

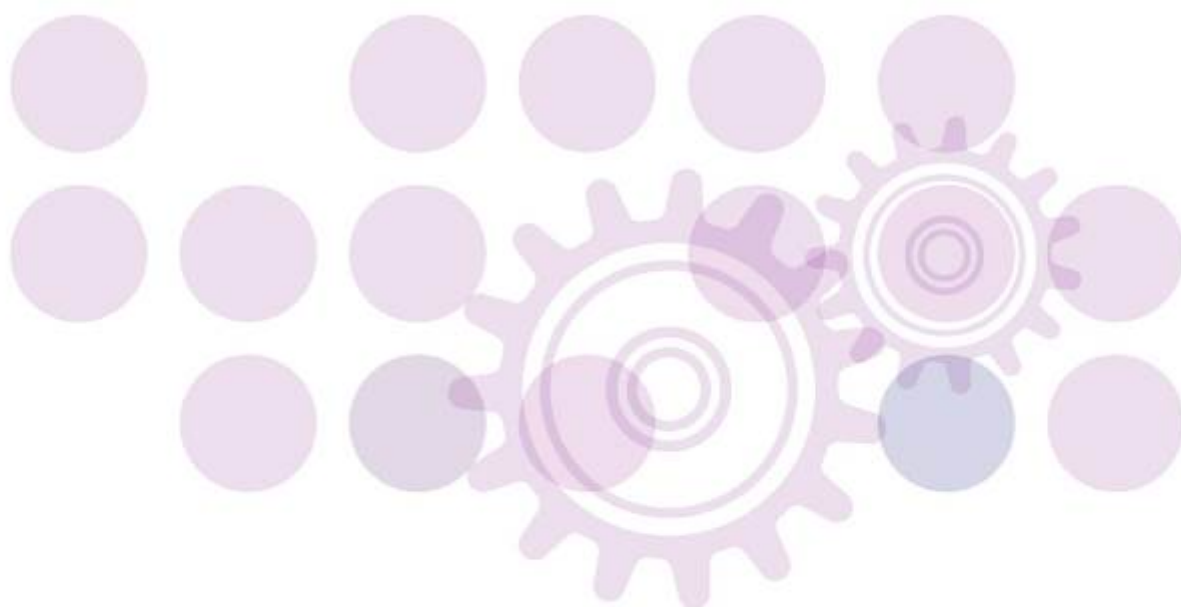


spd 17

supplementary planning document

June 2021

Urban Design Framework



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About this SPD

This Urban Design Framework Supplementary Planning Document (UDF SPD) has been prepared to help support the city councils' corporate objectives as set out in the Council Plan 2020 – 2023 – A Fairer City with a Sustainable future and the vision, objectives and planning policies set out in the Brighton & Hove City Plan (Parts One and Two), in particular City Plan Part One Policy CP12 Urban Design.

It signposts priorities the council would like applicants to consider when preparing design proposals. The level of consideration will depend on the scale and type of the development.

The SPD illustrates how good design is vital to the delivery of inclusive, sustainable and climate-resilient development that:

- helps the city to achieve its ambition of becoming carbon neutral by 2030;
- responds to the city's limited spatial opportunities and challenging physical and environmental constraints;
- helps to meet the city's significant housing needs through high quality higher density development together with development for other land use needs;
- secures improvements to the city's physical, social and environmental infrastructure;
- uses innovative, contemporary architecture to enhance the reputation of the city and creates places that improve health and well-being; and
- reflects positive engagement with all involved in the planning process.

It provides guidance on good design that can be used by:

- planning applicants and their design team when preparing planning applications;
- planning officers when assessing applications;
- councillors when making planning decisions; and
- residents, amenity groups and other organisations when commenting on planning applications.

Structure of this SPD

This document is structured in three main sections that build on national and local design policy and guidance:

A. Local priorities

This section focuses on design issues that are particularly important and relevant to Brighton & Hove and sets out design recommendations and principles to illustrate how the council would like to see local policy interpreted. The advice in this section is applicable to all types of development across the city.

B. Tall buildings

This section provides guidance on those additional design considerations that are particularly relevant to development that is 18 metres or more in height and/or significantly taller than its surroundings.

C. Planning Process

This section describes the council's preferred approach for engaging with applicants to resolve design issues prior to the submission of a planning application and during the application process.

D. Appendices

These provide additional information about some of the issues discussed in this guidance and also provide an extended list of policies and documents that should be read in conjunction with the SPD.

Each section of the guidance identifies the key City Plan policies, sets out key design principles and recommendations to help applicants achieve better planning outcomes and signposts good practice examples from the UK and beyond to illustrate how multiple design priorities can be achieved by good design.

National Planning Policy

The [National Planning Policy Framework \(NPPF 2019\)](#) and its [Practice Guidance](#) recognises the importance and value of good design as an essential component of sustainable development. Chapter 12 'Achieving well-designed places', promotes a proactive, contextual approach to the creation of high-quality buildings and places that respond to the aspirations of local communities. Supplementary planning documents are expected to provide clarity about design expectations at an early stage and a framework for creating distinctive places with a consistent and high-quality standard of design. The level of detail and degree of prescription is tailored to local circumstances.

The [National Design Guide - Planning practice guidance for beautiful, enduring and successful places](#) (NDG 2019) provides a high level framework of design guidance that establishes expectations on place making and design quality to guide individual development proposals. It expects local authorities to build on this framework by setting 'specific, detailed and measurable criteria for good design' at the local level. It sets out what constitutes good design based on ten characteristics for well-designed places summarised on the right. It provides details regarding how that can be incorporated into proposals as well as a useful glossary. This guidance builds on the principles of good design set out in NDG, focusing on what makes Brighton & Hove distinctive and the priorities and cross-cutting policy 'wins' that are of particular relevance to its context.



Ten characteristics of well-design places.

The [Living with Beauty: promoting health, well-being and sustainable growth \(2020\)](#) report recommends developing a planning framework that asks for beauty; refuses unadaptable, unhealthy and unsightly development and promotes stewardship of the built and natural environment. It advocates that these aims should be embedded in the planning system to support a more integrated approach to design, in which all matters relevant to placemaking are considered from the outset and subjected to a democratic or co-design process.

Local Planning Policy

[Brighton & Hove City Plan Part One](#) (adopted in 2016) Policy CP12 Urban Design is the key and overarching policy regarding development design along with CP13 Streets and Open Spaces that focuses on the design of spaces between buildings. These policies seek to raise the standard of and achieve excellence in sustainable design and construction of buildings and external spaces in the city.

There are also a number of retained policies in Chapter 3 of the [2005 Brighton & Hove Local Plan](#) that deal with design issues. These policies set out how good design in new development can help to create interest, diversity and a more pleasant environment.

The retained 2005 Local Plan policies will be superseded by [Brighton & Hove City Plan Part Two](#) (CPP2) which is at a late stage in its preparation. The UDF provides supplementary guidance relevant to some of these policies, in particular DM18 High quality design and places. This policy requires an integrated, design-led approach to proposals where place making and sustainable development are considered as one.

[East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan](#) (2013) Policies WMP3a-e set out the strategy for managing waste in new development. Policy WMP3d Minimising and Managing Waste During Construction, Demolition and Excavation looks at design measures to minimise or prevent waste from occurring and Policy WMP3e Waste Management to incorporate recycling infrastructure into new development.

[Shoreham Harbour Joint Area Action Plan](#) (2019) relates solely to the Shoreham Harbour and South Portslade area of the city and includes Policy SH9 Place making and design quality that seeks to promote high design quality that maximise the waterfront setting, respect local character and form/enhance public spaces.

The [South Downs Local Plan \(2019\)](#) relates to proposals located inside the South Downs National Park boundary and includes design policies that aim to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.

The council has adopted a series of [Supplementary Planning Documents \(SPD\)](#) and [Guidance \(SPG\)](#), [Planning Advice Notes \(PAN\)](#) and the [Developer Contributions Technical Guidance](#) to aid the implementation of design policies set in the City Plan and other Development Plan documents.

SECTION A: Local priorities

Brighton & Hove has long been recognised as one of the UK's most distinctive cities. Situated between the South Downs and the sea, the city has an undulating landscape of valleys and slopes. It is known for the spirit and diversity of its people, for its unique retail, leisure and cultural offer and for its world-famous seafront, natural and heritage assets. More recently it has become recognised for the strength of its small business economy and as a genuine hub of creativity, innovation and enterprise.

Brighton and Hove is an area with a high demand for development but a very constrained land supply. Competition for land for housing and other uses is intense and affordability issues are acute. The City Plan sets challenging housing and other land use targets and the council has set an ambition to become carbon neutral by 2030.

In order to meet, and if possible exceed, these targets, the council is committed to promote and foster high-density, mixed use development. High quality design is fundamental to delivering development that positively responds to the city's sensitive landscape, historic built environment and local priorities.

In Brighton & Hove, the quality of new development is determined by how well the design:

- **Makes the most of site conditions and existing buildings to support the city's aims to become zero carbon and reduce resource use and waste.**
- **Uses the identified character of the city's neighbourhoods as a starting point to inform design development.**
- **Delivers the type and amount of development required and contributes to delivering infrastructure needs.**
- **Supports accessibility and the ease of daily activities aiding connectivity and active travel for all users.**
- **Enhances nature and helps to make the city more climate resilient.**
- **Positively promotes health and well-being, providing appropriate level of public and private amenity for all users.**
- **Accommodates higher density to make the best use of limited opportunities.**
- **Preserves or enhances key views and the settings of landmarks.**
- **Enables appropriate and adaptable buildings and open space typologies that respond to the changing needs of users.**

Local priorities are developed further under the following three key design priorities:

1. Context;
2. Spaces between buildings; and
3. Buildings.

For each priority, the council has set out a set of design principles for applicants to prioritise when preparing proposals. Supporting information is also provided which applicants are encouraged to take into consideration when applying the design principles.

Good design decisions can address multiple policy objectives. Links to policies where good design decisions can lead to addressing other policies are provided along with considerations that may be relevant to all high-density development in the city.

1. Context

Applicants are expected to look beyond the site boundary and consider how the design of a development will respond to its location and surroundings.

Contextual attributes and considerations that are particularly relevant to Brighton & Hove include:

- 1.1. Environmental conditions;
- 1.2. Neighbourhood character;
- 1.3. Composition of street scene;
- 1.4. Views and landmarks; and
- 1.5. Opportunities for masterplanning.

These are explained in more detail in the sub-sections below.



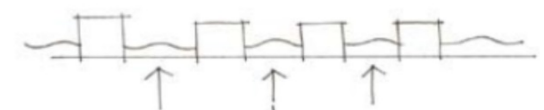
Developed valleys with views out to surrounding downland



Steep slopes allowing for city-wide panoramas



Undulating landscape allowing glimpses to the countryside beyond



Gently sloping landscape allowing glimpses down to the sea



Extract from Brighton & Hove Urban Characterisation Study highlighting relationship between the city's undulating topography and landscape character.

1.1. Environmental conditions

The key to designing low carbon, resource-efficient buildings and spaces is to take best advantage of the environmental conditions of a site, in particular local climate. In a city of undulating valleys and slopes, it is important to assess how environmental conditions (i.e. prevailing wind and sun path), landscape (i.e. access, outlook and hydrology) and existing features (i.e. buildings, trees and vegetation) within a site can contribute towards reducing emissions, resource use and heat island effect.

In a dense city it is also important for early context appraisal to fully scope and identify particular site features so that siting options avoid unacceptable impact upon the amenity of neighbours. The [Design Guide for Extensions and Alterations Supplementary Planning Document 12](#) signposts amenity issues that are relevant to the local context, in particular for small sites and householder development.

Design priorities to be considered when preparing proposals include:

- Consider orientation, layout and massing of existing and proposed development to ensure internal and external spaces receive appropriate levels of sunlight, outlook and protection from harsh weather conditions to maximise user comfort and reduce use of resources, particularly energy.
- Use landform to reduce the volume and rate of surface water run-off going into the city's drainage system and/or aquifer.
- Retain existing protected and other mature trees and seek to add more.
- Improve biodiversity and deliver Biodiversity Net Gains.



Policy links

CPP1: CP8, CP10, CP12, CP13, CP16.

Saved Local Plan: QD15, QD27

CPP2: DM18, DM20, DM22



Western Harbour development in Malmö, Sweden. More exposed coastal public spaces with sea views and a mix of uses contrast with sheltered residential spaces. Narrow openings are used to create shelter from the elements and a development that functions throughout the year.

1.2. Neighbourhood character

An analysis of the character and identity of Brighton & Hove and its neighbourhoods is set out in baseline studies such as the [Urban Characterisation Study \(UCS\)](#) and also within [Conservation Area Character Statements \(CACS\)](#).

Building on the UCS, the council has considered each neighbourhood in terms of sensitivity to change and likelihood to largely be conserved; be suitable for localised, incremental development and enhancement; and those which require major enhancement. Conservation areas in the central area of the city have not been included as these must be preserved or enhanced according to their identified character and appearance. This assessment is explained in more detail in Section D, sub-section 11. The map below illustrates which neighbourhood falls into each grouping. In those parts of the city that are not covered by character analysis, applicants will need to identify the key neighbourhood characteristics and priorities for improvement. A more detailed version of [this map is available to be viewed online](#).

Where a proposal is promoting a clear departure from the established neighbourhood character, the council will expect this to be justified through a design and, where appropriate, heritage statement (see Section C Planning process for further information).

Design priorities to be considered when preparing proposals include:

- Consider how to respond to neighbourhood characteristics identified in the UCS and CACS at the start of the design process.
- Wherever possible, retain and re-use buildings.
- Consolidate and improve established pedestrian and cycling routes and formalise informal ones.
- Allow existing levels to guide layout options and optimise effective pedestrian and vehicle access.
- Where possible, align external routes and spaces along utility easements for ease of access and consider re-routing services which preclude efficient layout options.
- Favour innovation and contemporary design while avoiding or mitigating conflict with surrounding built form.

Extract from Urban Characterisation Study illustrating character areas identified for the Sackville neighbourhood in Hove. More background information and descriptions of the four areas are provided in the Study.

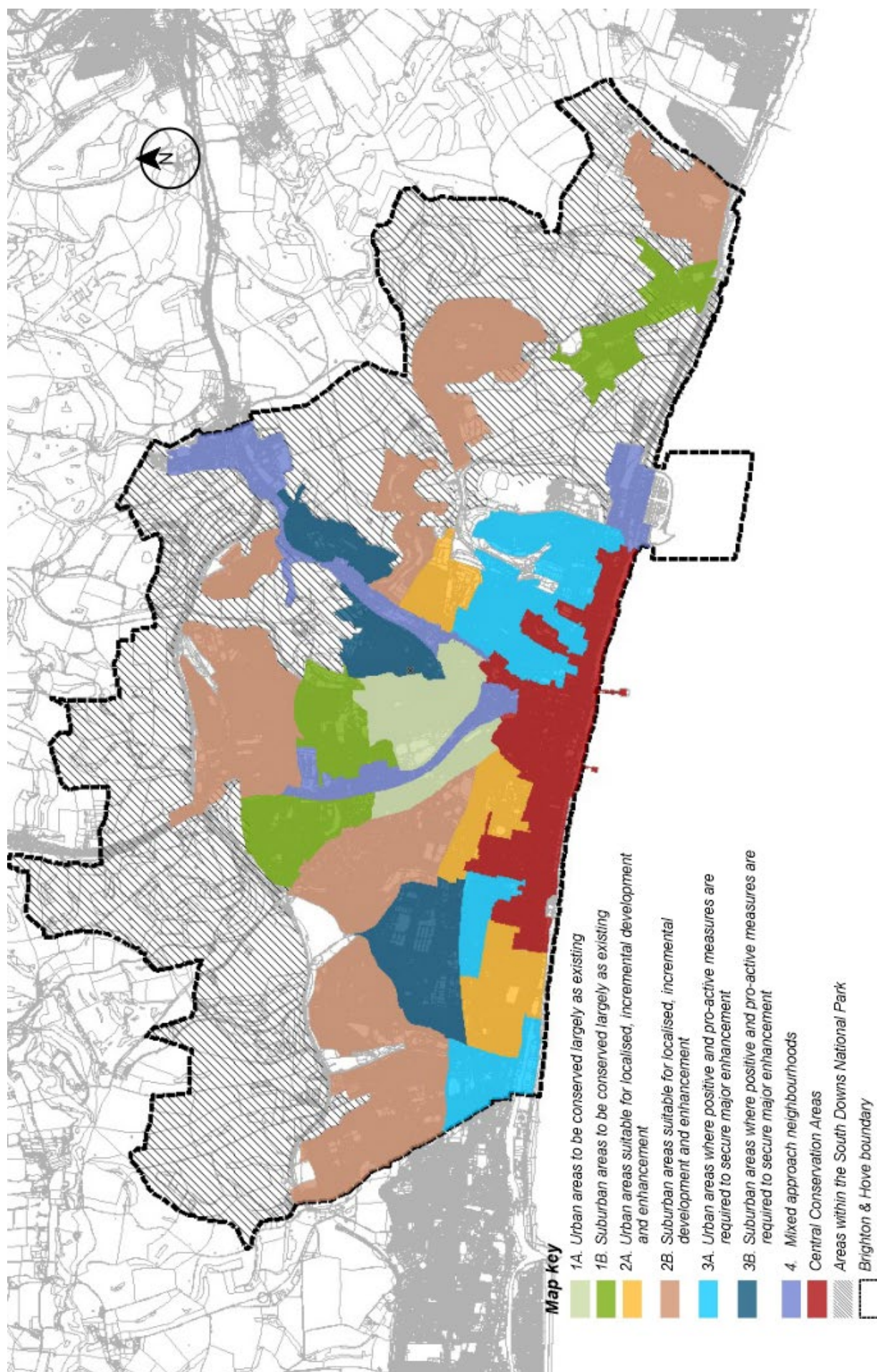
Policy links

CPP1: CP8, CP10, CP12, CP13, CP14, CP15, CP16.

Saved Local Plan: QD15.

CPP2: DM18, DM26.





Urban Characterisation Study neighbourhoods according to sensitivity to change. A more detailed version of [this map is available to be viewed online](#). For more details please see Section D, sub-section 11.

1.3. Composition of street scene

Streets are an invaluable asset to life in the city and constitute the majority of our public spaces. The way they look and feel is critical to the character of an area. Design features that are visible from the street or highway will be particularly important in the assessment of development proposals. [Transport for London's Heathy Streets guidance](#) provides useful design advice on street design.

