

Edward Street Quarter Planning Brief

Draft version

February 2013

Contents

Part 1

- 1. Introduction**
- 2. Reason for the Brief**
- 3. Status of the Brief**
- 4. Stakeholder consultation**
- 5. Planning policy context**
- 6. Material changes since adoption of SPD04**

Part 2

- 7. Development area**
- 8. Planning History**
- 9. Vision and development principles**
- 10. Land use and development quantum**
- 11. Heritage**
- 12. Scale, massing and building heights**
- 13. Transport**
- 14. Public realm**
- 15. Community infrastructure and facilities**
- 16. Sustainability**
- 17. Phasing**
- 18. Infrastructure and planning obligations**

PART 1

1. Introduction

This planning brief has been prepared to guide the future redevelopment of land in the vicinity of the new American Express building on John Street and Carlton Hill, Brighton. The brief includes the redevelopment of the former American Express building to the immediate south, as well as other buildings and land nearby. For the purpose of this document, the area covered by the brief is referred to as the Edward Street Quarter (ESQ) or the development area.

American Express is the largest private sector employer in Brighton & Hove. The decision by the company to construct a new “fit for purpose” building for their European operations in 2012, consolidates American Express’ operations and future in the city. Aside from the new American Express development the area is characterised by poor quality townscape and public realm. The completion of the new building - together with the scheduled demolition of the old offices - provides an exciting opportunity to regenerate the wider area to the benefit of the local resident and working population and the city as a whole.

2. Reason for the brief

This document has been prepared by Brighton & Hove City Council (the local planning authority) with assistance from CBRE and EPR Architects. Its main objective is to provide a planning framework for development that integrates the new American Express building into the surrounding area and secures a strategically important mixed use urban quarter focussed around offices, residential, ancillary retail and other services.

Much of the geographical area covered by this planning brief is the subject of the Edward Street Quarter Supplementary Planning Document (SPD) 04 (adopted in March 2006). The SPD was intended to guide redevelopment in the area based around the retention of the old 1970s American Express building which, at the time of the SPD’s adoption, reflected the intended development strategy of the company. However, the company reconsidered its strategy to seek the replacement of the Edward Street building with a new building on adjacent land. One of the requirements of the planning permission is the demolition of the Edward Street building by 2016 in order to provide a more appropriate neighbouring scale of development to the adjacent new building. This has highlighted the need for new planning guidance, hence the preparation of this planning brief which, when finally approved for development control purposes, will effectively supersede SPD 04.

The challenge for the Planning Brief is to establish development principles that meet the strategic needs of the city as established in the emerging City Plan. This will have to be balanced against the need to provide for financially viable development to attract the necessary development finance to transform the area into a new attractive, accessible and safer neighbourhood, for the benefit of existing and future residents, employers, employees and visitors alike.

3. Status of the brief

The planning brief has been prepared in order to reflect the most up to date national and local planning guidance and policy. Planning briefs can be prepared rapidly in response to development pressures and changes in situation, although they do not necessarily have the same status as adopted planning policies and related documents. However, this planning brief will be subject to extensive consultation with community groups and other stakeholders, which should afford it status as a valid material consideration in the planning process when the final version is approved. It takes due account of the NPPF and adopted development plan policies in relation to the realisation of the development aspirations of the council and American Express with regard to the emerging Edward Street Quarter.

4. Stakeholder consultation

Meetings to discuss the content of the brief have been held with local ward councillors as well as the Chair and Deputy Chair of the council's Economic Development & Culture Committee. They emphasised the need for the brief to address local concerns regarding the future redevelopment of the site and to provide net benefits to the local community (in particular the residents of the nearby Kingswood Milner housing estate) including:

- improved linkages between green spaces in the local area (Dorset Gardens Peace Park, Turner Park etc) and the new urban quarter;
- providing for deficiencies in the existing community infrastructure through new development in the proposed urban quarter and/ or through developer contributions.

Early consultation was also conducted with local community organisations to establish their visions for the local area, including Turner Area Partnership (a neighbourhood forum with multi-agency and resident representation) and Green Sea (a locally-based group of architects with an interest in improving the environment of Edward Street). The feedback from these early stakeholder meetings was used to inform the development principles to guide the future redevelopment of the site. These development principles are due to be consulted upon at a public exhibition to be held in March /April 2013.

The draft planning brief and exhibition material will be made available on the council's consultation portal via a link from the home page during the formal consultation period. A dedicated webpage containing the latest information on the Draft Edward Street Quarter Planning Brief will also be established, to keep members of the public informed of developments. The results of the public consultation will be used to inform the development of the Brief which aims to provide an up to date and dynamic response to the challenges of bringing forward development on this site.

5. Planning policy context

This brief has been prepared within the following planning policy context:

National context

Applications for planning permission must be determined in accordance with the local development plan unless material considerations indicate otherwise as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. The local development plan constitutes the adopted Local Plan and the Submission City Plan Part One. In conjunction with the National Planning Policy Framework (NPPF), these documents are a material consideration in planning decisions.

National Planning Policy Framework (NPPF)

The NPPF, published in March 2012, sets out the Government's planning policies for England and how these are expected to be applied. The framework requires each authority to work together with local communities to produce local and neighbourhood plans that reflect the needs of local communities. The most prominent objective in the NPPF is for local authorities to positively plan for and support sustainable growth in all three aspects of the physical, economic and social environment. There is a presumption in favour of sustainable development and the NPPF opens the door for local authorities to devise their own definition of sustainable development.

Regional context

Regional Spatial Strategies – the South East Plan

In a written ministerial statement issued 14th February 2013 the Secretary of State announced the decision to revoke the regional strategy for the South East (The South East Plan). The order to effect this decision "will be laid shortly after recess" which ends on 25 February 2013.

Local context

Local Plan (2005)

The NPPF explains that full weight can be given to relevant policies, which includes "saved" policies adopted since 2004, for 12 months from the date of publication, even if there is a limited degree of conflict with the NPPF. After this 12 month period, where Local Plan policies have a degree of consistency with the policies in the NPPF, due weight can be given to them.

At the time of writing the Brighton & Hove Local Plan (2005) is the adopted local development plan for the city and covers the area identified in this brief. The following policies are particularly relevant in informing this brief:

Economy and employment

- **Policy EM2** – Sites identified for high-tech and office uses (American Express Edward Street and adjacent land – 1.74 Ha)

Housing

- **Policy HO2** – Affordable housing – ‘windfall’ sites.
- **Policy HO3** – Dwelling type and size.
- **Policy HO4** – Dwelling densities.
- **Policy HO5** – Provision of private amenity space in residential development.
- **Policy HO6** – Provision of outdoor recreation space in housing schemes.
- **Policy HO13** – Accessible housing and lifetime homes.

