 City Plan only

- City Plan Policies and supporting documents provide sufficient guidance.

E2 Broad brush SPD

- Highlight important views identified in the Tall Buildings Study, Urban Characterisation Study, Conservation Area Character Statements, area-based Supplementary Planning Documents and planning briefs and approved planning applications. (see Example E2 below).

E3 Detailed SPD

- Through a more detailed masterplan approach outline strategic and key local views and their sensitivity to change to ensure a consistent approach to the visual assessment of new development in the city (see Example E2 below).

Example E2: Guidance that identifies views of local significance as part of a broader assessment framework - [London Borough of Wandsworth Local Plan SPD Local Views](#)

This guidance sets out 6 Local Views that are considered to have the greatest borough-wide importance. These complement the set of strategic views identified in the London View Management Framework, Wandsworth Local Plan and Conservation Area Appraisals and Management Strategies. It focuses on views upstream and downstream from bridges over the River Thames and of Heritage assets identifying viewpoints and setting out how the council will assess the

impact of new development on river frontages, established longer distance landmarks and specific heritage assets within the borough.

A broad brush UDF SPD could signpost views identified in the relevant studies, documents and approved planning applications.

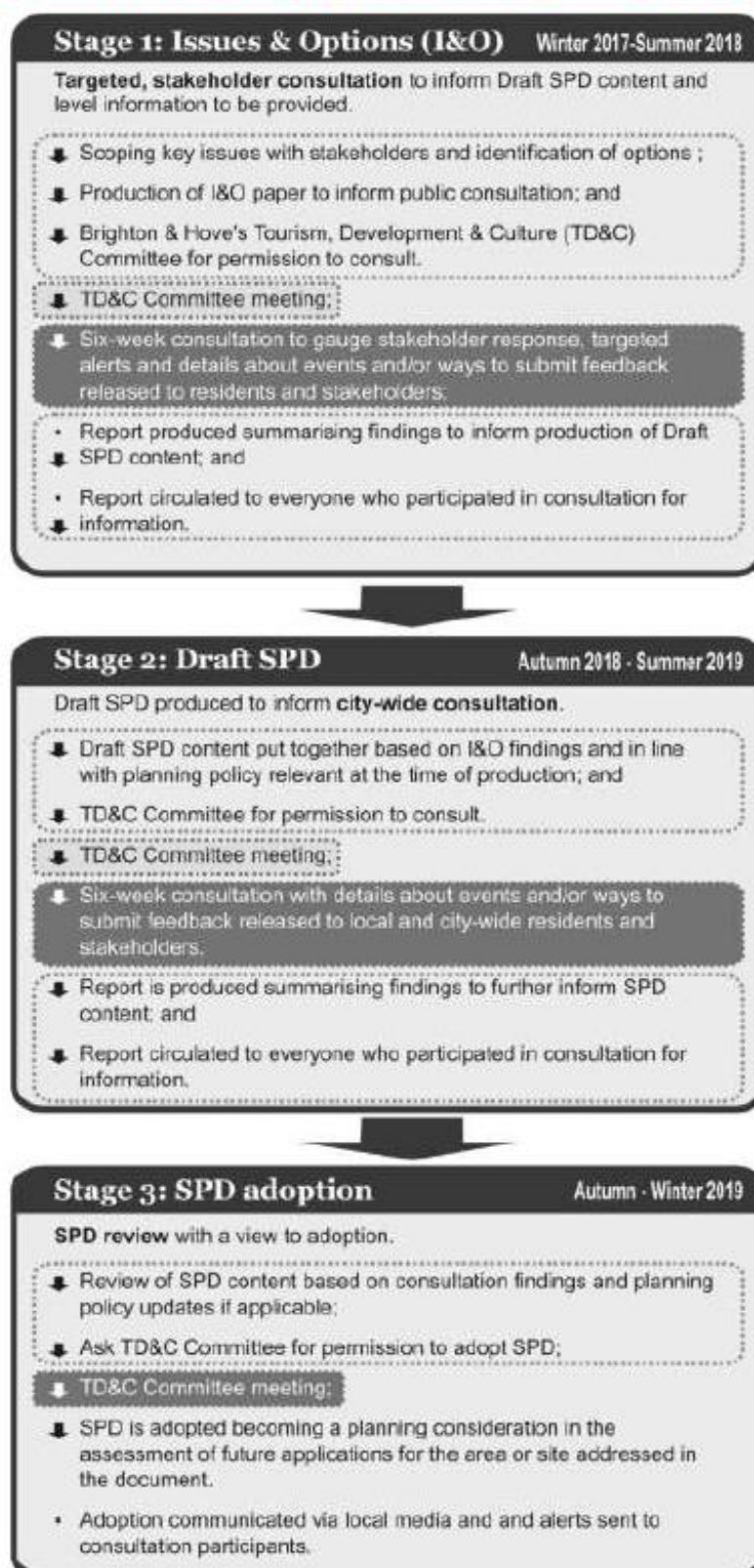
A detailed UDF SPD could also help to identify indicative local views.



View 5: From Queenstown Road to Battersea Power Station (above) and viewing point (below)



Appendix 1 - Stages in the preparation of the UDF SPD



Appendix 2 – Design policy context

The UDF SPD will demonstrate how the requirements of national and local planning policy can be met with the aim of producing consistently high quality design outcomes. Proposals that follow this guidance could be more likely to move through the planning process quickly and successfully. The following provides an overview of the key policies as they relate to design.

National Planning Policy

The [Planning Act 2008](#) (section 183) requires local authorities to have regard to the desirability of achieving good design. This SPD contributes to meeting the duty placed on local authorities by the Act.

The [National Planning Policy Framework \(NPPF\)](#) and its accompanying [Technical Guidance](#) recognise the importance and value of good design as an essential component of sustainable development. [These documents are currently under review](#) with proposals for 'Policy 12 Achieving well-design places' to support a proactive, contextual approach to the creation of high-quality buildings and places that respond to the aspirations of local communities.

Local Planning Policy

[Brighton & Hove City Plan Part One](#) (adopted in 2016)

CP12 Urban Design is the key and overarching policy regarding development design along with **CP13 Streets and Open Spaces** that focuses on the spaces between buildings. Additionally, the UDF is referenced in a number of policies across the Plan including SS1 Presumption in Favour of Sustainable Development, Development Areas Brighton Marina, Gas Works and Black Rock Area, DA3 Lewes Road, DA5 Eastern Road and Edward Street, DA6 Hove Station Area, CP1 Housing Delivery, CP5 Culture and Tourism, CP8 Sustainable Buildings and CP14 Housing Density and CP15 Heritage.

[Brighton & Hove Local Plan](#) (adopted in 2005)

There are a number of retained Local Plan policies that deal with design issues. Most form part of Chapter 3 and cover a range of issues such as, for example, QD27 Protection of Amenity, QD14 Extensions and alterations and QD14 Landscape design. These policies will be replaced through [Brighton & Hove City Plan Part Two](#) which the council is currently preparing. The UDF is expected to provide supplementary guidance on some of these issues.

[Supplementary Planning Documents \(SPD\)](#) and [Guidance \(SPG\)](#)

The Adopted City Plan and retained Local Plan Policies are supported by a range of detailed guidance on how these will be implemented. If adopted, the UDF SPD will form part of this set of planning documents.

Appendix 3 – Tall Building areas

Below is a transcript of the 12 tall building areas identified in City Plan Part One Policy CP12 Urban Design.

4.146 Given the city's physical and environmental constraints there is a need to increase density on existing brownfield land in a positive and sustainable manner. Taller buildings (in the context of the city's prevailing built form) offer one potential way of achieving this in appropriate locations. This policy seeks to ensure that such proposals are directed towards those broad areas where such potential has been identified. The areas are described in greater detail as follows:

- Brighton Marina – is a node (place where activity and routes are concentrated) limited to the boundaries formed by the eastern and western breakwaters and the undercliff walk to the north.
- Brighton Station / New England area – is a node situated to the east of Brighton Station, to the north of Trafalgar Street and along New England Street.
- Central Seafront – is a node comprising a small area to the east of Sussex Heights that includes Churchill Square, the Brighton Centre and the Odeon Cinema complex.
- Eastern Road / Edward Street – is a linear corridor broadly stretching from William Street in the west to Bristol Gate in the east and which focuses on the opportunities around existing tall buildings, particularly those at the County Hospital.
- Hove Station area – is a node situated on both sides of the rail corridor, extending westward to include the existing group of tall residential buildings to the north of Clarendon Road, together with the adjoining industrial areas.
- Lewes Road corridor – is a linear area centred on the University of Brighton's Moulsecoomb campus and the former Preston Barracks site.
- London Road / Preston Road corridor – is a linear area focused around existing 'mid rise' tall buildings that front the western edges of Preston Park, Surrenden Field and Withdean Park.
- Western Seafront / Kingsway – is a linear corridor along the stretch of Kingsway that directly overlooks Hove's Western Lawns as far west as Wish Road.
- Shoreham Harbour – is a node focused on the eastern-most area of the harbour within the Brighton & Hove City boundary, including both the docksides and the commercial area immediately north of Wellington Road.

Appendix 4 – Tall Building Statement assessment criteria

All planning applications involving tall buildings in the city must be accompanied by a Tall Building Statement. Below is a summary of the assessment criteria that should be addressed by applicants as part of the Statement.

Planning principles:	▪ Sustainability ▪ Land use mix ▪ Infrastructure ▪ Transport	Wider context:	▪ Visual Impact ▪ Siting of buildings ▪ Conservation
Detailed design considerations:	▪ Alignment ▪ Massing Scale ▪ Form Urban Pattern ▪ Streetscape ▪ Public Realm	▪ Public Access ▪ Accessibility ▪ Open Space ▪ Climatic Impact	▪ Neighbourliness ▪ Technology ▪ Materials ▪ Maintenance

Appendix 5 - Glossary

Accessible refers to a destination that is easy to get to or the feeling of belonging or ability to occupy a space or place.

Accessibility applies to a building and/or space that is easy for disabled people to enter and move through.

Adaptability is the ability of the form and pattern of development to adapt over time to a city's and neighbourhood's changing social, technological and economic conditions.

Building envelope is the skin of the building. It consists of the external walls, doors, windows, roof and lowest floor of the building.

Built environment refers to everything that is for humans, by humans, and to be used for human activity (versus natural environment). Examples would include cities, buildings, urban spaces, walkways, roads and parks.

Character is a recognisable feature and/or set of features that help identify a city or neighbourhood to its residents or visitors. This can include, for example, historic buildings, buildings with a distinct architecture, public art and public spaces. It can also refer to a development pattern created by a regular grid of streets and blocks reinforced by buildings that form a continuous street frontage.

Convivial spaces are open spaces where unplanned social interaction can occur. Examples may include (but are not limited to), urban plazas, courtyards, expanded building entrances, trail staging areas, park seating areas, pocket parks, etc.

Corridors (see tall building corridors).

Density refers to the number of units and/or people living in a given area. Typically measured in number of dwelling units per hectare or acre.

Design code approach whereby land owners establish the key components of the design of new developments up front and, through legal requirement, then require abidance by any developers subsequently wanting to build in the area covered by the code.

Design principles are a set of values to be expressed in the built environment that designers should consider when designing buildings and the spaces between them.

Ecosystem services refer to the function of existing natural systems that provide supportive functions to built infrastructure. Examples may include streets that are designed with greater water permeability than standard streets to capture and slowly release stormwater into the ground via vegetation and/or porous pavement.

Form and massing refers to a building's size, shape and configuration.

Ground-floor oriented development refers to buildings with views from and/or that have direct access from the street to individual units at the ground floor.

Landmarks are urban features with distinctive spatial features and by virtue of their colours, shape or value have the potential to help people to orientate or find their way in the environment.

Land use mix involves a range of complementary land uses that are located together in a balanced mix, including residential development, shops, employment community and recreation facilities and parks and open space.

Legibility is a clear and simple development pattern within a city and neighbourhood that enables residents and visitors to understand how an area is organised and to make their way around. This type of development pattern is generally delivered through a grid or modified grid network of streets that allows for easy navigation and provides a block pattern that creates increased connectivity, which also encourages alternative transport modes to the car. In turn, the block pattern sets the parameters for the type of built form that can be achieved.

Linear area is one that pertains to or resembles a line or corridor. Examples in Brighton & Hove are the areas along Lewes Road, Edward Street and the Seafront.

Masterplan is a detailed document that sets out guidelines for long-term development of an area or site over a specified period of time. They typically refer to large sections of land that are proposed to facilitate limited subdivision with development occurring primarily through the planning process.

Mobility refers to design and infrastructure that supports active (pedestrian and cyclist) modes of transportation as well as vehicle movement.

Nodes (see tall building notes).

Placemaking is a creative, collaborative process that includes design, development, renewal or regeneration of our urban or rural built environments. The outcome should be sustainable, well-designed places and homes which meet people's needs by harnessing the distinct characteristics and strengths of each place to improve the overall quality of life for people.

Public realm is defined as any publicly owned streets, pathways, right of ways, parks, or publicly accessible spaces and any public and civic building and facility.

Ridge line is that along the highest points of a mountain ridge, an area of higher ground separating two adjacent valleys, streams or watersheds.

Roof treatment refers to exposed roof areas that offer a significant opportunity for overlook from floors above and below. These include mechanical systems, lifts and other appurtenances that should be integrated into the form and architecture of the building. Careful attention should be paid to the design and screening of these to ensure neighbouring buildings are not affected by noise pollution.

Scale is the relationship between elements of a building or the building and its surrounding context.

Siting / Site layout refers to the location/placement of buildings relative to one another, as well as their setbacks from the site's boundaries and spaces between buildings.

Tall building corridors refer to areas along transportation routes that are classified in the Brighton & Hove Tall Buildings Study as potentially suitable for accommodating taller development.

Tall building nodes refer to areas classified in the Brighton & Hove Tall Buildings Study as potentially suitable for intense assemblies of taller development.

Topography is the physical appearance and features of an area of land, especially the shape of its surface.

Townscape refers to the general view, appearance and character of an urban scene/landscape.

Urban design is the process of shaping the setting of buildings and public realm for cities, towns and villages. This process is considered key to making places where people will want to live and which will nurture economic activity.

Valley floor is the broad, flat bottom of a valley.

Views and vistas refer to a unique distant view, viewscape or view corridor along a road, through an opening or high point.

D. Transcripts of workshop responses

Issue A - Priority areas for enhancement and design guidance

Table consensus: combination of A2 + A3

Role of nature (green infrastructure) in densification of development? = threat to environment /social quality of life.

Taller buildings (=up) versus loss of open space/public realm (=put) dilemma.

Characterisation: city divided into 6,7 Character Areas.

Noise issues.

Is there a minimum size for the high density living space?

If it is high density where are the cars parked? Lots of public transport/cycling walking routes.

Age friendly design accessible to all.

Health Impact Assessment of the density. Impact on health services + education.

High-level classification of the city zones? E.g. Seafront, City Centre, Neighbourhoods, Urban Fringe.

Strategy & Local views.

Need for new issue in UDF: integration of green infrastructure/nature-based solutions.

Traffic impact on buildings? Air quality, vehicle noise, road safety.

Need political will. Public realm/street tree planting PRIORITY.

Sound noise complaints / Urban sound planning (EU project).

Set maximum density thresholds? for different zones.

Encourages HMOs in DAs?

Social housing high density issues? Retrofit solutions. Incorporate crime + ASB.

Areas that allow + encourage involvement of residents + business in service provisions + providers. Work with + enhance service delivery.

A2 Broad brush appears to be the best as offers way of achieving consistency without being prescriptive.

Encouraging joint responsibility of public realm areas. Provide examples of successful planning applications that have achieved good neighbourhood partnerships.

Invite proposals which invite interventions to impose + maintain urban realm.

Pressing need for public realm vision for city + then to character neighbourhoods.

To include regard to other relevant policies + strategies in decision-making processes.

Agree strategic views to be protected should be identified otherwise a lot of work for us + developers each time.

Area with poor public realm use all options some broad brush, some detail.

Priority areas - 'DA' development areas (as defined in City Plan) + areas identified for change.

Suburban areas: need to use more efficiently; say will allow higher density if in character; show good examples e.g. encourage backhand.

Suggest we need a detailed SPD: allows flexibility but need certainty + political buy-in.

Include need to engage with local community. If we don't go into some detail - end up being led by the developer - need to get key principles down.

Divide area into smaller 'character' areas.

Agree - tall building part very useful - where, how esp. storeys gives developer certainty.

The Seafront: our 'shop window', generates income.

Issue B - Accommodating taller development

Table consensus: B3 but not as prescriptive as the Kilburn example

Constraints Plan needed immediately.

3D map of city needed immediately.

3D modelling visual, spatial representation + assessment (to be able to see the heights).

Minimum densities necessary but maximum densities can already be controlled + restricted.

Failure to detail significantly can waste officer + developer resources.

Maximise tall building opportunities.

Identify key buildings for protected view only e.g. Royal Pavilion, St Bart's Church, etc.

Town houses in Kensington + Chelsea are the densest in the country.

Don't want to be too restrictive and tie architects hands.

London has approved 500 buildings over 20 storeys.

Greater detail to assist planners + developers.

Other signature buildings.

Does taller building actually result on higher density (re: housing shortage example).

Table conversation tended towards detailed when overlap with other issues, but broad brush when not crossing over.

Visual impact constraints map for accommodating taller buildings.

Detail to defend against aggressive developers.

Protect views to the sea and the Downs.

Assessment of what impact on Conservation Areas tall buildings could be done as detail.

Gridlocks - broad v detail. Need flexibility.

Need protected views from key points in the city. Protected views of cherished buildings, churches, Royal Pavilion. Need to plan for strategic views of the future.

Need to meet our housing needs. 12,800 shortfall.

Use GIS + Vivacity - spatially to support SPD.

Link with issue E: views and vistas (Preston Barracks example 'poking through' vista).

Cluster or not taller buildings.

Is there financial support to i.e. a really detailed SPD + can easily become out of date.

Lack of detail + guidance leads to wasted money.

Critical we guide heights in context.

Maximise sustainability + quality together.

Identify landmark site of quality.

5-6 storey townhouse such as our Regency buildings can provide significant density.

Tall buildings competition world class.

Detail helps developers have a clear steer + they prefer clear guidelines.

Look at how San Francisco has achieved tall buildings in the Downtown area and low rise in the outer city.

Part of SPD frameworks is to look at 3D modelling to mark in views etc.

Multiple constraints can be very restrictive.

City-wide view assessment from Downs + the sea.

Detailed to make less experienced architects more aware of assessment parameters.

Helpful for SPD to map constraints e.g. views + vistas

Needs to set out constraints early on so they are known for the start.

Framework can indicate constraints such as densities and views, amenity impacts. Indicate whether high-density can be achieved by tall or lower closely packed.

Need detailed guidance so that case officers + developers know where tall buildings can go within DA area 2 QD4 Local Plan offered more guidance. Need to assess where tall buildings go.

Detailed. Future proofing? Retrofit options with tall buildings limited.

Energy efficiency issues with taller buildings if not double aspect. So detailed required.

Health + wellbeing - tall buildings?

Issue C - Building design

Table consensus: Combination of C2 and C3

Not really a comment on the SPD, but before it is adopted how are we going to provide guidance to developers, particularly on larger development sites.

Avoid over reliance on pastiche.

Consider all types of building design - sometimes something 'out of character' within an area can add to the area - the view currently seems to be that anything different will detract from enhancing Regency architecture.

Needs flexibility to avoid stifling innovation/evolution in urban design trends over the next 15 years.

Developers ask for certainty.

Context of an area - don't just focus on design of the 'bricks + mortar'.

Need more specific guidance than City Plan.

More scope for innovative architecture - detailed SPD would help identify suitable areas.

Larger development sites need specific guidance to be proactive rather than reactive in dealing with applications.

Specific guidance for each DA area - resource implications? Broad brush for rest of the city.

Broad brush checklists can allow innovation or local/non-strategic sites (e.g. infill). Not enough detail is City Plan at the moment.

Detailed SPDs and requirements on major sites can unlock other benefits across the city (e.g. District Energy networks) - without these, building level solutions may restrict future neighbouring development.

Mix + match C2/C3 as different sized development sites need different approaches. Example: coastal areas of Brittany (France).

Places in city centres to just 'be'.

Issue D - Public realm design

Table consensus: Combination of D2 and D3

Design out' urban realm approaches that aren't helpful.

Accessibility is not just about disability - its' about 'signposting' by good design.

Instinctive' navigation - public realm is about subliminal understanding of spaces + their connectivity.

Shared spaces and level roads/pavements etc. promote ambiguity, improve safety and reduce 'funnelling' of people through an area.

Surfacing!

Urban design to discourage anti-social behaviour.

Think holistically about small areas of public realm and how it fits into the wider urban grain.

Mixed approach - detailed guidance for city-centre areas with high level of visitors. General principle for suburban areas.

Places in city centres to just 'be'.

Need to create holistic view of public realm rather than piecemeal approach to development.

Table consensus: D3 with flexibility

Underground waste services. Many EU cities already have this. We should do an underground service survey to understand where services may present a challenge and where the opportunities are.

Could there be a design 'checklist' to help achieve consistency?

Could guidance encourage applicants to work with communities on 'look and feel' of the space?

Link to neighbourhood council's policy? In terms of consultation - get ownership of the plan by the community.

Space for cycling: council has adapted space for cycling objectives + should be more prominent in developments.

Public art: need improved strategy for delivery of public art as part of developments.

Access to water & public water drinking fountains could be built into public realm.

Natural shading & ways to address extreme heat.

Can developers evidence the materials they are using area re-used & locally sources where possible? Can the streetscape tell a story?

Ensure public realm guidance does not include high maintenance costs.

Broad brush guidance with advice on what could be included - not too prescriptive?

Transport input - public realm issue.

Detailed but need flexibility for developers if can't achieve certain standards.

Need to allow compromise/negotiation.

Access & consideration to ease of access particularly for disabled should be priority in terms of flow & use of materials and street furniture.

Will detailed plan work? Ghel produced document for the city, but how much was it incorporated into the planning system.

Neighbourhood Plan. Think of the character of different neighbourhoods - what they need. Problems faced in terms of air pollution, flooding issues, green spaces to decide broad brush SPD.

SUDS: rain gardens + permeable surfaces.

Street Art/Graffiti: promotion of street art in some locations - design to reduce canvas in others.

Car free/ low car neighbourhoods: restrict rat runs and movement of cars.

Detailed SPD may stifle creativity & innovative design.

How do the different options encourage community participation and collaboration?

Consider how public realm improvement unlocks wider economic growth/regen.

Consider ongoing maintenance costs to developer council.

Urban sound planning. Soundscape of the city.

Different frameworks for different 'types' of public realm e.g. residential, communal/park green, commercial.

There should be use of locally sourced materials supporting local circular economy. Circularity of materials should be key part of design i.e. Amvo Bank Pavilion, Amsterdam.

Leave room within policy for creative and new approaches - don't be too prescriptive.

Underground services are often a big constraint within or adjacent to development sites but many developers don't survey these until post planning. Services surveys should be done at pre-app stage so urban realm can be confidently + appropriately planned + designed.

Public realm that can signpost to key visitor destinations e.g. Lanes, North Laine, George Street, Boundary Road.

Public realm that designs out crime e.g. dark spaces, overgrown trees.

Allow spaces for Guerrilla gardening close to communities.

Ensure that tree planting does not become a hazard for buggies i.e. roots making pavement uneven.

Should incorporate 'play' equipment into urban realm (can be informal).

Should design in cycle parking and map out deficient areas.

Should give clear guidance on durability of materials + plants in urban realm, particularly given the coastal environment.

Protected and important trees should be identified in the SPD.

Public realm should have clear guidance for pathway/cycle path widths - could consult transport-officers and refer to existing guidance such as TFL?

Shared surfaces/streets should be clearly defined and SPD should provide guidance on their design.

Issue A - Priority areas for enhancement and design guidance

Table consensus: combination of A2 + A3

Plan ahead - think of area where we want the density to start - make good practice work.
Don't get bogged down in too much detail. Allow for movement as the city grows.
A3 Need a comprehensive approach to all uses e.g. approach to licensing.
Need to separate areas requiring masterplanning - public realm input - these are linked to A2.
Treasure Conservation Areas + enhance - they are investment in future economy.
Perhaps a 'hybrid' of A2 + A3. Some areas may need more detailed planning?
Consolidation of design is important so as not to create defined ghettos.
Assurance about sustainability + facilities at planning stage.
Improve: walking, cycling routes, public transport.
Protect urban greenspace - 'no' /minimal building on Greenfield sites.
Relationship with Conservation Area Management Plans? + Neighbourhood Plans? This needs to be defined i.e. hierarchy.
Ensuring infrastructure doctors' surgeries, schools, etc. is in place, especially if density of population is the driver.
Integrated transport services.
What will the duration of the SPD be - I will need to evolve + reflect change in the city.
Reduce motorised traffic/pollution.
Increase density in city centre - high rise.
Combination of A2 + A3 is required to address issue A. The grain will need to be assessed before development is proposed.
Address look + feel so as to produce an instantly recognisable city look; distinct and reflective of the city's unique character.

Issue B - Accommodating taller development

Table consensus: B3

SPD to address very tall buildings + definitions? Relevant definition.
Detailed assessment required.
Revisit strategic views. Maintain sea & Downs vistas + glimpses.
Revisit ideas of 'heights as tall. Look at density as I&O issue.
Existing SPG broad brush. As much detail as possible in UDF.
Kilburn example too different in practice terms + to enforce not the right way forward.
Look at views from public spaces.
Community spaces are vital for large sites and areas of higher density + taller development.
Shading etc. issues for wildlife case studies reviewing tall buildings and need for them.
Also issues re conglomeration/cluster of tall buildings once we allow one then they will all happen/gather.
Identify design guidance for spaces + public realm around taller and denser development.
High density can deliver many units. Not always the highest buildings which are the densest.

Issue C - Building design

Table consensus: Combination of C2 and C3

Broad brush approach for smaller developments.
Need realistic design montages etc. From developers often misleading.
Depends on size of development.
Hybrid of broad brush + detailed for some areas.
Overlap with Heritage? Conservation Areas...