Design priorities to be considered when preparing proposals include:

- Reference existing building lines, height, rhythm and proportions of frontages, windows and doors.
- Create opportunities for those inside buildings to see out on to the street/public space.
- Ensure buildings front on to streets and other public spaces, creating perimeter blocks.
- Frame streets and spaces and consider how facades turn around corners and are presented to street elevations.
- Avoid blank facades facing streets and other public areas to improve passive surveillance.
- Optimise provision of cycle parking/storage, electric charging points, pop-up green spaces (e.g. parklets) and avoid letting parking dominate the street scene.
- Maintain or extend tree cover and incorporate soft landscaping to improve comfort, enhance biodiversity, provide opportunities for food growing and reduce heat island effect.
- Create obstacle-free and sight impaired-friendly routes, level access bus stops with well-designed waiting/seating areas and shared spaces for pedestrians and cyclists.
- Incorporate features to help reduce water run-off and manage water quality.
- Reduce visual clutter and provide good levels of lighting while avoiding unnecessary pollution.
- Provide ease of access for deliveries, removals, and refuse collection.
- Screen refuse storage facilities that are visible from the street.



Corner House in London. Contemporary interpretation of a Victorian suburban townhouse that draws on established rhythms and decorative motifs of the surrounding area. [Southwark Council](#) application 17/AP/3083.



Policy links

CPP1: CP8, CP10, CP12, CP16.

Saved Local Plan: QD15

CPP2: DM18, DM22, DM33, DM36, DM43.

Marmalade Lane in Cambridgeshire. Flexibly designed streets. Car parking core with electric charging points. Shared open space with area for food growing. Flexibly designed overspill car parking area used for recreation. [South Cambridgeshire Council](#) application S/3223/15/FL.

1.4. Views and landmarks

In a city with an undulating landscape of valleys and slopes, it is important to consider the relationship between topography, views and landmarks. The council has identified key strategic and local views and landmarks to aid the assessment of design proposals.

Strategic views are generally distant views from elevated locations, mostly on the periphery of the built-up area, and include some panoramic views. They also include both distant and intermediate views from and along the seafront. In determining the strategic views the key factors are:

- the degree to which the view illustrates the relationship between the built-up city and the Downs, the National Park and/or the sea;
- the prominence of key ridge lines;
- the extent to which the view reveals the typical pattern of past development; and
- the presence of any notable landmarks.

A series of 'unfolding views' has also been identified, on key approaches to, and from arrival points in, the city. The viewpoints are all from public land within the city boundary and relate to an identifiable feature or road junction. Approximate location of strategic viewpoints and landmarks are signposted on the map below and illustrated in more detail at Section D, sub-section 12. Applicants will need to agree fixed points for verified views with the council.

Local views and landmarks that may be used for wayfinding and as route markers are identified in the [Urban Characterisation Study \(UCS\)](#) and [Conservation Area Character Statements \(CACS\)](#). Vistas towards the sea from the main east-west routes are also important across the city. There are likely to be other views that may be important to local communities. Applicants may want to identify these in consultation with the council and local communities, as well as with the South Downs National Park Authority where appropriate. It is important to ensure that newly identified viewpoints are available from accessible public land or rights of way that are well used.

Design priorities to be considered when preparing proposals include:

- **Consider the implications of identified views and landmarks for the design and demonstrate how they would be protected or enhanced by the proposals.**
- **When engaging with neighbours, local communities and the council, take opportunities to identify any additional views, including locally cherished views, to inform the development of proposals.**
- **Assess visual impacts that are more evident during winter when trees are bare and take into account the cumulative impact of different schemes including proposed developments in the submitted verified view images (rendered, wireline and/or 3D modelling).**

Extract from Urban Characterisation Study illustrating identified local views (left) and landmarks (right) for the Round Hill neighbourhood. More background information and detail are provided in the Study.

Map key



Landmarks

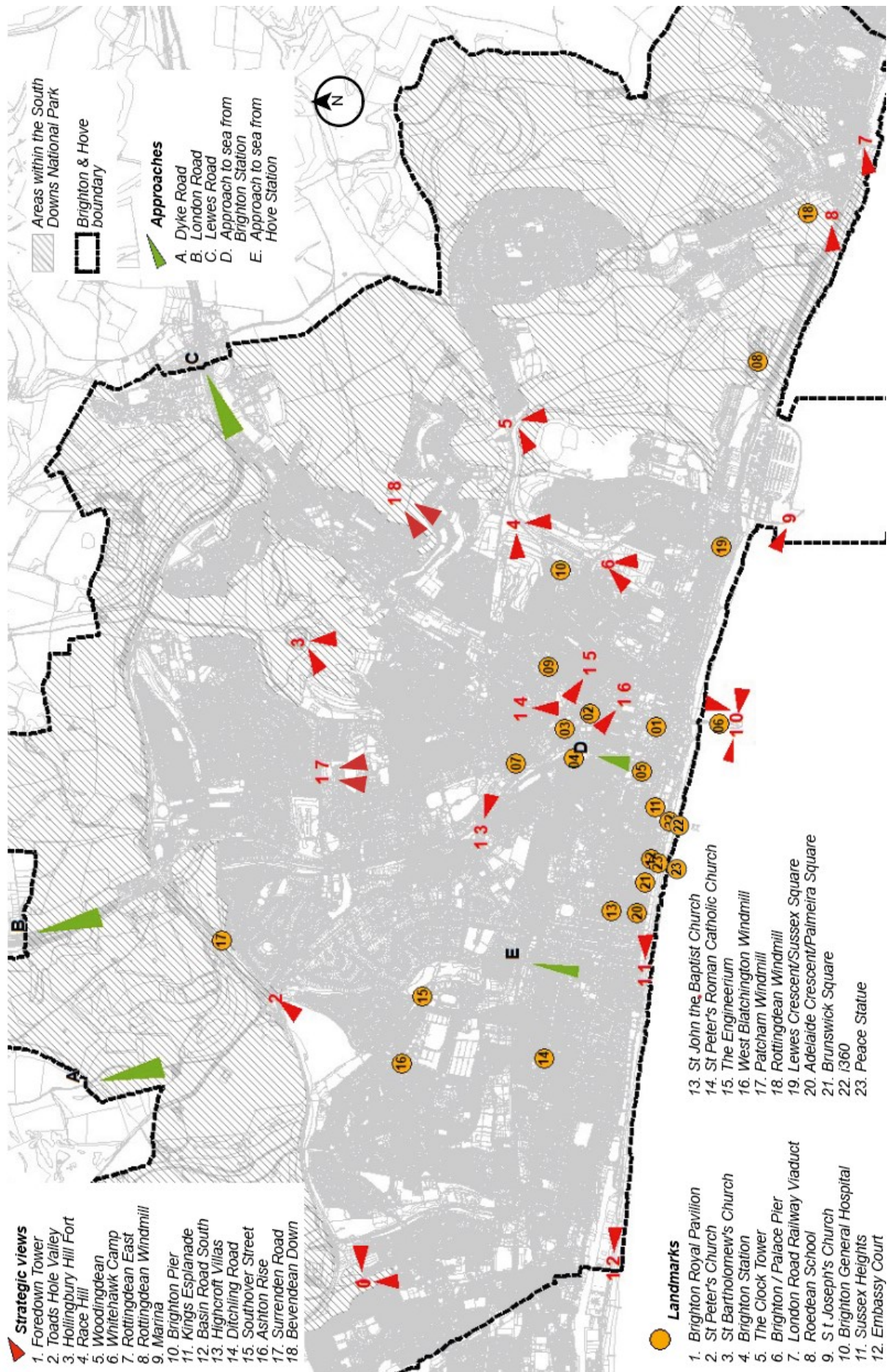


Views and vistas

Policy links

CPP1: CP12





Strategic viewpoints and landmarks. A more detailed version of [this map is available to be viewed online](#). For more details please see Section 12.

1.5. Opportunities for masterplanning

A masterplan-led approach can assist the preparation of proposals for many developments and there are certain circumstances where the council will consider the submission of one as being more appropriate.

The council would recommend proposals are supported by a masterplan-led approach where, for example:

- The impact of a major high density and/or mixed-use development and/or the cumulative effect of a series of small developments is likely to be significant.
- Development is likely to be delivered by multiple developers or landowners.
- It can inform the phasing of the development, including the release of a range of uses alongside residential development.
- A structured, integrated spatial framework is needed to drive regeneration particularly for complex projects.
- Significant historic and/or environmental assets need to be protected.

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Above: QuarterMile in Edinburgh. A masterplan was developed to drive the regeneration of the Edinburgh Royal Infirmary site. The scheme involves the refurbishment of existing and introduction of new buildings that are contemporary in appearance but sit well alongside listed heritage assets and elevating the character of the surrounding area. [Edinburgh Council](#) application 02/01662.

Below: A masterplan for City Plan Part One's Strategic Allocation 125-163 Preston Road within the New England Quarter and London Road Development Area 4 was commissioned by an applicant for the Anston House site. The masterplan identified opportunities for introducing a landscaped zone along Preston Road to make the road look like an extension of Preston Park. [Brighton & Hove Council](#) application BH2016/02499. See 5.7 Tall Buildings Area 7: London Road / Preston Road for further details.



Policy links

CPP1: CP12, CP13.

2. Spaces between buildings

Spaces between buildings include streets, open spaces and uses that are accessible to people living, working and visiting buildings.

Well-designed outside spaces sit well within the landscape and are created for people rather than buildings. They take on different characteristics as a result of the different groups of people who use them and the activities they accommodate. Some are vibrant and commercial, some are focussed around play while others are civic, peaceful and/or relaxing.

Defining how the spaces between buildings will function early in the design process can help inform the siting and design of buildings, hard and soft landscaping, the distribution of uses and infrastructure services that will frame the network of spaces within a development. In Brighton & Hove accessible open space is limited. The city is tightly constrained between the sea and the Downs and is already densely developed in more central areas.

The council supports landscape-led proposals where design makes the best use of the spaces between buildings having regard to combining and integrating the following priorities:

- 2.1. Active and inclusive travel;
- 2.2. Outdoor amenity;
- 2.3. Landscaping, biodiversity and water;
- 2.4. Mix of uses and active frontages;
- 2.5. Artistic element;
- 2.6. Materials and management; and
- 2.7. Phasing development.

These are explained in more detail below. The level of consideration will depend on the scale and type of the development.



2.1. Active and inclusive travel

Active travel refers to journeys made by physically active means, for example, walking, cycling and scooting. Inclusive travel needs to be addressed by taking account of the different needs of whole community, including children, older people and people with disabilities to provide access for all. Creating safe and enjoyable spaces as part of new development, that successfully integrate into the city's network of linked, publicly accessible routes and connections is key to improving health, lowering carbon emissions and improving air quality, reducing congestion and noise and promoting social interaction.

The [Public Life, Public Space Study \(PLPS\)](#), Local Transport Plan (LTP) and the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) set priorities for improving the legibility and quality of the public realm and the liveability of different types of public realm and links across the city. These range from improving legibility in and between the city's neighbourhoods to make movement easier for pedestrians and cyclists to supporting new development that overlooks and animates public spaces. General design concepts that can be applied to various types of routes within the city's hierarchy are provided. Guidance on principles for street design is provided in the [Manual for Streets 1](#) and [2](#) and [Cycle Infrastructure Design \(LTN 1/20\)](#).

There is a wealth of information about the layout and hierarchy of the city's [network of roads, highways, footpaths](#) and [cycle routes](#) adopted by the council and [Highways England](#). Information about existing patterns of movement for all modes of transport, in particular pedestrian and cyclists is available in free online sources like [DataShine Commute](#). Guidance on how to implement an active, inclusive environment is available from [Sport England](#), [Public Health England](#) and [Department for Transport](#). Guidance is also available on how to carry out [Health Impact Assessments](#). The [Parking Standards SPD](#) and [Streetscape Design Guidelines](#) set out minimum standards and recommendations regarding standards and materials. Where development is likely to affect the strategic road network early engagement with Highways England is encouraged.

Design priorities to be considered when preparing proposals include:

- Improve and/or create publicly-accessible routes through neighbourhoods, particularly where partial routes exist, pedestrian/cycle desire lines are available and/or to allow for future permeability between adjacent development sites.
- Provide cycle parking facilities that are easily accessible from the street, close to the building entrance, well-lit, secure and can be used by users of all ages.
- Car free and low car parking ratios with adequate, easily accessed disabled car parking facilities.
- Provide continuous, step- and obstacle-free access links to and across the public transport, pedestrian and cycling networks.
- Where possible, provide separate, marked facilities for pedestrians and cyclists.
- Avoid cul-de-sac layouts, dead ends and backs of properties facing the public highway.
- Provide legible, level-access entrances to buildings that are aligned with peoples' movement patterns and desire and sight lines within a site/area.
- Specify materials that can be re-used and recycled whilst harmonising with adjoining public realm materials.
- Incorporate wildlife-friendly planting and sustainable drainage to make routes more climate-resilient, attractive and comfortable for users and ensure quality of the aquifer is not compromised.
- Provide workplace showers, lockers and changing facilities.
- Make movement through and around the development intuitive and legible to reduce need for signage.



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Above top: Public Life Public Spaces-compliant improvements to Little East Street, Brighton.

Above left: Use of ramps and handrails can help to make routes more accessible.

Above right: University of Brighton, Lewes Road in Brighton. Cycle store conveniently and prominently located that support different types of cycling. Controlled access, entrance easily accessed from the street, accessible showers, changing rooms, lockers, bike repair equipment and parking facilities for cycles of different types and sizes. [Brighton & Hove Council](#) application BH2018/00689.

Left: New link created to increase permeability and create access to Hannington Lane and the Lanes area of Brighton. Unfortunately it is not step-free. [Brighton & Hove Council](#) application BH2015/00575.

Policy links

CPP1: CP8, CP9, CP11, CP12, CP13, CP16.
CPP2 DM33, DM36, DM37, DM44, DM46.

High density considerations

Consider low car and car-free development options while avoiding putting pressure on on-street parking in the surrounding area. Shared facilities should provide sufficient, safe, secure and easily accessible cycle, parking and storage by all users, including e-scooters, electric, cargo and other non-standard cycles used by people with mobility impairments. Contribute to and/or create neighbourhood mobility hubs where bus stops, e-bikes, car club vehicles and electric charging and collection points are provided.

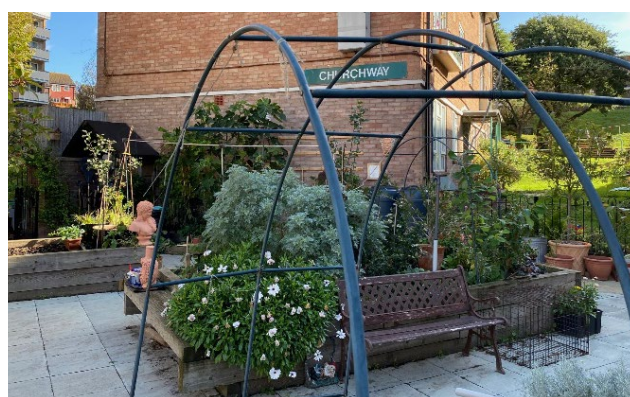
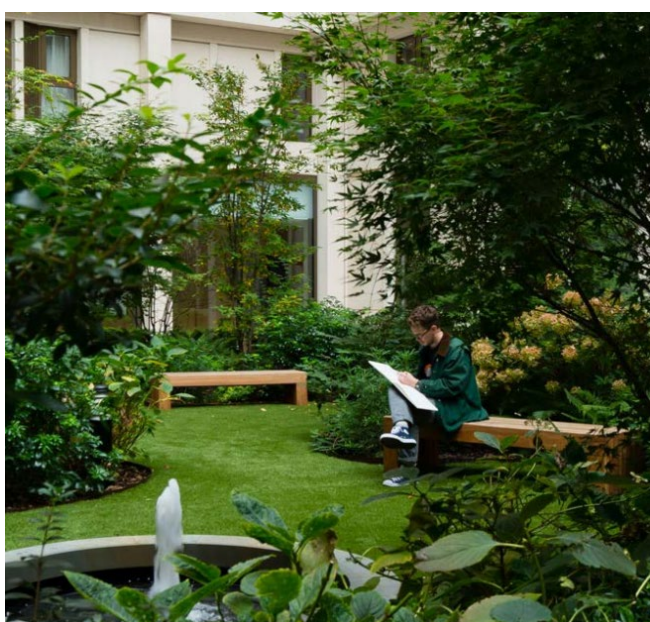
2.2. Outdoor amenity

Outdoor amenity spaces take on different roles as a result of the different groups of people who use them and the activities they accommodate. From private amenity space like courtyards and gardens to communal facilities public squares and parks, it is important to define the location, nature and use of these spaces and, if possible, consult users early on in the design process to inform the siting and design of buildings, hard and soft landscaping proposals and the distribution of uses across the development.

The Updated [Food Growing and Development Planning Advisory Note 6 \(PAN 06\)](#) provides guidance on how food growing can be successfully incorporated into new development to help achieve multiple policy benefits (i.e. space for growing healthy food, outdoor activity and encouraging biodiversity).

Design priorities to be considered when preparing proposals include:

- Locate outdoor amenity spaces to maximise sunlight and daylight and provide shade during the summer and provide appropriate lighting of spaces and building thresholds.
- Accommodate the differing needs of people that are expected to use the space including areas with greater levels of activity for sports, play and/or temporary events and cultural activities and quieter ones for rest and relaxation.
- Introduce defensible spaces that create a sense of privacy and retreat within the home and other indoor private spaces.
- Clearly delineate areas that are accessible to the public, shared by or for exclusive use of occupants with well-defined boundaries and no leftover areas.
- Maintain good levels of natural surveillance while avoiding unreasonable overlooking.
- Provide inclusive seating and other amenities that can be easily used by older people and people with different needs, including the deaf and visually impaired.
- Optimise planting and food growth for well-being/comfort of users and biodiversity and incorporate formal and informal play space that facilitates interaction with nature.
- Describe long-term landscape maintenance arrangements.
- Optimise opportunities to link outdoor amenity space into the wider network of the city's green network.



Above: Brook Mead Extra Care communal garden with facilities for food growing. [Brighton & Hove Council](#) application BH2013/02152.