Sustainable development

- **Policy SU2** – Efficiency of development in the use of energy, water and materials.
- **Policy SU13** – Minimisation and re-use of construction industry waste.
- **Policy SU14** – Waste management.

Transport and movement

- **Policy TR1** – Development and the demand for travel.
- **Policy TR2** – Public transport accessibility and parking.
- **Policy TR4** – Travel plans.
- **Policy TR5** – Sustainable transport corridors and bus priority routes.
- **Policy TR14** – Cycle access and parking
- **Policy TR18** – Parking for people with a mobility related disability.

Design and quality of development

- **Policy QD1** – Design – quality of development and design statements.
- **Policy QD2** – Design – key principles neighbourhoods.
- **Policy QD3** – Design – efficient and effective use of sites.
- **Policy QD4** – Design – strategic impact.
- **Policy QD5** – Design – street frontages.
- **Policy QD6** – Public art.
- **Policy QD7** – Crime prevention through environmental design.

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- **Policy QD15** – Landscape design.

Historic environment

- **Policy HE1** – Listed buildings.
- **Policy HE3** – Development affecting the setting of a listed building.
- **Policy HE6** – Development within or affecting the setting of conservation areas.

The council has also produced the following supplementary planning documents which are material considerations for the future redevelopment of the Edward Street Quarter:

- SPD03 – Construction and demolition waste.
- SPD04 – Edward Street Quarter (March 2006). This document is discussed in further detail below.
- SPD08 – Sustainable building design.

Local Development Framework

The Local Development Framework (LDF) is the official term used to describe the set of documents that will eventually replace all of the local planning authority's local development documents, including the Brighton & Hove Local Plan. The Proposed Submission City Plan Part One was agreed at council on 31 January 2013 for formal publication prior to its submission to the Secretary of State for independent examination. The policies most relevant in informing this brief are:

- DA5 – Eastern Road and Edward Street Area
- CP2 – Sustainable Economic Development
- CP3 – Employment Land
- CP8 – Sustainable Buildings
- CP9 – Sustainable Transport
- CP12 – Urban Design
- CP13 – Public Streets and Spaces

PART 2

7. Development area description

Location

For the purpose of this document the area referred to as the Edward Street Quarter comprises various parcels of land encompassing the former American Express building and Job Centre Plus to the north of Edward Street and is bounded by William Street to the west and White Street to the east (see Fig 1). The area defined as the quarter also includes the Dorset Gardens Peace Park, an area of open space alongside Dorset Gardens to the south of Edward Street.

Edward Street is a dual carriageway and an important transport link running between the central area of the city to the west and Eastern Road to the east, providing road and bus links to a number of important destinations including Brighton College, the

Royal Sussex County Hospital and Brighton Marina. The development area is within walking distance of the city centre, the seafront and Brighton mainline railway station. There are existing good public transport links to London, Gatwick Airport, surrounding towns and within the city.

The new American Express building excepted, the development area is characterised by a number of public and private sector buildings dating from the 1960s and 1970s. All of these suffer from a number of problems typically associated with buildings from this period, ranging from poor aesthetics to operational inefficiencies in layout and energy performance. These buildings include the adjacent Job Centre Plus building, the nearby Magistrates Court and Police headquarters on the western side of John Street. The demolition of the former American Express Edward Street building is a requirement of the S106 agreement.

Topography

The topography of the development area presents an interesting design challenge due to its location on a steeply sloping hillside that rises west-to-east from the valley floor (comprising Grand Parade and Valley Gardens). There is also a level change from south-to-north across the site as the slope of the hillside rises up from the seafront. The site affords views across the valley and as such, can be seen from various strategic viewpoints across the city, including parts of the historic seafront, Valley Gardens and the Royal Pavilion estate.

Heritage context

The site lies to the east and close to the historic centre of Brighton in an area first developed in Regency and early Victorian times and adjoins three Conservation Areas: East Cliff (to the south), Valley Gardens (to the west) and Carlton Hill (to the north east), the characteristics of which are summarised in the following table:

| East Cliff CA | Valley Gardens CA | Carlton Hill CA |
|---|---|--|
| Characterised by a mixture of stately homes that line the cliffs and tightly packed terraced houses in the side streets to the north of the seafront. The architecture is predominantly Regency in style, though not always strictly Regency in period, and most often the buildings are faced in smooth stucco render. | Characterised by different terraces or groups of buildings as well as several larger individual buildings, including a number of Listed buildings on Grand Parade. What links and unifies these disparate elements is the 23 acres of (mainly) public gardens which runs the length of the conservation area from Park Crescent to the sea, forming a green valley. | Characterised by its topography on steeply sloping ground, surviving street pattern with flint boundary walls, historic open space and a cluster of distinctive historic buildings. It is much more domestic in scale and is based around the public open space of the Turner Park. It comprises a cluster of statutorily listed buildings dating from the first half of the 19 th century. |

Existing residential and commercial uses surround the development area, and the East Cliff Conservation Area is located immediately to the south. There is a cluster

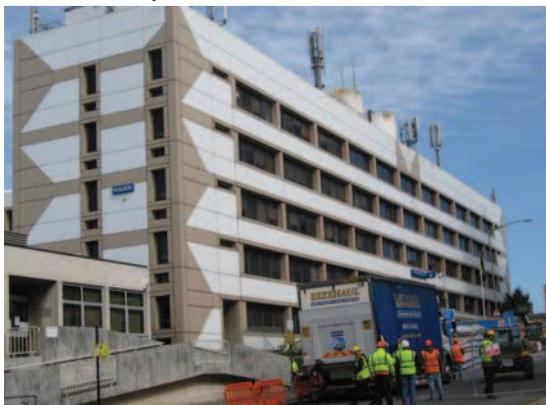
of listed buildings to the northeast of the development area (1-5 Tilbury Place and the Greek Orthodox Church on Carlton Hill), a listed building at 34-35 Mighell Street within the site, two listed buildings to the south of the site (1 Dorset Gardens and 161 Edward Street) and the listed flint wall to the northern and eastern boundary of Dorset Gardens Peace Park.

Extended development area

Since the publication of SPD04 in 2006, the concept of the Edward Street Quarter has been expanded for the purpose of this planning brief to include the following buildings on the periphery of the site (see Fig 1):

- the Police Headquarters building, Law Courts located to the west of John Street and Family Court (Phase 2); and
- Dorset Gardens Peace Park to the south of Edward Street (Phase 1).