Use design professionals from Brighton + Hove for masterplanning etc.
Materials for buildings. Robust/Good quality appropriate.
Resist plastic where possible in building materials especially external.
Too prescriptive = limited like span/scope of SPD.
Longevity of building life proposed.
Sensitive sites: how the hell do you define them? Not just Listed or Conservation Area.
How useful are the aged Character Studies + 32 neighbourhoods - change?
With regards to the examples shown - Anston House - the visuals are mainly deceptive - it would be important to stop this.
Public art where not suitable (like murals)
Balcony treatments - whether overhanging pavements or within site boundary or even discreetly internal - size (useful!)
Hybrid of broad brush SPD + detailed for specific areas to preserve look, heritage or economic development opportunity.
More detail that can be provided that reflects local interest.

Issue D - Public realm design

Table consensus: No consensus

Collaborative working with local businesses and consideration of 'meanwhile' uses.
Sunlight to public spaces very important e.g. Edward Street.
Work up + adopt policies + strategies for public realm. Needs vision.
Replacement of street trees that need to come down.
UDF document to bring together tie in with all studies. Making this easier all in one place.
Initial vision no retrofitting. Looking outside Brighton & Hove to get great ideas.
Proactive regarding public realm quality, maintenance + standard of design.
Don't want too prescriptive but clear criteria.
City Parks - consideration of long term management of new public realm created.
Temporary public realm improvements and meanwhile uses.

Table consensus: D2

Street noise intolerable. Vehicles, especially buses.
If to help developers . The city is too diverse for a simple broad brush approach. Our city development such as highways need to lead by example.
Good design & its effects on health & wellbeing of the space users.
Safe & secure.
Good cycle parking facilities.
Pavements not wide enough in city centre.
Some of our street lights are fine old structures which are mainly not listed but should be upgraded sensitively.
More attractive design - linked to art.
Kept clear.
Accessible for all.
De-cluttered.
Minimum acoustic standards for buildings - walls that absorb sound + not reflect it within buildings.
Avoid poorly laid pavements.
Dark Skies' minimise light pollution through light fittings.
Cutters on pavements - difficult to navigate through.
Un-necessary 'poles' e.g. lamp studs + parking notices never combined. Should be

rationalised to use 1 for several purposes.

Link UDF to Developer Contribution SPD to help guide how S106/future CIL monies are spent.

Broad brush: set out principles for how places will be used; public realm schemes will be too detailed if 'detailed SPD' option.

Broad brush to include general requirements for different spaces but not be too specific as this will depend on type, scale + size of development coming forward.

Graffiti + tagging could be countered by planting climbers and other plants close to walls. Even if it takes up 6-8" of pavement.

Can detailed advice/guidance be offered on an aspirational basis? Perhaps ranking, say ideal paving materials.

Too many poles on/near pavements + uneven pavements.

Ensure developers required to fund management and maintenance of public realm they deliver.

Broad brush important to ensure wider continuity in public realm but need to allow developers flexibility to ensure treatment suits type and size of space.

Seating - can't seat on them!

Bus shelter seats in the Old Steine good (old fashioned seating). New bus shelters do not provide proper seating or shelter. Signage at bus shelters on the wrong side and seats face the wrong way.

Detailed stifles imagination - needs to be flexible.

Detailed majors only?

Broad brush city-wide.

Public spaces outside private spaces often not as well maintained. Ex: Churchill Square.

Issue E - Views and vistas

T3 - Sujeet Sharma

Consensus: No consensus

Detailed SPD E3. Consider the Brent example in B3 as detailed building heights for areas with existing approvals.

E3: What are the strategic local views? Are they the ones in the Urban Characterisation Study?

E3: Protect views from the topes of hills into Bevendean + Whitehawk.

E3: Create local points/designs at the end of a long street. PS: Not a protected view?

E3: Consider views into St Peter's Church from Circus St as an example in A3.

Is the Urban Characterisation Study 2009 still a valid reference? i.e. what's changed since i360?

Strategic to detail (1) Good urban scale study of views in + out of the site;. (2) reasoned arguments/thoughts on how the proposals respect/respond/enhance these in positive ways; (3) Detailed analysis of options + how they positively affect character + nature of views.

Replacement of views ... particularly masterplan sites. Don't necessarily preserve fixed views unless they are very, very high value. Instead accept replacement that are equivalent or better.

How do you decide which single angle perspectives should be protected. This is impacted by personal experience.

The views and vistas are constantly changing. Detailed SPD could close conversations. Each development needs its own conversation.

Focus on action rather than an issue is key.

In there an in between E2+E3?

Difficult to pin down views as we don't just work with one vantage point.

Road infrastructure has caused a lot of views to change.

How much to we embrace change or insist on preservation? How far reaching visionary can we be i.e. does the SPD predicate one way or another?

Gentlemen's agreement 1920 - not to building within 200 yds of hilltops all around Brighton - Councillors & developers agreed which protected Downs & views (example Bevendean).

Save rare species from extinction flora + fauna - urban fringe - 5/6 of the only rare chalk grassland habitat in Sussex (around this area) and Kent (another 1/6 in Scandinavia) - no other fauna + flora.

Designing in family homes & having designated student blocks all along Lewes Road to free up family homes for rent (not for additional students).

Can we have a discussion group on email to highlight and to develop points?

Where are long term locals in the discussions & consultations? They could point to past good practice & what did not work (from experience?)

E. Transcripts of Consultation Portal responses

Should be governed by what people in the city want to see

Masterplans required for major developments.

There should only be further development where there is already development. Increasing density is preferable to new build

The City is most likely to thrive and deliver to the widest population by leading urban design proposals, rather than purely reacting to them, which a Detailed SPD offers.

The SPD should seek to protect and enhance the green infrastructure network of the city, that spans neighbourhoods and is vital to maintain and enhance the city's liveability, air quality and ability to adapt to climate change.

The Society believes that priority should be given to those areas which have already been highlighted as in need of improvement: examples include the proposals by the Gehl report in 2007, which includes corridors from the down to the sea both in Brighton and Hove and treatment of related conservation areas. We also believe that existing conservation areas should have investment strategies - with funding coming from developer contributions as and when appropriate. Major sites should be given detailed masterplan treatment which should include surrounding public realm. This work should be firmly focussed on implementation.

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.

Make it more obvious that the issue here is about higher density development. There is a risk to actively consider to environmental quality through the densification of development, hence to implement the stated objective to "to identify pro-active measures that could help to secure major enhancements to their built environment and public realm" there is a need for soft landscape/vegetation to be integrated through its creative use in public realm areas and on buildings themselves to deliver public environmental benefits and retain/increase the functionality of Green Infrastructure.

Any guidance needs to be followed by the BHCC Highways Department and other departments such as Cityclean. If these departments continue to ignore existing guidance on street enhancement and street design there is no point in producing more.

Opportunity for taller developments to make a real statement and be an example of the best design - will help continue marking out the city as individual and different.

Taller development only where there is already dense and tall development

Time and energy will be saved by identifying the areas where tall buildings may be located and a broad brush allows flexibility to meet changing design and construction developments which may make tall buildings suitable in the future, where currently they are deemed less so.

In a city like Brighton and Hove - where tall buildings are a rarity - special care is needed in accommodating them. This includes their impact on wind. I am not convinced that recent proposals (e.g. the University of Brighton's Moulsecomb development) pay sufficient attention to the visual and other impacts. Much recent development (e.g. the New England Quarter) deteriorates very quickly and becomes stained and an eyesore. The impacts of large developments on water management need to be taken into account more seriously.

We believe a more relaxed approach to higher buildings in the city within the defined nodes would be of benefit. Where several high building are feasible these should be 3D modelled with an aim to create an interesting and varied skyline.

Make sure tall buildings don't block views of the seas (particularly hotels on the seafront), which is important for mental wellbeing.

Taller development on City centre brownfield sites must take preference over urban development on green field sites.

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.

It is vital to enable residents to have the opportunity of contact with local nature, including those living in taller buildings, hence there is a need for inclusion of vegetation such as green roofs and balcony planters, and other wildlife measures to be installed too such as bird boxes.

Tall buildings and structures are an increasing threat to the setting of conservation areas and heritage assets. Examples being the i360 tower and the party hotel on the site of the former ice rink in Queen's Square which now dominates the listed churchyard of the listed St Nicholas Church. The local guidance must ensure these heritage assets are better protected.

Good opportunity to involve residents in 'place making' to create spaces that are usable and attractive

We feel that the current SPD12 provides clear guidance of what is acceptable and what is not. This principle should be retained subject to masterplanning of large developments.

Planning need to be more flexible to allow development of buildings with potential to provide additional accommodation. New build would therefore not be required

We are concerned that the multitude of policies with increasing demands put on developer contributions including the imminent CIL will reduce the quality of design to a bare minimum. This is an issue that the Council has not addressed. We cite as evidence the attitude by the authority to the design of 1-3 Ellen Street, with its varied materials and imaginative 3D greening up proposals. There is a need to recognise that good design costs money.

Place stairs at the entrance to tall buildings, not just lifts - so that stairs become the default form of access

Sustainable buildings using solar power and water harvesting should be mandatory.

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

Regarding building layout, the Wakefield DC example given of SPD guidance for housebuilders shows good incorporation of environmental GI elements "this is what is needed for the BHCC UDF too .

Provision for long-term maintenance should be included at the design stage

WHY are the council closed no the facility at Stanmer park and taking down the greenhouses? What a wonderful facility this is for a council to have. To let it go is a disgrace. Where will the plants come from now to keep the parks and gardens looking beautiful. Look at the sea front between the marina and Saltdean, it is a disgrace. No planting, weeds, rubbish not cleared. What impression does this give visitors, it's shocking. Public spaces and seafront/ clifftop walks should be maintained. Re open Stanmer Park and manage it correctly please

There is much more to do to make B&H a city in which people can travel easily without fear of physical threat or harm from pollution. To move forward to a healthier, safer city in which to travel a strong guide must be given.

Welcome commitment to improving integrated water management through a landscape-led approach.

It would be helpful to identify areas of public realm that need to be improved. From there a list of improvements could be produced that could serve as a menu for appropriate developer contributions. A good start are the proposals in the Gehl report (Public Life - Public Space) and in addition the long list of projects in the LTP - this could generate synergies with the development process in the City.

"making spaces age friendly" drop pavements, benches etc. covers all ages not just older small children people with walking limitations or heavy bags etc. "neighbourhoods with communal spaces and greening areas" people really value these and m improves perception of community safety "Consideration of street furniture and temporary things such as publicity A frames and smoking areas which are placed on the flattest smoothest part of the pavement . Older residents find this limits their feeling of "safe footed" walking and increases likelihood of tripping and falling. "glad to see cycle pedestrian friendly spaces " we do need some integrated parking to allow for ability access i.e. not just blue badges but also those with other temporary or circumstantial limitations, elderly people, small

children, delivery collections and drop off. Ensure all developments around parks have views onto the parks perhaps take advice from FCL/community safety re children's play areas a balance between the simple pleasure many get of watching children play, child safety surveillance keeping an eye on your kids, with safeguarding issues. Views of key sites e.g. pavilion whenever possible – Greening the urban environment it costs to manage the trees but the mental health and anti-pollution benefits are good. May need to consider less allergenic types for those who suffer hay fever. Communal urban gardens promoted as a key marketing point esp for tall new accommodations, or at the end of streets. Green cycle/walkways between estates, buildings, retail areas will need good lighting though for safety. Improvements to walking and cycling must be given high priority to reduce pollution from motor vehicles and ensure healthy user friendly routes. Priority given to public transport e.g. Bus lanes.

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 regarded as important. Look at Circus Street, where the public spaces between the tall buildings will be totally overshadowed and receive no 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 there 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 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.

I note that the "Public Life, Public Space" document refers to a "complete bicycle network" (it would be better to refer to a cycle network) and that "a coherent pedestrian and cycle network is vital to the legibility and overall quality of the City". We of course strongly agree with those statements. We support moves to "Copenhaganise". However it appears that the "Public Life, Public Space" document was published in 2007 which is a long time ago. Similarly the Streetscape Guidelines which you reference are out of date. The Streetscape Guidelines document refers to the "Brighton and Hove Cycle Track Design Guidance" which it states is available from the Transport Planning Team, however we have not seen a link to the document on this site. In order to bring about a coherent approach to cycling in City Plan Part 2 and this UDF, more resources need to be urgently brought forward to act on Government's guidance to produce a Local Cycling and Walking Infrastructure Plan in a timely manner and to provide a proper cycling strategy which becomes embedded in local planning documents. Transport and cycling provision is a rapidly changing area and we need references to up to date, evidence based documents with high quality standards for infrastructure. Shared space and shared surfaces are concepts which need re-evaluation in the light of fast-growing numbers of cyclists and the preferences of people walking or cycling. Shared space is not an adequate solution in many instances where in fact a segregation of modes is necessary for the comfort of all involved, taking road space or parking space where necessary. Also, a freight strategy needs to be developed to limit access by large vehicles to areas of the City where people walk and cycle (or are trying to cycle). Writing the LCWIP (which the DfT has clearly stated is pivotal in the funding process) was unacceptably delayed in this local authority and we are not seeing signs that adequate resources have been brought to bear for its successful and early completion.

Of the 5 Issues [resented, this is probably the key area to incorporate GI objectives in to, along the lines of those suggested in the broad brush SPD approach – however in this there is a need to also include functional environmental benefits as an objective here too. Such a need for explicit mention of GI objectives here should particularly emphasise climate change resilience and adaptation, as well as other elements of CPP2 DM policies 37 and 22). The Southampton Green Mile example given illustrates understanding of a specific GI agenda there.

The BHCC Highways Department and those departments operating in consultation with it such as Cityclean must be made to follow the guidance which already exists. This has not been evident in recent years. The proliferation of pointless street signs and other street clutter, the wide spread use of tarmac to replace flag stones in conservation areas and the placing of unsightly ill maintained communal bins in front of grade one listed churches are examples of the failure of these department s to follow guidance in even the most limited way.

It does not take a plan to identify the needs of the city. See ab l –™ve. Planting, rubbish removal and maintenance needed.

Please protect Greenbelt and brown belt. Build only on existing building sites, build upwards and outwards and re open closes empty buildings. Planning department need to be more efficient and move applications through quickly. They are currently slow and inefficient. Please do not allow any new build on greenfield or brownfield sites, or national park Please re open the wonderful facility at Stanmer Park and maintain our public spaces.

Being a hilly place, there are many strategic views you need to take account of, including views into the city from the S Downs.

– neighbourhoods with communal spaces and greening areas – people really value these and m improves perception of community safety. Re plans for more tall buildings such as hotels, do not built tall hotels along the sea front as they block the sea view for many residents - very valued and has mental wellbeing benefits - so many can see the sea not just the building residents/hotel stayers Mental health benefits of green/sea views. Ensure views of the Downs wherever possible. Ensure all developments around parks have views onto the parks perhaps take advice from FCL/community safety re children’s play areas a balance between the simple pleasure many get of watching children play, child safety surveillance keeping an eye on your kids, with safeguarding issues. Views of key sites e.g. pavilion whenever possible

B& H is fortunate to be between the Down and the Sea. High priority must be given to protect and ensure views of the Sea and downs are not spoilt by development particularly on the Urban Fringe and green spaces in the city. The Public Rights of Way network must be kept open and easy to use and improved. Particular note should be taken of the B&H Rights of Way Improvement Plan.

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, 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.

Note that encouraging links (including visual connections) between the city, downs and sea is a key objective of our Biosphere programme .

All public views from within conservation areas are particularly important but some might be identified as being of special importance.

Would like to see designers involve communities more in shaping new developments

We are broadly in favour of any advance planning that encompasses learning from previous design and development in the city and involves the diverse communities of the city in the framework.

Speculative development of urban fringe greenfield sites should not be allowed whilst brownfield sites lie undeveloped. Current/proposed Urban development on greenfield sites at Ovingdean, and Saltdean: Falmer Avenue and Coombe Farm are undemocratic, opposed by local elected Councillors and local residents. Sustainability and reduction of pollution must be given high priority in the UDF SDF

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 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.

Vision As with the draft proposals for the City Plan Part 2 we feel that the UDF SPD has missed an opportunity to outline and support a clear and forward looking vision for the future design of the urban realm within the city of Brighton and Hove. Set against the context of the aims and aspirations embodied within City Plan Part 1 there appears little to help developers and their design teams address the real needs of the City in years to come. As such it is very difficult to offer constructive and helpful advice upon a document that we feel is fundamentally flawed in its structure, as to do so could be interpreted as support for that structure. If the UD's purpose is to guide proposals on acceptable standards of good urban design, we question first the selection, and limitation, of these 5 criteria and would note that CP12 already notes a list of criteria that are broader and more relevant. However, even they appear to miss perhaps a key driver to any city-wide urban design strategy being one of movement patterns, how they exist and how or why they are being proposed to improve. From this, and coupled with a clear understanding of urban grain, development potential of the city, plus demographic, social and economic studies of the area in question, appropriate and meaningful proposals can be generated that contribute to a wider vision for the urban framework. So, we would suggest the five criteria listed are reviewed, broadened and linked back to connect more clearly with the aspirations and policies stated within CPP1. Examples for City Plan only / Broad Brush SPD / Detailed SPD levels As noted above we feel that save 1 example noted for Anston House to support A2, all other examples appear either poor in conveying their intention and in the detail of information, or seem inappropriate to the urban context of Brighton. We would note the

UDF might be better to refer to an excellent resource document, often quoted by CABE, entitled The Urban Design Compendium, Vols 1 & 2, published by The Housing Corporation and English Partnerships in 2007 this contains many precedent studies that illustrate the fundamental principles of good urban design. (Page 12 of Vol 1 of that document sets these out very clearly, page 2 of Vol 2 notes Brunswick Town, Hove as a good example of urban design from the Regency era and page 9 a process map leading from policy setting to leaving a positive legacy.) Conclusion Given our comments above and the degree of problems we can see within the Issues and Options Paper, we would suggest that the whole document is reviewed and this could be done with a body such as PAF working alongside the Council. We believe that PAF has offered this help with perhaps DSE facilitating the initial workshop. We believe that this could be a positive way forward.

My main comment is that the scope of the UDF SPD needs to be broadened to allow an integrated approach to be taken in the built environment to properly include soft landscape / natural environment / Green Infrastructure elements. The 5 issues identified in the SPD fail to adequately or explicitly include this agenda currently, hence I suggest that this becomes an additional 6th issue (and is much better integrated in to the current topics as possible/relevant). Regarding an expanded scope, in the Introduction and Purpose sections there is a need for explicit mention of CPP1 CP13 Public Streets and Spaces also, in addition to CP12, in order to take such a more integrated approach - since this includes a policy objective to incorporate street trees and biodiversity wherever possible. There is then also a link to make with the present proposed CPP2 policies also, in addition to DM18, including: DM37 Green Infrastructure and Nature Conservation - the key CPP2 policy for GI DM22 Landscape Design and Trees this has a strong focus on GI including a proposed requirement for GI Plans to be produced for developments; in order to produce useful and informed GI Plans there is a clear need for guidance to developers (and planners) which should be provided through the UDF SPD (given that BHCC lacks plans for a dedicated GI Strategy). SPD 11 Nature Conservation & Development - links to make to this also (+ Glossary "GI needs to be included and defined here (in addition to ecosystem services)

I think that enforcement is crucial. Our City needs to be protected from developer exploitation in the strongest way possible.

Much of the harm done in recent years to conservation areas and heritage assets has either resulted from a lack of planning policy enforcement or because the harm has been caused by a BHCC department exercising powers not subject to planning policy. Departments such as Highways and Cityclean especially (though not exclusively) must have managers who are prepared to read guidance on urban design (both local and national) and be willing to act in accordance with it.

Incidentally, I and the RNIB Solicitor did an inspection of the central streets of Brighton and Hove with regards to the clutter. We took many photographs of the culprits. The RNIB was inclined to sue, having got nowhere with the Council. In fact it didn't pursue a legal action, because of its shaky financial situation and the risks of costs against it, should it not be successful. Brighton and Hove City Council is very litigious. However, the law has strengthened with respect to obstruction of the public highway so the RNIB might think again should its finances improve.

However, we all hope that the Council will take the question of obstructions in the public realm seriously and will come up with a policy that will meet the approval of all reasonable people.

I want to mention something which ... is something that has been driving me mad for a long time: you probably know that on the northern edge of the enclosed gardens in Palmeira Square, there is a very attractive wall which separates the pavement on the northern side of the square from an area behind it which abuts on to the buildings. You might have noticed that on that wall are five (I think) very attractive black iron lamp holders, similar to those that one can see on the embankment to London. For many years, these lamp holders held light bulbs (surprise, surprise!) which worked. They did last an enormous number of years before failing but when they failed, they were not replaced. The last one lasted at least five years. I have tried several times to get the Council to replace the bulbs. How many Council staff does it take

to replace a light bulb? (Answer: a great number, it seems). This has never been done. I have tried several routes into the Council and the most helpful people seem to be the planning department however I am not sure this is a planning matter. It's a maintenance matter.

Why is this important? Because it's very silly to have an asset which is not being used. These lamps are very functional as well as being decorative - they are a great use to me because I can steer my way by their light. Not so much by the light they shed but by their beacon aspect. The northern side of Palmeira Square is rather dark and there are obstructions (not pointless obstructions) such as taxi and bus shelters, benches and rubbish bins which are mostly dark and I just cannot see after dark. There was an issue, false in my view, about the difficulties in seeing who was responsible for the lamps. At one time, Hove was a District within East Sussex County Council and they were responsible for street lighting in the town. Then Hove became part of Brighton and Hove unitary authority and responsibility for street lighting was transferred to that authority. I have been told many times that it is impossible to reallocate responsibility from ESCC to BHCC with regards to the wiring to the lamps and for the replacement of the bulbs within the lamps. It's a ridiculous situation and one which must be solved because the whole matter is bringing the Council into disrepute. I know most people in the area find this situation annoying but they think nothing can be done about it because of the perceived implacability of the Council. This saga reminds me of *Cloche merle*.

F. Transcripts of email responses

I am secretary of the Round Hill Society and have been documenting our street lights. Sadly they are losing their heritage value every time the top of a swan neck is cut off to replace the existing lantern with a nasty unsuitable fitting. As a conservation area I had hoped that heritage features would be protected, but it seems not. With LED units coming across the city I fear cheapness will outweigh quality. Perhaps some authorities care more and have found ways to upgrade existing lanterns?

Can we at least try to find a better solution?

To start perhaps one of the cut off lanterns can be found and examined by experts to see if upgrading the lantern might be possible.

If you have no time or budget I will undertake finding experts if you can get a lantern from your lighting agents.

Shared Space Roads To Be Halted In the UK - You might be interested in this breaking news about Shared Spaces.

I will be in touch with you later about Monday's event which was very useful. I found everyone there very welcoming. I'll talk to Chris Pugh another time about the audio arrangements.

I don't know if the subject of shared spaces was raised on Monday. Is it a planning matter? I should think so!

Please make sure that the information I have sent below is injected into the top areas of the Council's Planning Department or whatever it is called these days.

A discussion took place around the potential flexibility on the number of storeys when bringing tall buildings forward for housing, in certain areas of the City, and how the guidance will operate in this respect.

Ed spoke about the public's perception of high rise buildings and the development of Anston House was given as an example. It was agreed that a good high rise model was needed to change the public's view of high rise developments.

I attended the workshop on behalf of BTA and we are invited to make any comments before 13th September

It was a good workshop, well presented and the facilitators at each discussion table enabled a good dialogue

The document is, we think, a good start as an advisory document. It does provoke some useful questions by giving examples from other places that could be applied in our setting and as such is welcomed and supported by the Brunswick Town Association

Obviously there are aspects like environmental issues, greenery, aesthetics of building etc that must be an integral part of all city and urban design programmes for the future

One big question is will ALL council departments sign up if this is only a strategy and not the policy of council? And we cannot stress strongly enough the need for the principles espoused to be adopted as Policy. Otherwise we will continue with one department undermining the good work of another

We assume that this will need to be read and agreed in conjunction with the City Plan as one needs to inform the other

We feel that the statement on public realms and conservation are NOT strong enough, eg rubbish policy and required actions

We have some expressed concern regarding, can you have one approach fits all for a city like Brighton/Hove. Too rigid and developers have no ability to be creative, too flexible and it is abused

As an example it is noted that appx 3 tall building potential development includes western front of Kingsway overlooking Hove lawns as far as Wish Road. Equally we felt that the 3rd detailed option should be agreed in all cases

The workshop and the document are welcomed and this is a positive good step forward for further dialogue.

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, and 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 there 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 conglomeration 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.

The Brighton & Hove Planning Agents Forum (PAF) has considered the proposed Urban Design

Framework SPD Issues and Options paper and has the following comments to offer.

1.0 Vision

1.1 As with the draft proposals for the City Plan Part 2 we feel that the UDF SPD has missed an opportunity to outline and support a clear and forward looking vision for the future design of the urban realm within the city of Brighton and Hove. Set against the context of the aims and aspirations embodied within City Plan Part 1 there appears little to help developers and their design teams address the real needs of the City in years to come.

1.2 As such it is very difficult to offer constructive and helpful advice upon a document that we feel is fundamentally flawed in its structure, as to do so could be interpreted as support for that structure.

1.3 Nonetheless, we have included what we hope are seen as constructive comments for a potential way forward and trust this advice is taken up by BHCC.

2.0 SPD Issues and Options

2.1 The paper starts by noting 5 topics against which it is to offer advice on Urban Design issues, these are noted as being referred to within CPP1, CP12. That policy states: “4.145 The purpose of this policy is to provide a statutory basis for the proposed Urban Design Framework and to enable as much certainty and clarity as possible about where the city will broadly accommodate any taller development. The Urban Design Framework will set out priorities for preparing planning briefs and supplementary planning documents for development areas and other areas requiring positive enhancement. It will include identification of the key strategic views into, out of and within the city which require protection or which may benefit from development that would enhance them.”

And under 4.147 and 4.148: “Further detail on the boundaries of the tall building areas and guidance on appropriate height ranges will be provided in the Urban Design Framework.”

“All applications that fall within the definition of a tall building will be required to be accompanied by a Tall Building Statement, as currently set out in the adopted Tall Buildings Supplementary Planning Guidance (SPG 15), which will be superseded by the Urban Design Framework.”

