

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

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## 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**<sup>1</sup>.
- 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 <b>detail without being too prescriptive</b>	38
Ties in with other <b>planning policy</b> , strategies, studies and guidance	31
Promotes <b>engagement</b> with local professionals and communities	19
Creates places that are <b>accessible</b> to all	18
Draw attending to <b>good practice</b> examples in the city and elsewhere	18

<sup>1</sup> 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 <b>optimise density</b> , set density thresholds and identify land uses and facilities to meet the need of different areas/neighbourhoods	24
Identify <b>character areas</b> based on Urban Characterisation Study and/or City Plan (e.g. Seafront, Urban Fringe, Development Areas)	16
Identify areas/sites in need of proactive <b>masterplanning</b>	7
Prioritise and provide more detailed information for <b>Development Areas and Strategic Allocations</b> in the City Plan	6

*Accommodating taller development*

Comments	Number of responses
Provide clarity about <b>criteria</b> regarding impact assessment (for example context, heritage, design) as well as definitions, locations and facilities needed	58
Set out <b>densities</b> , height thresholds and/or preferred locations	7
Use <b>3D modelling</b> 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 <b>standards/assessment criteria</b> 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 <b>public health</b> objectives (improving air quality and health facilities)	15
Support <b>contemporary, innovative design</b> that takes account of context but adds to the area, including 'out of character' options	8
Include <b>checklist</b>	5

## Public realm design

Comments	Number of responses
Design in and integrate walking/cycling, public transport <b>movement/connectivity</b> with transport services (road safety, level surfaces, wide/unobstructed pavements, disability-friendly shared space and Public Rights of Way)	36
Design in <b>green infrastructure</b> 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 <b>streetscape</b> improvements and delivery of well-designed <b>public spaces</b> that are well integrated into the city's fabric	21
Design out <b>crime and anti-social behaviour</b> 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 <b>maintenance</b> 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
	Moulsecomb Train station (Westbound platform)	Train station
Trust for Developing Communities	Valley Gardens (redevelopment plan)	Major transport corridor
	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 <b>ease of movement</b> for wheelchair/mobility users	23
Spaces for <b>activities</b> for different age groups and families	11
Clearer directional <b>signage</b>	10
More, comfortable, visible, accessible <b>seating</b> and rest areas	8
Better <b>maintenance</b>	7
More <b>disabled parking</b> 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](mailto: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 workshops<sup>2</sup>;
  - local partnership and board meetings<sup>3</sup>; 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.

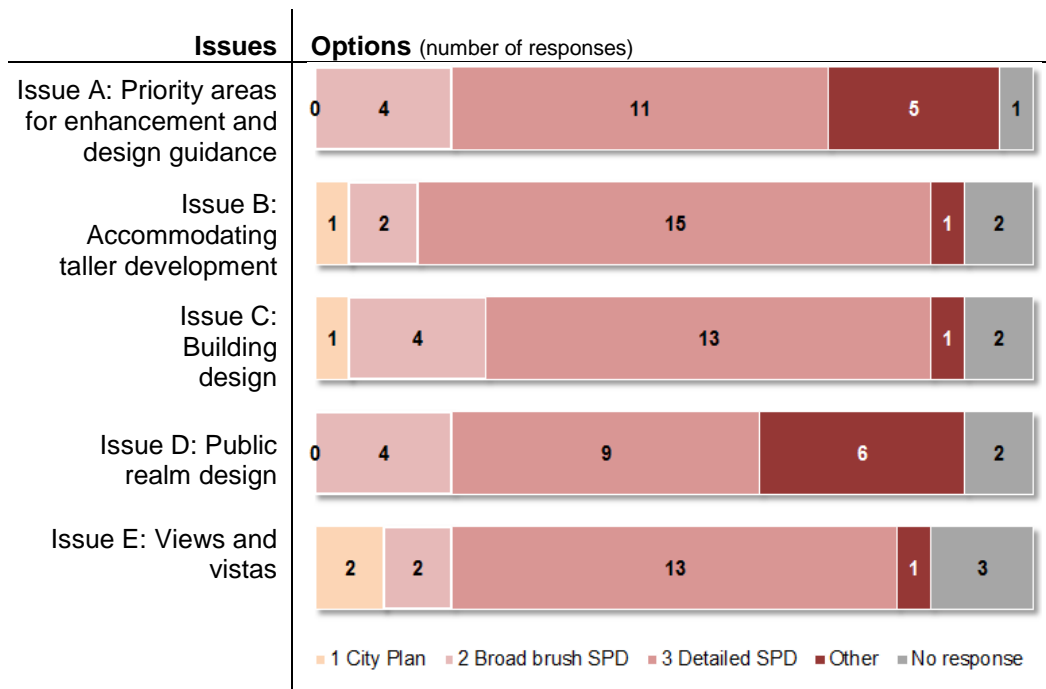
### Responses

- 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.

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<sup>2</sup> Two workshops (one officer and one stakeholder) took place at Hove Town Hall on Monday 23 July 2018.

<sup>3</sup> 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](#).