Police HQ and Law Courts

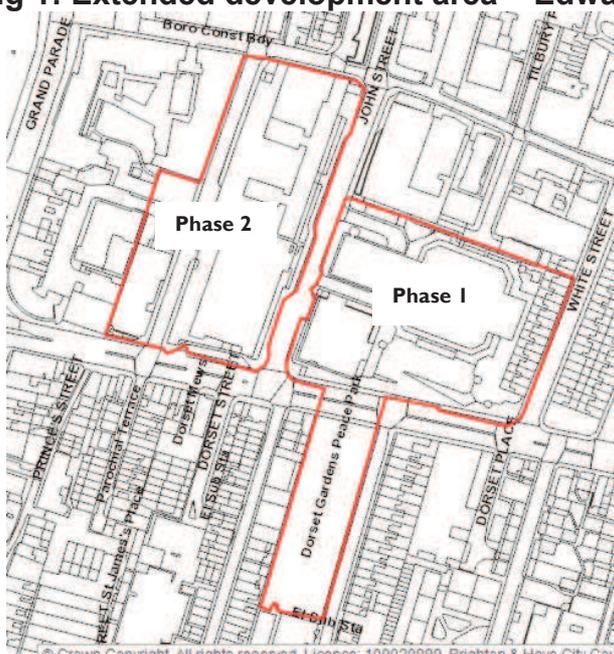


Police HQ building on the west side of John Street



Law Courts on the west side of John Street near Edward Street junction

Fig 1: Extended development area – Edward Street Quarter



Key

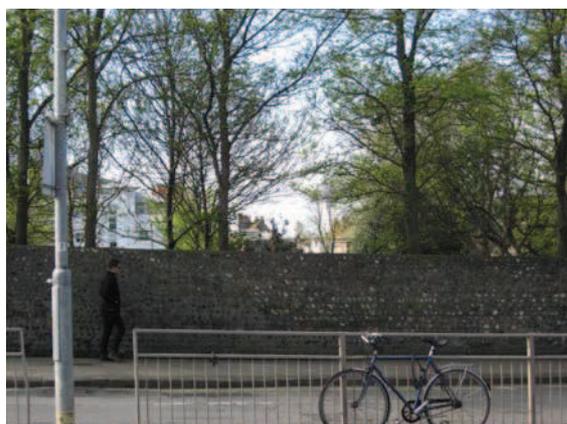
Phase 1 – former American Express site, surrounding buildings and Dorset Gardens Peace Park

Phase 2 – Police HQ, Law Courts in John Street and Family Court

The Police HQ, Law Court, Family Court and Job Centre Plus are characterised by poor architecture, public realm and connectivity. Whilst they are under separate land ownerships to American Express buildings old and new, their close proximity to the new American Express building and the remainder of the site means that their redevelopment potential should not be ignored and could provide an important contributory role in securing the wider area regeneration objectives of this planning brief. Any potential future redevelopment of these buildings would be dependent on decisions made by the relevant landowners. A number of land use scenarios are possible including the retention and/or replacement of the Police Station, Family Court, Law Court as well as the introduction of new land uses such as offices, residential, ancillary retail, student accommodation, community uses etc. subject to planning policy compliance.

Given the proximity of the Police Headquarters building to Circus Street, any future redevelopment of this site would also need to be informed by emerging plans for the redevelopment of Circus Street Municipal Market as guided by the council's supplementary planning document SPD05.

Dorset Gardens Peace Park is a substantial open space which is currently underutilised. The park tends to attract small groups of street drinkers, with little in the way of wider usage being apparent. With regard to the area covered by this brief, access to the park is hampered by the presence of fast moving traffic on the dual carriageway of Edward Street, guard rails along the central reservation and a pedestrian crossing that does not relate well to the park entrance (which is some distance down Dorset Gardens). Nevertheless, the park clearly has the potential to better serve its current and future communities and has therefore been included within this brief.



Northern boundary of Dorset Gardens Peace Park from Edward St



Dorset Gardens Peace Park looking north towards American Express site

8. Planning history

Planning permission for American Express Edward Street was granted in 1972 with its construction following between 1972 and 1975. Featuring a landscaped plaza fronting Edward Street, later additions included a two storey extension on the western side of the building, close to John Street, in 1982.

Planning permission was granted in 2009 for the construction of a new building for American Express' European operations immediately to the north of their existing building. The planning permission (ref: BH2009/01477) was subject to a Section 106 agreement which included a requirement for the demolition of the existing American Express Edward Street building which is anticipated by 2016.

The smaller site of the former Thwaites garage on the corner of Mighell Street and Carlton Hill has been the subject of several planning applications. The most recent application (ref: BH2012/01812) comprising office space on the lower ground floor and part of ground floor and 9 flats spread over three storeys, was withdrawn.

9. Vision and development principles

This brief's vision for the Edward Street Quarter is to create...

...a dynamic first class business and residential district with a strong sense of place, distinguished by high quality townscape, architecture and public realm.

In order to deliver this vision, development proposals should be guided by and reflect the following principles:

General

- An overall aim for a zero carbon development or – where that cannot be achieved – carbon neutral development, in order to act as an exemplar for sustainable development within and beyond Brighton & Hove and assist the city's bid to achieve UNESCO Biosphere Reserve status.
- Buildings of high quality design, layout, scale and massing – combining to form a coherent, legible and accessible development cluster focussed around the new American Express building – and creating a true sense of place that integrates with and links the local neighbourhoods.
- Development appropriately phased so as to provide a viable and successful community at each stage of completion, with each subsequent phase enhancing and contributing to the creation of a coherent urban quarter that will integrate with and benefit the wider area.
- Provision of the overall floorspace levels and land uses set out in this brief.

Connectivity and movement

- Consolidation and strengthening of public transport connections to the bus and rail network, through enhancement of routes to existing stations and bus stops on this prominent East West bus route.
- Improved cycle and pedestrian access – both to and within the development area – including improved connections to the Peace Gardens, St James' Street and the wider neighbourhood.

Place making

- A high quality public realm, including a series of successful social spaces at the heart of the development area, as well as John Street, William Street and the

Dorset Gardens Peace Gardens. Proposals must complement any future public realm improvements to St James Street.