The above text makes no mention of the subjects covered by points A, C or D and immediately sets up contradiction and inconsistency between the two documents. However, none of the 5 points A to E cover the need to set out the priorities for preparing planning briefs but reads more as a collection of examples of how one might choose to substantiate one’s proposals set against the 5 selected criteria.

2.2 If the UDF’s purpose is to guide proposals on acceptable standards of good urban design, we question first the selection, and limitation, of these 5 criteria and would note that CP12 already notes a list of criteria that are broader and more relevant. However, even they appear to miss perhaps a key driver to any city-wide urban design strategy being one of movement patterns, how they exist and how or why they are being proposed to improve. From this, and coupled with a clear understanding of urban grain, development potential of the city, plus demographic, social and economic studies of the area in question, appropriate and meaningful proposals can be generated that contribute to a wider vision for the urban framework.

2.3 So, we would suggest the five criteria listed are reviewed, broadened and linked back to connect more clearly with the aspirations and policies stated within CPP1.

3.0 Examples – for City Plan only / Broad Brush SPD / Detailed SPD levels

3.1 As noted above we feel that save 1 example noted for Anston House to support A2, all other examples appear either poor in conveying their intention and in the detail of information, or seem inappropriate to the urban context of Brighton.

3.2 We would note the UDF might be better to refer to an excellent resource document, often quoted by CABE, entitled The Urban Design Compendium, Vols 1 & 2, published by The Housing Corporation and English Partnerships in 2007 this contains many precedent studies that illustrate the fundamental principles of good urban design. (Page 12 of Vol 1 of that document sets these out very clearly, page 2 of Vol 2 notes Brunswick Town, Hove as a good example of urban design from the Regency era and page 9 a process map leading from policy setting to leaving a positive legacy.)

4.0 Conclusion

4.1 Given our comments above and the degree of problems we can see within the Issues and Options Paper, PAF would welcome the opportunity to help the Council in reviewing the composition of the document and assist in its potential re-structuring. We'd therefore like to propose a workshop between PAF, the Council, potentially facilitated by Design South East, with a mutually agreed agenda prior to the event, in order to develop the emerging UDF.

[There] are a couple of comments that are relevant for UDF in relation to GI and SUDs that you may want to look at in the CP2 feedback I submitted. See attached.

I really wanted to highlight the importance of the role of our public realm design in terms of support public health objectives – which I hope was picked up in the workshop I attended earlier this year too.

DM33 Safe, Sustainable and Active Travel

1) 2) Cyclists:

- To reduce disruption to cycling flow along routes, new development will support continuity of cycling track through good design and appropriate use of signage, where relevant. 'Difficult engineering solutions should be addressed early on to avoid gaps being left. The design should aim to minimise maintenance requirements and costs, and take account of who is responsible for that. Ensure the design of the route enables it to be used effectively in the dark and in poor weather'.

(https://www.sustrans.org.uk/sites/default/files/file_content_type/sustrans_handbook_for_cycle-friendly_design_11_04_14.pdf);

2) 3) Public Transport Users:

- "d) protect and, where appropriate, enhance existing and proposed public transport routes, services and facilities incl. signs and bus stops".

DM37 Green Infrastructure and Nature Conservation

3) 2.268) Green Infrastructure is a multi-functional and connected network of predominantly green spaces, water and other environmental features in urban and rural areas that delivers a wide range of environmental, social, economic benefits and quality of life benefits. It can help strengthen climate change resilience, health and well-being of communities, economic vibrancy, social cohesion, and, provide habitats and wildlife corridors as well as urban cooling.

4) The most effective approach to embedding GI into CP2 would be through the development of a Green Infrastructure Plan for the city. Would/should use this opportunity to set out our intention for having this in the pipeline. It will also support delivery of UDF.

DM43 Sustainable Urban Drainage

5) The design and layout of all new buildings, and the development of car parking and hard standing, will be required to incorporate appropriate Sustainable Urban Drainage Systems (SUDS) capable of ensuring that there is a reduction in the level of surface water leaving the site unless it can be

demonstrated not to be reasonably practicable.

SUDS should be sensitively located and designed to ensure that the quality of local water is not adversely affected; and should promote improved biodiversity, an enhanced landscape/townscape and good quality spaces that improve public amenities in the area.

6) 2.322 The choice of appropriate sustainable drainage measures for a site/development should be informed by specific catchment and ground characteristics, and will require the early consideration of a wide range of issues relating to the management, long term adoption and maintenance of SUDS. When determining the suitability of SUDS, vulnerability and the

importance of local ecological resources, such as water quality and biodiversity should be considered. See also policies DM42 Protecting the Water Environment and DM40 Protection of Environment and Health – Pollution and Nuisance and DM37 Green Infrastructure and Nature Conservation. The use of SUDS will be required as part of all development proposals other than in exceptional circumstances where it can be demonstrated that there is no appropriate SUDS solution which is reasonably practicable.

It is important that design and accessibility is factored into the planning of any SUDs. The choice of design and type of SUD is essential to ensure they function successfully both in terms of surface water management 'and' in terms of their social function. If suitability of systems 'type' is not properly considered there is a danger that surface water flooding can be exacerbated. SUDs should be designed to support and encourage greater public accessibility of spaces than was possible before. Creative and innovative design of SUDs can also help to open up areas that were otherwise inaccessible and support improvements in public realm and in health and well-being of local residents and communities.

DM45 Community Energy

2.264 Developers of medium scale and major development schemes are encouraged to actively seek community energy partners to deliver low carbon energy solutions which are 'led by' or 'meet the needs' of communities through full community ownership and control of a low carbon energy solution or project and that can add social value in accordance to the council social value framework. This policy is particularly relevant where viability issues restrict the applicants' ability to maximise the potential for low and zero carbon energy as part of their scheme.

I know this is probably not something you may have considered in the UDF work but public breastfeeding and how spaces for this can be incorporated into urban design could be of great added value into any work focusing on public health in the core elements of the UDF and how streetscape is designed to support better use of space.

Let me know if you are interested in bringing in Sally into any future workshops or consultations on relevant elements of the UDF development process

Thank you for inviting Highways England to the Urban Design Framework SPD workshop.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

Having reviewed the subject matter for the workshop, Highways England will not be attending as it will not affect the safe and efficient operation of the Strategic Road Network.

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Having examined above consultation, we note that the questionnaire is aimed at those living, working and studying in Brighton and Hove, and therefore Highways England does not have any comments.

Urban Design Framework Supplementary Planning Document (UDF SPD)

Draft UDF SPD response to early stakeholder consultation

Appendix to 24 September 2020 TECC report

What consultees said at Issues & Options consultation stage	How the council responded in the context of the Draft SPD
<i>General</i>	
Provides enough detail without being too prescriptive	The UDF has been prepared in the form of a Supplementary Planning Document (SPD). A SPD is one of a series of documents used by the council to provide guidance and information to planning applicants and landowners about how to successfully implement adopted and emerging policies in the City Plan Parts One and Two. It cannot make new or change existing policies but it can assist the council in delivering the amounts and types of development being proposed by City Plan Part One and Two in more innovative ways and through better quality design, illustrating good practice. The document builds on the National Design Guide, identifying local planning policy priorities and setting out broad design recommendations and principles that applicants can consider when preparing planning applications in Brighton & Hove.
Ties in with other planning policy, strategies, studies and guidance Signposts good practice examples in the city and elsewhere	Some design decisions can address multiple policy objectives. Links to policies where good design decisions can lead to addressing other policies are provided along with considerations that may be relevant to all high density development in the city. Hyperlinks to supporting documents/guidance that are particularly relevant to the Brighton & Hove context and good practice examples are signposted throughout the document, in particular in Section A Local priorities.
Promotes engagement with local professionals and communities	The SPD looks at opportunities to support constructive, multi-disciplinary design discussions between applicants, designers, planning officers, councillors and communities by outlining potentially appropriate solutions and illustrating best practice in the city and elsewhere.
Creates places that are accessible to all	In Section A, in particular in regard to Spaces between buildings, identifies ease of access for all as a design consideration that should be prioritised in the preparation of proposals. The Draft SPD shows how this is particularly important in Brighton & Hove given that accessible open space is limited and there is a need for proposals to consider how design proposals can deliver, for example, level, step-free and easy to navigate routes and links to public transport networks and provide building facilities that are accessible to those that will use them.
<i>Priority areas for enhancement and design guidance</i>	
Identify opportunities to optimise density, set density thresholds and identify facilities to meet the need of different	Section A Section 3.2 focuses more specifically on priorities for designing high quality, high density development indicating that the greater the density and height of a development, the greater the council's expectation for the benefits that can compensate for any perceived

Urban Design Framework Supplementary Planning Document (UDF SPD)

areas/neighbourhoods	inconveniences of living in smaller spaces, in particular when it comes to residential development. Throughout Section A Local priorities and Section B Tall buildings further considerations and opportunities that may be relevant to high density development in the city are signposted.
Identify areas/neighbourhoods based on Urban Characterisation Study character areas and/or identified in the City Plan (for example, Seafront, Conservation Areas, City Centre, Urban Fringe, Development Areas)	Section 1.2 Neighbourhood Character signposts the importance for designers to consider the character and identity of the city's neighbourhoods identified in the Urban Characterisation Study. Building on the UCS, this section sets out each neighbourhood in terms of sensitivity to change and likelihood to largely be conserved; be suitable for localised, incremental development and enhancement; and those which require major enhancement.
Identify areas/sites in need of proactive masterplanning	These are set out in sections 1.5 Opportunities for masterplanning and 2.7 Phasing of development.
Prioritise and provide more detailed information for Development Areas and Strategic Allocations in the City Plan	Indicative design principles for these in whole or in part are set out in more detail in Section B Tall buildings for each of the tall building areas identified.
<i>Accommodating taller development</i>	
Provide clarity about definitions, locations, facilities needed, guidelines/impact assessment criteria Density/height thresholds and/or locations Use 3D modelling to support guidance, aid assessment and ensure accuracy	Section A sets out local priorities that apply to all development. Section B Tall buildings provides additional guidance on issues that are particularly relevant to the assessment of any building of 18 metres or more in height and/or significantly taller than surrounding buildings. The Draft SPD includes indicative boundaries, height ranges and general design principles for identified tall building areas that are new to the guidance on tall buildings in the city having previously been considered as part of the 2003 Tall Buildings Study that were not incorporated into SPGBH15 Tall buildings. A streamlined and updated version of the impact assessment criteria set out in SPGBH15 Tall buildings is provided in 13 Tall Building Statement guidelines (Section D Appendices). Techniques that can be used to communicate design ideas well at various stages of the design process, including 3D modelling, are signposted in Section C Planning Process.
<i>Building design</i>	
Identify minimum standards including for internal spaces, sustainability, balcony treatment, acoustics and light pollution.	Making the best use of environmental conditions of a development site to deliver more sustainable buildings and the spaces between them is set out as a local priority in section 1.1. Opportunities to improve building performance, design to minimum space standards and provide adequate private amenity, in particular in high density development, are set out throughout Sections 2 Spaced between building and 3 Buildings.
Assess impact and promote design that supports public health objectives (improving air quality and health facilities).	
More scope for contemporary, innovative design that takes account of context but adds to the area, including 'out of	Sections 1.2 Neighbourhood character and 1.3 Composition of the street scene illustrate how further innovation in design is vital to the delivery of inclusive, sustainable and climate-resilient development that uses contemporary architecture

Urban Design Framework Supplementary Planning Document (UDF SPD)

character' options.	can positively contribute to enhancing neighbourhoods and streets. Advice regarding justification in instances where a scheme promotes a departure from the prevailing instances urban form/character is also provided in these as well as Section C Planning Process.
Include checklist	Questions that applicants can use as a checklist to inform the preparation of design proposals and engage with the council's design advice service, preferably at the pre-application stage are signposted in Section C Planning Process.
<i>Public realm design</i>	
Ensure the design of routes enables greater walking, cycling and public transport connectivity and better integration of transport services (improvements to road safety, level surfaces, de-cluttered pavements and guidance on shared space).	Section A Local priorities includes a section on active and inclusive travel providing links to relevant strategies and additional guidance available as well as good practice examples that address issues raised by respondents.
Design in green infrastructure/nature-based solutions that enhance biodiversity, mitigate against heat island effect (water fountains, community gardening, tree replacement) and incorporates public art and incidental play whilst deterring graffiti/tagging.	Sections 2 Spaces between buildings and 3 Buildings highlight the importance of taking an integrated approach to infrastructure design as a way of optimise the use of land and improve the city's resilience to climate change. Good practice examples that combine green and water management infrastructure and public art are provided.
Ensures streetscape improvements are delivered and good quality new spaces are created.	Section 2 Spaces between buildings identifies priorities for streetscape and public realm design and improvements including in regards to safety, accessibility, materials and management.
Design out crime and anti-social behaviour creating safe and secure spaces by using, for example, visually-impaired and heritage-appropriated lighting.	Sections 1.1 Environmental conditions and 2.2 Outdoor amenity highlight the importance of the location and orientation of internal and external spaces in ensuring these receive appropriate levels of sunlight and outlook and optimise well-being and comfort of users.
Proactive regarding streetscape and public amenity improvements and good quality new spaces/placemaking in the area (maintenance in particular of private outside spaces, temporary/meanwhile uses and standards including sunlight, public health -water fountains for breastfeeding)	The need to maintain adequate levels of natural surveillance and overlooking and providing facilities and provide outdoor amenity and furniture that can be used by people with difference needs is highlighted as a priority.
<i>Views and Vistas</i>	
Revisit and/or identify strategic and local views to be protected	Up to date information about and map setting out identified strategic and steps applicants can take to identify new

Urban Design Framework Supplementary Planning Document (UDF SPD)

and consider impact criteria including in regard to tall buildings	strategic and local views are set out into section 1.4. More detail about strategic viewpoints and landmarks are provided in Section 12.
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Subject:	The Hippodrome – Urgent Works Notice		
Date of Meeting:	24 September 2020		
Report of:	Executive Director – Economy, Environment and Culture		
Contact Officer:	Name:	Tim Jefferies	Tel: 01273 293152
	Email:	tim.jefferies@brighton-hove.gov.uk	
Ward(s) affected:	Regency		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 The report seeks authorisation to issue an Urgent Works Notice under the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) in respect of the grade II* listed Hippodrome in Middle Street, Brighton in order to preserve the listed building whilst it remains vacant.
- 1.2 This Notice is now considered to be necessary as a result of deterioration of the building's condition and the failure of the building's owners to properly carry out the necessary works to arrest this deterioration. The issue of the Notice would allow the council to carry out the works, if not carried out voluntarily, and reclaim the costs from the owners.

2. RECOMMENDATIONS:

- 2.1 That a Notice be issued under section 54 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), also known as an Urgent Works Notice, for the preservation of The Hippodrome, 52-58 Middle Street, Brighton.
- 2.2 That the council carry out the works listed in the Notice should the owners not volunteer, with the Notice period, to do so
- 2.3 That under s55 of the Act officers be authorised to recover the council's expenses incurred in carrying out the works required by the Notice.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The Hippodrome is a grade II* listed building that has been vacant since 2007. It has been on Historic England's At-Risk Register since 2013 and is at the top of the Theatres Trust's 'Theatres At Risk' list. The current owners, HIPPI Investments Ltd, purchased the building in 2017. The building suffers from a range of defects caused by long term water ingress, lack of maintenance and prolonged vacancy.

- 3.2 Council officers and Historic England last inspected the building on 16 December 2019. Officers were able to see that some works had been carried out to the building following previous inspections, including temporary roof repairs over the auditorium, some gutter clearance, boarding of broken windows and removal of pigeon infestation and guano. However, the visit nevertheless confirmed that the condition of the building remained of serious concern. The owners were therefore requested to carry out a series of further, more significant works, including works to address water ingress to the basement, fly tower and internal courtyard. On 12 March 2020 the owners advised that due to bad weather and the emerging Corona virus they had been unable to arrange contractors.
- 3.3 In April and June officers and Historic England held virtual meetings with the owners to discuss progress on the urgent works. The owners were requested to address the water ingress and to produce an action plan with a schedule of works and timetable, a specialist dry rot report and a report on the internal scaffolding that supports the plaster ceiling. None of the above documents has been received.
- 3.4 Immediately prior to the June meeting the owner's contractor submitted an inspection report setting out some works that had been carried out and those more substantive works that were planned. At the virtual meeting on 11 June the owner gave assurances that the main body of required works would commence within six weeks and it was agreed that a further joint site visit should be undertaken before then.
- 3.5 By 28 July no further contact had been received from the owners and no site visit had been arranged. A letter was sent to the owners advising that in view of the lack of progress on substantive works and the known condition of the building the council was now considering its powers to issue an Urgent Works Notice. A site visit was requested. One of the owners responded to say that their contractor would be in touch. The contractor wrote on 7 August to say that many of the works had been carried out but no details were provided and no response was received to a further request for a site visit. Therefore, the progress of any works since December 2019 cannot be verified.
- 3.6 Given the impending winter it is now considered necessary to issue a formal Notice to cover the following issues and works:
- Repairs to address condition of roofs and rainwater goods
 - Fly Tower weather proofing
 - Water ingress in basement
 - Flooding of internal courtyard
 - Dry rot survey and treatment
 - Removal of floor coverings, furniture and debris
 - Ventilation provision
 - New or altered scaffolding to better support fibrous plaster ceiling
- 3.7 A Notice under s54 of the Act applies to vacant listed buildings and may cover works of temporary support or shelter that are urgently necessary to preserve the building. The Notice must give the owner(s) not less than seven days to carry out the works; failing that the council may carry out the works and reclaim the costs from the owner under s55 of the Act.

- 3.8 Historic England has estimated that the cost of the works referred to above would likely be in the region of £xx. However, a site inspection will need to be carried out prior to the issue of a Notice in order to determine which works are outstanding. Historic England has offered to assist in drawing up the necessary Schedule of Works to accompany a Notice.
- 3.9 Historic England has also agreed in principle to offer a grant to the City Council to underwrite up to 80% of the costs of taking Urgent Works action in this case, subject to the council making a formal application. The council would be able to claim the grant on completion of the works. The grant would need to be repaid if the council is successful in recovering the costs from the owners under s55 of the Act.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The only other option would be to continue to seek the owner's voluntary agreement to carry out the necessary works. However, officers are not confident that any further, substantive works will be carried out in the absence of a formal Notice. This risks a continued deterioration in the condition of the building and the loss of historic fabric and features.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 Community engagement is not appropriate in enforcement cases but local conservation groups are known to be concerned about the condition of the Hippodrome.

6. CONCLUSION

- 6.1 The condition of the Hippodrome is poor and deteriorating and the listed building is at risk. Officers are not confident that the owners of the building will carry out the necessary substantive repairs that are necessary to arrest this deterioration. An Urgent Works Notice is therefore now considered necessary in order to preserve the building whilst it remains vacant.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 No specific budget exists for the council to carry out the requirements of a s54 Urgent Works Notice if needed. Therefore any expenditure would have to be met from the Planning service budget until the costs can be recovered from the owners and/or grant funding from Historic England has been received.

Finance Officer Consulted: Jess Laing

Date: 24/08/20

Legal Implications:

- 7.2 The statutory background to the service of an urgent works notice under s54 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is set out in the body of the report. There is no right of appeal against such a notice, but the

owners may appeal to the Secretary of State against the giving of notice under s55 requiring them to pay the expenses of the works.

Lawyer Consulted:

Hilary Woodward

Date: 28/08/20

Equalities Implications:

- 7.3 An Equality Impact Assessment has not been carried out on this specific issue. The proposed action would only impact upon the building's owners.

Sustainability Implications:

- 7.4 None. The repairs would be temporary works for the preservation of the building until its long term future is resolved.

Brexit Implications:

- 7.5 None identified.

Any Other Significant Implications:

- 7.6 None identified.

Crime & Disorder Implications:

- 7.7 The Hippodrome has been subject to graffiti and tagging but this cannot be covered by an Urgent Works Notice.

Risk and Opportunity Management Implications:

- 7.8 There are risks associated with access to and within the Hippodrome due to its poor condition. A specific risk assessment would need to be undertaken before any contractors are taken on site

Public Health Implications:

- 7.9 None.

Corporate / Citywide Implications:

- 7.10 The Hippodrome is a major vacant building in the Old Town conservation area in the heart of the city centre. Its vacancy and poor condition is currently blighting the area and Middle Street in particular (as set out in the Old Town Conservation area Management Plan). The restoration and reuse of the building and wider site has the potential to help regenerate the area and contribute to the aim of 'A City Working for All' in the corporate plan for 2020-23. These works would help to preserve the listed building until that can be achieved.

SUPPORTING DOCUMENTATION

Appendices:

None.

Background Documents

1. Correspondence with the building owners.
2. Old Town Conservation Area Management Plan.

Subject:		Support for the City’s Creative and Cultural Sector	
Date of Meeting:		24th September 2020	
Report of:		Executive Director of Economy, Culture and Environment	
Contact Officer:	Name:	Donna Chisholm	Tel: 01273 292571
	Email:	Donna.Chisholm@Brighton-Hove.gov.uk	
Ward(s) affected:		All	

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 In response to a Notice of Motion to the TECC Committee on 18th June 2020, this report sets out the actions that have been taken by the city council and other organisations to support the creative and cultural sector as a result of Covid-19. This sector has been significantly affected by the pandemic, with many individuals and organisations in the city still facing financial hardship.

2. RECOMMENDATIONS:

- 2.1 That committee notes the difficult circumstances faced by many artists, performers, practitioners, arts organisations and supporting freelancers as a result of the Covid-19 pandemic.
- 2.2 That committee notes the steps taken by the city council to prioritise the sector, as summarised in paragraphs 3.7 and 3.15 below.
- 2.3 That committee requests a report in January 2021 on the completion of the Arts Recovery Plan and on preparations for its implementation, as described in paragraph 3.17.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The creative and cultural sector has been badly affected by the Covid-19 crisis because it relies on income generated between April and October each year. Events, festivals and exhibitions have been cancelled and it is not yet clear when gatherings can safely resume. The sudden loss of income caused by lockdown, which has extended now for six months, has left most of the sector in financial difficulty.
- 3.2 Events, and the cultural industries which support them, draw millions of people into the city each year. The city's creative reputation encourages employers and entrepreneurs to set up their businesses locally. Business leaders are attracted by the high calibre of talent within the city, which in turn generates employment for freelancers and sole traders.

- 3.3 In 2019 a study from the University of Sussex revealed that the creative and cultural industries generated more than £1.5 billion in annual turnover for the Greater Brighton region. This figure increased by 22% in the five years to 2019. The number of people working for creative businesses has increased by almost 20% in five years, to more than 16,000 employees at over 6,100 companies.
- 3.4 Normally, Brighton has around 60 festivals every year. The Brighton Festival is the second largest in the UK and attracted 455,000 people as audience and participants in 2018. In 2019, Brighton Fringe, combined with The Warren and Speigeltent, contributed in the region of £20 million to the local economy. In 2019 Brighton Pride attracted 300,000 parade participants, totalling 450,000 attendees across Pride Weekend. Artists Open Houses has two events each year. Last year 15,000 artists and makers participated and occupied 180 venues within 14 different trails.
- 3.5 At this time all indoor events, festivals and exhibitions in the city between March and December 2020 have been cancelled. The impact of this has been felt across the city, with revenues lost in retail and hospitality, as much as in the creative and cultural sector.

Business Grants from Government

- 3.6 On 24th March the Government announced there would be support for small businesses and for those in the hospitality and leisure sectors, in the form of two grant funding schemes, the Small Business Grant Fund (SBGF) and the Retail, Hospitality and Leisure Grant Fund (RHLG). Small live music venues, artists' workspaces and galleries – all with with a rateable value of less than £51,000 - have benefited from these grants. Sums of either £10,000 or £25,000 have been distributed across the city.
- 3.7 On 28th May the Policy and Resources (Recovery) sub-committee agreed to the distribution of £3.68 million allocated to the city council by government as discretionary grants to businesses. Applications were invited for up to £25,000, with events and culture identified as two of the prioritised sub-sectors for the fund. In June and July a total of £935,000 was awarded to over 100 organisations in the events or cultural sub-sectors, with a further £747,500 awarded to 50 leisure businesses, an associated sector.

Arts Council England

- 3.8 Brighton and Hove has managed to secure millions of pounds channelled through the Arts Council England (ACE) as part of the £1.57bn Cultural Recovery Fund. These funds have been a lifeline for the sector, but government cannot replace the scale of the income lost.
- 3.9 In July of this year, 61 Brighton and Hove based organisations received emergency funds from ACE. Grants of up to £35,000 were awarded to a wide range of organisations, from Brighton Fringe to The Old Market.
- 3.10 Emergency funds were also awarded to national performance organisations

(NPOs) such as the Brighton Dome and Festival and The Lighthouse. The Royal Pavilion and Museums was not successful with an application for emergency funds because local authorities were excluded.

- 3.11 Last month the Emergency Grassroots Music Venues Fund from ACE awarded organisations such as Latest Bars Ltd £22,450, The Green Door Store £20,000 and Concorde 2 secured £14,000.

Use of General Covid-19 Government Schemes

- 3.12 In April the Greater Brighton Economic Board commissioned consultants Hatch to produce a Covid-19 Impact Assessment report to assist with understanding the economic impact of the pandemic on the Greater Brighton Region. As part of this work, they assessed usage of government initiatives according to sector.
- 3.13 The report indicates that at a national level, the arts, entertainment and recreation sectors have been the largest users of the Coronavirus Job Retention scheme. This scheme enabled organisations to claim up to 80% of staff costs for people on “furlough” from 20th March to the end of July 2020. From 1st August the contribution from government is gradually decreasing. The use of furloughing can be seen in the city where building-based organisations such as the Theatre Royal (part of the Ambassadors Theatre Group), Brighton Dome and Brighton Festival, the Royal Pavilion and Museums and the Brighton Centre have all placed staff on the scheme because of closure over the past six months.
- 3.14 The assessment report from Hatch also indicates that the arts, entertainment and recreation sectors nationally have also been amongst the largest users of the Business Rates Holiday, the ability to defer VAT payments and the small loans or grants schemes for self-employed people. These schemes have helped individuals and organisations to manage their way through this crisis, however, these are short term measures.