Left: Abell & Cleland House in London. Example of shared/communal facilities with quiet seating area, water features, and biodiversity-friendly soft landscaping. [City of Westminster](#) application 11/03034 and 13/11622.



Above: Jubilee Square, Brighton. Example of publically accessed flexible, multi-functional square that enables a range of activities to take place at different times of the day and throughout the year.

Above right: Bentheplein in Rotterdam, Netherlands. Basketball and skateboarding facilities incorporated into public realm that feature seating while functioning as flood water collection pools in rainstorm conditions.

Right: Silchester Estate in London. Central courtyard that provides good levels of natural light, overlooking and defensible space at ground level for units around the perimeter. [London Borough of Kensington & Chelsea](#) application PP/12/00646.

Below: Urban furniture that encourages social interaction.



Policy links

CPP1: CP5, CP12, CP13, CP16

CPP2: DM22, DM37, DM43, DM44.

High density considerations

Design communal amenity spaces to be used flexibly to maximise use throughout the day (e.g. children play during daytime and social activities during the evening). Incorporate communal and private garden areas that provide scope for privacy for residents as well as social interaction. Management is essential for the good use of communal spaces/facilities. Consider incorporating concierge/onsite management facilities that have good visibility from the main entrance lobby or key routes around the building.

2.3. Landscaping, biodiversity and water

The design of spaces between buildings should incorporate soft and hard landscaping that can contribute to reducing emissions, deliver biodiversity net gains, manage rainfall and flooding and counter heat island effects.

A green network formed of the city's public open spaces, routes and protected landscapes that connect wildlife habitats across the city has been identified. The [Interactive City Plan Map](#) layer for Nature Improvement Areas identifies opportunities for new development to contribute towards connecting up and improving links across this network. This map also provides information about the areas of the city most at risk from flooding from the sea (see National Flood Zones 2 and 3). Information about areas at risk from [surface water flooding](#) is also available. [Supplementary Planning Document 16 Sustainable Drainage \(SPD16\)](#) identifies opportunities for new development to use landscape-led sustainable drainage techniques to manage flood risk, reduce pollution and maintain the quality of the groundwater aquifer that provides drinking water for the city and provide opportunities for enhancing biodiversity.

The [Local Biodiversity Action Plan for Brighton & Hove](#) provides, among other things, a list of suitable plant species that can be used. [Supplementary Planning Document Nature Conservation and Development \(SPD11\)](#) shows the advantages of taking account of nature conservation features as part of initial scheme design. [Special Guidance A: Swift Boxes and Bricks for New Developments](#) addresses the provision of suitable habitats for migrating swifts. The council is also preparing a [Tree Strategy](#) that promotes greater diversity of species and provides a plant list of species that are appropriate to the city's environment.

Design priorities to be considered when preparing proposals include:

- Create landscapes that make a positive contribution to the city's green and blue infrastructure network and introduce street trees where possible, improving environmental comfort.
- Use locally suitable and climate resilient plant and tree species to help deliver multiple policy gains (e.g. biodiversity and edible landscaping) and ensure capacity for their growth to full maturity.
- Incorporate continuous soil volumes and capacity to ensure the health of newly planted wooded areas.
- Incorporate nature conservation features to ensure a net gain in biodiversity (e.g. bird/bat boxes and bee bricks).
- Use native planting that includes interesting texture, colour and scent and /or also explores the use of plants for food growing (edible landscaping).
- Adopt nature-based/sustainable drainage solutions to reduce surface water run-off and risk of contamination of the city's aquifer and flooding from the sea.
- Ensure good levels of sunlight and daylight to optimise planting opportunities.
- Incorporate composting facilities to reduce waste sent to landfill and reducing the need to use fertiliser.



Above: before (left) and after (right): Grey to Green public infrastructure improvements on Bridge Street, Sheffield City Council.



Above: Tasinge Plads, Copenhagen, Denmark. Before and after climate proofing initiative. Underused road space was transformed into a vibrant, green square for resident use, spill out space for shops, sprung floor that generates energy to pump water away and incidental children's play.

Right: One Brighton, a high-density residential development incorporates rooftop allotments that require continued and robust management scheme. [Brighton & Hove Council](#) application BH2006/01761.

Below: Front garden in Hove that uses planting native to the seafront environment. Wooded slats used as windbreakers that provide shelter slowing down wind speed (left).



Policy links

CPP1: CP8, CP10, CP11, CP12, CP13, CP16.

Saved Local Plan: QD15

CPP2: DM22, DM37, DM43.

High density considerations

Providing food growing space in balconies, small gardens or areas in communal outdoor spaces provides opportunities for improving physical and mental health, fostering socialisation and learning about food and diet. Consider the use of green roofs and walls to improve sustainable drainage and urban cooling.

2.4. Mix of uses and active frontages

The mix of uses integrated at the edges of spaces between buildings can help to provide a sense of enclosure, define inside and outside spaces and activate frontages along the perimeter edge.

A building provides active frontage if the ground floor includes windows and openings and provides a variety of uses which contribute to the visual and physical relationship between the building and the spaces at ground level.

Empty shops and blank facades lack vitality which can seem a negative feature, particularly where fronting the street and/or public spaces. In addition, areas that do not benefit from adequate levels of overlooking can be perceived as unsafe. Guidance is available on how to design safer spaces using [Secured by Design](#) and [Crowded Places](#) principles.

Design priorities to be considered when preparing proposals include:

- Present a human scale of development at street level comprising an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level.
- Enhance and enliven public spaces with a mix of uses to support meeting residents' basic, day-to-day needs locally.
- Locate public uses at the street level including shops, childcare, cafes, sports facilities and community rooms maximising use of windows and entrances to increase visual and physical connections between the interiors of buildings and adjacent open space.
- Design streets and open spaces flexibly to accommodate a range of formal and informal activities (e.g. parking and vehicle movement, informal play, temporary markets, meanwhile uses, sports and community events) which help to animate and activate these spaces at ground level throughout the day and evening.
- Avoid creating blank walls, continuous garage doors, dense planting and recesses to ground level frontages that could allow concealment around the perimeter of the open space.
- Wherever possible, provide public, accessible, gender neutral toilets in shops and restaurants near the entrance to the building from the open space.



Active ground floor uses overlooking the street help to increase safety, interest and activity.

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Above: Canada Water Square in London. Active uses at street level that contribute to public life at a local and city level. [London Borough of Southwark](#) application 09/AP/1783.

Below: Jubilee Street development in Brighton. Mix of uses with active frontages at street level.



Policy links

CPP1: CP8, CP10, CP11, CP12, CP13, CP16.

Saved Local Plan: QD5, QD15.

CPP2: DM12, DM14, DM16, DM18.

High density considerations

Where delivering a large scheme with multiple buildings, a masterplan led approach should be used to create a more comprehensive arrangement of uses in streets and spaces.

2.5. Artistic element

The artistic tradition of Brighton & Hove is an important part of its identity. The provision of public art can create and enhance local distinctiveness in the public realm and help develop a sense of place and improve access and legibility.

Incorporating artistic elements that members of the public can access and appreciate is one way in which new development can contribute towards an engaging and distinctive public realm. It also provides opportunities to involve the local community and local artists and makers.

Artistic elements can form part of the structure or finish of buildings, landscapes and streetscapes and take the form of fixed artworks that are sited in areas accessible to the public, whether outside or within buildings.

Temporary artworks can be used to engage local communities and/or identify aspects of the development site and its history that can inform the design proposals.

The [city's Public Art Strategy](#) and [Developer Contributions Technical Guidance](#) provide further guidance on the commissioning of artistic elements.

Design priorities to be considered when preparing proposals include:

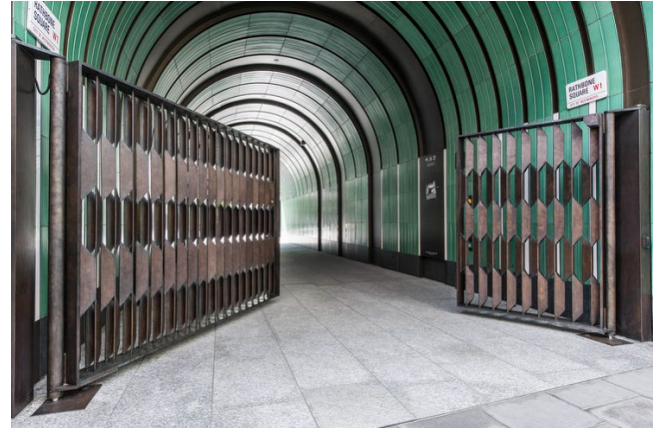
- Allow for the potential to incorporate artistic element at an early stage of the design process.
- Provide a co-ordinated approach to the design of artistic elements relating to the local context and identity of an area.
- Incorporate artistic elements into the design of buildings and public spaces that are not just functional, but create places that reflect the life, identity and aspirations of a particular community or place.
- Involve local communities in the development of the artistic element and
- Consider how the artistic elements might change over time due to light, positioning and material choices to ensure ongoing interest for viewers.



Artistic elements that take the form of fixed artworks.

Left: Happenstance Archway, The Level, Brighton.

Above: The World Turned Upside Down, The London School of Economics and Political Science, London.



Artistic elements that form part of the structure or finish of buildings.

Above left: *An Age An Instant*. Pedestrian passage and gate, Regent Street, London. [City of Westminster Council](#) application 10/00362

Above right: *Infinite Geometry*. Pedestrian passage and gates, Rathbone Place. [City of Westminster Council](#) application 14/05706

Right: *Stone Drawing*. Façade and internal walls, St John's College, Oxford. [Oxford Council](#) application 14/02399.

Below: *Platanus*. Façade, part of site-wide public art strategy, Vista development, Battersea, London. [London Borough of Wandsworth](#) application 2015/6813



Policy links

CPP1: CP5, CP8, CP9, CP10, CP12, CP13, CP15.

Saved Local Plan: QD15

CPP2: DM18, DM37.

High density considerations

Developing a strategy to identify opportunities for incorporating artistic elements throughout the scheme can be a good way of creating a distinctive place and engaging the local community.

2.6. Materials and management

The spaces between buildings should be designed, constructed and maintained in a way that enables them to maximise their value to users while minimising maintenance costs. From inception, design should incorporate appropriate measures for the efficient and low carbon management of water, waste and energy resources, integrating these into the initial design to increase effectiveness and reduce conflict. Embedding circular economy principles of reducing waste through salvage, use of recycled materials, modularity, ease of repair and re-use can also contribute towards reducing emissions.

[Brighton & Hove's Streetscape Design Guidelines](#) is a useful source of information for designers given that it benefits from consultation with a wide range of local stakeholders including disability organisations.

The [Open Spaces Strategy](#) identifies preferred surface materials to be used in parks and streetscapes. These are generic in nature and subject to exemptions for conservation areas, high profile projects and where frequent reinstatement of underground services is not anticipated. Applicants are encouraged to consult the council's Sustainable Transport team to seek advice on streetscape surface materials suitable for different road types in the city. Proposals which include streets and open spaces that are likely to be managed by the council in future are strongly encouraged to engage as early as possible with the council's Sustainable Transport and City Parks teams.

To support the council's smart city aspirations, applicants should consider how proposals may contribute to and integrate with active digital hubs within the city.

Design priorities to be considered when preparing proposals include:

- Achieve good design, workmanship and consistency of standards that can be sustained in the long-term.
- Use a simple, contained palette of hard wearing, durable, recycled and recyclable materials that are easy to clean and repair, in particular in road and communal areas of the development.
- Consider opportunities for modular and/or off-site construction to reduce costs and complexity of construction and waste and disturbance to existing residents.
- Describe how communal indoor and outdoor spaces including, for example, cycle storage, rainwater collection systems and long-term maintenance of materials will be managed.
- Major developments, street works and improvements to the public realm should consider wired and wireless connectivity, open access communication networks and smart technology.
- Use water porous rigid and unbound aggregate surfaces around existing and proposed street trees.

Policy links

CPP1: CP8

High density considerations

Phasing.



Above: Wide granite kerbs used to define edges of pedestrian realm and the carriageway and withstand level of intensity of pedestrian or heavy vehicle movements and resist damage and misuse. Brighton Station bus interchange, Brighton.

Left: Lewes Road. Asphalt footway surfacing can be a good option if well implemented and framed by high-quality kerbstones. These can help to minimise the risk of trip hazards and reduce maintenance costs (and disturbance during construction).

Below: Hard wearing, contrasting surface materials for space designed to accommodate a range of uses and functions. Valley Gardens, Brighton.



2.7. Phasing development

The phasing of development is often needed to be able to bring forward larger and more complex development sites and may also be required to facilitate financial viability for these types of development. For example, a first phase may need to generate funding for a subsequent phase.

Proposals that involve delivery as part of a phased approach will be expected to ensure appropriate levels of infrastructure and social amenities are provided at each phase so that new and existing residents can benefit from the changes to the site and its surroundings incrementally.

The council expects proposals to indicate how within the phasing:

- **Appropriate levels of affordable and private housing, open space and amenity is provided for each phase throughout the process.**
- **Which parcels of land will be brought forward within the development.**
- **Existing and proposed access/egress routes into the site, internal circulation routes and links with the existing neighbourhoods and street networks will be delivered.**

Permission to use image in progress

Phasing strategy to inform the masterplan for the New Museums Site in the University of Cambridge. This approach aims to help coordinate work with the local council and Historic England and minimise planning and delivery risk.

Policy links

CPP1: CP8, CP12, CP13, CP16

High density considerations

Sufficient new infrastructure will need to be in place before density is significantly raised in order to protect the well-being of existing and future residents/occupants.

3. Buildings

Designing, constructing, refurbishing and maintaining buildings with improved environmental performance is an essential part of the city's ambition to become carbon neutral by 2030 and more resilient to the impacts of climate change.

The need to meet the city's challenging housing targets also means that development should make the best use of opportunities provided by a site.

This is not just about the number of units but also about the quality of life for future users/occupiers of buildings. It is about well-designed buildings that can positively support community cohesion, physical and mental health and well-being, biodiversity and environmental enhancements.

Residential development, in particular, should consider how it can support the changing needs of individuals and families at different stages of life including when households spend greater periods of time in the home.

The council will support proposals where design makes the best use of the site by combining and integrating the following priorities:

- 3.1. Resource performance and use;
- 3.2. Designing at density;
- 3.3. Housing types and mix of uses;
- 3.4. Greening;
- 3.5. Materials and maintenance;
- 3.6. Waste storage and collection; and
- 3.7. Deliveries and servicing facilities.

These are explained in more detail below.



3.1. Resource performance and use

Facilitating the transition to a zero carbon and more climate-resilient city will require new development to at least meet and wherever possible exceed minimum standards set out in Part L of the Building Regulations and other resource efficiency targets set out in national and local policy or legislation. Opportunities for low and zero carbon energy generation, including district heating, have been identified and are set out in the city's [Renewable and Sustainable Energy Study](#).

In assessing the achievement of standards in developments in the city, the council will consider technical feasibility and financial viability.

Design priorities to be considered when preparing proposals include:

- Seek to avoid demolition of existing buildings and consider re-use and retrofit.
- Avoid deep and/or single aspect north facing units, in particular in residential development.
- Optimise provision of dual aspect units to achieve natural cross ventilation and good daylight/sunlight and natural ventilation whilst minimising the risk of overheating.
- Adopt a fabric-first approach and integrate onsite renewable energy production, storage and use into building design.
- Reduce construction waste through salvage and off-site modular construction systems.
- Consider resource use through the life cycle of a building by using durable materials and ensuring ease of disassembly and component reuse at the end of its life.
- Incorporate electricity and renewable heat generation and energy saving measures taking account of space requirements needed to support delivery.
- Incorporate rainwater harvesting to help maintain soft landscaping and/or for non-potable water uses (e.g. window washing or toilet flushing).
- Specify re-used and recycled materials.
- Support a sharing economy of goods and services to help reduce costs, consumption and facilitate social interaction.
- Consider exceeding minimum standards for insulation, in particular in residential development from noise from corridors, communal amenity spaces and other uses.
- Incorporate discreet waste storage to reduce clutter.
- Provide space and facilities for composting to reduce food waste.



Non-certified PassivHaus home in Hove. [Brighton & Hove Council](#) application BH2013/00588.



Above: Zero carbon homes at Lloyd Close in Hove (left - winner of RIBA Downland Prize 2011 and Green Apple Award for Architecture 2016) and Grantham Road in Brighton (right). [Brighton & Hove Council](#) applications BH2006/00453 and BH2010/02162 respectively.



Left: Royal Alexandra Quarter in Brighton. Part conversion of former Victorian children's hospital into flats, part construction of new flats. [Brighton & Hove Council](#) application BH2010/03379.

Below left: Existing building and trees used to drive design approach. Angel building in London where concrete frame of existing building was re-used, extended and wrapped with energy-efficient glazed skin. Newly landscaped public realm set around existing mature trees and new shops and restaurants to bring activity to main street frontage. [London Borough of Islington](#), application number P072615.

Below right: Paxton House in London. Former offices converted into flats. External circulation added to outside of building allows for greater number of apartments to be accommodated, each with a south or south west facing living space and balcony. Angled balustrade ensures privacy and maximises views from the interior. Walkways with chipped rubber ensures total acoustic dampening and acetylated timber longevity of building cladding. [London Borough of Croydon](#) application 14/03324/P.



Policy links

CPP1: CP8.

CPP2: DM37, DM44, DM45, DM46.

High density considerations

Take advantage of the volume of construction and number of users to consider circular economy principles of re-use of materials to reduce costs over the lifespan of the development. Explore opportunities to reduce neighbouring units carbon emissions by providing electricity and/or heat generation/distribution facilities beyond the perimeter of the development.

3.2. Designing at density

This section focuses on density issues in schemes that are less than 18 meters in height (approximately 6 storeys). Additional guidance on taller development is set out in Part C Tall Buildings.

In the context of the Brighton & Hove City Plan, density is generally measured by the number of dwellings per hectare (dph) for residential development. This reflects the numbers of people living within a given area. The City Plan identifies locations that are suitable for higher density and mixed-use development in its Development Area policies and Strategic Allocations. Policy CP14 Housing density sets an expectation that new residential development should achieve a minimum density of 100 dph within the identified Development Areas and 50 dph in other parts of the city. Development below 50 dph may be considered acceptable in some circumstances but all proposals should aim to avoid under-development.