- Retail, commercial and other 'active frontage' uses at ground floor level to serve and assist the safety of the resident and working community and contribute to an attractive environment.
- Cultural and community activities within the development area through the provision of dedicated cultural/ community floorspace and through the creation of new public squares for leisure and recreation and for hosting events that will benefit the wider area.
- Introduction of a greening strategy to improve the environment of key pedestrian routes in the area, including Edward Street and John Street.

10. Land use and development quantum

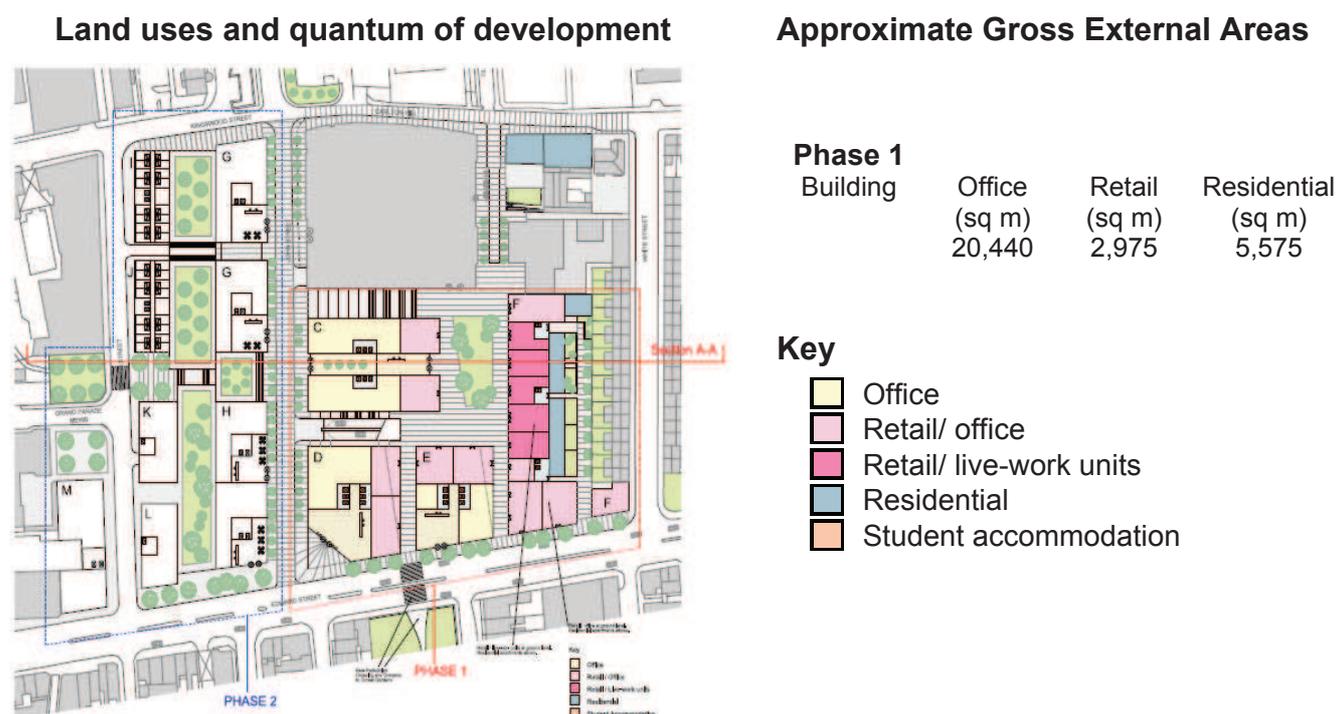
The Edward Street Quarter is included as a strategic allocation within Policy DA5 of the Submission version of the Draft City Plan which entails the demolition of the former American Express Edward Street building and its replacement with:

- 10,000 – 15,000 sq m of high quality office floorspace; and
- 65 residential units.

It should be noted that the City Plan's definition of the Edward Street Quarter is not as wide-ranging as the area covered in this brief. As defined in Policy DA5, the area includes the American Express Edward Street building and Job Centre Plus but does not include the buildings on the west side of John Street and William Street (the Police HQ, Law Courts and Family Court) that are identified as Phase 2 in this planning brief.

Various scenarios were capacity tested and a preferred development option has been identified that provides a level of development that is considered viable and appropriate within the context of the site's location and surrounding buildings (see Fig 2). The results of the capacity assessment have been used to propose appropriate indicative heights and massing of buildings, together with a possible mix of uses and quantum of development likely to be acceptable if these sites were redeveloped as part of Phase 1 and Phase 2 of the Edward Street Quarter. Please note the caveats made earlier in this brief, namely that any potential redevelopment beyond the old American Express Edward Street building would be dependent on decisions made by the relevant landowners. These buildings have been included in the brief because of their undoubted development potential.

Fig 2: Preferred development option



10.1 Employment floorspace

Based on the results of the capacity assessment of the site, the preferred development option proposes a Phase 1 target figure of approximately 21,000 sq m of employment floorspace, as part of a mixed use scheme. This is considered to be both viable and deliverable.

There is a growing demand in the city for modern but affordable office accommodation to meet the needs of local businesses and inward investors. Historically, office take-up in the city has comprised a large number of smaller office suites, with around 93% of transactions in 2010 involving buildings or office suites of less than 5,000 sq ft¹. Future proposals for this site will need to reflect current demand for office accommodation by offering flexible floorplates which have the ability to be sub-divided to meet the requirements of both large and small businesses.

10.2 Housing

Although the adopted Brighton & Hove Local Plan does not allocate any of the American Express site for housing, the emerging Local Development Framework has for some years proposed a residential element as part of the site’s redevelopment. An updated Strategic Housing Land Availability Assessment (2011) increased the number of residential units proposed for the site from 64 to 165. Work on assessing the capacity of the site in conjunction with other land uses would suggest that an indicative total of 65 units would be more realistic within local townscape constraints.

¹ Analysis of office market carried out by Cluttons, the council’s Property Agents, in June 2011.

The precise number of units achievable would be dependent on the types and size of units proposed.

Dwelling type and size

Proposals for new residential development should incorporate a mix of dwelling types and sizes that reflects and responds to Brighton & Hove's housing needs, in line with policy HO3 of the Local Plan and policy CP19 of the Draft City Plan. The need for more family housing and affordable housing is particularly important as evidenced by the council's recent report². These should be provided as part of any future development proposals.

Affordable housing

Policy HO2 of the Local Plan³ requires proposals for 10 or more dwellings, to provide 40% affordable housing. Residential development proposals that incorporate less than 40% would need to demonstrate that the scheme would be unviable and thus undeliverable if it were to provide 40% housing units.