Outdoor Events

- 3.15 The city council can support the resilience of the sector by providing landlord’s consent whenever possible to enable use of the city’s public spaces for Covid safe events. Over the past three months the city council has granted in-year consent for three large-scale, socially distanced events. This included The Warren outdoor season from 5th August to 27th September. Working closely with public health colleagues and ensuring promoters adhere to government guidelines enables officers to recommend these events proceed. In this uncertain environment, the financial risks for organisations promoting events are significant. November’s TECC Committee will receive a report on the proposed outdoor events programme for 2021/22.

Arts and Creative Industries Commission and the Arts Recovery Plan

- 3.16 The Arts and Creative Industries Commission (the commission) is part of our Brighton and Hove Connected strategic partnership. The commission delivers the city’s strategic cultural priorities as laid out in the Cultural Framework and is supported by the city council. Greater inclusion in the arts for all residents in the city is a key ambition for the ACIC. The council has provided funding, matched

by the ACE, an arts recovery plan covering the next three years. The commission is a major partner in the creation of the plan.

- 3.17 The arts recovery plan that will pave the way for investment in new jobs, new commissions and enabling the city's cultural community to adapt to the new context. The plan poses two important questions for consideration by a wide group of creative practitioners in the city:
- How can we re-imagine our public and cultural spaces as we re-emerge with a cultural offering for the city over the next year?
 - What are the opportunities for collaboration and disruption to create inclusive growth for cultural freelancers, organisations and audiences over the next year?
- 3.18 The plan will be completed in November 2020 and the intention is to use this to make large-scale applications for funding to deliver a series of programmes in the city and widely across Greater Brighton over the next three years.

Culture in Our City Website

- 3.19 In support of the arts and creative industries at this difficult time, the website cultureinourcity.com has been redesigned and refreshed with support from the Council, as a major source of information on relevant funds from Government, Arts Council England and other organisations. The website is the central information point for the work of the Commission.

4 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 As government has eased lockdown restrictions, some organisations have been able to function, such as studios spaces for artists, whilst others, such as indoor venues, still cannot. Social distancing requirements make their business model unsustainable.
- 4.2 The use of outdoor spaces, where transmission rates are much lower, offers a weather dependent alternative. The council's outdoor events team continues to support promoters to consider using a wide variety of spaces in the city.
- 4.3 Without intervention, there is a risk of losing parts of the creative and cultural sector. The recent report by Hatch indicates this could be as much as 50%, which would have a significant detrimental affect on the reputation and cultural wealth of the city.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The commission with its 20 core stakeholder representatives, has met regularly over the pandemic. Under its auspices and using the cultureinourcity.com website, the city council has funded a series of advice sessions and webinars for people working in the Creative and Culture sector.
- 5.2 The partners leading the Arts Recovery Plan are currently consulting widely. A

series of eight online workshops are being convened in September to gauge opinion on the key topics such as:

- the needs of the freelance community to adapt and survive in the city,
- collaborative working that could help address challenges or improve our cultural offer,
- adding value to the city centre experience for residents and visitors,
- infrastructure to enable an increased outdoor offer in both the city and beyond.

6. CONCLUSION

- 6.1 The city's creative and cultural sector has been badly affected by the Covid-19 pandemic, and there are indications it will take at least three years to recover. Parts of the sector maybe lost permanently because of a heavy reliance on generating income between April and October.
- 6.2 The Arts Recovery Plan, which is part funded by the city council, will provide a route to addressing longer-term issues faced by artists and organisations.
- 6.3 The longer that venues remain closed, events cannot take place, and new creative work cannot be consumed live by the public, the greater the risk that the sector will be damaged permanently. The city council's supporting role in the recovery of the sector will be critically important over the next three years. This includes how quickly and flexibly we grant landlord's consent and licences for events, how we collaborate with other bodies such as ACE to draw funds into the city, and how we support the commission to lead future strategic thinking.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 There are no financial implications arising directly from this report which is for noting.

Finance Officer Consulted: Jill Fisher

Date: 15/09/20

Legal Implications:

- 7.2 There are no legal implications arising directly from this report which is for noting.

Lawyer Consulted:

Alice Rowland

Date: 15/9/20

Equalities Implications:

- 7.3 The Brighton and Hove Cultural Framework identifies the importance of culture in promoting wellbeing and addressing health inequalities through enabling residents – especially those further away from opportunities - to participate in cultural activities. The annual cultural conference, planned for March 2020, had inclusion as its key theme.

- 7.4 To inform the cultural conference, research undertaken by Brighton People's Theatre in 2019 for the commission, funded by the council, provided a series of principles for community-led arts projects in the city. These principles were articulated following community work in East Brighton and Hangleton and Knoll, combined with research into best practice. This work will be used to inform the arts recovery plan.
- 7.5 The crisis in the sector caused by the pandemic has set back plans to increase inclusion in the creative and cultural sector by at least a year and possibly more.

Sustainability Implications:

- 7.6 Environmental sustainability will be a significant feature of recovery, as the sector seeks to use the crisis to innovate and reduce its carbon footprint. The Council's Outdoor Events Strategy lays out obligations which are being widely adopted in the sector, for example in reuse and recycling, and in reducing energy use.

Brexit Implications:

- 7.6 There are no Brexit implications.

Any Other Significant Implications:

None.

Crime & Disorder Implications:

- 7.5 All major event plans are submitted to the city's Safety Advisory Group for scrutiny and action. Indoor venues are subject to licencing conditions.

Risk and Opportunity Management Implications:

- 7.6 None.

Public Health Implications:

- 7.7 There are ongoing and shifting public health implications for the creative and cultural sector as a result the pandemic. These have been covered elsewhere in this report. Officers from the arts and events teams continue to liaise with regulatory services and public health, advising Councillors on developments. Government and industry guidance, as it alters, is continually being followed and fully implemented.

Corporate / Citywide Implications:

- 7.8 There are significant employment implications covered by this report. There were approximately 16,000 people working in the creative and cultural sector across Greater Brighton in 2019, with this being concentrated in the city. The full impact of the pandemic on the sector is not yet clear, but the actions taken by the council now, will help to mitigate the loss of skills, talent and employment.

SUPPORTING DOCUMENTATION

Appendices:

1. Daring to be different: Brighton and Hove Cultural Framework 2018/19

Background Documents

None



Daring to be different

**Brighton & Hove
Cultural Framework**



Supporting economic growth and maintaining
an attractive, connected and well run city for
residents, businesses and visitors

Arts &
Creative
Industries
Commission
Brighton & Hove


**Brighton & Hove
City Council**

03

CONTENTS

05

Introduction

07

Ambitions

10

Inclusion

12

Work Strands

20

Acknowledgements

DARING TO BE DIFFERENT



This strategic framework for Arts & Culture in Brighton & Hove is the result of a comprehensive dialogue between city partners who have given generously of

their time and expertise. It establishes clear themes, ambitions and priorities which will guide future collaboration and investment.

I am delighted that Brighton & Hove City Council (BHCC) has been a partner in developing the framework, and that we can now use it as a focus for discussions, action planning and delivery. The Council has formally adopted the framework and will work hard to support its implementation, with a view to strengthening what is already a vibrant sector. Together we will ensure we grow and sustain the positive impact of culture on our economy and our wellbeing, and create pathways for local residents, students and tourists (regardless of income, background or geography) to develop their cultural lives to the full.

Councillor Alan Robins

Chair of BHCC Tourism, Development & Culture Committee



There has long been something magnetic about Brighton & Hove: artists are drawn to our city - its natural beauty, its close community and its free spirit. Audiences

and residents are famously engaged; open to the new, the experimental and the edgy. Visitors come in their millions every year, employers and entrepreneurs choose the city for the lifestyle it provides and its rich talent pool of creatives.

Yet for all this wealth of creativity, innovation and opportunity, the conversations captured by this Framework show the arts and cultural sector in our city to be both ambitious and impatient. Driven by social purpose and a desire to connect better with each other and more imaginatively across sectors, we know that collective action will be more effective than our individual efforts.

Our shared commitment to inclusion is the starting point for each strand of the Framework and if properly grasped could enable a profound shift in our whole city's cultural, economic and social life. I know that with the collective resourcefulness, inventiveness and generosity of colleagues and the talents and leadership of the next generation we can realise our ambition.

Andrew Comben

Chair of Brighton & Hove Arts & Creative Industries Commission

Chief Executive of Brighton Dome & Brighton Festival

Brighton & Hove is known internationally as hotbed of creativity. It is at the epicentre of one of the most dynamic and innovative creative clusters in the UK, at the forefront of advances in artificial intelligence and augmented reality, as well as being home to hundreds of artists and creative producers. It hosts over sixty festivals a year, including the largest annual arts festival in England. Artists and creative people are drawn to live and work in the city because of its fantastic setting between the sea and the South Downs, its much-loved Georgian Architecture and heritage, and its liberal and cosmopolitan attitude, epitomised by its diverse day and night life. As well as being home to 35,000 students, the city boasts a strong civil society with over 2,300 third sector organisations and one of the largest populations of freelancers and homeworkers in the UK.

However, despite its distinctiveness, the city does face a number of significant challenges, some shared with other UK cities (such as the impact of Brexit, growing inequality and problems connected to an ageing population), and some caused by its unique geography, including relatively low productivity and very limited physical space for new houses or workspace. Other towns and cities in the South East are upping their game, realising the potential that new cultural infrastructure and activity brings in place-making, meaning that if Brighton & Hove doesn't continue to innovate and renew there is a real danger it will lose its productive capacity and creative edge.

This shared plan of action, co-created in a collaborative process involving hundreds of local people, is an ongoing process to address the things that hold Brighton back. Whether it is addressing inclusion, creating more opportunities for young people to get into creative employment, helping improve health and wellbeing or ensuring that creativity is properly positioned as the driver of growth and inward investment, Brighton & Hove needs build on its track record as a bold first-mover, and ensure it continues to dare to be different.

The framework is wide-ranging. There are five key themes, including the *Creative Coast*, which will create a prospectus for public and private investment with partners in and around Brighton. This will realise the economic potential of the region by super-charging its creative and cultural businesses.

The Framework has a shared plan of action within an agreed direction for the city's cultural sector which:

- ▷ Enables residents (especially those furthest from opportunities) to develop, produce, participate in and benefit from cultural activities
- ▷ Supports artists, creatives and cultural organisations to develop their practice, businesses, reach and reputation
- ▷ Articulates Brighton & Hove's distinctive cultural offer for residents, visitors, investors and businesses
- ▷ Provides a foundation to develop a more strategic partnership approach to public art/public realm and heritage
- ▷ Creates cases for partnership investment and links to economy strategy

It is recognised that the responsibility for delivering the actions lies with all partners, dependent on their capacity and resources.

The Framework is part of a Strategy Family which includes the Greater Brighton Economic Strategy, Inward Investment & Trade Strategy, Health & Wellbeing Strategy and the Brighton & Hove Visitor Economy Strategy, Destination Management Plan and Events Strategy.

The *Creative Coast* is an initiative of the Greater Brighton Economic Board, to create a clear and credible identity for the region as a business location and drive value from our creative density, our proximity to London and our position as the UK's homeworker capital.

Brighton & Hove Cultural Framework Ambitions

The Framework has five ambitions, which provide a shape for organising the actions. However, cultural activities are not tidily delineated and outcomes and actions may contribute to more than one of the ambitions. These ambitions are:

- #1: to become a nationally recognised Centre of Excellence for the use of culture in promoting wellbeing and addressing health inequalities
- #2: to develop a best practice co-production model for neighbourhoods, with residents truly in the lead
- #3: to be the best place in Britain to be a homeworker or creative freelancer
- #4: to be an irresistible magnet for creatives, audiences, visitors and investors
- #5: to step up as the regional capital of creative productivity and spill-over innovation

The subsequent work strands and their actions are:

OBJECTIVE	ACTION
LIVING WELL	Develop a common language and evidence based measurement framework Address health and wellbeing priorities in the city Develop Pay it Forward for Culture initiative across the city and link it to social prescribing Seek investment to support the development and dissemination of good practice
RETHINKING OUR PLACE	Prioritise cultural activity in East Brighton and Hangleton & Knoll, linked to neighbourhood action plans Work with residents to build interest and capacity, co-design cultural activities, and support artists and arts organisations to build good practice Build on the collaboration and co-ordination established through Our Future City, to extend the programme Review commissioning models at BHCC to align with priorities of the Framework

BRIGHTON EXPERIENCE	Explore a City artist-in-residence or city curator concept and potential for a 'City of Pop-ups' Develop an events strategy and make better use of our public spaces Consider Purple Flag status/improved management of night-time economy With partners develop public art, public realm and heritage strategies With the tourism sector develop the Destination Management Plan and implement the Visitor Economy Strategy Work with the business, education and third sectors to implement the Trade & Investment Strategy
BURSTING THE BUBBLES	Research needs of freelancers and barriers to growth, including access to space, finance and business support Galvanise networks to create an inclusive sector, improve clustering, innovation, capacity for leadership support and density of creative production With HE, encourage cross-sector networking with health sciences, advanced manufacturing and visitor experience Work with FE to develop modular cultural/creative apprenticeships, prioritising residents from the priority neighbourhoods
CREATIVE COAST	Explore creative enterprise zones Connect to the Creative Industries Sector Deal Explore large scale production/meanwhile space Scale up fusion between cultural and wider creative sectors Be the best home for creative SMEs in the UK Develop a set of clear and deliverable investment propositions Deliver an annual creative "summit" in the Autumn, to review progress, share ideas and plan for the future

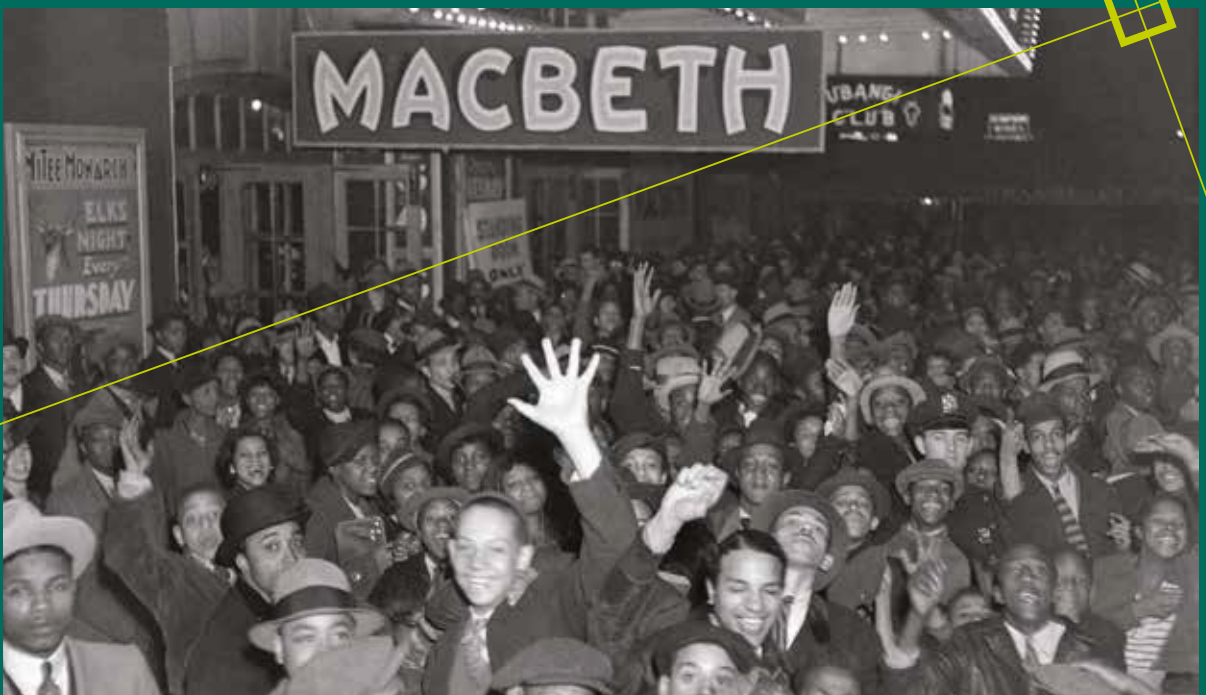
“

By its very nature the arts sector is extremely multi-faceted with a widely held perception that, perhaps more than any other industry, it is naturally more welcoming of different cultures, lifestyles and sensibilities. This view is especially prevalent in Brighton & Hove - a city well renowned for its 'cosmopolitan' appeal and 'cultural diversity'. A rather less promoted reality is the exceptionally low level of take up of the cultural offer from many communities in the city - particularly those facing social or economic isolation. There is no denying that Brighton is experiencing the effects of recent globalisation and is indeed now very diverse. The demographic make-up has changed way beyond recognition from my first introduction to Brighton's mono-cultural charms over 30 years ago. However, with the presence of such polarised communities and plethora of sub-communities the city can hardly be described as integrated.

Despite this, I can't imagine living anywhere else in the UK apart from Brighton, but my disenchantment at the increasing divergence between policy, PR and practice relating to inclusivity in the arts and the complacency that prevailed led me to seek opportunities as a cultural operator outside the area and in fact outside of the country. Before I knew it, a short-term hiatus turned into 10 years!

So how come I now find myself back involved in Brighton's strategic planning for the cultural framework? The short answer is I got deeply inspired by a South African festival that was originally established to preserve Afrikaans culture! I'm still struggling with the irony but simple fact is they now have the most amazing model of social inclusion I've ever experienced. A model that has filled me with hope that absolutely anything is possible...

JENNI LEWIN-TURNER, DIRECTOR,
URBANFLO CREATIVE



Macbeth Opening Night, Lafayette Theatre, Harlem, 14 April 1936

Early in the process of developing the framework, it was recognised that whilst the city enjoys an enviable volume and range of cultural activity, the limited diversity of practitioners, leadership, audiences, and participants continues to constrain our ambitions. There is also a shared awareness of and desire to include a wider range of voices, hear different stories and do all we can to avoid insularity and elitism.

Therefore a new voluntary Inclusion Charter has been adopted by the sector. This articulates a level of challenge for continuous improvement as below.

We (the arts, creative and cultural organisations) will:

- ▷ Actively promote the importance of reflecting a diversity of life experiences in our
 - _ Governing body
 - _ Artistic practice (including learning & participation practice)
 - _ Employment practice
 - _ Audience development activities
 - _ Internal and external communications
- ▷ Respect the diversity of life experiences of our staff team
- ▷ Encourage dialogue within the organisation, and with our partners, audiences and funders about the importance of plurality in society
- ▷ Report annually on what we have done, and the difference it has made to our customers/communities, artists and staff

Balancing targeted and universal approaches

Cultural opportunities are a force for good, and should be universally available, regardless of age, disability, race, religion, sex, sexuality, gender reassignment, marital status, pregnancy.

However, different levels of need occur within our community, caused by socio-political relationships between population groups and social classes, and in the variations in the distribution of power, money and resources that result (including the quality and availability of employment, housing, transport, access to services, and social and cultural resources).

The Framework is therefore predicated on the principle of seeking to provide more support to communities of interest or geography which have the greatest need.

“

The relationship between arts, culture and wellbeing is a well-documented one, but is the extent to which our society exploits creativity to improve the wellbeing of the nation proportionate to the huge potential of the arts and culture to transform lives?

Being sandwiched between the South Downs and the sea with little room to expand presents both challenges and strengths for our city. Brighton & Hove boasts the largest voluntary sector per capita in the UK, and a high concentration of arts & cultural organisations, many working in close proximity to one another given the city's inherent challenges with space.

To remain competitive in this landscape producers and service providers must continually innovate, whilst in order to co-exist in such a densely populated ecosystem, collaboration has become a given.

I believe that it's this unique landscape and culture of collaboration that we have to thank for some of the world-class work in the city, exemplifying the use of culture and creativity in Health and Wellbeing. The diverse cultural scene that our city is famous for is not only inspiring and enriching the lives of its residents and visitors but creative social-innovation projects are beating isolation, stopping violence and abuse and even reducing young people's vulnerability to exploitation.

In some cases, dynamic cross-sector partnerships in the city are leading and inspiring best practice internationally whilst the council has started to think and invest differently in achieving its Public Health outcomes creatively.

Emerging movements like The National Alliance for Arts, Health & Wellbeing indicate a critical mass building. Now is the time for the city to ask itself what role it could play in this movement, how far we want the impact of our work and learning to ripple out and ultimately how we can continue to build on the considerable opportunity we have to transform yet more lives through culture, creativity & collaboration.

ADAM JOOLIA. CEO, AUDIOACTIVE



Break4Change a groundbreaking Child to Parent Violence intervention run in partnership between AudioActive, Rise & BHCC

#1 LIVING WELL

Our ambition is to become a nationally recognised Centre of Excellence for culture in supporting wellbeing and addressing health inequalities.

Rationale

The recent All Party Parliamentary Group on Arts, Health & Wellbeing resulted in the publication of the Creative Health: The Arts for Health and Wellbeing report in July 2017¹. This report, which was commissioned in partnership with the National Alliance for Arts, Health and Wellbeing, King's College London, the Royal Society for Public Health and Guy's and St Thomas' Charity and funded by the Wellcome Foundation, Paul Hamlyn Foundation and the Arts and Humanities Research Council, set out comprehensive evidence and numerous examples of practice which demonstrate the beneficial impact of the arts to health and wellbeing.

"The conditions in which we are born, grow, work, live and age have profound effects on our health and wellbeing. Engagement with the arts and culture can have a positive impact on these social determinants, enhancing health, wellbeing and quality of life for people of all ages."

Brighton & Hove already has a strong body of practice in arts and health; the city is home to well-established practitioners and organisations. According to Public Health England², priorities in Brighton and Hove include tobacco control, alcohol and substance misuse, improving mental health and wellbeing, and promoting healthy lifestyles throughout the life course. By working more collaboratively, the arts and culture sector could be more effective in helping to tackle these issues. Better dialogue between health and cultural practitioners would enable improved targeting of programmes.

Cultural activities are commissioned, funded and supported by a range of partners, and their impact is evaluated with different tools. A common framework and vocabulary would lead to improved outcomes for local people.

Our Actions

A joint working group has been established with public health colleagues and chaired by the Director of Public Health. The publication of the annual public health report in 2018 will focus on the contribution of culture to health outcomes and will act as a springboard to developing joint activity and the development of a five year plan to establish the city as a Centre of Excellence for Culture, Health and Wellbeing.

In the first instance, we will;

- ▷ Develop a common language with the health and wellbeing sector, and a common measurement framework based on evidence based reporting,
- ▷ Target and co-ordinate our work to address health and wellbeing priorities in the city
- ▷ Develop the Pay it Forward for Culture initiative (led by Brighton Festival), across the city's arts provision, and link it to social prescribing
- ▷ Promote the contribution of culture to health & wellbeing
- ▷ Seek investment to support the development and dissemination of good practice

¹ http://www.artshealthandwellbeing.org.uk/appg-inquiry/Publications/Creative_Health_The_Short_Report.pdf

² <http://fingertipsreports.phe.org.uk/health-profiles/2017/e06000043.pdf>

#2 RETHINKING OUR PLACE

Our ambition is to develop a best practice co-production model for neighbourhoods, with residents truly in the lead.

Rationale

Brighton & Hove is known as a creative place, with a propensity for cultural participation and many capable and well-resourced communities, organisations and actors. But this is not the universal picture. Some communities, neighbourhoods and individuals have limited participation in culture owing to their financial situation, their life expectations, social networks, knowledge of what is provided and where, access to education, geographical isolation or other factors, such as lack of motivation or alienation from cultural activities organised for them by others. These are often the same residents who face barriers to other life chances and are living in areas identified as having high levels of deprivation.

Cultural engagement and participation work has been developed across the city over many years, yet current approaches still struggle to engage those residents most in need of support to access, create or enjoy cultural activities on their own terms. A more coordinated and sustained focus on enabling communities rather than “doing to” them, would produce a vibrant cultural life relevant to a wider range of residents. It would also build programmes and audiences which are more inclusive, and help to diversify the cultural leadership of the city.

Neighbourhood planning and community development work is becoming well established in these districts, with two areas in particular (East Brighton and Hangleton & Knoll) having made significant progress in establishing local priorities, and building local networks.

Brighton Festival’s Your Place initiative with Brighton People’s Theatre in these two locations has provided firm footings for developing a year round programme co-designed by residents in these areas, to develop a Brighton model for the future.

Our Actions

We will develop effective co-ordination of our work, to support residents to lead, produce and enjoy cultural activities relevant to them, and make it easier for them to access and use our resources for culture.

In the first instance we will;

- ▷ prioritise the delivery of cultural activities to the neighbourhoods of East Brighton and Hangleton & Knoll, linked to established neighbourhood working arrangements and neighbourhood action plans
- ▷ work with existing assets and community groups in the two priority neighbourhoods to develop approaches with residents which build interest, capacity and skills to co-design cultural activities, and support artists and arts organisations to build good practice
- ▷ build on the collaborative fundraising and co-ordinated targeting of activities established through Our Future City to extend the programmes in the two priority neighbourhoods
- ▷ review commissioning models at BHCC to align with the priorities of the Framework



In the words of The Bard himself - the times they are a-changin'.

Ever since fashionable folk flocked to Brighton's local beaches for a flagon of our 'healing' salt-water, the city has been a barometer for the latest trends. While downing a pint of blue stuff might not be one of the top reasons people live here anymore, the culture, community, and our habit for reinvention has meant we have always attracted radical change-makers.

Moving to Brighton is often about hope. Hope for cleaner air, more time with your family, a creative job, or just more freedom to be who you want to be. The city's relationship with work and wellbeing is actually one of its defining features, so it came as no surprise to find out that we have one of the largest freelancer populations in the UK calling it home.

As a city, we care about work and not just as a means to an end. From the Brighton Living Wage campaign to the annual Meaning conference, in many ways we lead the conversation about what a good work-life balance might look like.

As we deal with the rise of automation, the gig economy and an uncertain outlook from Brexit, these kind of conversations can ensure we build the right infrastructure and connections to amplify the things freelancers love - its transport links, creative network & culture - and help tackle its biggest problems - cost of space, loneliness & mental health.

If we're to see our children fit for 21st Century Brighton, this change of work needs a parallel change of education, we need a total re-think about how they get the work experiences they need to thrive - both these things go hand in hand and there are no easy solutions.