Designing high-quality, high-density development well is less about the number of units and/or higher-rise formats of development and more about creating attractive buildings and places which can offer users/occupants significant benefits from this type of living. It is about providing an attractive choice which offers, for example, shorter journeys to work and school, easy access to community services and creates homes that can evolve as needs change.

However, the greater the density and/or height of a development, the greater the expectation for the benefits that can compensate for any perceived inconveniences of living in smaller spaces, in particular when it comes to residential development.

Design priorities to be considered when preparing proposals include:

- **Take advantage of the volume of construction to embed low carbon energy consumption and circular economy opportunities and principles (e.g. re-use of materials) to reduce costs over the lifespan of the development.**
- **Consider delivering district heating projects at a neighbourhood level or futureproof to connect or act as anchor loads to enable network development.**
- **Provide dedicated, shared internal and external facilities to encourage social interaction with neighbours (e.g. spaces for events, office/workspace) in particular in residential and student accommodation.**
- **Provide private and communal external amenity to homes which ensures sufficient scope for privacy, sociability, storage and space for drying clothes for all residents.**
- **Avoid internal layouts with long double-banked corridors and single aspect residential units and minimise the number of units per stair core.**
- **Provide useable private amenity space and adequate storage facilities within residential units including additional storage for larger items within the development.**
- **Provide adequate accommodation/facilities for staff who will be responsible for the regular upkeep of internal and external spaces.**
- **Ensure community facilities are well integrated and accessible to those that will use them.**
- **Where there is a need for new onsite childcare facilities, consider co-locating these with other communal uses or homes for the elderly to help foster intergenerational interaction and improve mental and physical wellbeing without compromising the operation of existing community facilities.**



Above: Chester Balmore in London. Affordable, low energy in situ residential scheme, Camden, London. Mixed tenure development providing 53 residential units, 500m² of commercial space and public circulation routes. Fully compliant with Lifetime Homes, Housing Quality Indicators and Code for Sustainable Homes standards. [London Borough of Camden](#) application 2010/5478/P.

Below: Agar Grove in London. Balconies assist in the composition of building elevation, enliven its frontage and provide private amenity space. Double height communal entrances offer direct views out and through the building. Stairwells and corridors are naturally ventilated. [London Borough of Camden](#) application 2013/8088/P.



Policy links

CPP1: CP1, CP8, CP12, CP14.

CPP2: DM1, DM8, DM18, DM19.

Waste & Minerals Plan: MP23a.

High density considerations

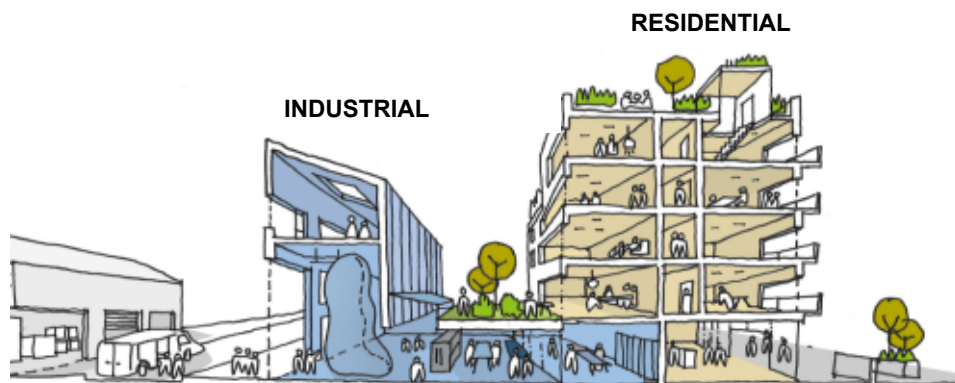
Ensure good levels of privacy and avoid unreasonable overlooking onto neighbouring properties and between windows of the same building by, for example, staggering windows. Design built-to-rent accommodation to meet the standard of other types of residential development.

3.3. Housing types and mix of uses

The design of residential development should provide flexible and adaptable homes to meet the city's identified needs regarding mix of sizes, types and tenures. The provision of affordable housing to meet local needs is a key priority for the council. Co-locating housing and other uses is one way in which to deliver compact forms of development that help reduce the need to commute and/or use cars, promote a critical mass of activation, increase and enhance the sense of place.

Design priorities to be considered when preparing proposals include:

- Incorporate, and where possible aim to exceed, the government's nationally described minimum space standards for residential development.
- Where possible, include a mix of housing typologies (i.e. flatted, townhouses, maisonettes).
- Ensure that all residential development meets minimum accessibility/adaptability standards (currently set out in Building Regulation M4 (2)).
- Establish a clear distinction between the front and back of properties according to the functions they perform (i.e. residential, shopping and/or light industrial) and orientate active uses (i.e. entrances, reception areas, offices) toward the street frontage.
- Provide adequate private amenity space in the form of gardens and/or inset balconies that face away from areas of poor air quality and unacceptable noise levels.
- Locate family homes ideally on the lower floors with private amenity space in the form of a terrace or garden.
- Avoid placing habitable spaces and amenity areas where air quality may be poor.
- Internal layouts should be designed to accommodate change over time such as from ageing, illness and impairment.
- Provide sufficient internal storage space to enable waste separation, in particular in residential units.
- In the case of mixed use development, combine functions within a cohesive building form and ensure the layout of adjacent uses seek to limit the transmission of noise, in particular to sound sensitive rooms within dwellings.
- Consider flexible design features for commercial floorspace to allow for reconfiguration of internal space to suit a range of occupiers including ground floor access systems.



Example of how interlocked mixed-uses can respond to varied site edge conditions with clear distinction of the functions each edge performs in relation to the public realm
[London Legacy Development Corporation](#) application 16/00685/FUL.

Policy links

CPP1: SA4, CP19, CP20
 CPP2: DM11.

High density considerations

Consider access requirements and vehicle types.
 Allow for legibility of functions and entrances.

3.4. Greening

Buildings can be designed to incorporate green roofs and walls, courtyards and gardens to help increase food provision, improve the health and wellbeing of residents, support biodiversity and pollinators, increase water absorption to minimise flood risk and reduce the need to cool and heat buildings mechanically.

Design priorities to be considered when preparing proposals include:

- Consider scope for incorporating well-sized green/brown roofs and green walls that create habitats for wildlife and food growth and benefit from a good management/maintenance regime.
- Consider green walls in appropriately lit and maintainable locations where there is a need, for example, to elevate the appearance of an otherwise blank façade.
- Favour plant species appropriate to the city's coastal and downland environment, in particular in exposed positions such as roofs.
- Provide adequate access to sunlight and sufficient irrigation, for example, through rainwater harvesting.
- Ensure that growing substrates contain sufficient nutrients and water run-off is not polluted.
- Incorporate composting facilities.
- When using the roof for amenity purposes ensure provision of improved safety and security measures such as, for instance, higher balustrades.
- Ensure sufficient soil volumes for the health of planted areas.
- Consider ways that renewable energy and water management systems can integrate with planted surfaces (e.g. blue and/or biosolar roofs).
- Avoid monoculture planting which limits biodiversity.
- Ensure tree planting pits have suitable root space so trees selected can grow to their full size without creating trip hazards that can adversely impact upon equal access.



Above left: Biosolar roof at The Ark, Noah's Ark Children's Hospice in London. [London Borough of Barnet](#) application 16/5151. Above right: Green roof over bike shed in Hove provides habitat for wildlife, helps to insulate and make buildings more attractive.

Policy links

CPP1: CP10, CP18

CPP2: DM22, DM37.

High density considerations

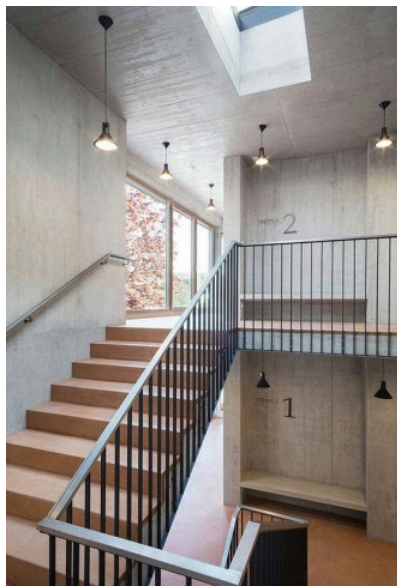
Where there is limited availability of outdoor space, external surfaces and roofs provide good opportunities for greening, like rooftop allotments. It is also important to provide sources of healthy, local and affordable food by protecting and maintaining allotments, garden plots, small-scale agriculture and market stalls.

3.5. Materials and maintenance

The city's coastal environment means that robust building materials need to be used and more care taken when designing and detailing their use of these in order to ensure durability, flood and wind hazard resistance and to reduce maintenance costs for users and owners. In the long-term, corrosion and decay resistance will also need to be considered. In the case of major development the council will require that a maintenance plan and indicative construction details are provided. The specification of materials and detailing is also a critical factor in embedding low carbon and circular economy principles into a design.

Design priorities to be considered when preparing proposals include:

- **Select materials, detailing and finishes that are easy to install, maintain and repair.**
- **Use a contained palette of materials to ensure a clear logic for choice and reduce maintenance costs.**
- **Re-use and/or recycle materials, including those arising from onsite construction, demolition and remediation works (e.g. with a pre-demolition audit of reclaimable materials).**
- **Consider how much waste the proposal is expected to generate, and how and where the waste will be handled.**
- **Enable building materials, components and products to be disassembled and re-used at the end of their useful life (e.g. with materials passports).**
- **Take opportunities for managing as much waste as possible on site.**
- **Provide adequate and easily accessible storage space to support recycling and re-use.**



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Policy links

CPP1: CP8, CP12.

CPP2: DM18.

High density considerations

Standardisation makes for easier maintenance by reducing the range of parts required and replicating repair processes. Modern Methods of Construction (MMC) can reduce construction programmes and disturbance to existing residents.

3.6. Waste storage and collection

New development should provide sufficient space to separate waste and recyclables and allow for the easy manoeuvring of waste collection vehicles.

Applicants should have regard to the detailed guidance provided in [Supplementary Planning Document 03 Construction and Demolition Waste](#) and [Planning Advice Note 5 – Design Guidance for the Storage and Collection of Recyclable Materials](#) and any subsequent revisions.

Where waste and recycling is collected through wheelie bins, consideration should be given to where those bins can be stored within the property's footprint. Where waste and recycling is collected through on-street communal bins, via bin stores in blocks of flats and/or other wastes systems, applicants are advised to contact the Cityclean Team as early as possible in the design process.

Design priorities to be considered when preparing proposals include:

- Appropriately integrated recycling and waste disposal, storage that works effectively for residents and meets the city's requirements for waste management and collection services.
- Storage designs should be attractive but discreet and robust to cope with the domestic or commercial bin activity around them.
- Provide sufficient waste storage capacity from the outset to avoid capacity shortfalls or inadequate services and help improve recycling and reduce residual waste.
- Space should be incorporated at street level within the property boundary and, where possible, located within the building envelope for storage of bins for collection.
- Communal container enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface.

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Screened bin storage facility close to collection point (left). Waste store has room for bulky waste and specialised items including lightbulbs and batteries in high density development (right).

Policy links

Waste & Minerals Plan: WMP3e.

High density considerations

Provide easily accessible, well-ventilated specialised facilities for various types of waste to avoid overflowing bins and disruption to standard waste collection.

3.7. Deliveries and servicing facilities

Delivery of goods and servicing needs to be carefully considered and, wherever possible, shared facilities, arrangements and timing of deliveries should be designed to avoid disrupting highway safety or traffic flow.

This involves considering the needs of last mile freight to help support the shift from combustion engines/HGVs to electric vehicle like, for example cargo bike delivery and freight logistics/hub facilities while safeguarding emergency vehicle access.

Design priorities to be considered when preparing proposals include:

- **Locate servicing facilities, in particular in residential uses, within the building envelope to avoid obstruction of the public highway and excessive nuisance.**
- **Base the design of service areas on the maximum number of vehicles likely to use the area at any one time.**
- **Provide adequate storage facilities for permanent service staff, including cleaning, maintenance and places to rest.**
- **Consider drop-off and pick up provision including deliveries depending on development type.**

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Concierge facilities at Porters Edge, Canada Water in London (left) and secure basement storage lockers for residents (right).

Policy links

CPP1: CP8.
CPP2: DM36.

High density considerations

Regular upkeep of a high density building requires full time staff and contractors who have special requirements. Consider providing staff facilities and/or access to water at key points, places to store equipment and to rest. Provide extra storage and dedicated room for collecting, storing and returning deliveries near the main entrance and consider providing facilities for concierge services.

SECTION B: Tall buildings

This section provides additional guidance on issues that are particularly relevant to the assessment of any building of 18 metres or more in height and that is significantly taller than the prevailing height of surrounding buildings (whichever is less).

Taller developments tend to be more visible, put further pressure on infrastructure, require more extensive management and are harder to maintain than low-rise development.

The council will expect tall buildings to integrate well with the surrounding context, embrace principles of sustainability and deliver public and social benefits.

The council will require applicants to provide a coherent explanation of any tall building proposal as part of a comprehensive design-led Tall Building Statement (see Section D, sub-section 13 for more detailed guidelines).

In Brighton & Hove, in addition to the general considerations set out in Section A Local Priorities, the quality of tall building development is determined by how well the design:

- **Provides tangible public and social benefits proportionate with the visual, cumulative, functional, or environmental impact caused.**
- **Makes a positive contribution to the city's urban form and skyline, its continued regeneration and the health and well-being of its residents.**
- **Achieves excellence in sustainable design and construction.**
- **Delivers improvements to connectivity and public realm and functions well at ground floor level.**
- **Minimises impact upon the microclimate and amenity of the application site and the surrounding area.**

Additional considerations that are relevant to the assessment of tall buildings include:

- Definition;
- Tall building areas; and
- Tall Building Statements.

Supporting information that the council would like applicants to prioritise when preparing proposals for tall buildings is also set out in this section.

4. Definition

In Brighton & Hove, a tall building is defined as any building of 18 metres or more in height and/or that is significantly taller than the prevailing height of surrounding buildings (whichever is less).

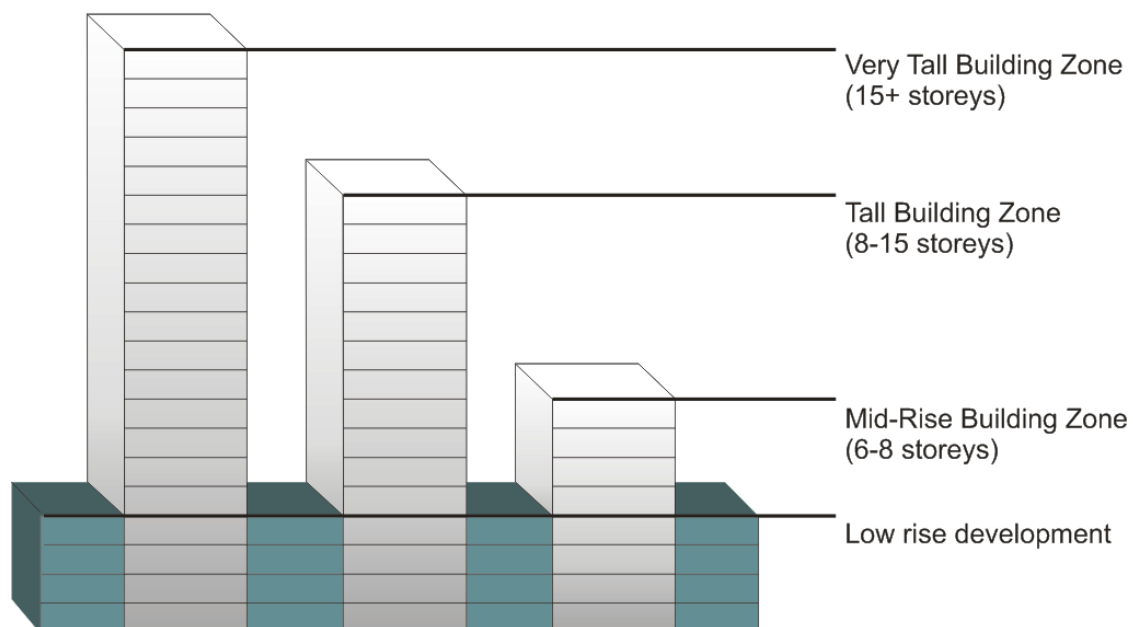
Significantly taller buildings are those in excess of 15% taller than mean height of surrounding development within a radius of 100 metres in all directions from the proposed footprint.

As a rule of thumb, an assessment of the mean height of surrounding existing development extending to 100 metres in all directions from the proposed footprint would be needed to establish whether a building is significantly taller.

For avoidance of doubt it is the height of the building in the context of building heights throughout the 100 m zone that will determine whether a building is significantly taller and not its relationship to buildings that immediately adjoin the proposed development.

This means that a proposed development may be 'significantly taller' and yet not the tallest building within the zone.

The city council will look at the evidence provided by applicants on this issue to determine whether a building is 'significantly taller'. The diagram below illustrates the three height ranges for tall buildings identified.



5. Tall Building areas

The areas considered suitable for taller development are identified in City Plan Part One Policy CP12. Many of these fall within the Development Areas identified in the City Plan.

Sites within these areas have varying degrees of suitability for taller development and not all sites within these areas will necessarily be suited to a tall building.

Sites outside these areas may also potentially be suited for tall buildings. However the threshold to prove the positive contribution of a tall building to the local townscape and community outside these areas is higher. In general conservation areas, elevated areas and urban fringe/low rise suburban areas are unlikely to be suitable to accommodate tall buildings.

Areas with potential to accommodate tall buildings are identified on the map below. A more detailed version of [this map is available to be viewed online](#).

More details about each area including indicative boundaries, height ranges, design principles and priority for improvements for each area are set out in the sub-sections below.

Guidance on boundary and height is an indicator of appropriateness. However, this is dependent on the individual site's compliance with policy and a visual impact assessment that should be conducted as part of the planning application process.



Indicative tall building areas . A more detailed version of [this map is available to be viewed online](#).