Lifetime homes

All new housing development should be built to 'lifetime homes' standards in accordance with the requirements of policy HO13 of the Local Plan and CP12 of the Draft City Plan. Any new development should be fully accessible to all sections of the community, including people with disabilities. Five per cent of housing units should be built to wheelchair accessible standards, including 10% of affordable housing units. Development proposals should also follow best practice in terms of the inclusive design principles as set out in the Lifetime Homes Design Guide (November 2011).

Gardens and private amenity space

The provision of private amenity space will also be expected for all new residential units e.g. a garden, balcony or roof terrace, in accordance with policy HO5 of the Local Plan and policy CP14 Housing Density of the Draft City Plan.

10.3 Retail uses

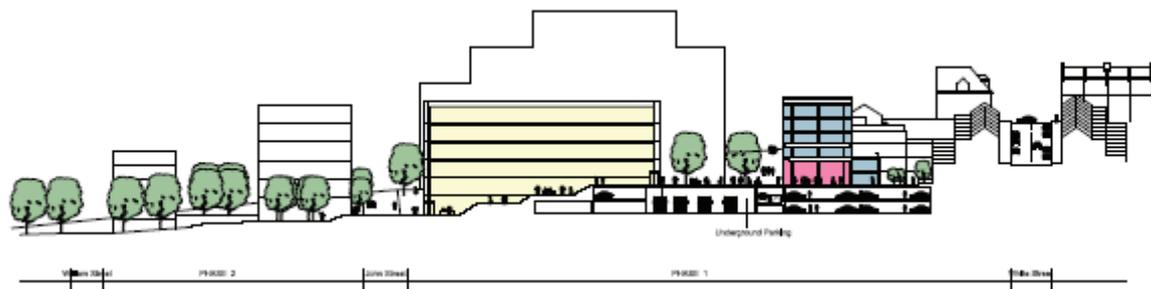
Office development should incorporate commercial 'active frontage' ground floor uses such as retail, cafes, bars, personal services etc. to serve the needs of the newly created residential and business communities. Such uses should be ancillary in terms of the overall land use mix. Ancillary retail uses are encouraged particularly where they can form the edges to areas of public realm – i.e. around public squares or along key linkages within the development area. Large food-based superstores and retail warehouses are not considered as appropriate or acceptable uses.

11. Scale, massing and building heights

The results of the capacity assessment, have established some clear parameters in terms of acceptable building heights, scale and massing. These are shown in Fig 3 and should guide any development proposals within the development area.

² "Implications of Demographic Change on Demand for Homes in Brighton & Hove" - Brighton & Hove City Council, 2012

³ Different thresholds of affordable housing have been set by policy CP20 Affordable Housing in the Submission City Plan Part One, but 40% of affordable housing would apply to sites of 15 or more dwellings.

Fig 3: Section through the Masterplan (A – A)

The upper limit for buildings fronting John Street is generally considered to be seven storeys, although developers must take into consideration the more domestic scale of development to the north of Carlton Hill/ Kingswood Street in the design of their proposals. The exact height of proposed development will need to take account of the relationship with adjoining buildings and respond to the topography of the area. This could allow for a variation in the height of elements of future development proposed in John Street. In stark contrast White Street, on the eastern boundary of the site, is almost entirely residential in character comprising of two storey terraced housing. Development proposals will therefore need to be lower in height and demonstrate that there will be no adverse impact on the residential amenity of existing occupiers.

There are a number of key strategic views which should be taken into account by developers in their proposals for the site. These include views from:

- Whitehawk Hill
- Hollingbury Hill
- Brighton Pier (formerly Palace Pier)
- Pavilion Gardens

Development proposals should also be assessed in terms of their visual impact on the wider historic environment and the local context. In these views the overall height, form, and silhouette of the development are important planning considerations as required by Policy QD4 (Local Plan) and Policy CP12 Urban Design (Draft City Plan). In submitting proposals for this sensitive context, developers should ensure that their assessment of visual impact is consistent with the approach adopted in the Townscape, Built Heritage and Visual Assessment submitted by American Express as part of their planning application (BH2009/01477). These viewpoints have been verified by the council's Heritage team.

12. Heritage

Any development proposals adjacent to the Grade II listed former farmhouse building (34-35 Mighell Street) will need to respect its setting and allow sufficient space on either side in order for it to be fully appreciated and to enable future maintenance of the building to take place (e.g. scaffolding). The relationship between the listed

farmhouse and American Express' utility building on the southern elevation reflects the type of approach that would create a respectful distance and therefore not impede the setting of the listed farmhouse. The design of subsequent development proposals will therefore need to observe a similar gap between the development and the listed former farmhouse building. In addition, maintaining space around the building is likely to create fewer amenity issues in terms of loss of light. Bearing in mind that the farmhouse is a residential property, this will be an important aspect that needs to be addressed in development proposals.

A Heritage Statement will be a requirement of any future application. The Statement will need to be based upon a thorough review of the available evidence.

Development proposals should have regard to the Conservation Area Character Statement and the Townscape, Built Heritage and Visual Assessment and subsequent addenda submitted with the American Express application (ref: BH2009/01477), as part of the Environmental Impact Assessment. However, the height of proposed development to the immediate south of the listed building is likely to be a key consideration for this very sensitive part of the site.

13. Transport

Sustainable transport

Improvements to sustainable transport in the wider area are key to realising the development potential and aspirations of this brief. The development area is situated to the north of Edward Street which links directly to Grand Parade, where the A23 from London, A270 from Lewes and A259 coast roads all converge. Edward Street forms part of a 'sustainable transport corridor' as defined in policy TR 4 of the Local Plan and is well served by local bus services which run every 10 minutes throughout the working day.

Improved Bus Provision

The Eastern Road/ Edward Street corridor is identified in the emerging City Plan as the focus for long term development and regeneration in the city and represents a significant hub for business and labour markets. This is evidenced by:

- the recently completed American Express building (33,860 sq m) which employs approximately 3,000 people;
- the proposed redevelopment of the Royal Sussex County Hospital (known as the 3T's) which, if the government secures the necessary funding, will entail public realm improvements as part of the planning consent and a new build of approximately 72,000 sq m, leading to a net increase of 54,000 sq m at the site.

Traffic growth of 29% is forecast to occur in the AM peak period between 2011 and 2022, with 27% growth in the PM peak period as a result of both of these developments. If the existing bus infrastructure is not improved, this is likely to lead to increased demand and substantial delay to bus services.