By 2025 up to 50% of the city could be freelancers. If we get this right, Brighton will continue to grow and innovate, becoming a world-class example of how people can be fulfilled by work AND lead a healthy, happy life. If we get this wrong, we risk losing a generation and at worst, becoming irrelevant as a city. It's up to us to make sure it's the right decision.

DECLAN CASSIDY,
HEAD OF IMPACT, MAKERCLUB



Co-workers at Platf9rm, Hove

#3 BURSTING THE BUBBLES

Our ambition is to be the best place in Britain to be a homeworker or creative freelancer.

Rationale

We have one of the highest proportions of homeworkers in the country. Their flexible business models, based on self-employment, give the city increased resilience to a fluctuating economy. We want the city to continue to be a place which is a draw for its quality of life and where creative freelancers choose to be based, can work collaboratively and be economically productive.

Networking opportunities for the cultural & creative sectors do exist in the city, but these are found largely within sector "bubbles". They tend to work in silos which mitigates collaboration or co-operation. Rather than encouraging a strong, inclusive and creatively productive local ecosystem, they leave the workforce isolated and professionally disconnected. Many people look instead to the capital for work.

The active facilitation of sector networking would open up opportunities for new and emerging talents, encourage development of supply chains and support a thriving culture of home-working. In addition, the development of new opportunities for cross-sector networks, especially between the creative and cultural producers and key growth sectors in the city (health sciences, advanced manufacturing, visitor experience) would support innovation and grow productivity. Engagement with further and higher education and the private sector has potential to support the research and development and manufacturing of spill-over innovation product (the "triple helix").

The city is well-placed to develop a modular model for apprenticeships, linked to its life-style draw for home and freelance workers and the availability of a wide range of SMEs specialising in high growth creative

and cultural disciplines. This would help to address first entry barriers and provide a progression route into the creative economy for young people growing up in the city.

Making a Start

We will burst the bubbles which separate the various creative sub-sectors and independent operators and connect them with each other and with potential partners in high growth industries. The drivers of home-working, the needs of freelancers and the opportunities for increased productivity are not well understood and further research is needed to identify the support and development actions to facilitate growth. We will pilot a modular approach to SME based apprenticeships.

- ▷ research the needs of freelancers and barriers to growth of home businesses in the creative & cultural sectors including access to space, finance and business support
- ▷ galvanise networks in order to create an inclusive sector, with improved clustering and potential for innovation, capacity for leadership support and density of creative production
- ▷ together with partners from HE, encourage cross-sector networking and informal opportunities for meet-ups with health sciences, advanced manufacturing and visitor experience sectors
- ▷ work with FE providers to develop modular (cross organisational) cultural/creative apprenticeships, prioritising residents from the East Brighton and Hangleton & Knoll neighbourhoods



Culture is experienced in the present; it defines our own existence and justifies our very sense of being human. Time is short in the spectrum of a single human life and culture affirms our existence to future generations. Being human is at the heart of culture, we leave echoes of our culture through the media of language, art, knowledge and architecture; these voices are foremost of our time and define our communities.

As citizens of culture, our identity is influenced by the built world that surrounds us, from the shores to the countryside, our landscapes are packed full of opportunity. Throughout history architecture has profoundly and persistently reflected the culture of its time. Today one can see the life of the community expressed in architecture and hopefully if these spaces are well-designed, they will positively affect the people within them.

We are the custodians of our cultured past and innovators of the present, and so we must be mindful of a paradoxical approach. The balance of looking back whilst moving forward and allowing for evolution of new ideas and new ways to inform culture is key.

The geometry of the city has grown out of agriculture, through industry and fixed in a grid of density. There is a need to innovate new building models and typologies, being brave in thinking about 'heritage' as a stepping stone to a present architecture rather than a fixed moment. Its very nature 'fixed' prompts a building stock which is limited, much of the time narrow and compartmentalized.



Photo Credit Jim Stephenson

Alter & Company Happenstance Archway

It's time to look at our urban landscape through a new lens, be open to new ideas and ask ourselves bigger questions about how we want to live and contribute to culture.

Brighton is a perfect place for individuals, groups, and grass roots programmes to flourish. Yet businesses that are growing, or want to grow are limited by space, which creates a barrier to attracting investment. It is imperative that architecture and culture work hand in hand to develop and respond to current and future needs so that we can drive productivity, inward investment and ultimately, culture.

The cultural framework is a place to rethink the way culture and creativity is organised, the way the city is planned, the way education is delivered, and the way we interact with each other and communities, the way the public realm can be distinctly Brightonian, the way communities can have a voice in shaping developments, the way culture can promote a healthy and inclusive community – our human right.

GRANT SHEPHERD, DIRECTOR,
ALTER & COMPANY ARCHITECTS

#4 THE BRIGHTON EXPERIENCE

Our ambition is to be an irresistible magnet for creatives, audiences, visitors and investors.

Rationale

The cultural offer of Brighton & Hove has been and is central to its success, and serves to make the city an attractive place to live, work and visit. The inherent character of the place – the Brighton Experience – has a clear impact on the impression we make on opinion-formers in the wider region, nationally and internationally. It is equally important to our residents, whose sense of identity is influenced by the physical environment, our rich heritage, the natural assets of the coast and South Downs, the city's sense of fun and tolerant attitude; the opportunities for enjoying a different (and better) kind of life.

To unleash its potential to help attract and retain creatives (especially graduates), tourists, students, businesses and trade, we will position ourselves through a clearly defined narrative, based on our creative density, our proximity to London (with cheaper live/work costs), and high quality of life.

We will develop our brand for culture, tourism and inward investment, bringing together the Cultural Framework, Destination Management Plan and Trade and Investment Strategies, at the same time closely targeting efforts to attract, develop and deliver events which align with our high growth markets.

Making a Start

We will need a clearly understood brand strategy, shared with all our city partners.

We will also need to “walk the talk” - improving the way in which we manage and promote our place, especially as a destination for tourism, ensuring a quality of public realm and managing our heritage assets effectively, as well as providing a safe and enjoyable night-time economy.

In the first instance we will;

- ▷ Explore a City artist-in-residence or city curator concept and potential for a “City of Pop-ups”
- ▷ Develop a focussed events strategy linked to strategic priorities and make better use of our public spaces
- ▷ Consider Purple Flag status/improved management of night-time economy
- ▷ Develop a public art and public realm strategy with partners
- ▷ Develop a Heritage Strategy with partners
- ▷ Work with the tourism sector to develop the Destination Management Plan and implement the Visitor Economy Strategy
- ▷ Work with the business, education and third sectors to implement the Trade and Investment Strategy

#5 CREATIVE COAST

Our ambition is to step up to lead as the regional capital of creative productivity and spill-over innovation.

Rationale

Brighton is creatively supercharged. Outside of London, it is one of the most significant centres for the creative economy in the South East. From its recent designation by NESTA³, as a “Creative District” with the highest intensity of ‘creative embedded’ companies in its Travel to Work Area of any cluster in the UK to its long established knowledge economy, providing 57,000 jobs, its 35,000 students, strong civil society, rapidly growing ICT/Digital sector and reputation for fusion – science, technology and arts convergence – there is depth and breadth to its creative ecology.

Like any creative cluster, continual change and evolution are vital if it is to maintain its leading edge, whether that is pioneering VR and AR or furthering its reputation as one of the UK’s leading centres for artistic production. The geographic factors that combine to help make Brighton a disruptive creative test-bed, including its proximity to Gatwick and London, the coast and the desirable locations of the South Downs also present challenges. Property and workspace can be expensive and limited, supply chains within the local economy are relatively weak, there are skills gaps and recruitment challenges and not enough opportunities for local young people to get on.

Brighton is not an island – its cultural and creative strengths serve audiences and businesses regionally, nationally and internationally. Continuing to thrive will require new forms of public and private investment, and a fresh joined-up approach from regional partners so that existing strengths, spillover effects and new opportunities can be aligned in a proposition that better captures the economic and cultural reality of the *Creative Coast*.

Brighton and Hove has a variety of cultural organisations and operators, ranging in scale from the largest (the Council’s Royal Pavilion and Museums Service and Brighton Dome Brighton Festival) through well-established mid-scale companies, to micro businesses and sole traders. In addition, there are cultural producers which are based in Brighton and Hove and operate widely outside the city, whether regionally, nationally or internationally. These organisations attract funding from the public and private sector, and want to support the wider cultural sector of the city by sharing their assets, skills and soft resources – including platforms. In this way, smaller and less well-resourced operations could increase the impact of their work. This call for Brighton & Hove to be “more generous” extends beyond the city borders, and could help to support a flourishing ecology across the Greater Brighton footprint.

³ <https://www.nesta.org.uk/publications/creative-nation>

Making a Start

In the first instance (as part of our collaboration on developing the *Creative Coast* concept with our regional partners) we will;

- ▷ Build stronger “horizontal supply chains” through clustering and networks that connect existing and potential hotspots
- ▷ Explore the potential for creative enterprise zones – providing opportunities to businesses to grow in the *Creative Coast* in new locations
- ▷ Connect to the Creative Industries Sector Deal – through a strategic framework with a clear vision for growth
- ▷ Identify large-scale production space/ meanwhile space – to provide the next generation of producers with room to experiment
- ▷ Scale up approaches to fusion between cultural and wider creative sectors – to further Brighton’s leading role as a test-bed for disruptive innovation
- ▷ Build capacity for collective tendering between SMEs – in private and public sectors
- ▷ Link with Higher Education (research) and the private sector (production) to support creative innovation – maximising the potential of the region’s knowledge economy anchors
- ▷ Be the best home for creative SMEs and freelancers in the UK wherever they are based on the *Creative Coast* – by providing specialist support, co-working space, grow-on space, training, networking, access to funding and markets
- ▷ Develop a set of clear and deliverable investment propositions across the *Creative Coast* for new infrastructure which will support the continued growth of the sector and grow the regional economy
- ▷ Continue the programme of creative “Provocations” in partnership with Brighton University, which connect the creative sector to big issues facing the city and region
- ▷ Deliver an annual creative “summit” in the Autumn, to review progress, share ideas and plan for the future

ARTS & CREATIVE INDUSTRIES COMMISSION

Attenborough Centre for Creative Arts (University of Sussex), Artists Open Houses, Brighton & Hove City Council, Brighton Dome & Brighton Festival, Brighton Fringe, Carousel, Creative Future, Fabrica, Lighthouse, Our Future City, Photoworks, Royal Pavilion & Museums, South East Dance, Theatre Royal, Wired Sussex, The Werks, University of Brighton, Urban Flo.

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COVER IMAGE

Jon Link (Modern Toss)

BRIGHTON & HOVE CITY COUNCIL

Val Birchall, Branwen Lorigan, Nicola Mansfield

We recognise that by the time the list above is published many more people, organisations and services will have contributed to the delivery of the Cultural Framework. We appreciate and acknowledge the huge efforts and continued input from all.

Tell us about your ideas
and join the debate at -

 **@CreativeBTN**
#BHCulture

Find out more at -
www.cultureinourcity.com

Subject:	Public Spaces Protection Orders (Non Parks and Open Spaces)		
Date of Meeting:	24th September 2020		
Report of:	Interim Executive Director Housing Neighbourhoods and Communities		
Contact Officer:	Name:	Jo Player	Tel: 01273 292488
	Email:	Jo.player@brighton-hove.gov.uk	
Ward(s) affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 Public Spaces Protection Orders (PSPOs) are intended to deal with a particular nuisance or problem in an area that is detrimental to the local community's quality of life by imposing conditions on the use of that area that apply to everyone. They are designed to ensure people can use and enjoy public spaces safe from anti-social behaviour.
- 1.2 In 2017 existing Dog control orders, and the Designated Public Place Order for addressing anti- social behaviour associated with alcohol use in a public space transitioned into Public Place Protection Orders. There was no requirement at this time to consult on the transition due to a change in legislation and the provisions of the orders stayed the same. However under the Anti-social Behaviour, Crime and Policing Act 2014, there is a requirement to consult on these continuing to be in place as they are due to expire in October 2020.
- 1.3 This report does not relate to PSPOs for parks and open spaces which this committee agreed to let lapse at the meeting in November 2019.

2. RECOMMENDATIONS:

- 2.1 That the committee endorses the continued use of the PSPOs relating to the existing gating orders, dog control orders and drinking in public places for three years until further review is required in 2023. The orders will be amended to reflect the new relevant dates.
- 2.2 That the committee agrees for officers to work with residents to consider amendments to the Oxford Court gating PSPO and to bring a proposed amended Order back to Committee for approval.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 Under the Anti-social Behaviour, Crime and Policing Act 2014 existing Designated Public Place Order (DPPO), Gating Orders and Dog Control Orders

in place at the time the Act came into force continued for three years but were to be treated as Public Space Protection Orders (PSPOs) from October 2017.

From October 2017 those orders automatically transitioned into PSPOs with the same conditions as the original orders. The orders and the subsequent PSPOs have addressed and reduced ASB in relation to the areas that the gates have been installed. In relation to dog control, the PSPOs have meant that there has less risk of people and especially children being affected by diseases contained within dog faeces also a reduced risk of incidents concerning dogs not being on leads.

- 3.2 Brighton and Hove has a city wide PSPO in place relating to alcohol. This order allows police officers and police community support officers to remove alcohol from any person in a public place if that person is involved in anti-social behaviour (ASB) or the officer believes that by having alcohol in their possession there is an increased risk of ASB. This has been useful in tone setting in the city and police colleagues are supportive of this continuing.
- 3.3 Brighton and Hove has a number of dog control orders in place in a number of parks and open spaces including the seafront. They replaced former inconsistent and unenforced bylaws. There are four orders requiring:
 - Removal of dog faeces
 - Dogs on leads
 - Requiring a dog to be put on a lead when requested by an authorised officer
 - Dog exclusion areas

The orders are attached at Appendix 1-4

- 3.4 Brighton and Hove had two original gating orders in place, one at Brunswick Row to manage drug use, dealing and street drinking. The other is at Farman Street Hove due to reports of night time disorder, drug use, street drinking and criminal damage. Both are night time orders with locking managed by residents. These are attached at Appendix 5 and 6.
- 3.5 Two further gating orders were granted by the Neighbourhood Inclusion Communities and Equalities Committee in March 2018. These are in Oxford Court and St James Court. These are also managed by local residents and were put in to address anti-social behaviour. These are attached at Appendices 7 and 8. Since the building of the medical centre close to Oxford Court, a request has been received to slightly amend this PSPO. Officers will work with residents to facilitate this with the agreement of committee.
- 3.6 Since 2019 staffing resource to implement further gating orders has been deleted due to savings requirements. It is not possible therefore for additional gating orders to be considered at this time unless additional resource is found. The existing ones are appreciated by the communities that they serve.

- 3.7 There is a requirement for the council to consult on the continuation of PSPOs. Consultation was carried out on the council's consultation portal between 15th July 2020 to 21st August 2020 in relation to the dog control orders and the alcohol PSPO. Residents were also invited to feed back in relation to the gating orders in their communities. Consultation was also carried out with specific communities/groups of interest as specified by the legislation. This included the police, the Police and Crime Commissioner, Seafront team, City Parks and the Brighton and Hove Green Spaces Forum, amongst others. Analysis of that consultation is attached at Appendix 9 and 10. The consultation shows that there is support for the dog control, alcohol in public places and the existing gating orders to continue.
- 3.8 41 responses were received in relation to the alcohol PSPO. Of these 79% strongly agreed that they should remain in place with 13% tending to agree that they should remain in place. 45 responses were received in relation to dog control orders, 72% of respondents strongly agreed that these should remain in place and 15% tended to agree that they should remain in place.
- 3.9 Whilst there were limited responses to the consultation regarding the four gating orders, all residents who did respond felt that having the gates in place had reduced incidents of ASB which they had been brought in to address.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 It would be possible to rescind these orders but they are helpful in managing the specific anti-social behaviour they were introduced to address.
- 4.2 PSPOs have proved an effective enforcement method because a separate Court application is not required for each new matter as would be the case for an injunction, for example, saving both time and resource. Unlike enforcement using byelaws, PSPOs enable a an immediate fine to be issued, again providing an immediate impact and more effective deterrent.
- 4.3 Residents and professionals have no desire to rescind them.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 In relation to the PSPO relating to alcohol, police and support services for the street community are of the view that the order should remain in force as a helpful tool acting as a deterrent and helping to manage ASB in the city. Local outreach services were contacted specifically to inform them of the consultation, in relation to the alcohol PSPO. The legislation requires that consultation regarding PSPOs is carried out and that groups that would have a specific interest in them are consulted with.
- 5.2 Regulatory Services at Brighton & Hove City Council have not received any requests for changes to the current Dog Control Orders and therefore consider them to be proportional and appropriately targeted.
- 5.3 PSPOs are not designed to target rough sleepers. In relation to the dog control orders, StreetVet has 40 volunteer vets and veterinary nurses delivering check-

ups to pets belong to rough sleepers.

- 5.4 Residents have been contacted in the locality of the four gating orders. Residents at all four sites felt the orders were still necessary as a community safety and crime reduction measure and had felt that the gates have reduced ASB and reduced incidents of ASB in the vicinity.

6. CONCLUSION

- 6.1 At any time, where there is evidence and strong public support these orders can be varied or rescinded. However there does not appear to be support for these orders to be rescinded at this time.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 There are no direct financial implications arising from the recommendations made in this report.

Finance Officer Consulted: Michael Bentley

Date: 03/09/20

Legal Implications:

- 7.2 These are addressed in the body of the report.

Lawyer Consulted: Elizabeth Culbert

Date: 09/09/20

Crime & Disorder Implications:

- 7.3 These orders assist in the council discharging its duty under the Crime and Disorder Act 1998 and the Anti-social Behaviour, Crime and Policing Act 2014

Equalities Implications:

- 7.4 There are no equalities implications in relation to this report.

Sustainability Implications:

- 7.5 There are no sustainability implications in relation to this report.

SUPPORTING DOCUMENTATION

Appendices:

1. Dog Control Order 1 Fouling of land
2. Dog Control Order 2 Dogs on leads
3. Dog Control Order 3 Putting on lead by direction
4. Dog Control Order 4 Exclusion from land
5. Farman Street gating order
6. Brunswick Row gating order
7. St James' Court gating order
8. Oxford Court gating order
9. Analysis of consultation

The Clean Neighbourhoods and Environment Act 2005

**The Dog Control Orders (Prescribed Offences and Penalties, etc.)
Regulations 2006 (S.I.2006/1059)**

The Dogs on Leads (Brighton and Hove) Order 2009

Brighton and Hove City Council (the Council) hereby makes the following Order:

1. This Order comes into force on 1st January 2009.
2. This Order applies to the land specified in Schedule 1.

Offence

3.(1) A person in charge of a dog shall be guilty of an offence if at any time on any land to which this Order applies he does not keep the dog on a lead, unless—

- (a) he has a reasonable excuse for failing to do so; or
- (b) the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to his failing to do so.

- (2) For the purposes of this article a person who habitually has a dog in his possession shall be taken to be in charge of the dog at any time unless at that time some other person is in charge of the dog.

Penalty

4. A person who is guilty of an offence under article 3 shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

THE COMMON SEAL OF BRIGHTON & HOVE)
COUNCIL was affixed hereto this)
in the presence of:-)

Authorised Officer

SCHEDULE 1

Description of Land, or Lands, to which the Order applies

1. Subject to the exceptions set out at paragraph 2 below, all roads (as defined by Section 142 Road Traffic Regulation Act 1984) in the administrative area of the Council, including the seafront promenades (upper and lower).¹
2. This Order does not apply to land used for agriculture² or woodland or Forestry Commission Land³.

¹ A 'road' is defined in section 142 of the Road Traffic Regulation Act 1984 as 'any length of highway or of any other road to which the public has access, and includes bridges over which a road passes.'

² 'agriculture' includes horticulture, fruit growing, seed growing, dairy farming, and livestock breeding, and keeping, and the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds.

³ 'Forestry Commission Land' is land that is placed at the disposal of the Forestry Commissioners under section 39(1) of the Forestry Act 1967.

The Clean Neighbourhoods and Environment Act 2005

The Dog Control Orders (Prescribed Offences and Penalties, etc.) Regulations 2006 (S.I.2006/1059)

The Dogs on Leads by Direction (Brighton and Hove) Order 2009

Brighton and Hove Council (in this Order called "the Council") hereby makes the following Order:

1. This Order comes into force on 1st January 2009.
2. This Order applies to the land specified in Schedule 1.
3. In this Order "an authorised officer of the Council" means an employee of the Council who is authorised in writing by the Council for the purpose of giving directions under this Order.

Offence

4. (1) A person in charge of a dog shall be guilty of an offence if at any time, on any land to which this Order applies, he does not comply with a direction given him by an authorised officer of the Council to put and keep the dog on a lead, unless—
 - (a) he has a reasonable excuse for failing to do so; or
 - (b) the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to his failing to do so.
- (2) For the purposes of this article—
 - (a) a person who habitually has a dog in his possession shall be taken to be in charge of the dog at any time unless at that time some other person is in charge of the dog;
 - (b) an authorised officer of the Council may only give a direction under this Order to put and keep a dog on a lead if such restraint is reasonably necessary to prevent a nuisance or behaviour by the dog likely to cause annoyance or disturbance to any other person or the worrying or disturbance of any animal or bird.

Penalty

5. A person who is guilty of an offence under article 4 shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

THE COMMON SEAL OF BRIGHTON & HOVE)
COUNCIL was affixed hereto this)
in the presence of:-)

Authorised Officer

SCHEDULE 1

Description of land, or lands, to which the Order applies

All land in the City of Brighton and Hove which is open to the air, including covered land which is open on at least one side, and to which the public are entitled or permitted to have access (with or without payment), with the exception of Forestry Commission Land.¹

¹ "Forestry Commission Land" is land that is placed at the disposal of the Forestry Commissioners under section 39(1) of the Forestry Act 1967.

The Clean Neighbourhoods and Environment Act 2005

The Dog Control Orders (Prescribed Offences and Penalties, etc) Regulations 2006 (S.I 2006/1059)

The Fouling of Land by Dogs (Brighton & Hove) Order 2009

Brighton & Hove City Council (the Council) hereby makes the following Order:-

1. This Order comes into force on 1st January 2009.
2. This Order applies to the land specified in Schedule 1.

Offence

- 3.(1) If a dog defecates at any time on land to which this Order applies and a person who is in charge of the dog at that time fails to remove the faeces from the land forthwith, that person shall be guilty of an offence unless—
 - (a) he has a reasonable excuse for failing to do so; or
 - (b) the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to his failing to do so.
- (2) Nothing in this article applies to a person who—
 - (a) is registered as a blind person in a register compiled under section 29 of the National Assistance Act 1948; or
 - (b) has a disability which affects his mobility, manual dexterity, physical co-ordination or ability to lift, carry or otherwise move everyday objects, in respect of a dog trained by a prescribed charity and upon which he relies for assistance.
- (3) For the purposes of this article—
 - (a) a person who habitually has a dog in his possession shall be taken to be in charge of the dog at any time unless at that time some other person is in charge of the dog;
 - (b) placing the faeces in a receptacle on the land which is provided for the purpose, or for the disposal of waste, shall be a sufficient removal from the land;

- (c) being unaware of the defecation (whether by reason of not being in the vicinity or otherwise), or not having a device for or other suitable means of removing the faeces shall not be a reasonable excuse for failing to remove the faeces;
- (d) each of the following is a "prescribed charity"—
 - (i) Dogs for the Disabled (registered charity number 700454);
 - (ii) Support Dogs (registered charity number 1088281);
 - (iii) Canine Partners for Independence (registered charity number 803680).

Penalty

4. A person who is guilty of an offence under article 3 shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

THE COMMON SEAL OF BRIGHTON & HOVE)
COUNCIL was affixed hereto this)
 in the presence of:-)

Authorised Officer

SCHEDULE 1

Description of land, or lands, to which the Order applies

1. Subject to the exception in paragraph 2 below, all land which is in the administrative area of the Council and which is:-
 - a. Open to the air (which includes land that is covered but open to the air on at least one side) and;
 - b. To which the public are entitled or permitted to have access (with or without payment).
2. Excepted from the description in paragraph 1 above is land that is used for agriculture¹, woodland and Forestry Commission Land².

¹ 'agriculture' includes horticulture, fruit growing, seed growing, dairy farming, and livestock breeding, and keeping, and the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds.

² 'Forestry Commission Land' is land that is placed at the disposal of the Forestry Commissioners under section 39(1) of the Forestry Act 1967.

The Clean Neighbourhoods and Environment Act 2005

The Dog Control Orders (Prescribed Offences and Penalties, etc.) Regulations 2006 (S.I.2006/1059)

The Dogs Exclusion (Brighton and Hove) Order 2011

Brighton & Hove City Council hereby makes the following Order:

1. This Order comes into force on 1st January 2011.
2. This Order applies to the land specified in Schedule 1.
3. This Order repeals the Dog Exclusion (Brighton and Hove) Order 2009.

Offence

3. (1) A person in charge of a dog shall be guilty of an offence if, during the periods specified in Schedule 1, he takes the dog onto, or permits the dog to enter or to remain on, any land to which this Order applies unless—
 - (a) he has a reasonable excuse for doing so; or
 - (b) the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to his doing so.
- (2) Nothing in this article applies to a person who—
 - (a) is registered as a blind person in a register compiled under section 29 of the National Assistance Act 1948; or
 - (b) is deaf, in respect of a dog trained by Hearing Dogs for Deaf People (registered charity number 293358) and upon which he relies for assistance; or
 - (c) has a disability which affects his mobility, manual dexterity, physical co-ordination or ability to lift, carry or otherwise move everyday objects, in respect of a dog trained by a prescribed charity and upon which he relies for assistance.
- (3) For the purposes of this article—
 - (a) a person who habitually has a dog in his possession shall be taken to be in charge of the dog at any time unless at that time some other person is in charge of the dog; and
 - (b) each of the following is a "prescribed charity"—

- (i) Dogs for the Disabled (registered charity number 700454);
- (ii) Support Dogs (registered charity number 1088281);
- (iii) Canine Partners for Independence (registered charity number 803680).