Map key

	CPP1 Development Areas (DA)		CPP1 Special Area (SA)		Indicative area with potential for tall buildings
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Indicative areas with potential for tall buildings

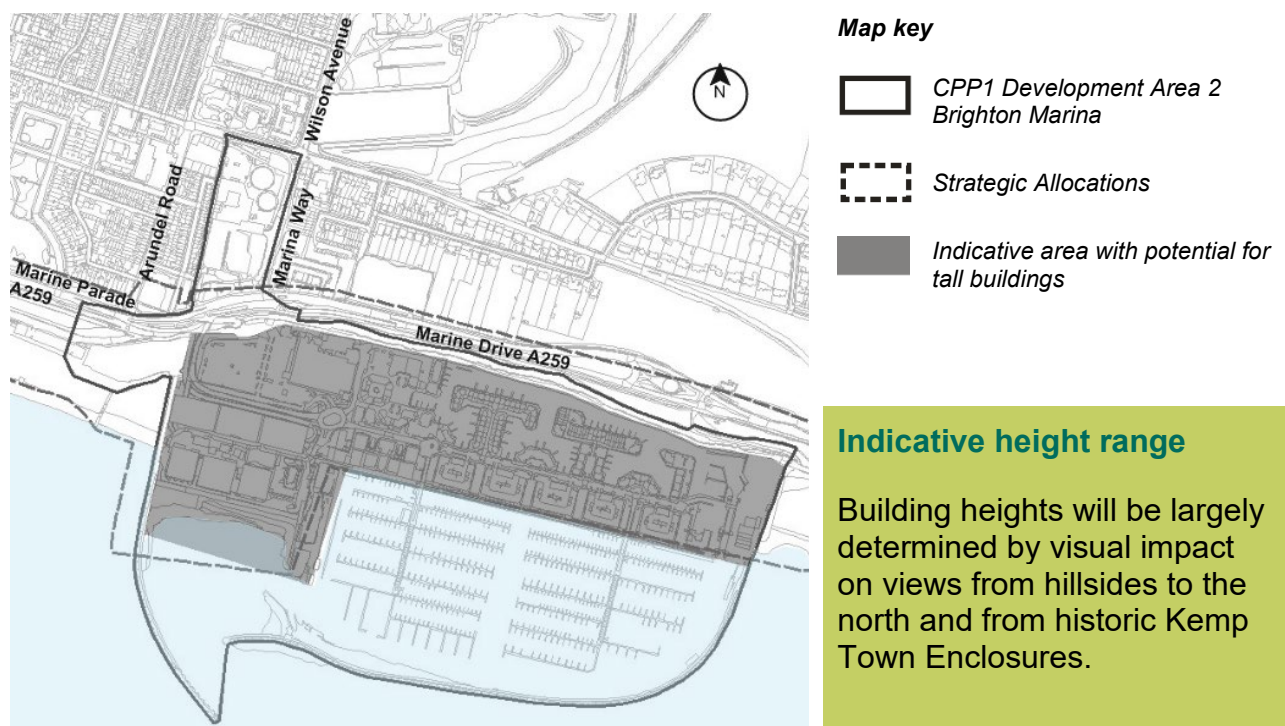
1 Brighton Marina	4 Eastern Road/ Edward Street	7 London Road / Preston Road
2 Brighton Station/ New England Quarter	5 Hove Station	8 Western Seafront/ Kingsway
3 Central Seafront	6 Lewes Road	9 Shoreham Harbour

5.1. Area 1: Brighton Marina

The Marina, mainly because of the topography and the existence of shopping facilities in the complex, has potential for tall buildings.

The cliffs to the north of the area are able to mitigate, up to a certain height, the visual impact of tall development on surrounding areas. Its seafront location would readily offer amenity for residents and occupiers of any tall building by providing links to extensive open spaces. Its role as a commercial and leisure destination and the opportunity to 'bookend' the urban edge of the city contribute to the tall building opportunity within this area.

There are particular sensitivities for development due to the relative proximity to Kemp Town conservation area and housing on the adjacent hillside, which provide challenges for designers. [Brighton Marina masterplan Planning Advice Note 04](#) signposts visual impact considerations and sets out priorities for improving the public realm, active travel and emergency service connections and provision of affordable housing.



The following design priorities should be considered in proposals:

- Have regard to visual impact on heritage assets and the residential areas to the north of the cliffs and overall composition when viewed along the coast.
- Seek to resolve poor connections to Madeira Drive, Marine Parade, areas north of A259 and the city centre as this area has the least developed transport services and infrastructure of all the tall building areas.
- Contribute towards a continued, generous, fully public boardwalk along the water's edge and seawall with appropriate landscape treatment for a highly exposed environment.
- Create routes across the site that help to draw people towards the boardwalk/water's edge.
- Incorporate design features that help to reduce the risk of flooding from the sea and surface water.

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Above: Examples of continued, generous, fully public boardwalk and routes leading up to it where a range of activities for residents and visitors can take place.

Below: Coastline open spaces designed to accommodate floodwater during storms and/or as a result of sea level rise.

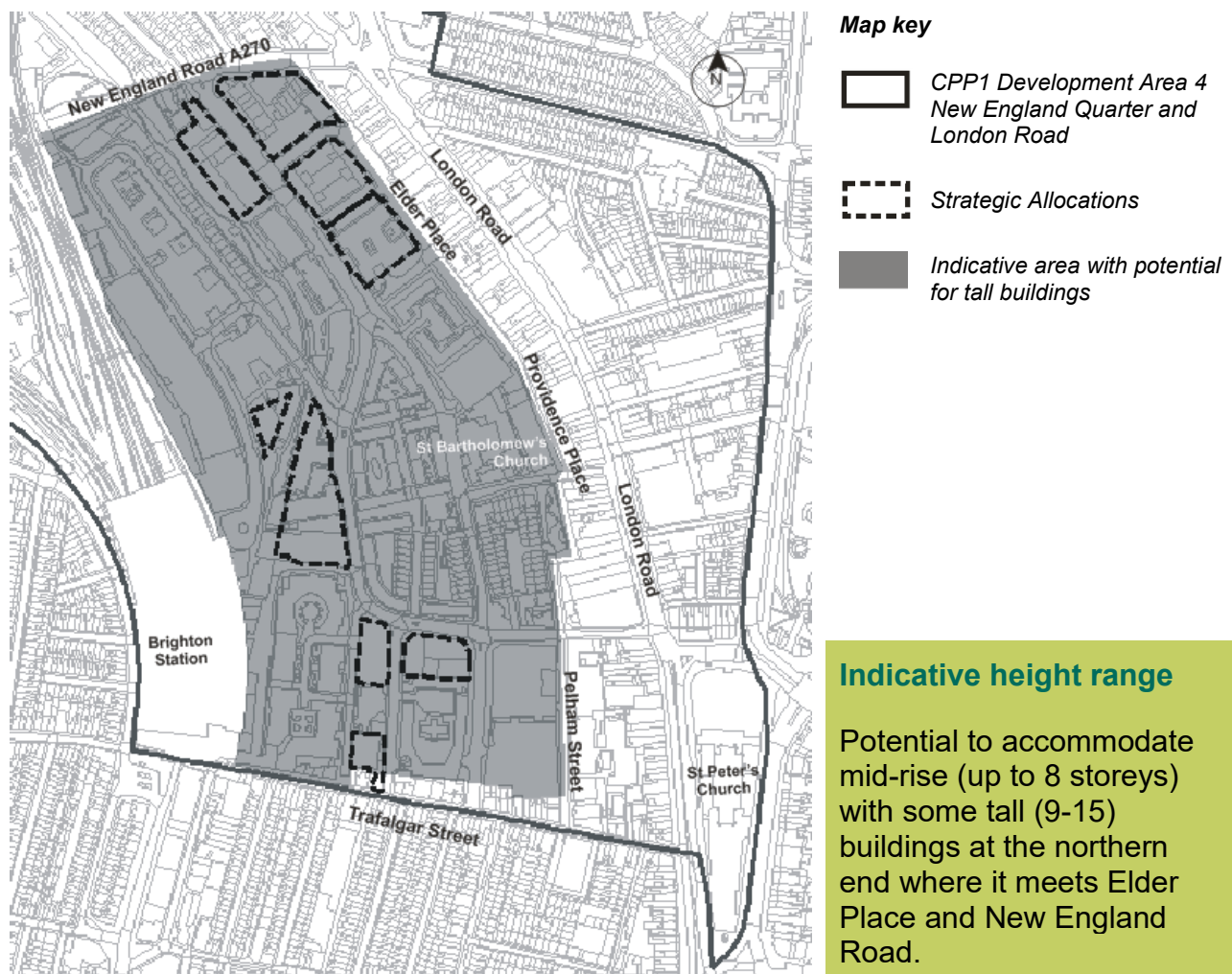


5.2. Area 2: Brighton Station / New England

This area includes the New England Quarter and provides an opportunity for tall buildings in proximity to the retail and commercial core of the city. It has the potential to invigorate this part of the city with a high-quality public realm and to support the development approved and in part already constructed on former station land.

The area is well placed to capitalise on the excellent transportation links provided by Brighton Station. However, it raises a number of sensitivities, which require detailed analysis in order to fully appreciate the potential impact and acceptability of tall buildings in the area. The interface with the North Laine conservation area requires particular attention when considering tall buildings in this area. Similarly, visual impacts on heritage assets such as St. Bartholomew's Church, St Peter's Church, the viaduct, railway station and on views from the Valley Gardens Conservation area and from across the valley will need to be considered in detail. The housing tower block, Theobald House, north of Trafalgar Street, and the buildings that form part of the New England Quarter should not be used as a guide to height or building typology appropriate to future developments in this area.

[London Road Central Masterplan SPD 10](#) sets out how new development can contribute towards infrastructure improvements, the establishment of a secondary circuit of activities and attractions, improvements to London Road bus interchange and provision of east-west pedestrian/cyclist priority links across the area.



The following design priorities should be considered in proposals:

- Deliver public realm improvements to service yard areas such as Elder Place to reduce volume of traffic, discourage rat running, encourage social interaction and improve pedestrian and cycling connectivity from Brighton Station to London Road and from New England Road to the North Laine area.
- Strengthen the role of the Greenway as a north-south link to Brighton Station by bringing activities to eastern edges and increasing access to it.
- Take advantage of the level difference to activate frontages and provide separate entrances to different uses (i.e. residential, commercial) and service access.
- Introduce landscaping, calming measures and street trees to provide improved pedestrian and cycling links, improved air quality and provide inter-connected green infrastructure/biodiversity across the area.
- Ensure individual schemes contribute to a coordinated public realm strategy.



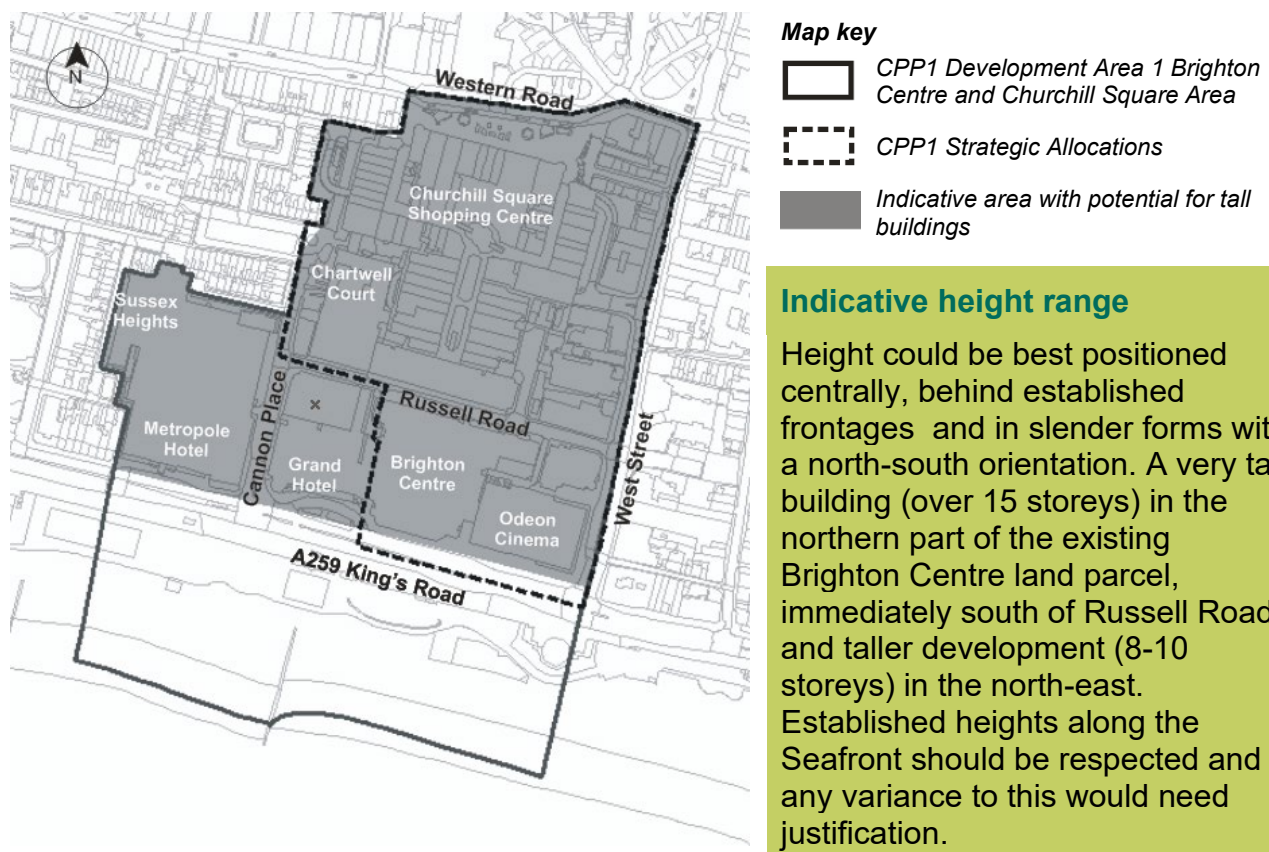
Above: Indicative masterplan and examples/options explored for public realm improvements to Elder Place and new links from New England Road to the Greenway and Brighton Station. [Brighton & Hove Council application BH2018/02598](#).



5.3. Area 3: Central Seafront

Located in the cultural, retail and commercial core of the city this is a potential location for additional high-quality tall buildings. This area is made up of a large area of built up land east of Sussex Heights, and includes Churchill Square, the Brighton Centre and the Odeon Cinema. It is characterised by a variety of building types and styles including tall development, the most notable of which is Sussex Heights. A number of sites in the area, such as the Brighton Centre and Odeon Cinema, are underutilised and/or are of poor architectural quality.

A new vision statement and/or masterplan should be developed in collaboration with the council, main landowner, developer, operators and stakeholders that takes into consideration a views' analysis of the site and its surroundings to set out agreed massing, routes and open spaces. This should take account of the opportunities for phasing as well as constraints including heritage settings and rights of light.



The following design priorities should be considered in proposals:

- 'All round' visual impact assessment of middle and long distance views along the seafront, on the visual prospect on arrival from Brighton Station and on adjacent Old Town and Regency Square conservation areas, which include many listed buildings, and other adjacent heritage assets.
- Improvements to the seafront that better accommodate north-south pedestrian movement, slower traffic and complement the character of the beach, promoting this stretch of King's Road as an exemplar for the benefit of the wider city.
- Assess 'last mile' movements associated with retail and leisure developments in order to consider opportunities for rationalisation of multi-modal movements that can significantly reduce onsite car parking provision, re-route some bus services along the seafront and reduce the impact on Churchill Square.

- Improve pedestrian and cycle north-south connectivity particularly from the station and Churchill Square to the seafront with different approaches taken to West Street, Cannon Place and one new, central, open-air friendly route.
- Provide public and social benefits, such as a new public open space and active frontages in key locations for footfall generation such as cultural and arts venues.
- Provide mixed-use and flexible conference centre venue capable of co-locating wide ranging uses and explore options for a highly functional venue that helps to unlock important space for public realm.

King's Road and seafront

- Active frontage with uses for the public and local residents, such as services, restaurants or leisure on ground, first and roof level as a minimum.
- Building alignment with the existing line of the Kingswest building to continue the balance on the seafront and provide sufficient public realm.

Northern boundary

- Reduce volume of public transport, enhance public realm and open up to sea views.
- Consider establishing entrance into the shopping centre via a new central street to define the character of this frontage.
- Provide a greater sense of enclosure to Churchill Square alongside a better defined and flexible space which functions for the benefit of the public and improves the continuity of levels.