In recognition of this, a council bid for funding under the Department for Transport 's (DfT) Better Bus Area (BBA) Programme and has been awarded £3.48M to secure

improvements in bus provision and infrastructure along the Eastern Road/ Edward Street corridor. A number of options are currently being explored by the council including the feasibility of:

- introducing dedicated bus and cycle lanes;
- improving the carriageway and bus stops; and
- ensuring clear passage for buses at all times through avoiding conflict between other modes of transport.

Any development proposals should support and enhance the use of public transport through channelling investment towards those aspects of bus provision and infrastructure which are unlikely to benefit from BBA funding. This will require close liaison with the Transport Planning Team to ensure that development proposals do not duplicate planned or existing provision but provide genuine added value.

Cycle routes and infrastructure

Cycling should be strongly encouraged in accordance with Local Plan policy TR13 (Cycle network) and Draft City Plan policy CP9 Sustainable Transport which set out the requirements for development proposals and specifically reference cycle routes in the Edward Street/ Eastern Road area.

Cycle infrastructure in the vicinity of the development area is extremely poor, with a number of accidents involving cyclists being reported along the Edward Street corridor. While funding under the BBA Programme is likely to be channelled into improving infrastructure along this east/west corridor, there is a need for future development proposals to improve cycle routes and infrastructure beyond the corridor. In particular, the council would welcome proposals that created safe cycle routes to the south of Edward Street, providing vital connections to St James's Street and the seafront. These could take the form of cycle contra-flows to expedite safe cycle passage in areas typified by narrow streets e.g. Dorset Street. This has been successfully trialled in the North Laines area of the city. Development proposals should also include safe cycle routes along Mighell Street (following its reinstatement) and John Street, the latter is currently used as a short cut by drivers seeking to avoid the traffic lights at the junction of Edward Street with Pavilion Parade.

Car and cycle parking standards

The locality benefits from good sustainable transport linkages. Funding from the Sustainable Transport Fund and BBA Programme has been secured by the council to provide a series of improvements along the Eastern Road/ Edward Street corridor between 2011-2014, to encourage and provide further modal shifts away from the car to more sustainable forms of transport. Parking levels should therefore be kept low across the development area, although it is recognised that some car parking provision will be necessary. The full standard for parking for disabled drivers should be met on site. Cycle parking and facilities such as secure cycle storage, showers and changing rooms will be required as set out in the parking standards in Brighton & Hove Local Plan Policy TR12 (Cycle access and parking). Further guidance on the accessibility of the site to public transport and parking guidance and standards for development are set out in Chapter 1 of the Brighton & Hove Local Plan and in SPG Note 4, 'Parking Standards'.

14. Public realm

A coordinated public realm can help to create an identity for a place, encourage pedestrian movement, provide a foil to visually connect disparate buildings and create an impression of a safe and cared for environment. The public realm that currently characterises the locality fails to achieve many of the aspirations for good design set down in national and local policy guidance⁴ and provides a poor quality environment.



Eastern corner of White Street



Job Centre fronting Edward Street

It is therefore essential that any new development addresses this negative image by providing an attractive pedestrian environment, creating active frontages and improving legibility as set out in this brief. Further advice on public realm is provided in the council's Legibility Study⁵ and Streetscape Design Guidelines⁶ which provide comprehensive design guidance for achieving high quality public spaces.

Improving connectivity

Future development proposals for the site should connect Mighell Street to Edward Street. This would create a direct north-south pedestrian route through the site, reflecting connection that existed in the past, prior to the development of the 1970 American Express Edward Street building. Other significant benefits would include:

- improving the approach to and from Tilbury Place;
- improving Mighell Street frontages and its function; and
- increasing footfall through the site.

All of these benefits are central to creating a permeable, legible and pleasant public realm within the heart of the development area.

Public square

The importance of creating social spaces for people to meet, sit and socialise, cannot be underestimated. Since the aspiration of the brief is "to create a dynamic commercial district which is attractive as a first class business and residential destination", this will need to be supported by public spaces which not only attract

⁴ NPPF, QD1 (Local Plan) and CP13 (Draft City Plan)

⁵ "Public Space: Public Life" (BHCC, 2007)

⁶ "Streetscape Design Guidelines" (BHCC, 2010)

sufficient footfall to ensure commercial success but also provide a pleasant amenity space for workers, residents and visitors to enjoy during their leisure time.

With the reinstatement of Mighell Street, there is an opportunity to create a public square in the heart of the commercial/ residential district somewhere along this important north-south pedestrian route.



Jubilee Square, Brighton – an example of public space defined by buildings with active frontages at ground floor level.

Dorset Gardens Peace Park

This public open space, to the immediate south of Edward Street, is currently under-utilised for a number of reasons. There is little in the space to attract potential users and it is difficult to access from residential areas to the north due to the barrier to pedestrian movement created by Edward Street and the park's northern boundary flint wall. Development proposals should provide for:

- improvements to the existing pedestrian/ cycle crossing in front of the Job Centre;
- investigating the potential for a park entrance to be created on the northern listed flint wall boundary of the park, subject to Heritage considerations;
- improvements within the Peace Gardens to make it a people-friendly space that will provide for a wide variety of informal leisure needs with respect to the area's communities. This could include the removal of some areas of railing along Dorset Gardens and the introduction of elements such as terraced steps, seating and provision of sports equipment (e.g. table tennis tables). The council has expertise in place-making projects and can provide guidance and advice in this respect.

Any changes affecting the gardens will require liaison with the council's Heritage team to ensure changes are sympathetically designed and meet the requirements of East Cliff Conservation Area Study and Enhancement Plan.

Turner Park

This park, to the north of the development area, is tucked behind Tilbury Place and has recently benefited from some improvements to its play facilities, as well as the