Penalty

4. A person who is guilty of an offence under article 3 shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

THE COMMON SEAL OF BRIGHTON & HOVE)
CITY COUNCIL was affixed hereto this)
 in the presence of:-)

Authorised Officer

SCHEDULE 1

Description of land, or lands, to which the Order applies

All those areas situated within the City of Brighton & Hove as described for the purposes of identification below, being land which is open to the air and to which the public are entitled or permitted to have access (with or without payment). For the purposes of this Order, land which is covered is to be treated as “open to the air” if it is open on at least one side.

1. Children’s Play Areas

All children’s play areas in the City of Brighton and Hove enclosed by fencing and containing play equipment.

2. Cemeteries

- a. The following cemeteries subject to the exception set out in paragraph 2.b below:-

- Borough Cemetery (Woodvale), Lewes Road;
- Extra Mural Cemetery, Lewes Road;
- Borough Cemetery, Bear Road;
- Jewish Cemetery, Bear Road
- Meadowview and Lawn Memorial Cemetery, Warren Road
- Hove Cemetery, North and South, Old Shoreham Road
- Portslade Cemetery, Victoria Road

- b. The Order does not apply to persons attending a funeral or remembrance service or visiting a grave or to persons residing in the premises of the cemeteries specified at 2.a above. In these circumstances dogs must be kept on a lead at all times.

3. Gardens and Parks

The enclosed gardens of the following city centre squares:-

- Brunswick Square
- Norfolk Square
- Russell Square
- Bedford Square
- Clarence Square
- Powis Square
- Pelham Square
- Regency Square (North End)
- New Steine Square

The following parks and gardens:-

- Steine Memorial Gardens
- Kipling Gardens, Rottingdean
- The Rockery Gardens, Preston Road
- William Clarke Park, Picton Street
- Saunders Park (excluding the fenced dog area to the South West corner of the park), Lewes Road

4. Beaches

The beaches (including the foreshore) between the months of May to September inclusive with the exception of the following beaches (showing a “dog friendly” sign):-

- the beach between Longridge Avenue and the border,
- beaches between Chailey Avenue and Arundel Drive West, Rottingdean
- beaches between West Marina Wall to Rottingdean slope
- beaches between the west wall of Brighton Marina and up to the Volks railway station opposite New Steine
- the beach in front and to the East of the Meeting Place Cafe, up to the large groyne with the lifering on.
- the beach to the east of the Lawns Cafe, at the bottom of St John's Road, Hove promenade.
- the beach in front of the King Alfred car park.
- the beach to the east of Hove Lagoon.

5. Areas of Queens Park

The Southern Lawns of Queens Park (containing the lake), the tennis courts, the Quiet Garden, the Wild Garden, the cascade area and bowling green.

**HIGHWAYS ACT 1980, SECTION 129A
BRIGHTON & HOVE CITY COUNCIL**

The Brighton & Hove Brunswick Row (Gating) Order 2007

This Order is made by BRIGHTON & HOVE CITY COUNCIL ("the City Council") under section 129A of the Highways Act 1980 ("the 1980 Act") because it appears to the City Council that as respects the relevant highway described in article 1 below ("the highway") –

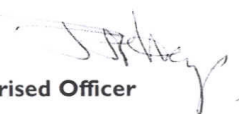
- (a) the City Council is the highway authority for the highway;
- (b) the premises adjoining or adjacent to the highway are affected by crime or anti-social behaviour;
- (c) the existence of the highway is facilitating the persistent commission of criminal offences or anti-social behaviour; and
- (d) it is in all the circumstances expedient to make the order for the purposes of reducing crime or anti-social behaviour.

Sussex Police Authority for the area in which the highway lies has been consulted as required by the 1980 Act.

BY THIS ORDER:

- 1. the public right of way shown shaded green on the map contained in this Order and described in the Schedule to this Order, shall be restricted between the hours of 1800 and 0800, by the erection of gates at its junction with Ditchling Road and its eastern junction with Queens Place, after 7 days from the date of this Order.
- 2. the occupiers of the properties in Brunswick Row and the properties in Ditchling Road adjoining the right of way will not be affected by the restriction.
- 3. the alternative route for pedestrians is via Queens Place or Oxford Place
- 4. the Director of Environment Services of the City Council is responsible for the maintenance and operation of the gate authorised by this order.
- 5. locking and unlocking of the gates to facilitate daytime access will be carried out by key holding residents of Brunswick Row.

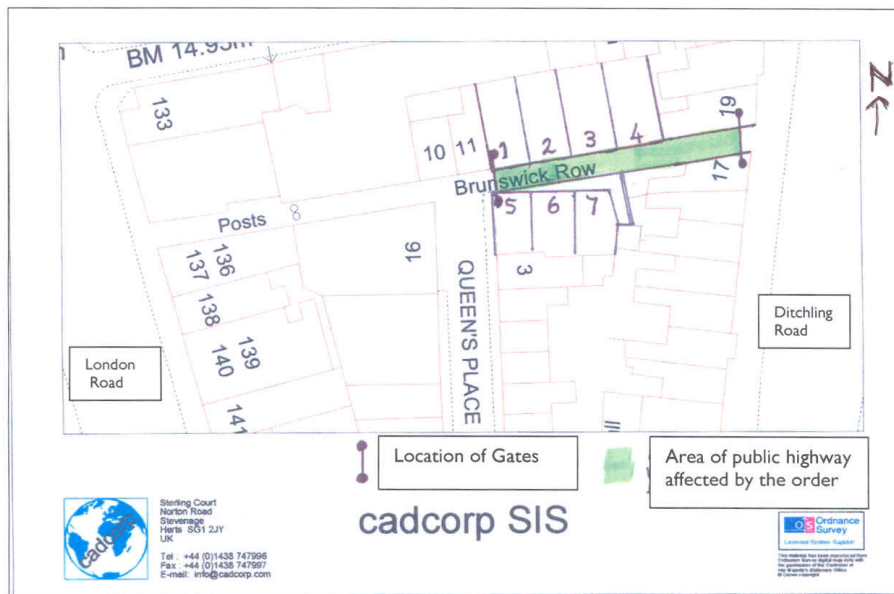
The Common Seal of Brighton & Hove City Council was affixed hereto)
on the 23rd day of August 2007)
in the presence of:)


Authorised Officer



SCHEDULE

The footpath leading southwards from Ditchling Road Brighton, between Nos. 17 and 19, to the junction with Queens Place, between Nos 1 and 5 Brunswick Row; a distance of approximately 36 metres with an average width of 3 metres.



BRIGHTON & HOVE CITY COUNCIL
HIGHWAYS ACT 1980
The Brighton & Hove Farman Street (Gating) Order 2013

This Gating Order (the "Order") is made by Brighton & Hove City Council ("the Council") under section 129A of the Highways Act 1980 on the 28th day of February 2013 because the Council is satisfied that:

- (a) premises adjoining or adjacent to the public footpath known as Farman Street ("the highway") are affected by crime and/or anti-social behaviour;
- (b) the existence of the highway is facilitating the persistent commission of criminal offences and/or anti-social behaviour; and
- (c) it is in all the circumstances expedient to make the Order for the purposes of reducing crime and/or anti-social behaviour.

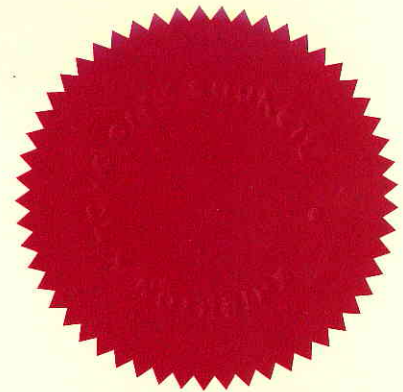
The Order comes into force on the 1st day of March 2013 and may be cited as The Brighton & Hove Farman Street (Gating) Order 2013.

BY THIS ORDER:

1. Entry into Farman Street from its junction with Western Road shall be restricted between the hours of 2100 and 0800 each day by one locked gate at its junction with Western Road. Exit from Farman Street into Western Road will not be restricted.
2. The owners and occupiers of the properties in Farman Street and the properties in Western Road adjoining the highway and visitors to those properties will not be affected by the restriction.
3. The alternative route for pedestrians is via Little Western Street or Waterloo Street
4. The Council's Strategic Director of Place is responsible for the maintenance and operation of the gate authorised by the Order and his representative Mr Simon Bannister can be contacted on 01273-293925 Monday to Friday between 9am - 5pm. Outside those days and times call the Council's Emergency Standby number 01273-292229

The Common Seal of
Brighton & Hove City Council
was affixed hereto in the
presence of


Authorised Officer



36492

DRAFT ORDER

BRIGHTON AND HOVE CITY COUNCIL (Oxford Court) PUBLIC SPACES PROTECTION ORDER 2018

Brighton & Hove City Council in exercise of its powers under Section 59, 64 and 72 of the Antisocial Behaviour, Crime and Policing Act 2014 ("the Act") hereby makes the following Order:-

1. This Order shall come into operation on on xxxxxxxxxx and shall have effect for a period of 3 years thereafter, unless extended by further orders under the Council's statutory powers.
2. This Order relates to the footpath linking Oxford Street with Oxford Court Carpark as shown on the attached Plan
3. The effect of this Order is to restrict the public right of way over the highway shown on the attached plan at all times except for owners or occupiers of property adjoining the highway affected by this order needing to access the property.

This Order authorises the installation lockable gates at either end of the affected highway, as shown on the attached plan

4. The alternative route for pedestrians will be along Oxford Street
5. Responsibility for the maintenance of the gates will lie with the residents and will be jointly managed by the Council and residents and will be governed by a joint management agreement which will be put in place before this order is enacted.
6. The Council is satisfied that the conditions set out in Sections 59, 64 and 72 of the Act have been satisfied and that it is in all the circumstances expedient to make this Order for the purposes of reducing crime and antisocial behaviour in and around the affected area. The Council makes the Order because criminal and antisocial behaviour in and around the affected area has had a detrimental effect on the quality of life of those in the locality. The effect or likely effect of this is of a persistent or continuing nature such as to make this unreasonable, and justifies the restrictions imposed by this Order.
8. If any interested person desires to question the validity of this Order on the grounds that the Council had no power to make it or that any requirement of the Act has not been complied with in relation to this Order, he or she may apply to the High Court within six weeks from the date on which this Order is made.

Legend

Footpath Highways



Brighton & Hove
 City Council

Scale 1:1,000

Draft Order

Brighton & Hove City Council (St James Court) Public Spaces Protection Order 2018

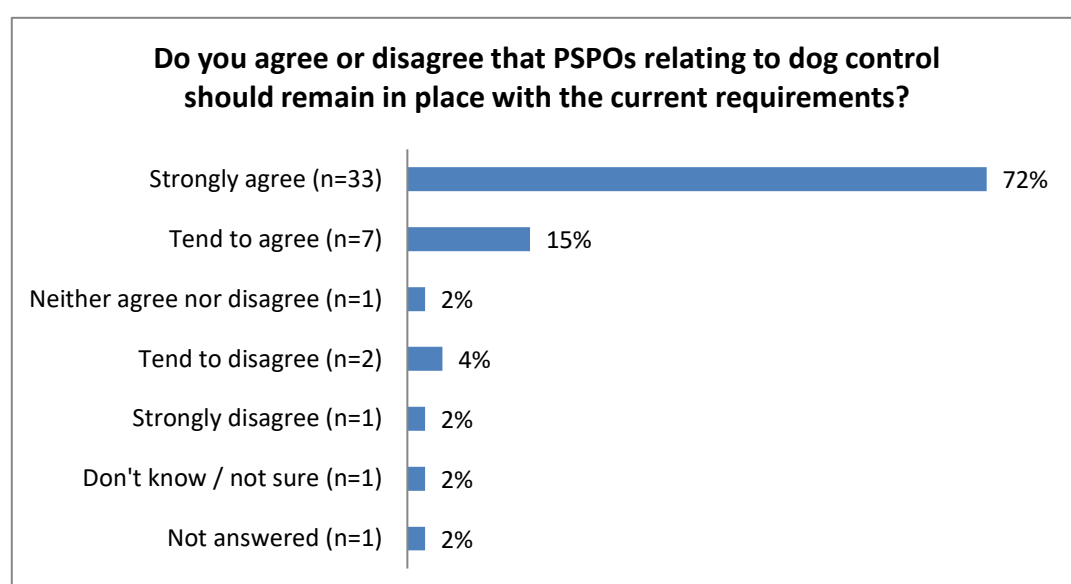
Brighton & Hove City Council in exercise of its powers under Section 59, 64 and 72 of the Antisocial Behaviour, Crime and Policing Act 2014 ('the act') hereby makes the following Order:

1. This order shall come into operation on xxxxxxxxxx and shall have effect for a period of three years thereafter, unless extended by further orders under the council's statutory powers.
2. This order relates to the footpath know as St James Court linking as shown on the attached plan.
3. The effect of this order is to restrict entry via the southern access point as shown on the attached plan at all times except for owners or occupiers of property adjoining the highway affected by this order needing to access the property. The northern access point will remain unaffected.
4. This order authorises the installation a lockable gate at the southern end of the affected highway, as shown on the attached plan. The gate will not restrict exit on to George Street at this point.
5. The alternative route for pedestrians will be along George Street. St James Court will remain accessible at all times via the northern entrance point.
6. Responsibility for the maintenance of the gates will lie with the residents and will be jointly managed by the council and residents and will be governed by a joint management agreement which will be put in place before this order is enacted.
7. The council is satisfied that the conditions set out in Sections 59, 64 and 72 of the act have been satisfied and that it is in all the circumstances expedient to make this order for the purposes of reducing crime and antisocial behaviour in and around the affected area. The council makes the order because criminal and anti-social behaviour in and around the affected area has had a detrimental effect on the quality of life of those in the locality. The effect or likely effect of this is of a persistent or continuing nature such as to make this unreasonable, and justifies the restrictions imposed by this order.
8. If any interested person desires to question the validity of this order on the grounds that the council had no power to make it or that any requirement of the act has not been complied with in relation to this order, he or she may apply to the High Court within six weeks from the date on which this order is made.

Do you agree or disagree that PSPOs relating to dog control should remain in place with the current requirements? - Q2a	Do you have any comments concerning the PSPOs relating to dog controls? - Q2b	How are you responding to this consultation. As a... - Q6
Strongly agree		Local resident
Strongly agree		Local resident
Tend to agree		Local resident
Neither agree nor disagree		Local resident
Strongly agree		Local resident
Strongly agree		Local resident
Strongly agree		Local resident
Strongly agree		As a representative of a local commu
Strongly agree		Local resident
Strongly agree		Local resident
Strongly agree		As a representative of a stakeholder g
Strongly agree		Local resident
Strongly agree		Local resident
Tend to agree		Local resident
Strongly agree	1) though there is clear signage in par	Local resident
Tend to disagree	Although I am not a dog-owner, I feel	Local resident
Strongly agree	Areas that exclude dogs need to be in	As a representative of a local commu
Tend to agree	As a father of a young child I am regul	Local resident
Tend to disagree	Comments relating to Dogs Exclusion	Local resident
Strongly disagree	Dogs as pets are important. We shou	Local resident
Strongly agree	I run the community garden in Saund	As a representative of a local commu
Strongly agree	I strongly agree with continuing the P	Local resident
Tend to agree	I think the exclusion of dogs on beach	Local resident
Strongly agree	I use Bedford Square regularly and ev	Local resident
Tend to agree	I would want to see the continued ex	As a representative of a local commu
Strongly agree	Is there a way (eg via a licensing syste	Local resident
Don't know / not sure	It is unclear to me how and when the	Local resident
Strongly agree	It it very depressing that the three sq	Local resident
Tend to agree	More dog waste bins should be made	Local resident
Strongly agree	More prominent signage is needed, es	Local resident
Strongly agree	More public information is needed to	As a representative of a local commu
Strongly agree	Norfolk Square is a tiny Square with v	Local resident
Strongly agree	Not aware that I've ever heard of any	Local resident
Strongly agree	Not only should the PSPO remain in p	Local resident
Strongly agree	Not sure how the problem can be sol	Local resident
Strongly agree	prominent notices to be displayed	Local resident
Strongly agree	Should be city wide not just some are	Local resident
Strongly agree	The contents of PSPOs relating to dog	As a representative of a local commu
Strongly agree	The controls are fine on paper but the	As a representative of a stakeholder g
Strongly agree	The dog controls are important in ma	Local resident
Tend to agree	The dogs on lead requirements b are	Local resident
Strongly agree	The rules need much stricter enforce	Local resident
Not Answered	There should be a limit to the numbe	Local resident
Strongly agree	This survey does not seem to mentio	As a representative of a local commu
Strongly agree	Whilst they exist they are not enforce	Local resident
Strongly agree	Yes. Too many dog walkers do not cl	Local resident

Strongly agree (n=33)	72%
Tend to agree (n=7)	15%
Neither agree nor disagree (n=1)	2%
Tend to disagree (n=2)	4%
Strongly disagree (n=1)	2%
Don't know / not sure (n=1)	2%
Not answered (n=1)	2%

How are you responding to this consultation. As a... - if you are representing a business, a community, voluntary or statutory organisation, what is your name and who are you representing?	How are you responding to this consultation. As a... - In what 'other' way are you responding to this consultation?	How old are you? - Age
	Council tenant	69
		79
		49
		Not Answered
		69
		70
		69
Volunteer associated with Green Spa		Not Answered
		33
		52
A/CI Dee Wells - Sussex Police		Not Answered
		Not Answered
		59
		65
		40
	I am also a member of a volunteer ga	63
Norfolk Square Group	Concerned resident	Not Answered
		46
		43
		53
Rosie Linford, Food Partnership Comr	as a local resident	Not Answered
		42
		47
		59
Rachel Swinney T/Superintendent –		Not Answered
		50
		65
		74
		49
		64
Bernadette Skinner Ovingdean Reside	local resident and member of Beacon	Not Answered
Ray Teuten. Norfolk Square Resident	A very concerned resident	59
	Volunteer in local park- Norfolk Squa	67
	none	46
	Fed up with the very unpleasant nuis	50
		80
	As a parent and dog owner	47
Brighton & Hove Green Spaces Forum	As a member of the public and green	Not Answered
Susan Johnson, Secretary of Friends of	I dont undertand the question - I am	Not Answered
		Not Answered
		45
		Not Answered
		75
Friends of Wish Park and Friends of H	Local resident and TUT volunteer	Not Answered
		49
		Not Answered



What gender are you? - Gender	What gender are you? - Gender - if other	Do you identify as the sex you were assigned at birth? - Do you identify as sex assigned at birth
Male		Yes
Male		Yes
Male		Yes
Prefer not to say		Prefer not to say
Female		Yes
Male		Yes
Male		Yes
Not Answered		Not Answered
Male		Yes
Male		Yes
Not Answered		Not Answered
Not Answered		Not Answered
Female		Yes
Male		Yes
Male		Yes
Female		Yes
Not Answered		Not Answered
Male		Yes
Female		Yes
Male		Yes
Not Answered		Not Answered
Male		Yes
Female		Yes
Female		Yes
Not Answered		Not Answered
Female		Prefer not to say
Female		Yes
Female		Yes
Male		Yes
Male		Yes
Not Answered		Not Answered
Male		Yes
Male		Yes
Male		Yes
Female		Yes
Female		Yes
Prefer not to say		Prefer not to say
Not Answered		Not Answered
Not Answered		Not Answered
Prefer not to say		Prefer not to say
Prefer not to say		Prefer not to say
Male		Yes
Female		Yes
Not Answered		Not Answered
Male		Yes
Male		Yes

How would you describe your ethnic origin? - Ethnic origin	Which of the following best describes your sexual orientation? - Sexual orientation	Which of the following best describes your sexual orientation? - Sexual orientation - if other
White: English / Welsh / Scottish / Nd	Lesbian / Gay woman	
White: English / Welsh / Scottish / Nd	Prefer not to say	
White: English / Welsh / Scottish / Nd	Bisexual	
Prefer not to say	Prefer not to say	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
Not Answered	Not Answered	
White: English / Welsh / Scottish / Nd	Gay man	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
Not Answered	Not Answered	
Not Answered	Not Answered	
White: English / Welsh / Scottish / Nd	Prefer not to say	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
Not Answered	Not Answered	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Not Answered	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
Not Answered	Not Answered	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Other	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
Not Answered	Not Answered	
White: English / Welsh / Scottish / Nd	Prefer not to say	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Not Answered	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
Not Answered	Not Answered	
White: English / Welsh / Scottish / Nd	Prefer not to say	
Mixed: Asian & White	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
Prefer not to say	Prefer not to say	
Not Answered	Not Answered	
Not Answered	Not Answered	
Prefer not to say	Prefer not to say	
Prefer not to say	Prefer not to say	
Prefer not to say	Heterosexual / straight	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	
Not Answered	Not Answered	
White: Any other White background	Gay man	
White: English / Welsh / Scottish / Nd	Heterosexual / straight	

What is your religion or belief? - Religion/belief	What is your religion or belief? - Religion/belief: if other	Armed Forces Service - Armed forces service - Are you currently serving in the UK Armed Forces? (this includes reservists or part-time service, such as the Territorial Army)
Atheist		No
I have no particular religion		No
Agnostic		No
Prefer not to say		Prefer not to say
Atheist		No
Atheist		No
I have no particular religion		No
Not Answered		Not Answered
I have no particular religion		No
Christian		No
Not Answered		Not Answered
Not Answered		Not Answered
Prefer not to say		No
Atheist		No
I have no particular religion		Not Answered
Agnostic		No
Not Answered		Not Answered
I have no particular religion		No
Atheist		No
I have no particular religion		No
Not Answered		Not Answered
I have no particular religion		No
Pagan		No
I have no particular religion		No
Not Answered		Not Answered
Christian		No
I have no particular religion		No
I have no particular religion		No
Atheist		No
I have no particular religion		No
Not Answered		Not Answered
Prefer not to say		No
I have no particular religion		No
I have no particular religion		No
I have no particular religion		Not Answered
Christian		No
Prefer not to say		Prefer not to say
Not Answered		Not Answered
Not Answered		Not Answered
Prefer not to say		Prefer not to say
I have no particular religion		Prefer not to say
Prefer not to say		Not Answered
I have no particular religion		No
Not Answered		Not Answered
I have no particular religion		No
Christian		No

Armed Forces Service - Armed forces service - Have you ever served in the UK Armed Forces?	Armed Forces Service - Armed forces service - Are you a member of a current or former serviceman or woman's immediate family/household?	Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? - Health or disability
No	No	Yes a little
No	No	No
No	No	No
Prefer not to say	Prefer not to say	Prefer not to say
No	No	No
No	No	Yes a little
No	No	Yes a little
Not Answered		Not Answered
No	No	No
No	Yes	Yes a little
Not Answered		Not Answered
Not Answered		Not Answered
No	No	No
No	No	No
Not Answered		No
No	No	No
Not Answered		Not Answered
No	No	No
No	No	No
No	No	No
Not Answered		Not Answered
No	No	No
No	No	No
No	No	Yes a little
Not Answered		Not Answered
No	No	Yes a little
No	No	No
No	No	No
No	No	No
No	No	No
Not Answered		Not Answered
No	No	Prefer not to say
No	No	No
No	No	No
No	No	No
No	No	No
Prefer not to say	Prefer not to say	Yes a little
Not Answered		Not Answered
Not Answered		Not Answered
Prefer not to say		Prefer not to say
Prefer not to say	Prefer not to say	Prefer not to say
Not Answered		No
Not Answered		Yes a little
Not Answered		Not Answered
No	No	No
No	No	No

Please let us know the type of impairment which applies to you - Impairment type - Physical Impairment	Please let us know the type of impairment which applies to you - Impairment type - Sensory Impairment	Please let us know the type of impairment which applies to you - Impairment type - Learning Disability / Difficulty
Physical Impairment		
Physical Impairment		
Physical Impairment		
Physical Impairment		

Are you a carer? - Carer responsibilities	As a carer, who do you care for? - Care receiver - Parent	As a carer, who do you care for? - Care receiver - Child with special needs
No		
No		
No		
Prefer not to say		
No		
No		
No		
Not Answered		
Yes	Parent	
No		
Not Answered		
Not Answered		
No		
No		
No		
No		
Not Answered		
No		
No		
No		
Not Answered		
No		
No		
No		
Not Answered		
Yes	Parent	
No		
No		
No		
Yes		
Not Answered		
No		
No		
No		
Yes	Parent	
No		
Prefer not to say		
Not Answered		
Not Answered		
Prefer not to say		
Prefer not to say		
No		
Yes		
Not Answered		
No		
No		