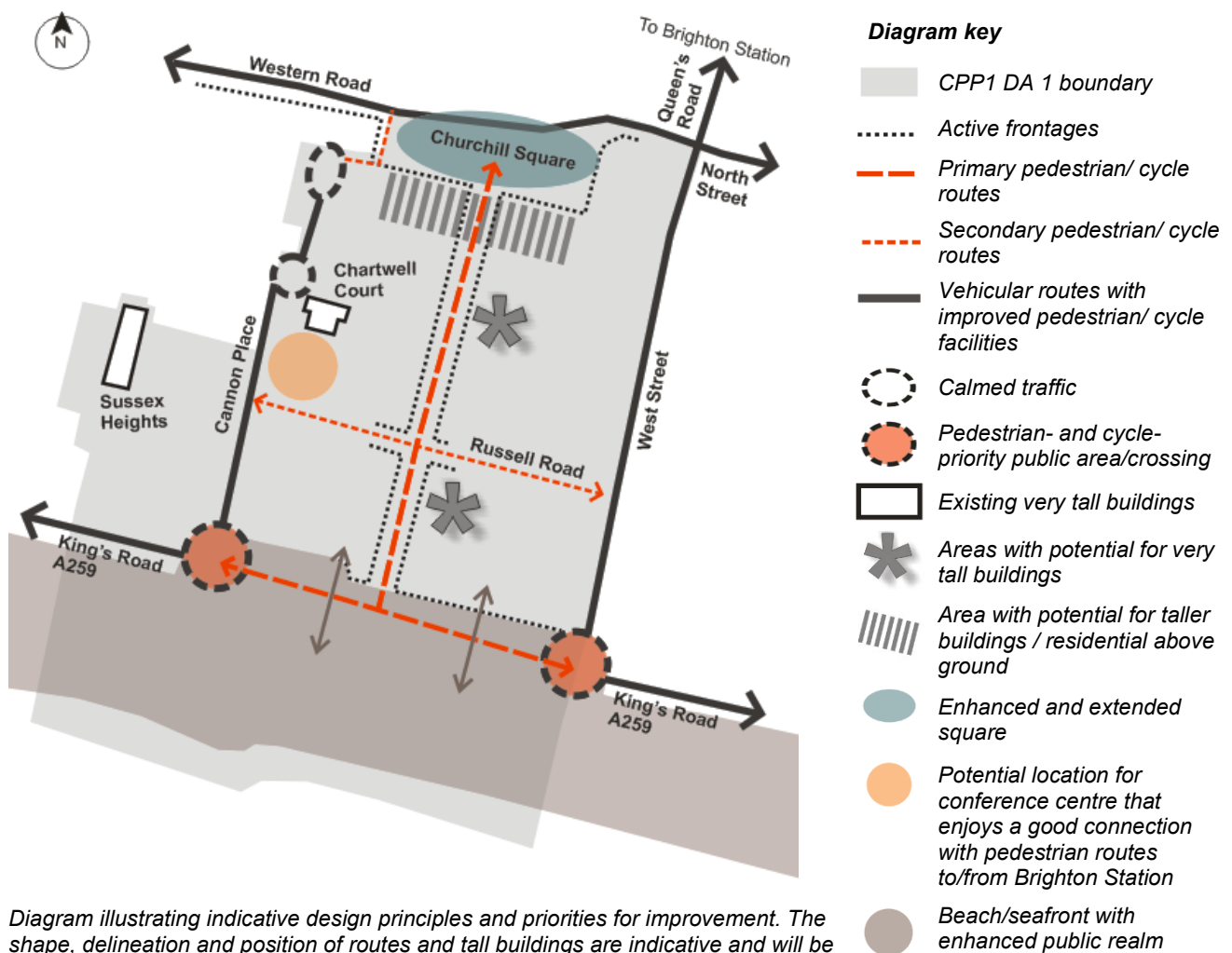
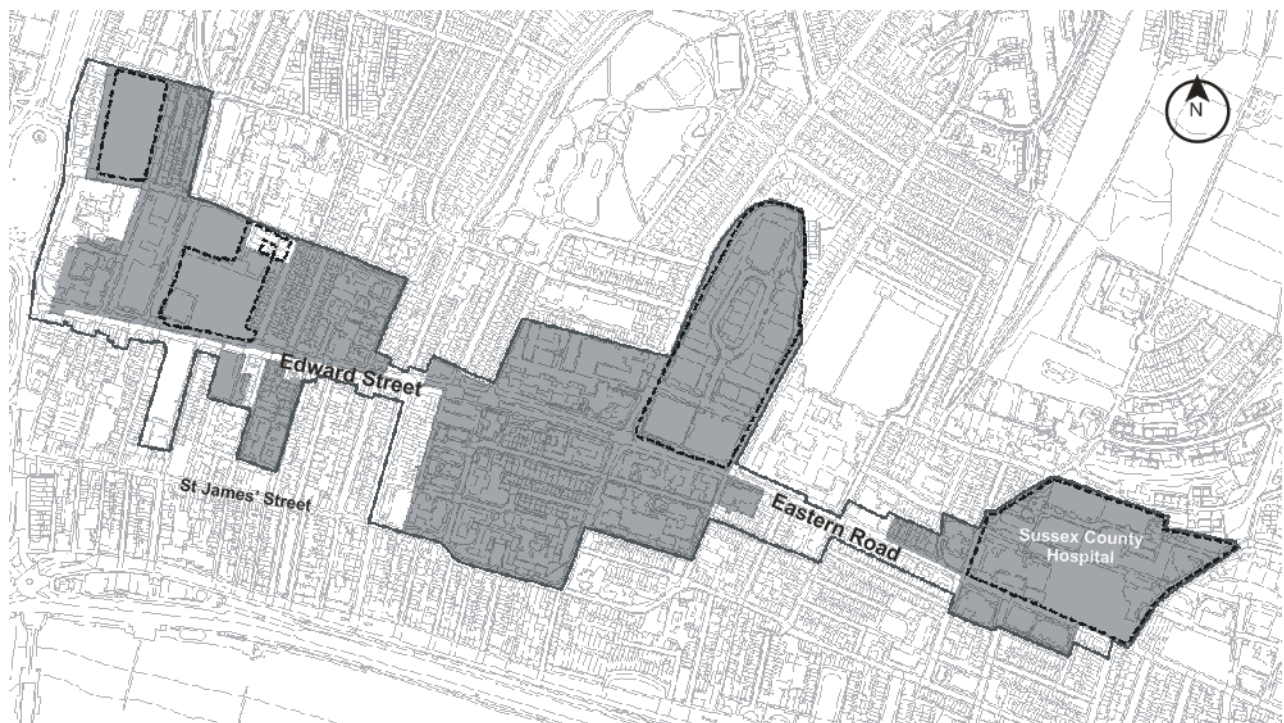


Diagram illustrating indicative design principles and priorities for improvement. The shape, delineation and position of routes and tall buildings are indicative and will be guided by views, townscape studies, practical considerations of aspect, amenity and ground conditions among other considerations.

5.4. Area 4: Eastern Road / Edward Street

This corridor provides an opportunity for new tall development and the refurbishment of existing tall development. It is linear in form and it can be broadly defined as the corridor between William Street in the west and Bristol Gate in the east. The area incorporates several existing tall buildings and is in close proximity to the existing St. James' Street district shopping centre.

Existing tall buildings particularly those at the Sussex County Hospital, provide unique opportunities to develop small clusters of tall buildings along the corridor, albeit of significantly lesser height than those existing residential tower blocks in this area.



Indicative height ranges

Mid-rise (up to 8 storeys) with limited tall (9-15 storeys) buildings in areas that do not harmfully impact on designated heritage asset settings.

Map key

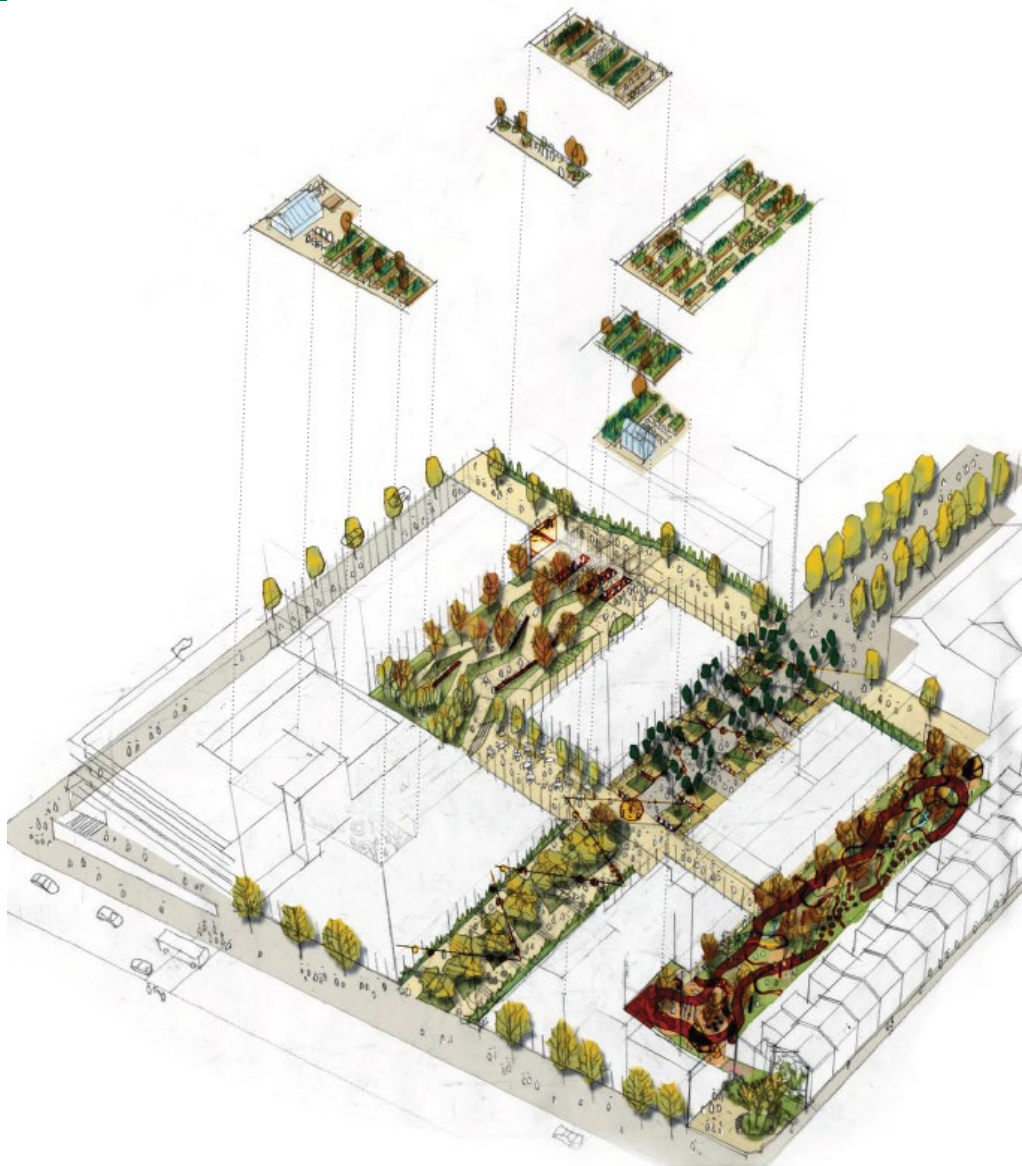
-  CPP1 Development Area 5 Eastern Road and Edward Street
-  CPP1 Strategic Allocations
-  Indicative area with potential for tall buildings



Above: Opportunities to repair urban edge along Edward Street. [Brighton & Hove Council](#) application BH2011/02886.

The following design priorities should be considered in proposals:

- Assess impact of tall development on the East Cliff, College and Queens Park conservation areas and the settings of listed buildings in the vicinity.
- Consider reducing the negative impact of intrusive existing tall buildings by contributing to development of small clusters of more attractive tall buildings.
- Public realm, pedestrian and cycling infrastructure improvements to Eastern Road and Edward Street sustainable transport corridor, in particular road crossings.
- Provision of community facilities.
- Work with the topography and orientation to provide exceptional outward sea views.
- Repair the urban edge of the Eastern Road/Edward Street corridor, introducing frontages to streetscape.
- Improve pedestrian and cycling links between existing and additional open space provided in new development, Queen's Park, Dorset Gardens and the beach.
- Introduce soft landscaping and tree planting to improve the environment of Eastern Road/Edward Street and highlight key pedestrian routes.



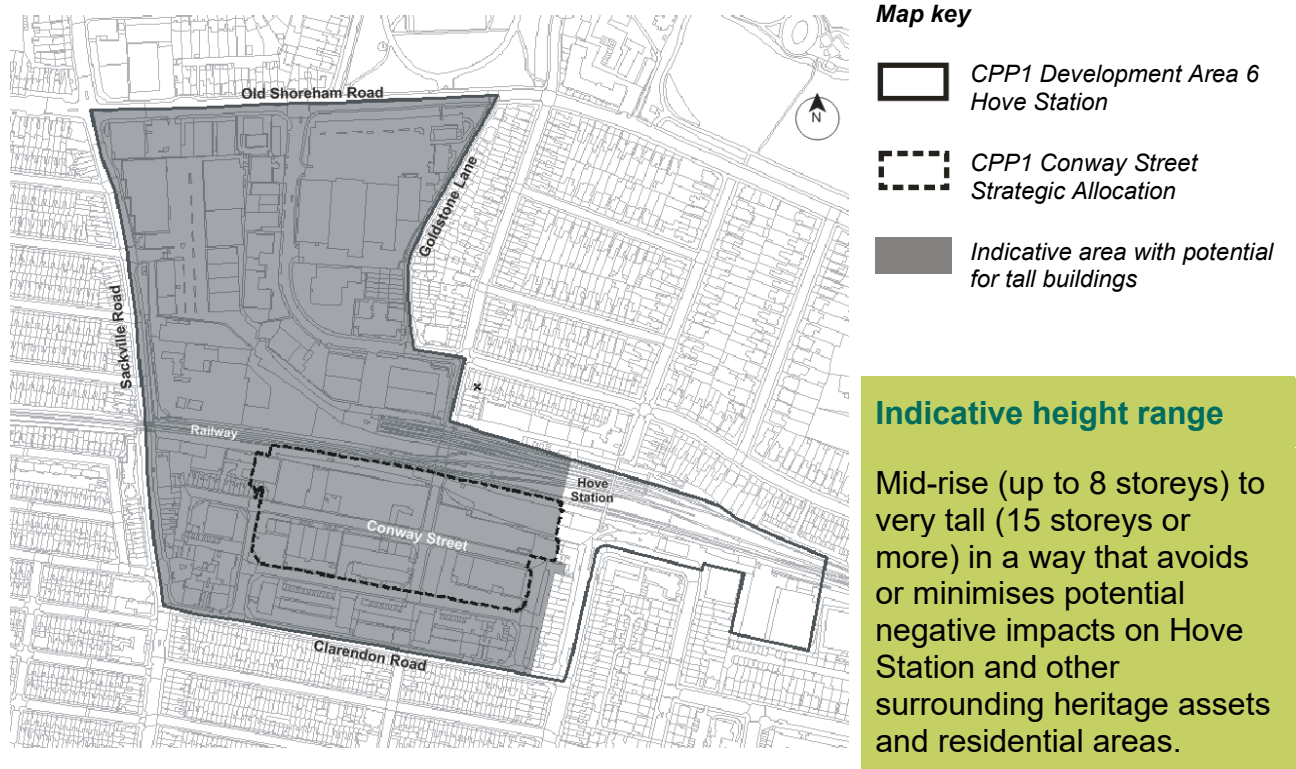
Above: Landscape strategy indicating how soft landscaping and planting will help define different functions for outdoor spaces at ground and roof levels. [Brighton & Hove Council](#) application BH2018/00340.

5.5. Area 5: Hove Station

Existing tall buildings, strong linear linkages to the seafront, proximity to the city's second largest rail station, good bus and rail services, proximity to Hove Park and a number of under-utilised sites provide opportunities for redevelopment and provide the area with opportunities for tall building development. Hove Station itself is a listed building and other designated heritage assets adjacent to the area require that key views be carefully considered in order to preserve or enhance their settings. Substantial parts of the area are allocated as employment sites and tall buildings may represent an opportunity to contribute to the delivery of the council's employment policies.

A development framework for new tall buildings for the area south of the railway is set out in the [Conway Street Industrial Area Masterplan Supplementary Planning Document](#). It identifies buildings heights and key views, land use requirements, infrastructure and public realm improvements, and how new development can support local communities and businesses.

The [Draft Hove Station Neighbourhood Plan](#) supports, in principle, tall development (8-15 storeys) in this area.



The following design priorities should be considered in proposals:

- Reduce volume and speed of vehicular traffic through the area and provide greater space for pedestrians and cyclists.
- Improve existing pedestrian footbridge over railway by introducing lifts.
- Improve pedestrian and cycling routes from Old Shoreham Road/Hove Park through Fonthill Road tunnel to Clarendon Road and east-west links to Hove Station.
- Improve public realm, introducing greening and open spaces for communal activities.



Map key

	Vehicular route		Improved pedestrian links		Regional cycle route
	Priority flow vehicular route		Key pedestrian/cycle priority route		Focal green space
	Access only vehicular route		Indicative pedestrian/cycle links		Key area of public realm
	Potential pedestrian/cycle bridge over railway line (illustrative alignment)				

Above: Extract of Draft Hove Station Masterplan SPD signposting indicative public realm improvements to support active travel across the area.

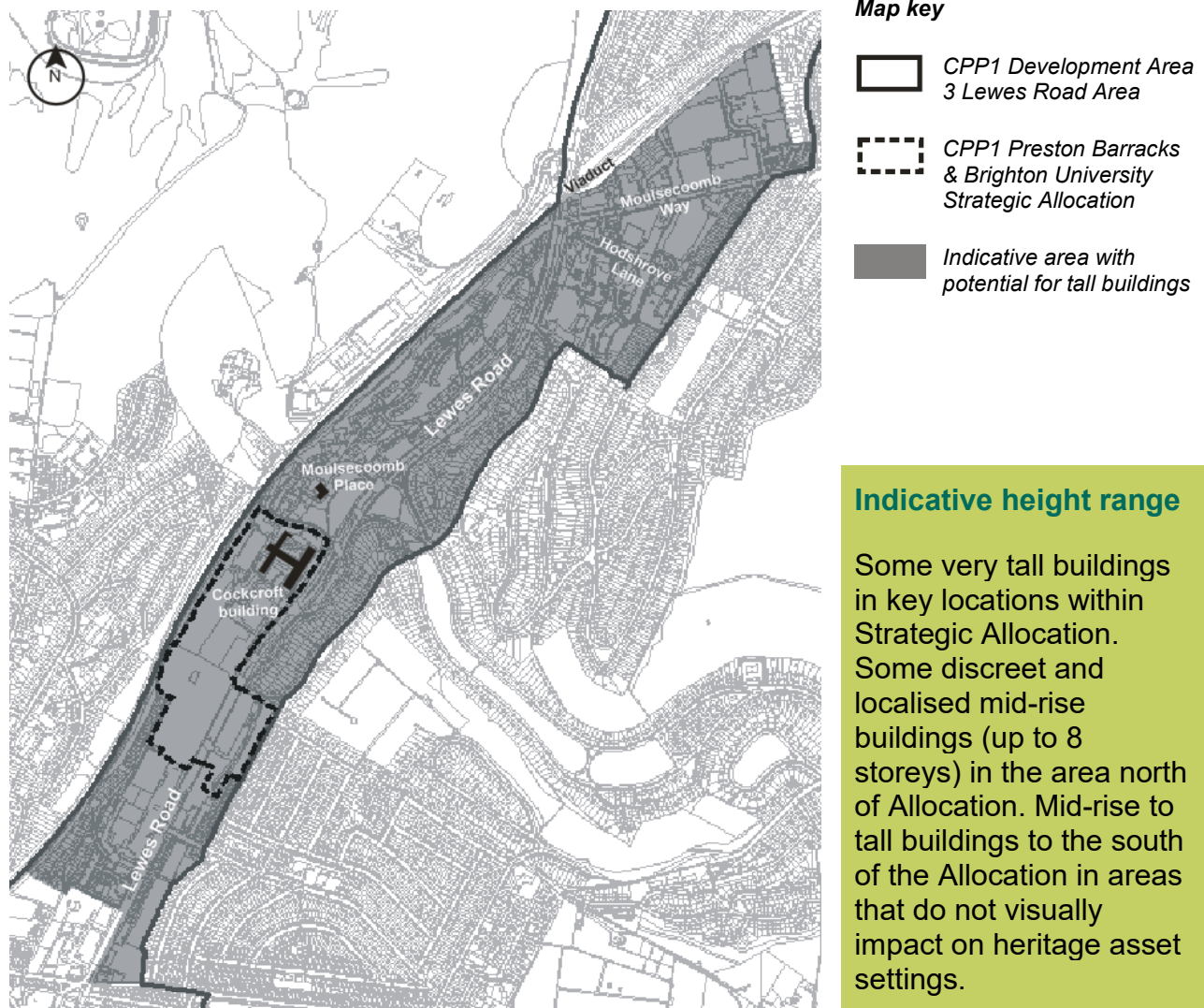
Below: Public realm improvements to cycle lane and introduction of greening and sustainable surface water drainage features. Aldgate Square, London.