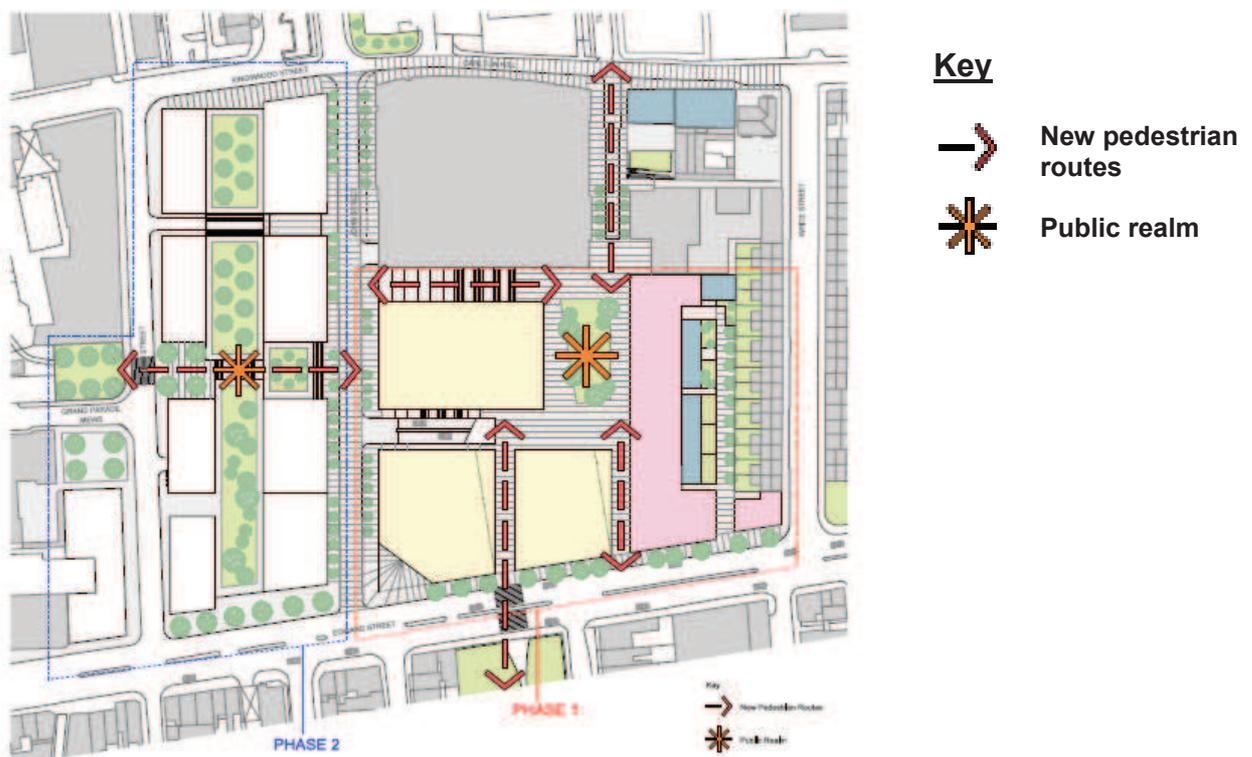
establishment of a new Children’s Centre with After School Club in the form of a portacabin. However, there is scope for improvements to the existing access to the park via Tilbury Place which could be financed through developer contributions, if proposals are deficient in open space and need to incorporate mitigation measures. There is also potential for creating a viewing area with railings for the newly installed camera obscura at the top of the folly in the park, as well as improving the gardens in the immediate vicinity of the folly.

Greening of the development area

The main pedestrian and vehicular access to the Edward Street Quarter is via Edward Street, John Street, William Street, Carlton Hill and White Street. Edward Street, William Street and John Street, in particular, are areas that suffer from poor quality townscape and public realm. These streets are characterised by drab concrete pavements, are devoid of greenery and distinctly lacking in quality street furniture. Such a harsh environment does nothing to attract investment into the development area or to provide an attractive environment for local residents and workers in which to relax.

Developers should work with the council in examining enhancements to the highway, pavements and physical appearance of the area, including greening initiatives, public art and public transport improvements. The creation of “green corridors” will be sought (including shared space where appropriate), through appropriate planting and landscaping to facilitate improvements in pedestrian movement along Edward Street, Carlton Hill, William Street, John Street and to the seafront (see Fig 4). The replacement of the fence on the southern boundary of Carlton Hill Primary school with a flint wall is also desirable. This would complete the landscaping works which have been undertaken to Carlton Hill as part of the planning permission for the new American Express building.

Fig 4: Enhanced connectivity and greening of development area



The need for community facilities arising from the development and its impact on the wider area will need to be met by developers, either through the direct provision of community buildings/ facilities within the development area or through financial contributions directed towards existing community organisations in the vicinity of the site. Similarly, depending on the impact of proposed development on existing health and education services, financial contributions may also be sought to improve existing health facilities and/ or expand the number of school places.

16. Sustainability

All development proposals will be required to incorporate sustainable design features to help deliver the principles of the One Planet approach, radical reductions in greenhouse gas emissions, particularly CO₂ emissions, and mitigate against and adapt to climate change. Local Plan policies SU2 and SU13 and CP8 of the Submission City Plan Part One promote efficiency of development in the use of energy, water, materials and promote reduction in construction waste.

Supplementary Planning Document 08: Sustainable Building Design and its associated checklist outline the minimum standards in relation to sustainable design which will be expected on the site. These refer to standards around energy and carbon dioxide emissions, water use, use of materials and building benchmark standards. The following performance benchmarks are expected to be practical and achievable. There is emerging national evidence which would suggest that achieving these standards in sustainability increases the profitability of private sales.

Code for Sustainable Homes

All new build residential units, including those within mixed-use developments, are expected to emit no annual net carbon dioxide from energy use, be designed to Lifetime Home Standards and achieve a minimum rating of Level 4 of the Code for Sustainable Homes (CSH).

BREEAM ratings

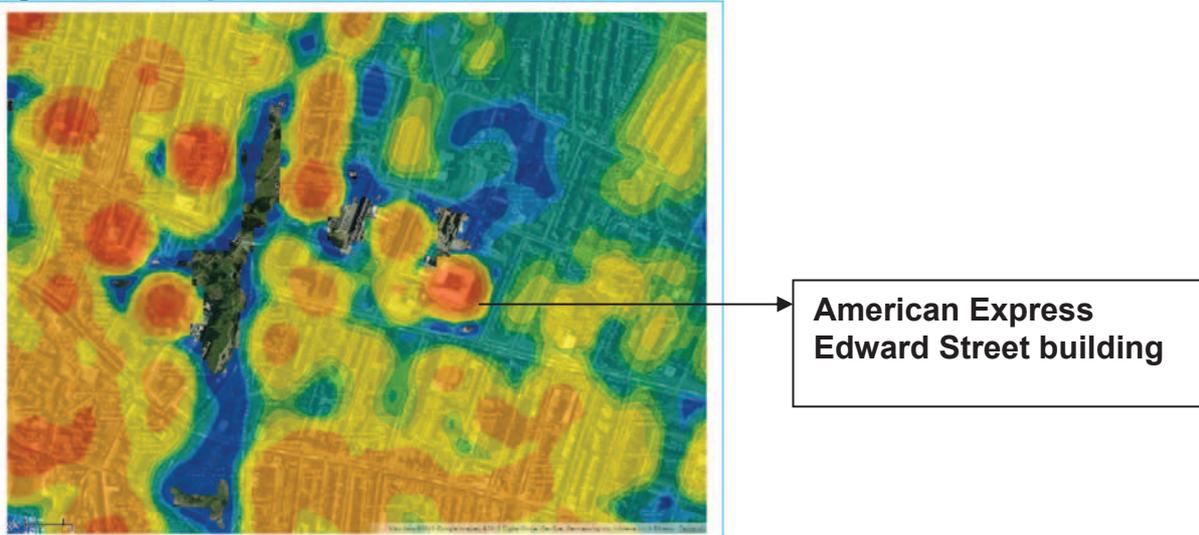
All non-residential developments are expected to score at least 60% in the energy and water sections of the relevant BREEAM assessment within a minimum overall rating of 'Excellent'.