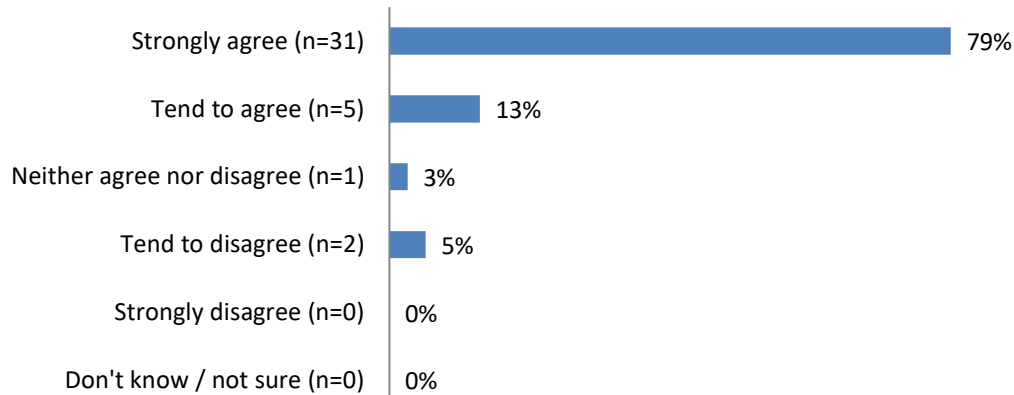
As a carer, who do you care for? - Care receiver - Other	Response ID	Submitted Date
	ANON-RBC1-H4MK-V	2020-07-19 18:53:22
	ANON-RBC1-H4MX-9	2020-07-19 20:06:32
	ANON-RBC1-H4MU-6	2020-07-20 07:22:54
	ANON-RBC1-H4M8-9	2020-07-20 08:03:08
	ANON-RBC1-H4MP-1	2020-07-20 08:55:33
	ANON-RBC1-H4M2-3	2020-07-20 11:25:07
	ANON-RBC1-H4TB-T	2020-07-21 13:16:55
	ANON-RBC1-H4TQ-9	2020-07-21 14:35:57
	ANON-RBC1-H4TU-D	2020-07-31 10:21:14
	ANON-RBC1-H4TT-C	2020-08-01 11:03:45
	ANON-RBC1-H4T8-G	2020-08-03 16:14:43
	ANON-RBC1-H4TA-S	2020-08-04 13:59:35
	ANON-RBC1-H4ZQ-F	2020-08-12 00:22:09
	ANON-RBC1-H4ZF-4	2020-08-16 13:22:05
	ANON-RBC1-H4TG-Y	2020-08-06 09:54:55
	ANON-RBC1-H4TJ-2	2020-08-07 14:46:39
	ANON-RBC1-H4TD-V	2020-08-07 09:30:08
	ANON-RBC1-H4M4-5	2020-07-15 21:27:56
	ANON-RBC1-H4T4-C	2020-07-20 12:18:07
	ANON-RBC1-H4TF-X	2020-07-21 08:59:38
	ANON-RBC1-H4T9-H	2020-07-22 11:11:08
	ANON-RBC1-H4TM-5	2020-08-07 23:19:46
	ANON-RBC1-H4MT-5	2020-07-20 07:50:53
	ANON-RBC1-H4T1-9	2020-07-20 14:43:17
	ANON-RBC1-H4ZR-G	2020-08-24 14:11:47
	ANON-RBC1-H4M1-2	2020-07-18 10:56:24
	ANON-RBC1-H4ME-P	2020-07-19 17:54:36
	ANON-RBC1-H4MM-X	2020-07-20 09:50:49
	ANON-RBC1-H4TW-F	2020-08-09 14:52:04
	ANON-RBC1-H4M7-8	2020-07-19 19:05:55
	ANON-RBC1-H4MH-S	2020-07-19 19:17:17
	ANON-RBC1-H4ZS-H	2020-08-20 10:28:31
	ANON-RBC1-H4TR-A	2020-07-22 16:25:38
	ANON-RBC1-H4T7-F	2020-07-22 14:52:06
	ANON-RBC1-H4TS-B	2020-07-22 12:23:55
	ANON-RBC1-H4M3-4	2020-07-20 12:17:17
	ANON-RBC1-H4Z9-Q	2020-08-20 10:06:46
	ANON-RBC1-H4MY-A	2020-07-19 18:13:48
	ANON-RBC1-H4TY-H	2020-07-22 10:54:56
	ANON-RBC1-H4TH-Z	2020-07-23 11:39:51
	ANON-RBC1-H4MW-8	2020-07-20 10:49:49
	ANON-RBC1-H4Z3-H	2020-08-20 15:38:08
	ANON-RBC1-H4M6-7	2020-07-19 19:36:44
	ANON-RBC1-H4TV-E	2020-07-30 20:22:49
	ANON-RBC1-H4MQ-2	2020-07-18 10:45:42
	ANON-RBC1-H4Z7-N	2020-08-20 15:35:02

Do you agree or disagree that the PSPO relating to alcohol use on public spaces should remain in place? - Q4a	Do you have any comments about the PSPO relating to alcohol use on public spaces? - Q4b	How are you responding to this consultation. As a... - Q6
Strongly agree	Yes; please enforce the existing rules	Local resident
Tend to agree	When people drink alcohol to the deg	Local resident
Strongly agree	These rules are essential and should b	Local resident
Strongly agree	There is one particular 'hot spot' near	Local resident
Strongly agree	There is nothing wrong with people dr	As a representative of a stakeholder g
Strongly agree	There doesn't seem to be any enforce	Local resident
Strongly agree	There ought to be restrictions about v	Local resident
Strongly agree	The PSPO helps to reduce anti social b	As a representative of a stakeholder g
Strongly agree	Since Lockdown, there has been a hug	As a representative of a local commun
Strongly agree	Please enforce the existing rules more	Local resident
Strongly agree	Norfolk Square as been a hotspot for r	Local resident
Strongly agree	More dogs - less alcohol. Alcohol is a s	Local resident
Strongly agree	It is difficult for members of the public	Local resident
Neither agree nor disagree	It is all about the behaviour of people	Local resident
Strongly agree	Is it for specific public spaces or all of	As a representative of a local commun
Tend to disagree	If people are so drunk in a public spac	Local resident
Tend to agree	I would want to see the continued exi	As a representative of a local commun
Strongly agree	How do you plan to enforce this, as at	Local resident
Strongly agree	Groups of children between 12 ~ 18 a	Other, please give details below
Strongly agree	Certain public areas in particularly Nor	As a representative of a local commun
Strongly agree	Better signage is needed to inform pe	Local resident
Strongly agree	begging is usually associated with drin	Local resident
Strongly agree	Be good to see more active interventi	Local resident
Strongly agree	As I use the square often I see so muc	Local resident
Strongly agree	Alcohol consumption should be banne	Local resident
Strongly agree	Alcohol bans are not enforced, i live o	Local resident
Strongly agree	Again, Norfolk Square has serious issu	Local resident
Strongly agree		Local resident
Strongly agree		Local resident
Tend to agree		Local resident
Strongly agree		Local resident
Strongly agree		As a representative of a local commun
Tend to disagree		Local resident
Strongly agree		Local resident
Strongly agree		Local resident
Tend to agree		Local resident
Strongly agree		Local resident
Strongly agree		Local resident
Tend to agree		Local resident

Strongly agree (n=31)	79%
Tend to agree (n=5)	13%
Neither agree nor disagree (n=1)	3%
Tend to disagree (n=2)	5%
Strongly disagree (n=0)	0%
Don't know / not sure (n=0)	0%

How are you responding to this consultation. As a... - if you are representing a business, a community, voluntary or statutory organisation, what is your name and who are you representing?	How are you responding to this consultation. As a... - In what 'other' way are you responding to this consultation?	How old are you? - Age
		56
		45
		40
Susan Johnson, Secretary of Friends of	I dont undertand the question - I am a	Not Answered
		65
	Fed up with the very unpleasant nuisa	50
A/CI Dee Wells - Sussex Police		Not Answered
Rosie Linford, Food Partnership Comm	as a local resident	Not Answered
		Not Answered
Ray Teuten. Norfolk Square Residents	A very concerned resident	59
		53
	I am also a member of a volunteer gar	63
		47
Friends of Wish Park and Friends of Ho	Local resident and TUT volunteer	Not Answered
		74
Rachel Swinney T/Superintendent – D		Not Answered
		Not Answered
	Both a resident and Saunders Park vol	Not Answered
Norfolk Square Group	Concerned resident	Not Answered
		64
		67
	Volunteer in local park- Norfolk Squar	67
		59
		50
		49
		42
		50
		79
		49
		69
Volunteer associated with Green Spac		Not Answered
		Not Answered
		52
		Not Answered
		49
		59
		65
	As a parent and dog owner	47

Do you agree or disagree that the PSPO relating to alcohol use on public spaces should remain in place?



What gender are you? - Gender	What gender are you? - Gender - if other	Do you identify as the sex you were assigned at birth? - Do you identify as sex assigned at birth
Male		Yes
Female		Yes
Prefer not to say		Prefer not to say
Male		Yes
Not Answered		Not Answered
Female		Yes
Female		Yes
Not Answered		Not Answered
Not Answered		Not Answered
Male		Yes
Male		Yes
Male		Yes
Female		Yes
Female		Yes
Not Answered		Not Answered
Female		Yes
Not Answered		Not Answered
Prefer not to say		Prefer not to say
Not Answered		Not Answered
Not Answered		Not Answered
Male		Yes
Male		Yes
Male		Yes
Female		Yes
Female		Yes
Male		Yes
Male		Yes
Female		Prefer not to say
Male		Yes
Male		Yes
Female		Yes
Not Answered		Not Answered
Female		Yes
Male		Yes
Not Answered		Not Answered
Male		Yes
Female		Yes
Male		Yes
Prefer not to say		Prefer not to say

How would you describe your ethnic origin? - Ethnic origin	Which of the following best describes your sexual orientation? - Sexual orientation	Which of the following best describes your sexual orientation? - Sexual orientation - if other
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: English / Welsh / Scottish / No	Not Answered	
Prefer not to say	Prefer not to say	
White: English / Welsh / Scottish / No	Heterosexual / straight	
Not Answered	Not Answered	
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: English / Welsh / Scottish / No	Heterosexual / straight	
Not Answered	Not Answered	
Not Answered	Not Answered	
Prefer not to say	Heterosexual / straight	
White: English / Welsh / Scottish / No	Prefer not to say	
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: English / Welsh / Scottish / No	Other	
Not Answered	Not Answered	
White: English / Welsh / Scottish / No	Not Answered	
Not Answered	Not Answered	
Prefer not to say	Prefer not to say	
Not Answered	Not Answered	
Not Answered	Not Answered	
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: English / Welsh / Scottish / No	Gay man	
Mixed: Asian & White	Heterosexual / straight	
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: Any other White background	Gay man	
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: English / Welsh / Scottish / No	Prefer not to say	
White: English / Welsh / Scottish / No	Prefer not to say	
White: English / Welsh / Scottish / No	Bisexual	
White: English / Welsh / Scottish / No	Heterosexual / straight	
Not Answered	Not Answered	
White: English / Welsh / Scottish / No	Bisexual	
White: English / Welsh / Scottish / No	Heterosexual / straight	
Not Answered	Not Answered	
White: English / Welsh / Scottish / No	Heterosexual / straight	
White: English / Welsh / Scottish / No	Prefer not to say	
White: English / Welsh / Scottish / No	Heterosexual / straight	
Prefer not to say	Prefer not to say	

What is your religion or belief? - Religion/belief	What is your religion or belief? - Religion/belief: if other	Armed Forces Service - Armed forces service - Are you currently serving in the UK Armed Forces? (this includes reservists or part-time service, such as the Territorial Army)
Christian		No
I have no particular religion		Not Answered
I have no particular religion		Prefer not to say
I have no particular religion		Not Answered
Not Answered		Not Answered
I have no particular religion		No
I have no particular religion		Not Answered
Not Answered		Not Answered
Not Answered		Not Answered
Prefer not to say		Not Answered
Prefer not to say		No
I have no particular religion		No
Agnostic		No
Pagan		No
Not Answered		Not Answered
I have no particular religion		No
Not Answered		Not Answered
Prefer not to say		Prefer not to say
Not Answered		Not Answered
Not Answered		Not Answered
I have no particular religion		No
Christian		No
I have no particular religion		No
I have no particular religion		No
I have no particular religion		No
I have no particular religion		No
I have no particular religion		No
Christian		No
I have no particular religion		No
Agnostic		No
Atheist		No
Not Answered		Not Answered
Agnostic		No
Christian		No
Not Answered		Not Answered
Atheist		No
Prefer not to say		No
Atheist		No
Prefer not to say		Prefer not to say

Armed Forces Service - Armed forces service - Have you ever served in the UK Armed Forces?	Armed Forces Service - Armed forces service - Are you a member of a current or former serviceman or woman's immediate family/household?	Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? - Health or disability
No	No	No
Not Answered	Not Answered	Yes a lot
Prefer not to say	Prefer not to say	Prefer not to say
Not Answered	Not Answered	No
Not Answered	Not Answered	Not Answered
No	No	No
No	No	No
Not Answered	Not Answered	Not Answered
Not Answered	Not Answered	Not Answered
Not Answered	Not Answered	No
No	No	Prefer not to say
No	No	No
No	No	No
No	No	No
Not Answered	Not Answered	Not Answered
No	No	No
Not Answered	Not Answered	Not Answered
Prefer not to say	Not Answered	Prefer not to say
Not Answered	Not Answered	Not Answered
Not Answered	Not Answered	Not Answered
No	No	No
Yes	Not Answered	No
No	No	No
No	No	Yes a little
No	No	No
No	No	No
No	No	No
No	No	Yes a little
No	No	No
No	No	No
No	No	No
Not Answered	Not Answered	Not Answered
No	No	No
No	Yes	Yes a little
Not Answered	Not Answered	Not Answered
No	No	No
No	No	No
No	No	No
Prefer not to say	Prefer not to say	Yes a little

Are you a carer? - Carer responsibilities	As a carer, who do you care for? - Care receiver - Parent	As a carer, who do you care for? - Care receiver - Child with special needs
No		
No		
Prefer not to say		
No		
Not Answered		
No		
Yes	Parent	
Not Answered		
Not Answered		
No		
No		
No		
No		
No		
Not Answered		
No		
Not Answered		
Prefer not to say		
Not Answered		
Not Answered		
Yes		
No		
No		
No		
No		
No		
No		
Yes	Parent	
No		
No		
No		
Not Answered		
No		
No		
Not Answered		
No		
No		
No		
Prefer not to say		

As a carer, who do you care for? - Care receiver - Other	Last Modified Date	Response ID
	2020-08-20 15:34:32	ANON-RBC1-H4Z7-N
	2020-07-19 20:34:44	ANON-RBC1-H4MV-7
	2020-07-20 10:49:40	ANON-RBC1-H4MW-8
	2020-08-06 09:54:51	ANON-RBC1-H4TG-Y
	2020-07-22 10:54:26	ANON-RBC1-H4TY-H
	2020-07-19 17:43:00	ANON-RBC1-H4MB-K
	2020-07-22 12:23:36	ANON-RBC1-H4TS-B
	2020-08-03 16:13:58	ANON-RBC1-H4T8-G
	2020-07-22 11:10:55	ANON-RBC1-H4T9-H
	2020-08-20 15:37:50	ANON-RBC1-H4Z3-H
	2020-08-20 10:28:12	ANON-RBC1-H4ZS-H
	2020-07-21 08:59:34	ANON-RBC1-H4TF-X
	2020-08-07 14:46:19	ANON-RBC1-H4TJ-2
	2020-07-20 07:50:45	ANON-RBC1-H4MT-5
	2020-07-30 20:22:16	ANON-RBC1-H4TV-E
	2020-07-20 09:50:36	ANON-RBC1-H4MM-X
	2020-08-24 14:11:44	ANON-RBC1-H4ZR-G
	2020-07-23 11:39:29	ANON-RBC1-H4TH-Z
	2020-07-22 14:03:00	ANON-RBC1-H4TK-3
	2020-08-07 09:29:37	ANON-RBC1-H4TD-V
	2020-07-19 19:05:12	ANON-RBC1-H4M7-8
	2020-08-17 08:38:33	ANON-RBC1-H4ZB-Z
	2020-07-22 16:25:27	ANON-RBC1-H4TR-A
	2020-07-20 14:43:07	ANON-RBC1-H4T1-9
	2020-07-20 09:36:06	ANON-RBC1-H4MJ-U
	2020-07-18 10:45:35	ANON-RBC1-H4MQ-2
	2020-08-07 23:19:32	ANON-RBC1-H4TM-5
	2020-07-18 10:56:15	ANON-RBC1-H4M1-2
	2020-07-19 20:06:12	ANON-RBC1-H4MX-9
	2020-07-20 07:22:51	ANON-RBC1-H4MU-6
	2020-07-20 08:55:14	ANON-RBC1-H4MP-1
	2020-07-21 14:35:46	ANON-RBC1-H4TQ-9
	2020-07-21 21:28:12	ANON-RBC1-H4TE-W
	2020-08-01 11:03:36	ANON-RBC1-H4TT-C
	2020-08-04 13:59:30	ANON-RBC1-H4TA-S
	2020-08-09 14:51:58	ANON-RBC1-H4TW-F
	2020-08-12 00:21:36	ANON-RBC1-H4ZQ-F
	2020-08-16 13:21:56	ANON-RBC1-H4ZF-4
	2020-08-20 10:06:39	ANON-RBC1-H4Z9-Q

Submitted Date	
2020-08-20 15:35:02	
2020-07-19 20:34:56	
2020-07-20 10:49:49	
2020-08-06 09:54:55	
2020-07-22 10:54:56	
2020-07-19 17:43:06	
2020-07-22 12:23:55	
2020-08-03 16:14:43	
2020-07-22 11:11:08	
2020-08-20 15:38:08	
2020-08-20 10:28:31	
2020-07-21 08:59:38	
2020-08-07 14:46:39	
2020-07-20 07:50:53	
2020-07-30 20:22:49	
2020-07-20 09:50:49	
2020-08-24 14:11:47	
2020-07-23 11:39:51	
2020-07-22 14:03:08	
2020-08-07 09:30:08	
2020-07-19 19:05:55	
2020-08-17 08:38:42	
2020-07-22 16:25:38	
2020-07-20 14:43:17	
2020-07-20 09:36:25	
2020-07-18 10:45:42	
2020-08-07 23:19:46	
2020-07-18 10:56:24	
2020-07-19 20:06:32	
2020-07-20 07:22:54	
2020-07-20 08:55:33	
2020-07-21 14:35:57	
2020-07-21 21:28:16	
2020-08-01 11:03:45	
2020-08-04 13:59:35	
2020-08-09 14:52:04	
2020-08-12 00:22:09	
2020-08-16 13:22:05	
2020-08-20 10:06:46	

Please use the space below to comments on the scheme – particularly views around its effectiveness and whether the gates are still required as a response to crime and antisocial behaviour. - comments

Number of responses: 5

I believe the gates are very helpful. The row is quite secluded and I believe would be a common place for drug using activity if it was not blocked off at night. My understanding is that this was part of the reason for its implementation in the first place and I think the activity would quickly return were the gates to be removed. Additionally, the benefits of the gates outweigh any negatives as the alley would not be a common footpath after dark anyway and the route is open during the day for transport between the level and London Road.

We live at number 4 and we would Very much like to gates to stay as we have experienced anti-social and illegal behaviour outside our property during when the gates are open in the day. We have seen illegal drug behavior on many occasions and at times have chosen not to leave the property at the time due to it happening right outside. If the gates were to be removed the alley is quite secluded so I believe we would see an increase in illegal behaviour and would be disruptive as well as make us more nervous.

The gating order is essential to reduce anti-social behaviour in the residential side of Brunswick Row.

However, the gating order does not alleviate all anti-social behaviour: new graffiti appears on an almost weekly basis on a wall on the Ditchling Road side of Brunswick Row, and public urination is occasionally a nuisance during the day. Extending the gating order to be 24-hours would go some way to solving these problems.

As I live in Queens Place itself (the old original cottages) I had never been given or informed of the code to be able to use on gate. For the odd occasion I need to get through. I believe a lady who used to live there let me have it one time, although it may obviously have been changed.

I would ask that if it is going to be continued, are the residents in queens place allowed to know the code as well? As there have been many times it is still locked after 8am in the morning. And if one wants to get through to access ones own property, haven't been able to. As with all the building work that's has been going on of recent, the other end has been blocked as well - London rd end.

I cannot say re antisocial behaviour as not living in the row, however it has not seemed to stop the graffiti that is always occurring, unsure if that's been reported. And if anything the rear door of macdonalds, is profoundly an anti social area. Which is in Queens place.

thanking you trust you will be to address my query
regards

S.Williams
Queens Place

To remove the gates at Brunswick Row would be a complete disaster for all residents - I have seen the documentation of events prior to the Gating Order and the reading was pretty grim - however I'm not surprised

at the anti-social behaviour that previous residents experienced as we still experience at times some pretty unpleasant behaviour by the General Public.

We have teenage weed smoking and adult junkies having a fix outside my house - there is a blind spot from the street which is used for various activities, such as dealing or shooting up.

Last week I saw a man urinating against a neighbour's house.

We have skateboarders thinking our street is an extension of the Skate Park at the Level.

Very Occasionally Delivery Scooters use our street as a cut through even though we are a paved pedestrian street.

We also have a large selection of not very good graffiti.

Also, there is the mobile phone user who feels it's absolutely fine to hold a ranting argument outside the house for what seems like forever, I also experience the door being knocked [this one although annoying isn't as bad as the other activities]

Also not forgetting the group of loud teenagers who seem to think it's okay to sit in groups on the street or on my window sill.

As you can see we are dealing with a fair amount of anti-social behaviour during the day I can

Please use the space below to comments on the scheme – particularly views around its effectiveness and whether the gates are still required as a response to crime and antisocial behaviour. - Feedback

Number of responses: 7

We campaigned for some years to get the gate installed. Rough sleepers, drug-runners and alcoholics plagued Farman Street until the gate was put in place. The street was a little rat-run - and often used as a lavatory.

Since the installation, there have been occasional incidents, but on the whole it has transformed our street into a garden square that has won flower awards on several occasions.

Newer residents may not realise the benefits that have been brought to the street. But most of us who have lived here for many years are most appreciative of the council for keeping it in place. The residents do their best to keep it painted and in good condition.

One thing I would ask: is it possible for the department responsible for parking regulations be extra vigilant regarding the small car space at the Cross Street end of Farman Street?

When we moved here we were told it was really there only for fire tenders and medical emergency vehicles. Recently, it seems as if half Brighton has discovered a free parking area. The slamming of doors and the noise of engines straining to get out of Farman Street and into Cross Street is pretty constant and distressing.

Thank you. Please keep the gate.

Sincerely

Bruce and Barbara Montague
7 Farman Street
BN31AL

Further to the emails from Bruce, Richard and Lucie, I shall be grateful if you would include mine too for your file.

The gate in Farman Street has reduced the noise, anti-social behaviour, drug-taking and dog fouling. Hence, these have improved the quality of life and decreased the stress level in our lives.

Alley gating has been successful by working alongside the police and local authorities for combating crime and anti-social behaviour.

Keep the Gate! Gates work!

Best Wishes,
Joe & Amy Rock
7A Farman Street

My home is number one Patrick House. My home is right next to the security gate and the busy and loud Western Road. It is vital that the gate security remains for the following reasons.

1. for our health, protection and wellbeing
2. A few steps away is the busy Western Road
3. Before the gates were installed drunks would congregate, some with loud music. There was fighting, banging on my window, sitting on my window ledge, people dancing, loud talk and laughing all into the early hours. No-one can live peacefully in such an anti social environment.
4. we the people that live here desperately need to live peacefully. we look after the flowers and plants in the formal square. We cannot live peacefully if the gates are removed to let disorderly people destroy our nightlife sleeping. PLEASE SAVE OUR PEACE.

I personally have one more problem. I have never been told how to operate the gate door. Is it by key or by code. Being register serverly disabled i have to walk around the whole block when its locked just to get to my front door. Its tough and dangerous. please write to me with how to operate the gate lock.

Mrs EM Daveron

As a background for you & I believe has been clearly minuted on previous emails - this area faced continuous problems relating to both alcohol & drug related incidents - resulting in an ongoing pressure group by the residents of Farman Street to place a gate at the junction of Farman Street & Western Road

Since that action prevailed there has been a marked decrease in the action of both alcohol & drug incidences - although there is still in the background / during times of the year when " a return to the past " has resulted in needles / drug dealing / severe alcoholism occurring - though overall it is a far better picture than previous gate - less years

I have been resident in Farman Street for over 12 years & I have clearly seen the " improvement " since the inception of the gate - so I strongly recommend continuation of the existing status & keeping the gate in - situ pending a further PSPO review in three years time - 2023.

Yours sincerely

Martin Kelly

As a long term resident of Farman street I can confirm that the gate has been and still is very effective with regard to anti social behaviour and late night disturbance .

Since it's installation over eight years ago there has been a greatly reduced need to inform the police of drunken behaviour, drug dealing , burglary and general late night noise and nuisance . The closing of the gate carried out by neighbours or myself and is regularly checked for lubrication and keypad function .

Regards

Richard Oxford

The gate is in good order however the paving is broken and needs repairing. Please let me know if you need access.

Gabriel Oscar Disney

Regarding our gate 'Farman Street PSPO review ' it's very effective & it seems to have reduced criminal & antisocial behaviour considerably.

It needs to remain in place.

Thank you so much.

I have noticed a rise in drug dealing going on during the day in our courtyard here in Farman Street & they deal ,out of shot of the CCTV cameras, in front of the back door to the laundromat that's on Western Road.

The lights haven't been working on Cross Street for a number of weeks (which I have reported) & there's been a rise in criminal activity there at night as it's pitch black!

If only Cross Street could be blocked off at night too!! But I understand that it would be impossible for this request to be granted.

The flow of traffic ,pick up & drop off, is high on Cross Street late into the night & into the early morning.

As the pubs ,restaurants & bars have been shut during lockdown this eased considerably .

Lucie Llewellyn-Myles

Please use the space below to comments on the scheme – particularly views around its effectiveness and whether the gates are still required as a response to crime and antisocial behaviour. - Feedback

Number of responses: 2

I was the one responsible for lobbying action to get this reviewed as my studio overlooks the alley, and all of the awful activity that once occurred there!

With regards to the alley itself, there has been a noticeable improvement to the street by having access restricted to it. Such a great feeling seeing drug dealers from out of town turn on their heels once they realised it was closed off! That's not to say that new problems haven't arisen; I personally take it upon myself to keep the gate 'tag-free', and clean out the rubbish on a regular basis that gets thrown in from the street/wind.

We have a combination padlock on the gate to enable ease of access for those that need to access. (code is 2020)

We do have issues with people urinating in the corner of the gate on Oxford Street as the gate was fixed to the recess instead of flush to the street. If this could be moved forward it would remedy this issue.

I have seen the plans for the medical centre and car park and like the prospect of the alley being used for access for the rear of the properties on Oxford Street and bike shed as this will ensure it is kept clear. the car park is now closed to the public but is a complete mess.

Due to COVID the Bat & Ball Pub had kept its commercial bin in the alley due to space in their yard which was fine and has now returned. The rubbish however at the end of the alley (where the fence is) and fly-tipping in the car park is a growing problem. I have spoken with the residents of number 25 Oxford Street (when he is sober) and have tried to educate him on the 'shared space' and it 'doesn't belong to anyone!' It has become a dumping ground and a fire hazard.

Due to funding, only one gate could be installed and a fence panel at the opposite end. I would

With regards to the alley itself, there has been a noticeable improvement to the street by having access restricted to it. Such a great feeling seeing drug dealers from out of town turn on their heels once they realised it was closed off! That's not to say that new problems haven't arisen; I personally take it upon myself to keep the gate 'tag-free', and clean out the rubbish on a regular basis that gets thrown in from the street/wind.