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5.6. Area 6: Lewes Road corridor

Centred on the Preston Barracks & Brighton University Strategic Allocation this is an academic corridor and major route into the city. It has the ability to build on excellent bus and rail services, university facilities, existing tall buildings along the valley bottom and limited heritage constraints to become a focus for tall building investment.

The Cockcroft building and grade II listed Moulsecoomb Place function as the transition point from a dense urban grain bounding central Lewes Road to a more landscape-led and green character in the northern suburban area. This transition point is a key public realm node that provides east-west connectivity across the valley.

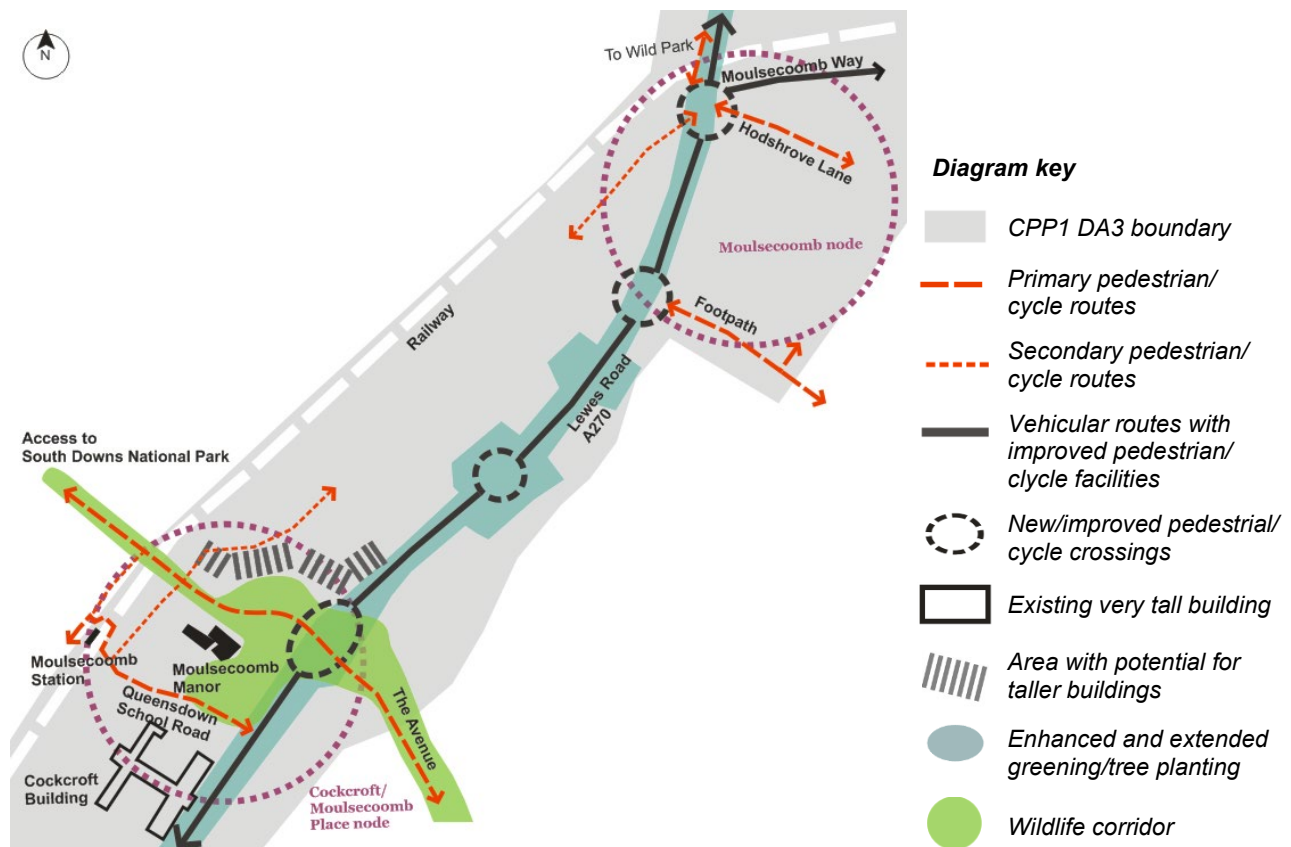


The following design priorities should be considered in proposals:

- Enhance the look and feel of the Lewes Road approach into the city from the northeast and re-inforce its character as a continuous street with a strong green and active travel character (e.g. slow vehicles, multimodal movement, inter-connected green infrastructure).
- Recognise and relate to the valley topography and presence of the South Downs in approach to form, density and massing.
- Safeguard downland views and the setting of the South Downs National Park and take care not to impact the horizon line.

Area north of Cockcroft building/Moulsecoomb Place transition node

- Increase density in areas closer to transport links creating a tighter urban grain and maximising the use of open spaces (i.e. for play, food growing, community activities, biodiversity).
- Replace road environment with one more fitting to a gateway location.
- Improve and/or create safer and more legible road environment and east-west strong green pedestrian and cycle connectivity with safe road crossings and connections to existing green spaces and
- Optimise the use of community facilities in the Hodshrove Lane area.



Above: Diagram summarising indicative placemaking opportunities identified for the area north of the Cockcroft/Moulsecoomb Place node.

Right: Road improvements that contribute to enhancing green character and providing generous, safer and more attractive pedestrian crossings Illustration from [Better Greenway Project](#), Southend-on-sea.

Below: Before (left) and after (right) example of low-rise intensification of occupied valley rise areas. [Croydon Council Draft Suburban Design Guide](#).



5.7. Area 7: London Road / Preston Road

Situated along the A23/London Road corridor this area incorporates two separately defined stretches of existing 'mid-rise' tall buildings that front respectively the western edge of Preston Park; and Surrenden Field and Withdean Park. Unique aspects include typologies that range from blocks of tall residential and office development through to high quality low-rise residential settings within Preston Village and Preston Park conservation areas.



Map key

-  CPP1 Development Area 4
New England Quarter and
London Road
-  CPP1 Strategic Allocation
125-163 Preston Road
-  Indicative area with potential for
tall buildings

Indicative height range

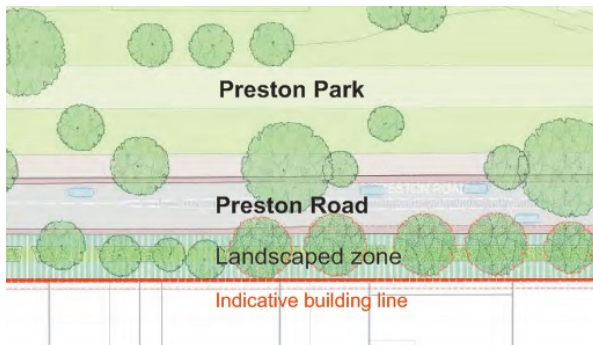
Mid-rise (up to 8 storeys) with tall (9-15 storeys) in key landmark or gateway locations.

The following design priorities should be considered in proposals:

- Enhance and mend the green character of the A23 to create a boulevard and establish better connectivity across it to parks and open spaces
- Improve facilities for pedestrians, cyclists and bus users (e.g. crossings, cycle lanes and parking).
- Respect the green residential character of the area, through a pattern of tall buildings and open spaces that emphasise the linear form of the corridor and provide a more unified approach to built form.
- Reinforce the existing tall buildings and utilise the significant level change to the west to better integrate tall buildings within the townscape.

Strategic Allocation 125-163 Preston Road

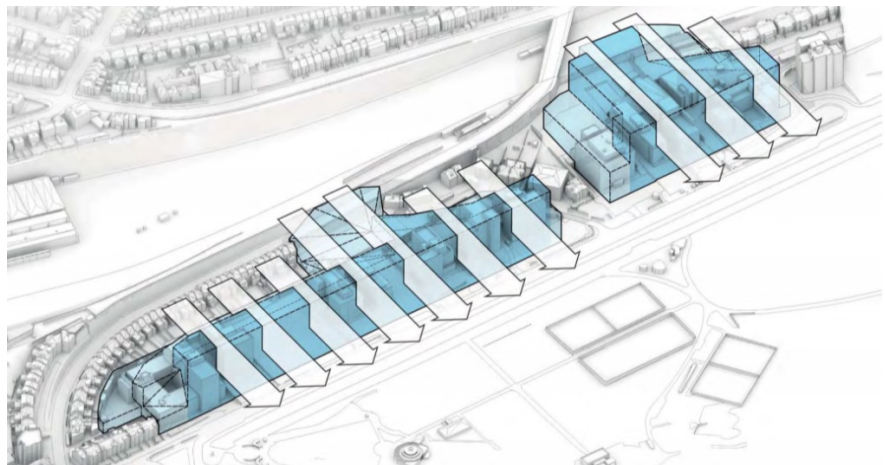
- Enhance the appearance of the existing tall building frontage to the west of Preston Park, whilst respecting the Park's setting as a heritage asset.
- Introduce a landscaped zone with continuous building set-back from Preston Road that enhances promenade of trees, provides generous pedestrian areas with raised planting and seating and improved cycling facilities.
- Leave gaps between built elements to maintain visual permeability between townscape and Preston Park valley bottom.
- Introduce courtyards and open spaces to create opportunities for amenity and animate ground floor and street edge.



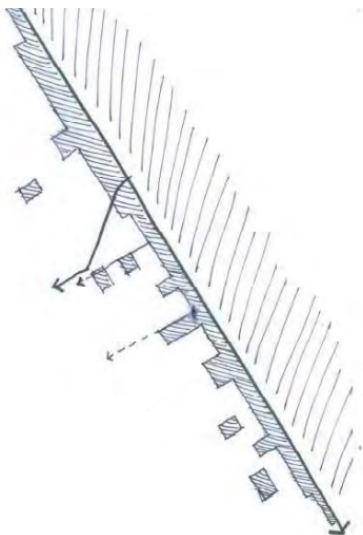
Above: Introduction of landscaped zone with enhanced planting, seating, cycling and public transport facilities along Preston Road.

Right: Gaps between buildings to safeguard views down to Preston Park and across the valley.

Below: Courtyard and open spaces used to animate ground floor and street edge.



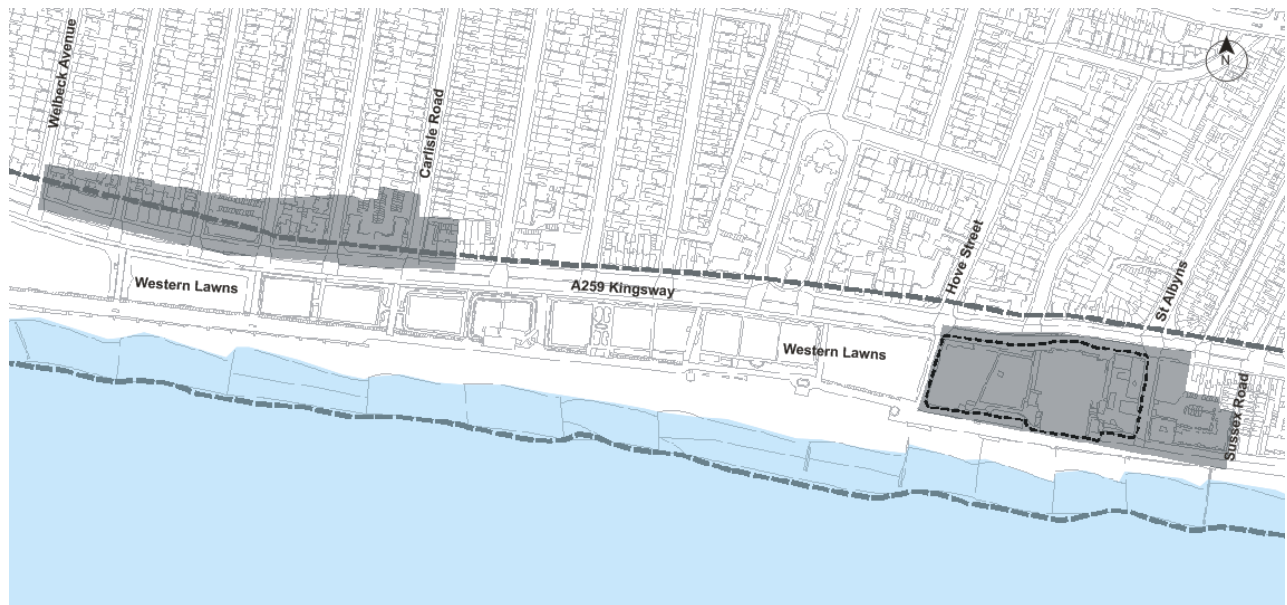
[Brighton & Hove Council](#)
application BH2016/02499.



5.8. Area 8: Western Seafront/Kingsway

Kingsway is designated as a sustainable transport corridor and has scope for public transport improvements. The stretch overlooking the Western Lawns is characterised in the main by residential buildings of varying heights and styles that range in quality from exceptional to poor. Opportunities exist here to replace poor building stock with taller 'mid-rise' buildings, following an existing changing pattern of growth.

The King Alfred Strategic Allocation is unique in that it is the only part of the seafront to have some development right up to the seafront's edge. This affords opportunities for different taller 'landmark' development form, potentially creating a prominent and distinctive 'endstop' to Hove's Western Lawns.



Indicative height ranges

Mid-rise (up to 8 storeys) along Kingsway and tall (9-15 storeys) to very tall (over 15 storeys) in key locations within King Alfred Strategic Allocation.

Map key

-  CPP1 Special Area 1 The Seafront
-  CPP1 King Alfred Strategic Allocation
-  Indicative area with potential for tall buildings

The following design priorities should be considered in proposals:

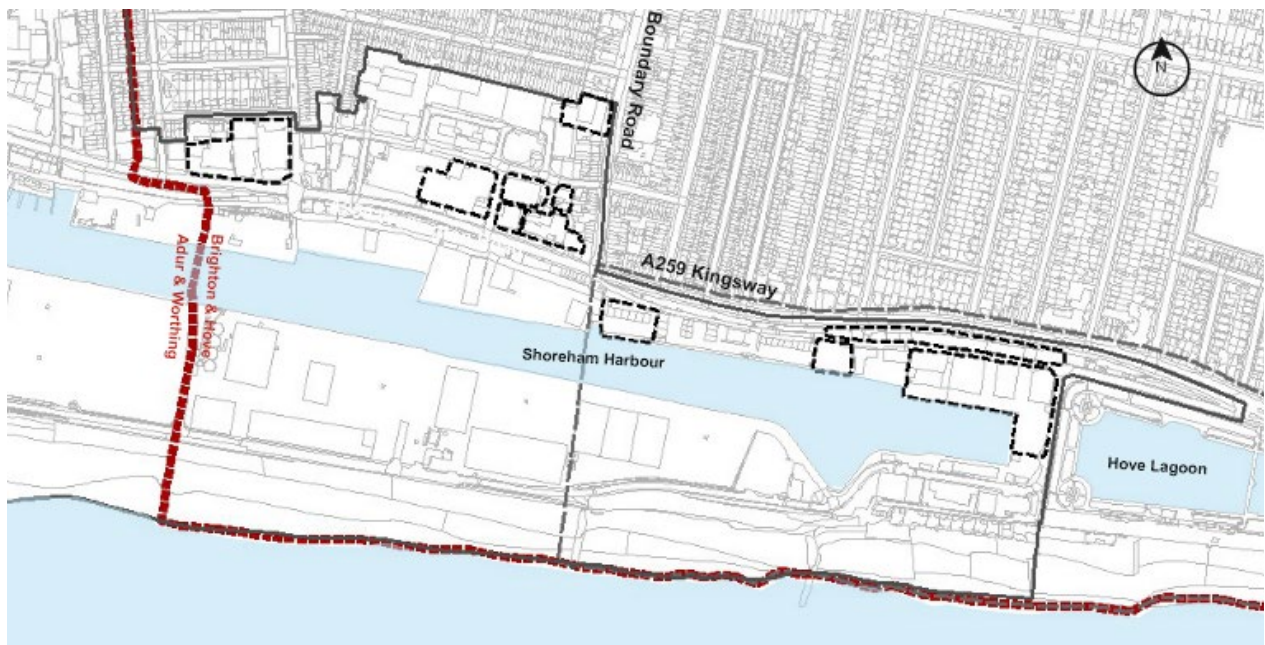
- Contribute to creation of a more consistent height, form and scale on the north side of Kingsway to ensure a coherent streetscape that is neighbourly and maintains public access and local views to the seafront.
- Respond to the distinct characters of the Kingsway, with its taller buildings and lower-scaled conservation and/or residential areas with mainly two-storey houses to the north.
- Capitalise on the views to the sea and the open space in the Western Lawns.
- Improve pedestrian and cycling connectivity along and across the A259.
- Improve leisure facilities in the Western Lawns (e.g. landscaping, seating and maintenance).
- Use landscape solutions to ensure privacy at ground level for residential uses.

5.9. Area 9: Shoreham Harbour

Shoreham Harbour is a working harbour that straddles the local authority boundary between Adur district (within West Sussex) and Brighton & Hove. Opportunities exist to bring back into use vacant and underused sites as well as raising the quality of the local environment and increasing recreational opportunities and waterfront access. The area currently has a utilitarian character that offers opportunities for development to realise the potential of this brownfield asset whilst recognising the ongoing importance of the port-related activities.

A [Joint Area Action Plan](#) (JAAP) adopted in 2019 forms part of the development plan for the city and sets out a strategy for the regeneration of the whole Harbour area. It includes site allocations for new housing and employment development as well as policies relating to flood defence, travel, the environment and other issues. The site allocation policies include appropriate building heights which could include tall buildings.

