

THE KINGSCLIFFE SOCIETY
Comments on DRAFT CITY PLAN

Part 1 Introduction

Pages 10-15 A Profile of Brighton & Hove - Context and Challenge

The introduction consists of three pages of detailed descriptive and statistical context, of the geography, economy, infrastructure, demographics and culture of the city. In all of this there appears to be only one reference to the architectural heritage:

The city is known internationally for its extensive Regency and Victorian architecture and has around 3,400 listed buildings.

In view of the precarious condition and lacklustre appearance of much of this heritage, and the pressures of unsympathetic usage and intrusive development, we feel that this statement, a rare claim of international status, should be matched by a statement in the lengthy list of “challenges”. The challenge is to raise, among the city’s own priorities, the status of its architectural heritage to the level of its national and international reputation.

DA2 Brighton Marina and Black Rock Site

Marina

We strongly support the proposition that developments “do not breach the cliff height within the marina”.

Since our area of concern, the East Cliff Conservation Area, is situated close to the Marina and the character of the area is affected by marine activity and quality, we are very concerned that this section of the draft city plan makes so little reference to the boats themselves or to any scope for research and innovation in marine science and engineering. The latter potential could be explored and promoted in connection with the plan’s priority to conserve biodiversity and geodiversity.

We consider the Marina to have been overloaded with residential blocks, and to have competed with the city centre for similar retail and leisure amenities, to the detriment of both, and we regret the plan to continue with this policy.

Black Rock

We do not want a huge monolithic institution on this site, attracting crowds and traffic and not benefiting the appearance and routine experience of the surrounding public realm. We would prefer development schemes such as that which was submitted previously for a hotel. We are especially concerned that developments on this blighted wasteland site should follow and complement the existing character of Madeira Drive, and take full account of the proximity of important historic architecture and natural environment.

DA5 Eastern Road and Edward Street Area

We would like to see in the introduction to this section of the plan recognition of the proximity of the entire length of this development area to the East Cliff Conservation Area.

We broadly welcome the fairly careful design and placement of the Patching Lodge development, whereas we consider both the new Amex building and the projected hospital expansion to be cases of overdevelopment, and would wish to see a more sensitive scale and impact in any future developments in the area.

SA1 The Seafront

We fully support the second and fourth of the priorities under A:

- Promote high quality architecture and urban design which complements the natural heritage of the seafront and preserves and enhances the character and appearance of the Conservation Areas, and the historic squares and lawns that adjoin the seafront⁷⁰;
- Monitor, conserve and expand designated coastal habitats and secure nature conservation enhancements to the marine and coastal environment;

We appreciate recent improvements in the level of maintenance of the seafront ironwork, together with the major works on the Madeira Lift; and we welcome the mention in a word, in this section of the plan, of maintenance; but we consider the maintenance to merit more than a mere fleeting mention. We would also like to see a stated acknowledgement and approval of the fact that so much of the seafront ironwork is specifically listed as being of special interest warranting every effort of preservation.

East of Palace Pier

The Central Seafront item in this section of the plan promotes “tranquillity” west of the Peace Statue, and we would like to see the same term applied to the area between the Palace Pier and Black Rock. It should be possible to continue with the occasional traditional types of event associated with Madeira Drive, to construct more and better practical amenities related to the beaches, and to develop low-scale and family-orientated leisure facilities at the Peter Pan site, without damaging the essentially quiet pedestrian nature of Madeira Drive.

Hard surfacing over the shingle spoils the grand geometry of the beaches and encourages disruption of open views of the sea. We recommend a general policy against it.

We would like to see the inclusion of a proposal for a continuation on Madeira Drive, extending to Black Rock, of street lighting conforming to the design of the listed lantern lampposts.

Between Marine Parade and Madeira Drive we recommend at least the removal of the corrugated roof and the underlying unit of the current Aquarium development, to enable a major restoration of the former listed terraces.

SA2 Central Brighton

Although not located in Central Brighton, St. James's Street (the district shopping centre in our conservation area) has been encouraged by individual and incremental planning and licensing decisions to host the kind of soulless retail and hyperactive night time economy that ought if anywhere to be in North Street while North Street itself struggles to sustain the kind of specialist and niche retail that could help to restore St. James's Street historic and residential character (cf the success of East Street).

In respect of the above comments relating to St. James's Street, we emphasise concerns in relation to the conflict between short term, ill-considered commercial interests versus stable residential and employment needs.

SA6 Sustainable Neighbourhoods.