We have a combination padlock on the gate due to someones behaviour when drunk, and they would cut off padlocks(!!!) so this is a much easier way to manage it.

We do have issues with people urinating in the corner on Oxford Street as the gate was fixed to the recess instead of flush to the street. If this could be moved forward it would remedy this issue.

I have seen the plans for the medical centre and car park and like the prospect of the alley being used for access for the rear of the properties on Oxford Street and bike shed as this will ensure it is kept clear.

Due to COVID the Bat & Ball Pub had kept its commercial bin in the alley due to space in their yard which was fine and has now returned. The rubbish however at the end of the alley (where the fence is) is a growing problem. I write this in confidence so this does not get fed back to Marcus, but he continuously dumps rubbish in the car park, the alley and has had many, many run-ins with the police for his behaviour. I have spoken with Marcus (when he is sober) and have tried to educate him on the 'shared space' and it 'doesn't belong to anyone!' I think it's finally getting through!

Due to funding, only one gate could be installed and a fence panel at the opposite end. I would strongly recommend the gate staying in place to ensure the safety of all. Only those who require access to it when it becomes a thoroughfare need know the codes. (At present the code is 2020 and those in question would be: No 26 Oxford Street (who has front and rear access, The tenant who

Please use the space below to comments on the scheme – particularly views around its effectiveness and whether the gates are still required as a response to crime and antisocial behaviour. - Feedback

Number of responses: 1

As the longest servicing resident here (53 years). I am delighted we have the gate. It has made quite a difference to the area. We don't have people using the place as a toilet or a dumping ground for their rubbish nor drug dealers and their addict.

I make sure the gate receives oil when required and should any other mechanical difficulties arise i would approach the local shop in St James Street. Most people living here are short term folk with no interest in the gate as far as i know. I have contemplated having a spring fixed for it to close automatically as some are very lax in ensuring that the gate is closed behind them. I would expect to pay for this myself.

I am aware that landlord are involved in the care of the gate. Whether they are aware of their responsibility I don't know. I have never seen them but your previous colleague (Mr Banister) who was present when the gate was first installed reconned he was going to let me know their phone numbers so that i could contact them should it be necessary but heard nothing more. I hope this help you.

R F Spashett

Subject:		Mary Clarke Statue Appeal Report	
Date of Meeting:		24th September 2020	
Report of:		Executive Director, Economy, Environment and Culture	
Contact Officer:	Name:	Branwen Lorigan	Tel: 01273 29175
	Email:	Branwen.lorigan@brighton-hove.gov.uk	
Ward(s) affected:		All	

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 On 30th January 2020 a notice of motion was presented to Brighton & Hove City Council Meeting requesting an update on council involvement with the work of the Mary Clarke Statue Appeal. This followed an award of £10,000 in 2018 to the Appeal by the council to fund the making of a bronze maquette (or model) of a full-size statue of Mary Clarke, a suffragette active in Brighton in 1909/10.
- 1.2 This report details involvement from the council (Arts, Planning, Visit Brighton, Venues, City Transport, Royal Pavilion and Museums) in support of the Mary Clarke Statue Appeal.

2. RECOMMENDATIONS:

- 2.1 the Committee notes the work of officers in Arts, Planning, Visit Brighton, Venues, City Transport and the Museums Service in the support of the Mary Clarke Statue Appeal.
- 2.2 the committee notes the fundraising work being undertaken by the Appeal to move forward with their plans.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The Mary Clarke Statue Appeal was set up in 2018 and gained charity status in 2019. The charitable objectives of the Mary Clarke Statue Appeal are to advance art and education for the benefit of the public by the provision of a sculpture of the suffragette Mary Clarke. The Appeal group sees the Mary Clarke statue as a symbol of democracy and women's rights and as a means to raising awareness of the suffragettes' role in furthering democracy and equal rights for women. Board members of the charity are Andrew Winter, Briony Graham Goulden, Kathryn Henderson and Jean Calder (Chair).

- 3.2 Mary Clarke was born in 1861 in Salford, Manchester and she is the sister of Emmeline Pankhurst. Mary was a member of the Brighton branch of the Women's Social & Political Union (WSPU). In 1909 Mary was appointed as an official paid WSPU organiser for Brighton. It is documented on the Mary Clarke Statue Appeal website that Mary chaired a meeting at Hove Town Hall on 23 October 1909 and a meeting on 5 May 1910 at Brighton Dome. In 1909 Mary was responsible for organising a campaign to protest against the January 1910 General Election. Mary attended the 'Black Friday' protest on 18 November 1910 in London. During this protest Mary was arrested for breaking a window and imprisoned in Holloway Prison for a month. Mary went on a hunger strike and was force fed. Shortly after her release from prison she collapsed and died of a brain haemorrhage. In 2019 the site of the WSPU offices in Brighton were commemorated by a blue plaque.

COUNCIL SUPPORT FOR THE APPEAL GROUP

- 3.3 The council's award of a £10,000 grant enabled the Appeal to start the commissioning process that resulted in the commission of the artist Denise Dutton to make the maquette. This was an important catalyse for the promotion of the Mary Clarke Statue Appeal fund raising campaign that seeks to raise £100,000 for the eventual full-size statue.
- 3.4 In 2020 Visit Brighton and the arts team promoted the Appeal and fundraising events associated with it, on their website and on Twitter. Over the past year the group has also had discussions with council's Head of Tourism and Venues about a potential suffragette trail centred on the statue and other locations and activities from this period.
- 3.5 The Royal Pavilion and Museums service has funded some blue plaques highlighting activities and people related to the suffragette movement in the city. Head of Tourism and Venues and Visit Brighton staff have advised the Appeal on crowdfunding and what is required to run a successful campaign. They continue to be available for further advice.
- 3.6 The council's planning officer with responsibility for conservation has met, and exchanged correspondence with, a representative of the Appeal group to advise on the planning process for the potential installation of a statue. Royal Pavilion and Museums staff have met with the Appeal group and shared information about the Pavilion Gardens Conservation Management Plan and fundraising plans for this.
- 3.7 A representative of the Appeal group recently met with the council's Head of Engagement at the Royal Pavilion and Museums to discuss the profile of women within the city's museums, which includes clearer representation of the suffragettes, for example through the education work at Preston Manor, which focuses on the Edwardian period. The Head of Engagement and the Appeal group will meet later in the year, when staff have reopened all museums and can work on refreshing exhibition material.
- 3.8 The arts team have contacted City Transport colleagues on behalf of the Appeal group to discuss a variety of potential sites for the statue within Victoria Gardens and the Old Steine areas of the Valley Gardens redevelopment.

OPTIONS FOR THE LOCATION OF THE MARY CLARKE STATUE

- 3.9 Since the idea of a statue to Mary Clarke was first suggested, there have been discussions on a suitable location for it. The future location would be subject to a planning application and also consent would be required from the landowner. The following options could be considered:

Entrance to Brighton Museum in Royal Pavilion Gardens. A memorial service was held for Mary Clarke in 1910 at the Royal Pavilion. The Royal Pavilion Gardens are Grade 2 listed and on the 'at risk' list prepared by Historic England. The gardens are covered by criteria laid out in City Plan Part 2 (DM32, 2.245) which limits additions to the gardens. A conservation management plan for the gardens was adopted by the Tourism, Development and Culture Committee on 17 January 2019 which in turn was used to successfully bid for National Lottery Heritage Funds in 2019. This location is preferred by the Appeal group.

Old Steine. This site is close to the Royal Pavilion and to The Dome. Initial discussions have been had with Transport officers around the possible siting of the statue in phase 3 of the Valley Gardens redevelopment and this area has potential as a location close to the Pavilion and The Dome.

New Road. The Appeal group have had discussions with Planning who have indicated their preference for this location. More discussion is needed with Highways officers to consider options along New Road. The completed redevelopment of The Corn Exchange may present some opportunities.

- 3.10 The arts team are planning to organise a visit of the site options with the Appeal group and associated officers from Royal Pavilion & Museums, Planning and City Transport in the Autumn.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The Appeal group have undertaken a number of fundraising activities since 2018 and they continue to raise funds for the statue. With significant budget pressures as a result of Covid-19, it is not considered appropriate to award further monies from the Council to the Appeal. Officer will continue to provide advice to the charity as funds are raised.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The Appeal group will be invited to take part in the Public Art consultation events in October 2020. These events will inform a Public Art Strategy for the city. The forthcoming Public Art Strategy will set out how future artistic interventions in public spaces will be decided. This will include how communities can be fully engaged in decision-making on what is represented in public spaces across the city.
- 5.2 With the support of the council's arts team, the Appeal are engaging with the Royal Pavilion & Museums Head of Engagement to facilitate closer working on the topics of Women Leaders and Innovators. A post about Mary Clarke has been included in the Museums blog promoting [Pioneering Women of Sussex](#).

- 5.3 The Appeal group have consulted widely on the principal of a statue in the city for Mary Clarke, and this has widespread support, as can be seen on the group's website.

6. CONCLUSION

- 6.1 Council officers have provided advice to The Mary Clarke Appeal group over the course of 2019 and 2020, following the award of £10,000 from the Council in 2018.
- 6.2 The Appeal group continue to raise funds for statue through their website and using online platforms. The wider importance of the suffrage movement and the women who played a major role in it during the early twentieth century will play a greater part in future exhibitions within the Royal Pavilion and Museums.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 Following the Covid-19 pandemic, the financial position of the council has been severely impacted. Every effort is being made to control expenditure and the council has been forced to review how best to allocate its resources to meet the council priorities.
- 7.2 As the paper does not propose any further grants or donations, the financial implications are restricted to the cost of officer time that is being committed in support of this project.
- 7.3 If this commitment can be met from within the establishment costs for the department, then there are not expected to be any additional budget requirements.

Finance Officer Consulted: Name: Jess Laing

Date: 15/09/2020

Legal Implications:

- 7.4 There are no legal implications arising directly out of this report which is for noting.

Lawyer Consulted:

Alice Rowland

Date: 14/9/20

Equalities Implications:

- 7.5 An Equalities Impact Assessment has not been carried out or is planned. This is because the Mary Clarke Appeal is an external charitable organisation with its own policies and obligations. If the statue was to be located on council land, an external report would be sought to confirm that the family of Mary Clarke had no known association with slavery, or the direct proceeds of this activity.

Sustainability Implications:

- 7.6 There are no sustainability impacts or implications at this time. It is not yet known what the statue will be made of, or how it will be moved to its permanent location.

Brexit Implications:

- 7.7 None identified

Crime & Disorder Implications:

- 7.8 There are no crime and disorder implications.

Risk and Opportunity Management Implications:

- 7.9 There are no risk and opportunity management implications

Public Health Implications:

- 7.10 There are no public health implications.

Corporate / Citywide Implications:

- 7.11 The equalities implications relate to the visibility of women in the historic social development of the city, with particular reference to the role of Mary Clarke and the suffragette movement during the early part of the twentieth century.

SUPPORTING DOCUMENTATION

Appendices:

There are no appendices.

Background Documents

1. Executive Summary of the Conservation Plan for the Royal Pavilion and Museum Gardens. Adopted by the Tourism, Development and Culture Committee on 17th January 2019.

APPENDIX 2: CONSERVATION PLAN EXECUTIVE SUMMARY & POLICY SCHEDULE

APPENDIX 2A: EXECUTIVE SUMMARY

The Need for a Conservation Plan

Built as a seaside pleasure palace by King George IV, Brighton Pavilion is a truly iconic building and its pleasure grounds sought to match its Regency flamboyance through innovative landscape design and horticulture. First designed as a private royal retreat the Royal Pavilion Garden (the Garden) was opened to the public in 1851 and has now become one of Brighton's most loved and used public spaces. Nash's design was partly recreated in the 1990s and the Garden is one of the few surviving Regency style gardens in England.

However, high levels of use, anti-social behaviour and an erosion of character resulted in the Garden being placed on the Heritage at Risk Register in 2017. A Conservation Plan was commissioned by Brighton & Hove City Council to address the issues facing the Garden and with a view of restoring the Garden to its former glory.

Summary of the Royal Pavilion Garden's Heritage Significances

A full Statement of Significance is provided in **Section 3** of this Conservation Plan. This is supported by detailed Tables of Significance for each individual heritage asset in **Appendix 4**. The following is a summary of the key points of the Garden's Statement of Significance.

As a place the Royal Pavilion Garden captures a unique blend of historic, aesthetic and community significances. Its history as a Regency style private royal garden and setting for the exuberant Royal Pavilion is a central aspect of its significance; but so is its over 165 years as an important public park and open space in the heart of Brighton. These two aspects form the primary significances of the site.

In historic terms the Garden is one of the few surviving Regency style gardens in England. Its creation by Nash in the early 19th century marked an important stage in the development of landscape and garden design bringing contemporary aesthetics into the realm of the garden. Sadly, the pioneering and influential nature of the design was not recognised in later phases of the Garden's life and the design was gradually eroded and lost. The partial re-creation of the Nash garden in the 1980s and 1990s sought to address this loss by re-creating elements of the design and implementing a Nash style picturesque landscape. There were however physical limitations to the extent of the works and the analytical works that supported the re-creation were largely limited to documentary analysis.

Consequently, the current garden, or even the garden that was created at the end of the re-creation works process, cannot be considered to be a fully intact and authentic recreation of the Nash design. It is instead a well-informed re-creation that provides a strong sense of the original Nash design and incorporates key aspects of the design. Its historic and evidential value lies in the elements that are known to accurately reflect earlier features and in the clear sense it provides of how a Regency garden was laid out, planted and maintained.

There are four Nash views of the Royal Pavilion that include images of the Garden, represented by aquatints by A.C. Pugin and contained within 'Views of the Royal Pavilion' (**Figure 5**). These are significant as they provide evidence for the layout of the Garden and established principal views of the Royal Pavilion.

A substantial element of its significance also relates to its relationship with the Royal Pavilion and wider estate. As an ensemble they represent an important architectural statement and their royal connections provide them with historic resonance. The Garden unifies and brings the architectural elements together and is a fundamental component of their setting. In particular it provides the main landscape setting for the Royal Pavilion itself. The decline in the quality of the Regency-style landscape is therefore affecting the significance of both the Garden and the Pavilion.

Since 1851 the Garden has served a public purpose, in contrast to its original private design intent, as an accessible public park for the people of Brighton. It has become an important urban green space providing a venue for numerous formal and informal events. It is now well used all year round with over five million people visiting or passing through the Garden each year. Its use is supported by the in-garden café and a regular programme of events. Its openness and ease of access makes it a particularly attractive venue. This communal usage is a fundamental aspect of the Garden's significance and has been for over 165 years.

Headline Risks and Opportunities

Underlying most of the issues and challenges facing the Garden is the inherent tension between its historic significance as a flamboyant Regency garden associated with the Royal estate, and its modern function as an important urban green space in the centre of Brighton.

Historic England placed the Garden on the Heritage at Risk Register for South East England in October 2017 citing the following reasons:

- The Garden had begun to suffer visibly from the high levels of visitor use and recreational development pressure; and
- There has been an erosion of the character caused by a disparate range of fencing, litter bins, signage and lighting units.

The combination of these factors was viewed as weakening the sense of the Garden's rich history for visitors.

Risks and opportunities facing the conservation of the Garden's heritage significances are grouped under the following headings, and explored in **Section 4** of this Conservation Plan:

- Presence on the Heritage at Risk Register
- User pressures
- Condition of the Garden
- Anti-social behaviour
- Trees and ecology
- Long-term climate change risks
- Completeness of restoration works
- External development pressures
- Management costs and resources
- Access, Engagement & Profile
- Interpretation & Research

Key Policies

The primary purpose of this Conservation Plan is to ensure that the significances of the Garden are fully taken into account during day-to-day and strategic decision-making. The policies in **Section 5** are designed to support this purpose, being developed from the analysis of risks and opportunities presented in **Section 4**.

Section 5 is divided into seven sections. Key policies are:

Policy 1: Governance

Policy 2: Strategic Principles

Policy 3: Capital Works Priorities

Policy 4: Management & Operation Priorities

Policy 5: Masterplan & Guidance

Policy 6: Interpretation & Research

Policy 7: Audience Development & Engagement

Governance Policy 1a: If the Royal Pavilion & Museums is to move to an independent Trust, ensure that a Trustee with horticultural / historic parks background is appointed to the new Trust to provide oversight of the long-term conservation and management of the Royal Pavilion Garden element of the wider Estate.

Governance Policy 1b: If the Royal Pavilion & Museums is to move to an independent Trust, ensure that management structures within the Trust provide clarity on responsibility for the Garden and that appropriate levels of resourcing and revenue funding are maintained to support the Garden.

Governance Policy 1c: If responsibility for management remains with the local authority ensure that the daily management of the Garden remains with the Royal Pavilion and Museums division of B&HCC; and that regular integration meetings are held with other parties operating within the Royal Estate.

Strategic Principle 2a: Ensure all decisions and actions conserve and enhance the significance of the Garden (as defined in the Statement of Significance) and potential conflicts between significances are addressed through reasoned decisions supported, where necessary, by expert opinion and stakeholder engagement.

Strategic Principle 2b: Ensure future management and development decisions maintain the Garden's key role as a free to enter accessible public open space in the heart of Brighton.

Strategic Principle 2c: Maintain an appropriate level of capital and revenue funding/resources to ensure a high standard of management and maintenance of the Garden and explore possible new future funding sources.

Strategic Principle 2d: Ensure future management and development decisions maintain and enhance the distinctive historic character of the Garden and the "Nash Style" approach to horticulture and landscape design.

Strategic Principle 2e: Conserve the significance of the Garden by continuing to provide a high standard of management and maintenance.

Strategic Principle 2f: Promote the Garden's community and recreational values, providing facilities, activities and events which meet local people's and visitor's needs.

Strategic Principle 2g: Conserve, protect and enhance Nash's Views.

Strategic Principle 2h: Ensure a good understanding of the Garden's significance through a systematic approach to managing information and high quality interpretation.

Strategic Principle 2i: Adopt, Implement & Review the Conservation Plan.

Capital Works Priorities Policy 3a: Design and implement a boundary for the Garden that enables management of egress and exit in a way that is sympathetic to the Garden and surrounding area.

Capital Works Priorities Policy 3b: Improve and enhance the entrances to the Garden.

Capital Works Priorities Policy 3c: Enhance the Western Lawn compartment.

Capital Works Priorities Policy 3d: Enhance the East/North East Lawn compartments

Capital Works Priorities Policy 3e: Enhance the area of the Garden near to The Corn Exchange and The Dome.

Capital Works Priorities Policy 3f: Relocate the public toilets and maintenance sheds.

Capital Works Priorities Policy 3g: Rationalise and improve the Garden's furniture and path network.

Capital Works Priorities Policy 3h: Enhance the lighting within the Garden.

Capital Works Priorities Policy 3i: Improve the streetscape quality on all the lanes entering the Garden.

Capital Works Priorities Policy 3j: Remove or mitigate the features that detract from the Garden's character.

Management & Operational Priorities Policy 4a: Address the issue of the succession of the existing Head Gardener.

Management & Operational Priorities Policy 4b: Update the Management and Maintenance Plan (MMP) following the completion of any capital works or changes to procedures.

Management & Operational Priorities Policy 4c: Provide adequate training to staff and volunteers on managing and maintaining the heritage.

Management & Operational Priorities Policy 4d: Develop an agreed event accommodation and servicing procedure for the Garden.

Management & Operational Priorities Policy 4e: Digitally record the drawings from the restoration/plans for beds – to ensure these are not lost in a fire or other disaster.

Management & Operational Priorities Policy 4f: The Sustainability Policy of the new Trust should include specific elements relevant to the Garden.

Management & Operational Priorities Policy 4g: Develop a tree strategy.

Masterplan & Guidance Policy 5a: All of the capital works projects should be drawn together into an agreed Masterplan/concept design for the Garden.

Masterplan & Guidance Policy 5b: Establish design guidelines for the Garden and use appropriate methods and materials during any improvement/amendment (e.g. any new buildings, infrastructure, furniture and signage) and ongoing maintenance of the Garden.

Masterplan & Guidance Policy 5c: Carry out archaeological research on the Garden (e.g. geophysical surveying).

Interpretation & Research Policy 6a: Develop, implement and review an interpretation strategy for the Garden.

Interpretation & Research Policy 6b: Research, catalogue and conserve material in the archive.

Audience Development & Engagement Policy 7a: Develop, implement and review an Activity Plan.

Audience Development & Engagement Policy 7b: Enhance the programme of events and activities for all users.

Appendix 2B: Policy Schedule

Policies	Progress & next steps	Completion Date
Governance	When RPM moves to an independent Trust it is important to ensure management structures are in place to provide oversight, ensure appropriate levels of resourcing and reporting to the Council	Implementation Phase of RPM Trust
Strategic Principles	A management and decision making framework to guide the day to day management of the Garden to conserve and enhance the garden significances	Spring 2019
Capital work Priorities	A high level masterplan for the Royal Pavilion Estate has already been developed outlining investment priorities. These priorities formed part of the public consultation in. Round 1 HLF funding will support refinement and detailed development of capital programme	Dec 2019 for Round 2 HLF submission
Management & Operational Priorities	A Management & Maintenance Plan has been produced by Chris Blandford Associates to support this Conservation Plan further areas to be developed 1. Training & development plan for staff and volunteers (Part of HLF Round 1 work) 2. Event accommodation and servicing procedures(Part of HLF Round 1 work) 3. Digital Preservation strategy for Garden archives 4. Update of RPM Sustainability policy to include specific Garden elements 5. Tree Strategy 6. Succession planning	Items 1, 2 &3 by HLF Round 2 submission Dec 2019 Items 4, 5 & 6 June 2019
Masterplan & Design Guidance	To be developed to Riba Stage 3 as part of HLF Round 1 work	By HLF Round 2 Submission Dec 2019
Interpretation & Research Strategy	Interpretation Strategy to be developed to Riba Stage 2-3 for HLF Round 1 resubmission Research strategy to be funded via Round 1 in preparation of Round 2	March 2019 By HLF Round 2 Submission Dec 2019
Audience Development & Engagement Strategy	To be developed as part of HLF Round 2 works Access Audit to be undertaken in advance of re submission for HLF Round 1	By HLF Round 2 Submission Dec 2019 March 2019

Subject:		Appointment of a Standing Invitee to the TECC Committee	
Date of Meeting:		24 September 2020	
Report of:		Executive Lead Officer, Strategy, Governance & Law	
Contact Officer:	Name:	Abraham Ghebre-Ghiorgis	Tel: 01273 291500
	Email:	Abraham.ghebre-ghiorgis@brighton-hove.gov.uk	
Ward(s) affected:		All	

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 The purpose of the report is to propose the appointment of Stephanie Prior as a standing invitee to the TECC Committee

2. RECOMMENDATIONS:

- 2.1 That Stephanie Prior be appointed as the Standing Invitee to the TECC Committee

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The Council has been reviewing the representation of people from BME background in its committees and sub-committees. As part of the initiative to address the disproportionate under-representation, the Policy & Resources Committee decided in December 2019 to introduce a standing invitee to the committee with full speaking rights. The Black Lives Matter movement and the support it generated from across society gave this an added urgency.
- 3.2 The Council received applications from a number of high calibre candidates from business, academia, public service and social activists. Unfortunately, there was only one vacancy. Given the quality of the candidates, the interviewing panel that had representatives from the BME Community, alongside the Leaders of the three political groups in the Council, decided to recommend the appointment of one candidate as a standing invitee to the P&R Committee and a second one to the TECC Committee.
- 3.3 The person the Panel recommended for appointment to the TECC Committee is Stephanie Prior. Currently, she works as a Business Development & Marketing Manager for an international law firm based in Brighton. She achieved a distinction in politics, policy and globalisation and went on to study anthropology at London Goldsmith University

- 3.4 Stephanie has been instrumental in creating a platform for women in business to build their professional network, learn from experts and start/develop businesses. She has appeared in TV and radio programmes, including radio 5 live and Latest TV.
- 3.5 She has represented the BME Community in the beauty industry and challenged the commercial ideology of beauty that does not embrace diversity. She made history by becoming the first woman of colour to win the title of Miss Sussex and compete in the 2014 Miss England competition. She is passionate about equalities and social justice and has the unique ability of combining that passion with highly developed business and marketing skills. The selection panel was very impressed by her performance and felt her passion, energy and ability to connect with the BME Community, especially the younger ones, would make a useful contribution to the Council's anti-racist strategy and, more specifically, the work of the TECC committee.
- 3.6 Under the Council's constitution, the TECC Committee has the power to appoint people to become standing invitees to the committee and the Panel recommended that the committee uses this power to appoint Stephanie Prior to that position.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 There is no mandatory obligation to appoint additional standing invitees to the Committee. However, the selection panel felt that not to do so would be a wasted opportunity and making the appointment would enable the person to work in collaboration with and alongside the standing invitee to the P&R Committee

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The proposal to appoint a standing invitee to the P&R Committee was the subject of consultation with the Racial harassment Forum and the BMECP. The selection panel has two representatives one each from those organisations.

6. CONCLUSION

- 6.1 The proposal will make a positive contribution to the Council's efforts to tackle racism and increase BME representation in the committees of the Council. This was the unanimous recommendation of the selection panel.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 There are no financial implications arising from this report and any expenses in the form of disbursements can be covered within the Members' Allowances budget held by Democratic Services.

Finance Officer Consulted: Nigel Manvell

Date: 16/09/20

Legal Implications:

- 7.2 The proposals will contribute to the discharge of the Councils functions under the Equality Act 2010 to promote equalities and good relations between people of different racial background.

Lawyer Consulted:

Abraham Ghebre-Ghiorghis Date: 15/09/20

Equalities Implications:

- 7.3 As stated, in the body of this report, the appointment will help the Council to advance its anti-racism strategy and increase the effectiveness of the engagement with the local BME Community. This is only one strand of the anti-racist strategy which includes, among other things, the proposed diversity leadership academy

Sustainability Implications:

- 7.4 There are no sustainability implications arising directly from this report

Brexit Implications:

- 7.5 There are no direct Brexit implications arising from this report

SUPPORTING DOCUMENTATION

Appendices:

None

Background Documents

None