Sustainability Checklist

All developers will be required to submit a completed Brighton & Hove Sustainability Checklist with the planning application and/or a sustainability statement with all full or reserved matters planning applications. In the case of outline applications, a condition will be attached requiring these at reserved matters stage and a Section 106 agreement will provide for any mitigation measures.

Energy efficiency and carbon dioxide emissions

Energy use can most easily be minimised where the design approach includes energy efficiency as a guiding principle at the outset of the design process. This means incorporating the highest possible levels of insulation and airtightness and applying passive design solutions to maximise passive heating, cooling, lighting and ventilation. All developments are expected to exceed Part L Building Regulations by 20% as a minimum, but residential development should aspire towards zero carbon status i.e. emitting no net annual carbon dioxide emissions from energy use.

Fig 5: Heat map

District heating and Energy Service Companies

The draft Brighton & Hove Strategy Energy Study (AECOM, 2012) reviewed the potential for heat networks in Brighton and Hove. The study sought to identify locations with the most potential for district heating: 14 areas were identified as having particularly advantageous conditions to enable the development of a successful heat network. The criteria used to assess potential included the following criteria: total heat demand; heat density; presence of key anchor loads; building energy profiles; proximity to key opportunities and constraints; development sites and potential for expansion; other benefits; and financial and practical viability. The Edward Street area has been identified within a long list of 14 potential clusters (see Fig 5).

Development proposals should explore the feasibility of integrating within their proposals for the site:

- district heat and power systems;
- retrofitting supply to existing buildings; and
- setting up ESCOs to supply heat and power to sections of the development area.

This should be undertaken with reference to any existing or proposed energy infrastructure for the site. Energy Service Companies (ESCOs) have different models of operation, but all usually develop low carbon solutions for local energy generation by designing, building, financing, operating and maintaining energy generating plant, and through managing energy services. Solutions are usually based on combined heat and power generation (e.g. district heating) and/or renewable energy technologies.

ESCOs can work at varying levels, from housing and mixed-use blocks, or to wider development areas, with the potential to retrofit district heating to supply existing development in areas of the city. Their primary purposes would be to:

- benefit tenants and owners by offering lower electricity and heating bills as part of a low carbon option;
- improve social cohesion by reducing fuel poverty; and

-
- lower dependence on national and/or regional energy sources that can be susceptible to volatile pricing and long-term availability and involve transmission losses.

Examples of successful ESCOs include: Southampton District Energy Scheme (Southampton Geothermal Heating Co Ltd); London Borough of Tower Hamlets (Barkantine Heat and Power); Aberdeen Heat and Power; and Nottingham, Renewable Nottinghamshire Utilities Ltd.

It is also important for developers to consider impacts on air quality. Multi Utility Service Companies (MUSCOs) are currently a theoretical model, which could innovate to supply services such as water, waste and telecommunications in addition to heat and/or power. Exploration of this kind of innovation in the development area - aiming to maximise sustainable supply and financial benefit to tenants and residents - would be welcomed.

17. Phasing

Insert phasing plan diagram showing following:

| | |
|-----------------|---|
| Phase 1a | American Express Edward Street redevelopment |
| Phase 1b | Job Centre Plus redevelopment |
| Phase 2a | Police Station |
| Phase 2b | Magistrates Court and Family Court |

The above phasing plan is indicative and based on the following considerations:

- The Section 106 legal requirement associated with the new American Express building requires American Express Edward Street to be demolished by 2016. This provides the necessity for this parcel of land to be redeveloped as an early phase in the realisation of the brief, in order to provide a high quality environment around the new American Express building. Temporary use of the former HQ building is considered desirable until its demolition.
- The future redevelopment of the Job Centre Plus building is less certain as it lies under a separate land ownership. However, its redevelopment is highly desirable in respect of meeting the objectives of this brief. It is also anticipated that the aspirations of the brief and the redevelopment of the American Express Edward Street building may provide a catalyst for the redevelopment of this particular land parcel.
- There is currently no known aspiration by Crown Properties to redevelop the Magistrates Court. It is therefore likely that this building will remain in situ for its established purpose for many years to come. Should its redevelopment become a future possibility, this brief sets out the parameters relating to townscape and other planning issues to help guide future development on the site.

18. Infrastructure and Planning Obligations

The council is currently considering whether to adopt a Community Infrastructure Levy (CIL) in respect of planning applications. The scope of what a CIL would cover is one of the issues under consideration.

If CIL is further progressed it will be spent on city wide infrastructure priorities published in a Regulation 123 list. After adoption of CIL any relevant development including any liable permitted development will be subject to the levy, unless planning permission was granted before adoption of the CIL charging schedules.

Whatever the outcome of current deliberations, major development proposals will continue to be subject to a Section 106 Agreement to provide for or contribute towards works and community infrastructure measures that are necessary and are required by that development (and not covered by a CIL should one be adopted). When such contributions are sought, there will be a requirement to ensure provision is in place and on time to serve development in accordance with the phasing plan. As the objective is to aim for a zero carbon development, there is likely to be a particular need for planning obligations to provide for sustainable transport solutions, as appropriate to the scale of the development proposed.

The likely areas where contributions may be sought include:

- Recreation, play space and sports provision;
- Affordable business accommodation;
- Affordable housing;
- Public realm, environmental improvements & legibility;
- Air quality management;
- Arts and creative industries;
- Community safety measures and maintenance;
- Education provision;
- Employment, commercial space retention;
- Employment training programmes;
- Sustainable transport and highway improvements for all road users;
- Other community needs, including engagement, support and community building retention or replacement;
- Phasing Plan;
- Project management monitoring contribution;
- Sustainability and biodiversity;
- Public art; and
- Utilities