Houses in Multiple Occupation

We welcome the proposal re Article 4 directions and it is helpful to have a clear policy to guide assessment of planning applications for new HMO's. In the Draft Plan it is indicated that if within a radius of 50 metres from the centre point of an application site's highway frontage more than 10% of properties are HMO's then planning change of use to HMO would not be allowed.

However, the draft options paper put out for consultation gave a distance of 100 metres, not 50. We have not detected any responses asking for that original distance to be made smaller and we are concerned that the reduction could impact adversely on neighbourhoods already containing large numbers of HMO's. We would ask that the 100 metres yardstick be used.

Further, in our response to the draft options paper we opined that the '*more than*' 10% of properties in HMO use should be amended to a straight 10%. That has not been taken up in the draft City Plan, although (at paragraph 4.218) there is reference to a '10% threshold'. In the light of that straightforward 10% we consider that the '*more than*' should be deleted.

CP9 Sustainable Transport

At 4.90 there is reference to 'informal' park and ride. Our response to the consultation on the four policy options paper was to keep Park and Ride (in the medium to long term) in the form of a revised criteria-based policy incorporated into the sustainable transport policy.

In rejecting that we note the council's aim to come to arrangements with owners of large car parks (200 places plus) situated on the edge of the city. We wonder about feasibility in terms of sufficient availability, what the cost would be to motorists and how much control the city would have over charging. Until such things are settled satisfactorily efforts to retain Park and Ride should be maintained.

CP12 Urban Design

We agree generally with the expectations on "all new development". However, we have concerns regarding the interpretation and implementation of the second expectation:

2. Establish a strong sense of place by respecting the diverse character and urban grain¹⁷⁸ of the city's identified neighbourhoods;

There are areas of the city, typified by those alongside St James's Street, where the strong sense of place in quiet historic residential side streets in a conservation area is severely damaged, and is at risk of being destroyed, by the promotion of an excessive contrast of character in the minority of commercial streets central to such an area. Decisions on the design of new development in areas like St James's Street should be guided by the styles, materials and proportions of the historic architecture, conducive to quiet and polite usages and a calm "sense of place" suited to the conservation area.

To the same ends, we recommend the insertion early in this section of a cross reference to the second, third and eighth of the ten measures proposed in the policy on Public Streets and Spaces (CP13).

CP13 Public Streets and Spaces

We have particular concerns regarding the past practice in the commissioning of **public art** in the East Cliff conservation area. The aids memorial, singled out in this section of the plan, is remarkable but provokes mixed reactions, and may have a depressing and despairing effect. The grey "desire" slogan on the Madeira Wall is intrusive, drab and tawdry in appearance, and selfish and inane in meaning - unlike, for example, the simple but subtle, and far more Brightonian "kiss" column facing East Street.

We especially regret the lack of wide or local consultation conducted on much public art introduced into the city in recent years, and we look forward to reading the forthcoming planned "guidance" on the subject in the hope that well publicised consultation will be proposed in it.

CP15 Heritage

We are disappointed that the plan's coverage of heritage runs to a little over one page.

While we agree with the sentiment in the first "aim" set out in this section, it is articulated in very general and equivocal terms. It is not elucidated or elaborated in the supporting text, only clarified by simple references to national designations and local conservation frameworks.

The third "aim" is that the "conservation strategy will be taken forward and reviewed". The commitment to the value of conservation is expressed in very mild terms; and this commitment is scarcely strengthened in the supporting text by the aforementioned simple references to designations, strategies and assessments.

The future of the internationally renowned architectural heritage of the city depends on a robust and confident statement championing its preservation and protection. The draft city plan is a vital context in which such a statement can and ought to be made. In our view, in the interest of the East Cliff Conservation Area and of all elements of the city's heritage, it needs to be made far more fully and forcefully.

CP16 Open Space

We welcome the acknowledgement of beaches in this section though one passing mention in parentheses represents a minimal degree of attention. Moreover, in a section's supporting text of twelve paragraphs, we would have expected a paragraph setting out the need for and methods of protecting the distinctive openness of the city's beaches. Furthermore, we would welcome a statement recognising the intrinsic geological, geometric and aesthetic interest of this expanse of shingle stones forming such a major open space between the land and the sea.

CP18 Healthy City.

Linked to our comments above (SA2 & SA6) in respect of St. James's Street we would observe that the very people living around the street whose stability, civility and custom sustain the neighbourhood are often caused ill-health and in many cases are hence driven out by the culture of noise, disorder, etc. The reasons for these adverse outcomes need attention from the council in terms of policy decisions affecting the area.

Submitted for The Kingscliffe Society

19 July 2012