



Hove Civic Society

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Your ref

Our ref

Dear Policy Team,

Comments City Plan Part II

Thank you for the draft and thanks for consulting us. Our comments are organised first by policy then followed by a few general points.

Policy related comments:

1. Policy DM1.c National Space Standards: we welcome this introduction, which was highlighted as a modification during the City Plan I process.
2. Policy DM4. Housing and Accommodation for Older People: we fully support this policy.
3. Policy DM6. Build to Rent Housing: The introduction of this policy is very welcome. However we believe that 1.b should be deleted as it might have unintended and undesirable consequences. For example if a major developer offers comprehensive Build to Rent on a large site – such contributions should be seen in the city wide context.
4. Policy DM18. High Quality of Design and Places: We would like to raise several points here:
 - 4.1 We believe that the public realm immediately adjacent to a development site needs to be addressed in order to firmly integrate a new development into the city fabric. This may mean improvements to a deteriorated line of street trees or some other improvements to the immediate public realm which will benefit both the developers and the city population. These intentions we believe are reflected in your reasoned justification but are not explicit enough in the policy.
 - 4.2 We firmly support the sentiments expressed in para 2.148 and would like to point out the potential conflict with the Council's current standards for example on play space. As we need to think about how we can accommodate play equipment etc within new, higher density developments we may need to accept the concept of pocket parks or multiuse of spaces rather than sticking to a standard of 500sqm for a playground, which in most cases will not be feasible. There are many good examples of multiuse surfaces which are enjoyed by local communities.
 - 4.3 Hove Civic Society firmly supports Public Art in the City and we believe that the last paragraph of the policy should be worded as follows: *In addition to the above, major development proposals on strategic and/or prominent sites **will be required to** incorporate an artistic element in the development.* We believe this would be more in keeping with paras 2.150 onwards. The Society also believes that there is an opportunity here to highlight the potential of cooperation between developers and local communities to generate art in the City. We make a further reference to this under our general points.
5. Policy DM19. Maximising Development Potential: we understand the rationale for this policy, but believe on the whole that sites are well used to the extent that proposals are

generally reduced as part of the planning application process. We wonder whether this policy is not redundant.

6. Policy DM22. Landscape Design and Trees: we welcome this policy and in particular para 2.175, but would suggest several adjustments.
 - 6.1 We believe a higher density of new tree planting is required than that currently undertaken. Looking at older pictures of Hove in particular suggests a tree planting density of about twice that we now have. The reason for this is that thinning took place after the initial planting in the late 19th century to provide adequate space for the growing trees, which is quite correct, but that new underplanting never took place. For a healthy tree population and to secure a continuous tree cover regular replacement planting is necessary.
 - 6.2 In practice tree planting in the City is very unsatisfactory not least because an increasing number of highways regulations and a proliferation of signage take precedent ahead of the location of new trees. This needs to be addressed and is a corporate issue for the Council.
 - 6.3 We also believe the Council needs to be firmer on enforcement of tree planting, which leaves much to be desired. This gives a clear signal to developers that landscaping and planting of trees is about the lowest priority and can easily be evaded.
 - 6.4 We would urge the Council to introduce a simple standard for new street tree planting of 1 tree per new dwelling, to be planted adjacent or in the vicinity of new developments.
 - 6.5 In view of public sector expenditure constraints, which seriously undermine neighbourhood services such as tree planting, we would suggest a mechanism coupled to developer contributions that sets up a type of endowment fund from which resources can be drawn in future years for maintenance of trees in the public realm. We make further comments on developer contributions below.
7. DM24. Advertisements: We note that the introduction and use of banners on light posts are not reflected in the policy, which it should. We feel that there could be a danger of a direct conflict between the Council as a planning authority and the Council as a commercial organisation seeking to generate income by selling advertisement space.
8. DM26. Conservation Areas: We are not sure whether this policy adds much over and above the City Plan. We would rather expect a statement on the review of conservation areas. We have long believed that there is a need for more areas, but at the same time an argument can be made for reducing some of the existing areas.
9. DM32. The Royal Pavilion Estate: We welcome this policy.
10. DM33. Safe, sustainable and active travel: We wonder if this policy should not also be explicitly linked to the earlier policy on public realm improvements.
11. DM44. Energy Efficiency and Renewables: para 2.251 onwards. We believe that there is little incentive for developers to implement the type of CO2 reduction measures needed such as district heating nodes highlighted in the energy studies unless the Council gives a firm lead. Paras 2.251 etc leaves the developer in a complete vacuum as there is no lead, no program nor any political intention to bring about for example district heating nodes and an outline of a district heating system for the city, with its associated technical standards and potential trading mechanisms. This type of policy needs leadership across the City to work!
12. DM45. Community Energy: it is fine to work with the community and we support this – but where is the council?? We believe that there is a policy missing which highlights the interaction needed between the council and the developers (and in this case the community) to make these policies meaningful.
13. DM46. Heating and Cooling Networks: We welcome this policy, its reasoned justification and in particular para 2.279.

14. SSA3. Land at Lyon Close: We support this
15. SSA4. Sackville Trading Estate: We support the principles of this. However we believe the policy needs more flexibility. We feel that the employment use may be too high.
16. H1. Housing Sites and Mixed use sites: We miss an indication of what the council intends to do to in terms of reducing the growing discrepancy between housing need and supply. This surely cannot be static – especially bearing in mind that this was a key issue before the City Plan Part I was declared sound by the Inspector. Surely the identification of sites needs to continue and this should be stated in this policy.
17. H2. Housing Sites Urban Fringe: We note with concerns how the housing allocations at the urban fringe are being successively whittled down. This will inevitably result in more pressure in the built up part of the City. We have long been critical of the identification of individual sites at the fringe, which are too small to generate necessary community facilities or a transport infrastructure that reduces the dependence on car borne travel. We believe the council should seek to identify a larger area in the Eastern Part of the City for a new city quarter where a proper infrastructure can be supported.
18. Appendix 2. Parking Standards: we would like to raise here our support for the Hove Station Quarter as defined in the emerging Hove Station Neighbourhood Plan to have the same car parking standards as the central area.

General Points

19. We do realise that the document as drafted is there to help development managers to decide planning applications. The nature of planning however is often an interaction of public and private sector activities, where for example the public sector can provide the infrastructure framework and where developers then follow. We believe that such interactions should be highlighted. These are some examples:
 - 19.1 For heat networks to work and developers to be encouraged to join there is a need for a plan, however rudimentary, produced by the local authority – setting technical standards to allow networks to grow together over time and trading mechanisms for heat. The City Plan is the location where we would expect such aspirations to be set out and detailed as far as possible.
 - 19.2 The City faces long term transport problems and the Society believes that a substantial uplift in public transport is going to be needed in the years to come. This applies for example to the coastal road, not least to the stretch between the Marina and Shoreham Harbour as a result of a major amount of redevelopment in the pipeline. Cities of a similar size to Brighton such as Bilbao and Brescia have introduced metro-systems to deal with congestion and to create more liveable cities. We believe the City Council should start examining such options in earnest. An indication of when and where this issue will be raised should be included in the plan.
 - 19.3 The Society believes that Part II of the City Plan is the place to take further the Gehl consultancy report on Public Space, Public Life¹, which was welcomed by all parties and which should be further developed through the public realm policies in the City Plan Part II. The report provides examples of corridors and areas from the Downs to the Sea in both Brighton and Hove that would substantially benefit from improvements. In addition entry points to conservation areas, such as the Avenues, are highlighted which, if improved, would substantially improve the public realm quality there. Gehl in one instance calls this – ‘Polishing the Pearls’ and the Society believes these ideas should be built into the City plan as diagrams. This will act as guidance and inspiration to developers and help these ideas come to fruition as developments arise adjacent to these areas of improvements. We

¹ <https://www.brighton-hove.gov.uk/content/parking-and-travel/travel-transport-and-road-safety/public-life-public-space>

firmly believe that this is an important role of the City plan in that it provides a ready menu of improvements necessary to which developer contributions can be directed as appropriate.

- 19.4 For the same reason we would argue that major schemes, such as those listed in the LTP should be highlighted in Part II. An example of great importance to the Society are the proposed improvements to Church Road. Again this may help generate synergies for the Council and a more speedy implementation
- 19.5 The Society believes that more transparency is needed regarding developer contributions. The council's schedule and calculations of allocating developer contributions to open space / recreation, education etc are largely unknown to the public and we believe the document which shows how such funds are to be allocated should be included as an annex in Part II or clearly referenced. We also believe there should be a statement on how local communities can get involved in commenting on and putting forward proposals for developer contributions for local improvements. We believe this is essential to help build a greater degree of trust between communities and the construction industry.
- 19.6 Finally we would like to come back to the need for community involvement in improving the City. This is referred to several times in Part II of the City Plan and we welcome this. However we fail to see a mechanism where communities can be involved and be listened to. Hove Civic Society has long argued for their sculpture in the city initiative, which we now see as a potential open air city-wide sculpture gallery. We have recently inaugurated the Hove Plinth and the first sculpture, we have commissioned the second sculpture and having been asked by the council to do so, we are now starting to identify locations throughout Hove for final locations of sculptures. We would like these sites to be shown in a diagram in the City Plan Part II, not least to provide an indication to developers where major arts installations could be located.

We are more than happy to meet you and elaborate on any of these points.

With kind regards

Helmut Lusser
Chairman

Hove Civic Society encourages high standards of architecture and town planning and the conservation of buildings of historic interest throughout Hove.

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Helmut Lusser (Chairman), John Kapp (Hon Secretary), Bob Ryder (Vice-Chair Planning), Clare Tikly, Andrew Haicalis (Hon Treasurer), Elaine Evans (Publicity and History), Karin Janzon (Convenor Public Sculpture), Helen Phillips (Membership), Andrew Nichols, Paul Abbott, Mike Cook, Bob Jefferson, Patrick Lowe;

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