The JAAP area within Brighton & Hove includes both the docksides and the commercial area north of Wellington Road.



Indicative height ranges

Appropriate heights for the development sites are set out in Policies CA2 and CA3 of the [Shoreham Harbour Joint Area Action Plan](#).

Map key

- CPP1 Special Area 1 The Seafront
- Shoreham Harbour Joint Area Action Plan (JAAP) boundary
- JAAP Site Allocations Aldrington Basin CA2 AB 1-4 and North Quayside and South Portslade SP1-7.
- Brighton & Hove boundary

For design priorities that should be considered in proposals please refer to [Shoreham Harbour Joint Area Action Plan \(JAAP\)](#).

6. Tall Building Statements

Proposals that trigger the tall buildings design guidance will be required to include as part of their planning submission a thorough and detailed Tall Buildings Statement (TBS).

This submission must include written and illustrative supporting information and justification for the chosen uses and proposed built form, which includes the following:

- a survey plan and calculations illustrating the proposal's relationship to the mean height of all surrounding development for a distance of 100m;
- a plan illustrating the relationship of the proposed site to one of the tall building areas;
- a statement describing how the proposal addresses the guidelines in Section D, sub-section 13 and would provide a safe, positive and attractive addition to the city;
- evidence of exploration of the viability and appropriateness of other forms of high density development; and
- an urban design assessment, including a 3D modelling and analysis, within the proposal's area of visual impact to support the appropriateness of the site for taller development.

An Environmental Impact Assessment (EIA) may be required. Where one is required, it will be acceptable for applicants to undertake a townscape and visual impact assessment as part of the EIA provided that all the information required to be included in the TBS can be adequately addressed in the EIA. This will depend on the amount of development proposed, the site location, and the sensitivity of environmental receptors, such as landscape, ecology, heritage assets and people.

The [national EIA guidance](#) explains the way in which the EIA process operates.

Applicants may be required to submit a screening report as to the necessity for an EIA.

Major tall building developments are also likely to require a separate transport assessment (or an appropriate transport chapter in an EIA, to be agreed at the scoping stage) as referred to in City Plan Part One Policy CP9 Sustainable Transport.

Applicants may also be required to carry out a [Habitats Regulation Assessment](#) (HRA). Where an EIA or HRA is required, applicants should engage as early as possible with Natural England.

SECTION C: Planning process

This section of the guidance describes the council's preferred approach to applicant engagement with the local planning authority and other stakeholders prior to the submission of a planning application.

Design is a collaborative process involving a range of people from different disciplines and with varying levels of design skill at all stages.

From the beginning, a design project of any scale can present complex challenges which could benefit from constructive conversation with council officers and other key stakeholders including design professionals, advisory bodies, the local community and neighbours.

The council as a Local Planning Authority (LPA) holds a responsibility to ensure that design proposals are of high quality and align with policy objectives.

The council takes a stance in favour of sustainable development and wants high quality design proposals to succeed.

To ensure that your design is of high quality and aligns with our policy objectives, the council recommends:

- **Identifying key local stakeholders, including neighbours, and allocating resources and time to consult and respond to their feedback prior to submitting a planning application.**
- **Identifying relevant policies, site allocations and guidance and showing how these have informed the scheme.**
- **Engaging its design advice services as early as possible prior to submitting a planning application and before a preferred design option is chosen.**
- **Building the time and costs of engaging with the council's design advice services into the project programme.**
- **Presenting a concise, clear design statement illustrating the parameters that informed the design options using drawings and illustrations that can be easily understood by people with basic or no design skills.**
- **Using 'a day in the life' scenarios to test and illustrate how the development will be used.**

Advice on how applicants can positively engage with the council and make the best of its services to resolve design issues is further detailed under three broad themes:

1. Pre-application process;
2. Design advice services; and
3. Communicating design ideas well.

7. Pre-application process

It can be difficult to know how early to start the design conversation with the local planning authority.

Early engagement is important. Problems can often arise when applicants progress their design proposals in detail to establish floor plans or prepare expensive architectural and/or engineering drawings prior to engaging with the council and other stakeholders like neighbours.

In line with NPPF paragraphs 39-46, our advice is that you involve us as early as possible prior to the submission of a planning application.

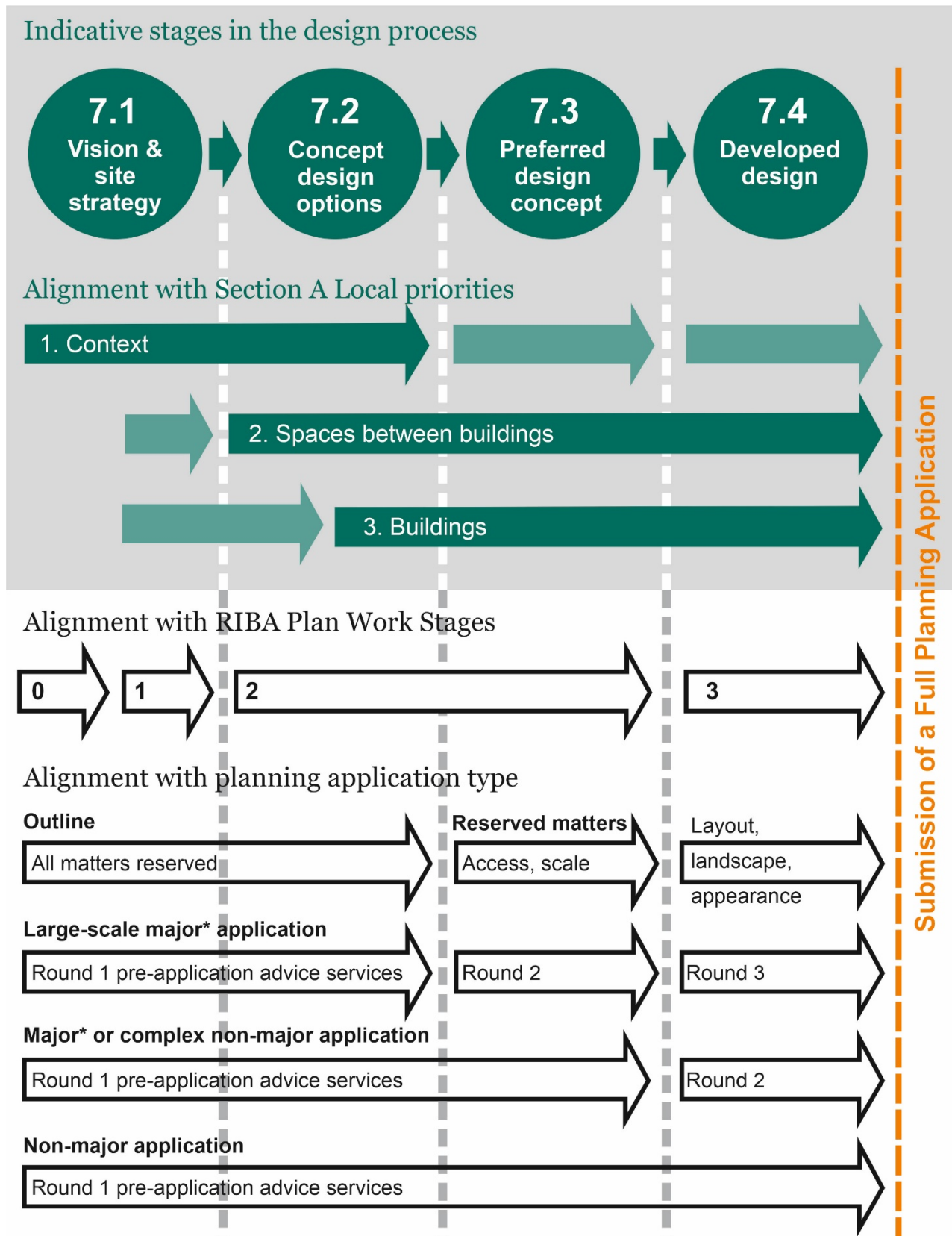
Preferably, your proposals should be at an advanced enough stage in the design process to allow constructive feedback, but not so advanced as to risk reductive work.

For the purpose of this guide, the diagram below identifies indicative stages in the design development process and signposts instances when applicants are encouraged to seek design feedback from the LPA prior to submitting a planning application.

The diagram also indicates approximately how different planning routes, scales of development, the RIBA Plan of Work 2020, and consideration of local design priorities may align with this process. The most appropriate pre-application advice services will depend on the scale and complexity of development proposals. Applicants are encouraged to engage with the LPA to identify the most suitable option.

More detailed information on the indicative stages can be found in the chapters following the diagram.

More detailed information about the council's design advice services and how to access these is provided in sub-section 8 below.



* Major applications involve 10+ dwellings / over half a hectare / building(s) exceeds 1000m²; office / light industrial - 1000+ m² / 1+ hectare; general industrial - 1000+ m² / 1+ hectare; retail - 1000+ m² / 1+ hectare; Gypsy/Traveller site - 10+ pitches; and/or site area exceeds 1 hectare. Large-scale major applications are those involving City Plan Strategic Allocations, tall buildings and/or complex mixed-use schemes with masterplan elements like, for example, public realm.

7.1. Vision and site strategy

This is the stage when contextual analysis of the development site and its surroundings is carried out and positive ambitions and parameters are established in the form of a vision and site strategy to inform design proposals.

The vision describes key ambitions and design principles derived from contextual analysis addressing local priorities set out in Section A, community engagement, the client's development brief and the designer's own creative response to site. It should address quantitative and qualitative design attributes and should be used as a point of reference throughout the design process.

The site strategy is derived from site constraints and opportunities in response to contextual analysis, policy objectives and local priorities set out in Section A. It sets out key physical parameters including points of access; primary routes, nodes and destinations; location of buildings and spaces between them; zones where height may be concentrated; indicative uses; and building fronts and backs.

At this stage, the council expects would-be applicants to submit design information including:

- **Clear and concise contextual analysis communicated using satellite imagery, photography, diagrams and text (see sub-section 9 below).**
- **A vision statement to guide design development, addressing sustainability and including the approach to community and stakeholder engagement and key outcomes which have informed the vision.**
- **Site constraints and opportunities diagrams which round up contextual analysis into diagrammatic site plans and inform a clear site strategy incorporating physical parameters.**
- **If a masterplan is appropriate, a diagrammatic plan indicating areas outside of the development red line that are fundamental to the masterplan and why.**

At this stage, the council would look to assess with regard to local design priorities:

Context

- Does contextual analysis meaningfully inform the development vision?
- Has meaningful community and stakeholder engagement been undertaken or planned, in particular with neighbours, and how have/will outcomes inform the vision?
- In instances such as those set out in Section A, sub-section 1.5, is a masterplan being developed to ensure a holistic design approach?
- Is there any information available regarding ecological conditions within the site?

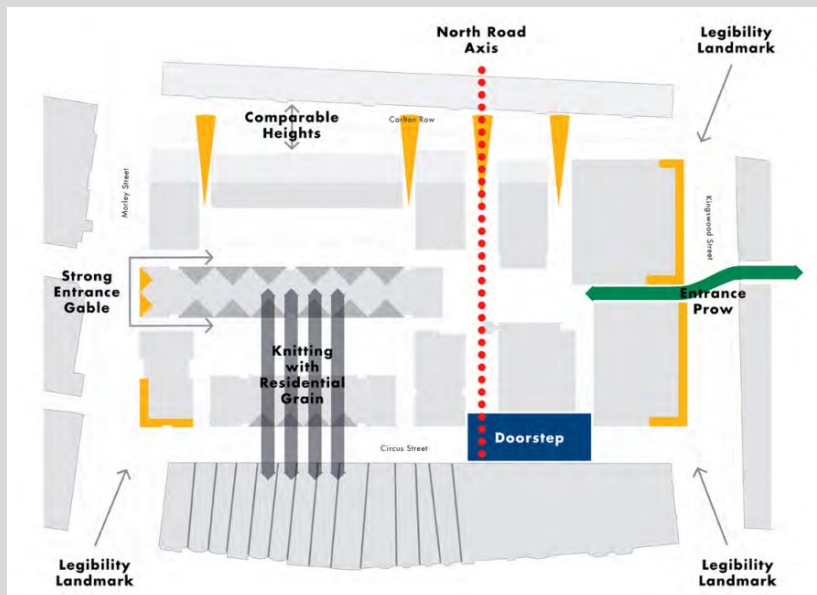
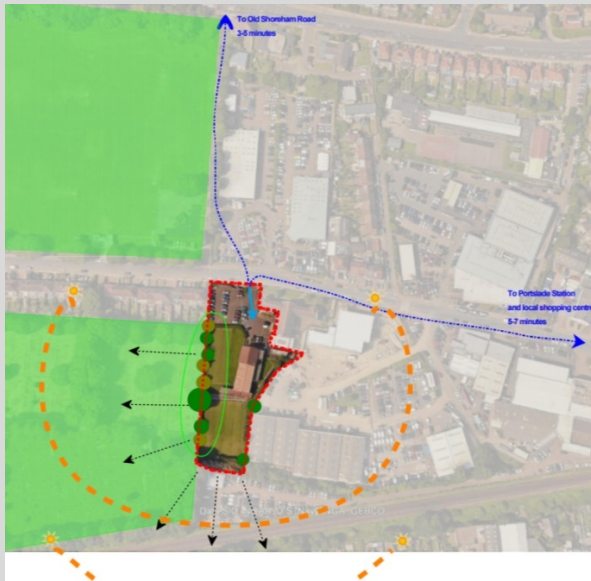
Spaces between buildings

- Do site constraints and opportunities meaningfully inform the site strategy?
- Is the site strategy the foundation of a landscape-led design approach providing base parameters with regard to site layout and land use that are appropriate to context?
- Does the site strategy enable a climate resilient development with regard to environmental comfort?
- How do considerations of green infrastructure inform the site strategy?

Buildings

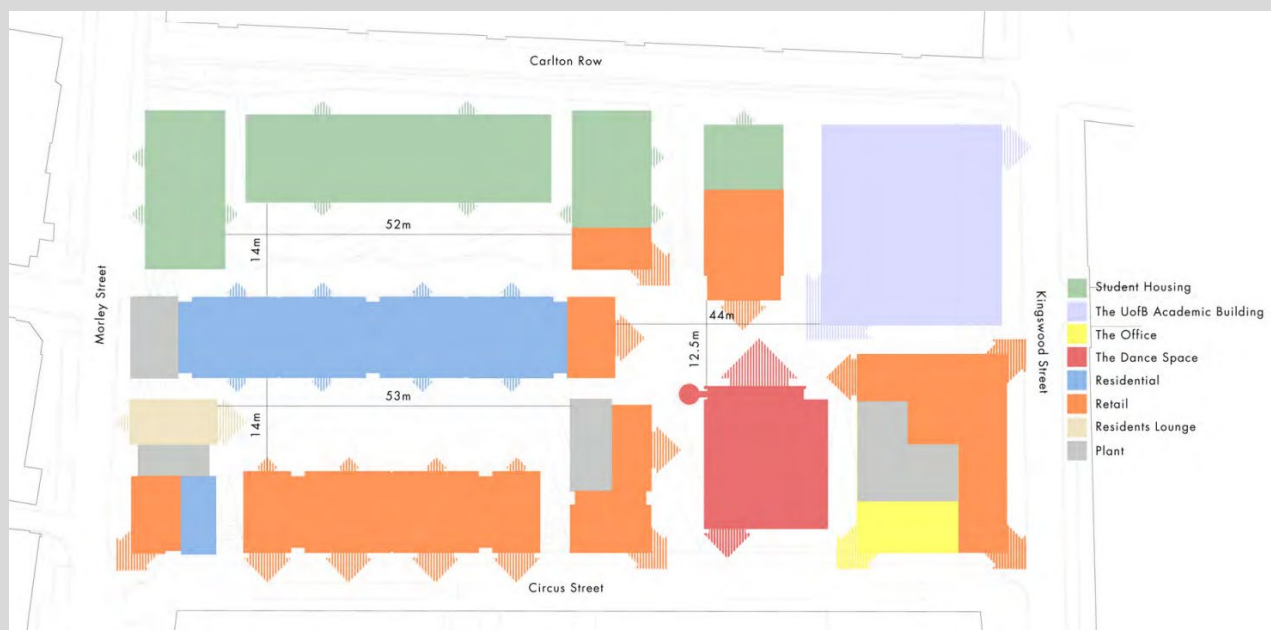
- Are identified building zones and/or areas where height may be concentrated appropriate to wider context?
- Are buildings oriented appropriately to optimise passive design solutions, outlook, and neighbourliness?
- Are building locations, uses, fronts/back, access and servicing facilities appropriate in relation to adjacent land and building uses?

Good practice



Above: Site constraints and opportunities diagram which can inform the site strategy and design development. [Brighton & Hove Council](#) application BH2019/02578.

Left and below: Combination of site plans illustrating the Site Strategy for the Circus Street development in Brighton. The Site Strategy addresses primary routes, focal buildings, points of access, built form, uses and fronts and backs. [Brighton & Hove Council](#) application BH2013/03461.



7.2. Conceptual design options

This stage involves the development of creative solutions which build on the vision and site strategy to generate a design concept that will influence the layout, form, appearance and details of a proposed development.

Conceptual design options should demonstrate an understanding of competing contextual influences, should seek to realise the development vision, and should present a creative response to the site strategy, achieving innovation in design.

Along with the vision, conceptual design options should be loose enough to allow the design to develop organically, and should remain a constant point of reference throughout the design process.

At this stage, the council expects would-be applicants to submit design information including:

- A storyboard of stages in design development leading to a number of conceptual design options.
- Sketch drawings and images which may include figure ground studies, plans, sections, elevations, 3D visualisation and/or physical models to clearly indicate site layout, scale and massing, contextual streetscape, ground plane functionality, spatial adjacencies and indicative movement strategies.
- Relevant identified strategic and local views and views from within the development, all using 3D visualisation.
- Analysis of 'a day in the life' of future occupants. See sub-section 9.1.
- An updated community and stakeholder engagement report to show how design proposals have/will develop in response to feedback.

At this stage, the council would look to assess with regard to local design priorities:

Context

- Do conceptual design options holistically address contextual influences and are they successfully developed from the vision and site strategy?
- Do they positively contribute to the streetscape and how?
- Do they sensitively address strategic and local views and local heritage assets?

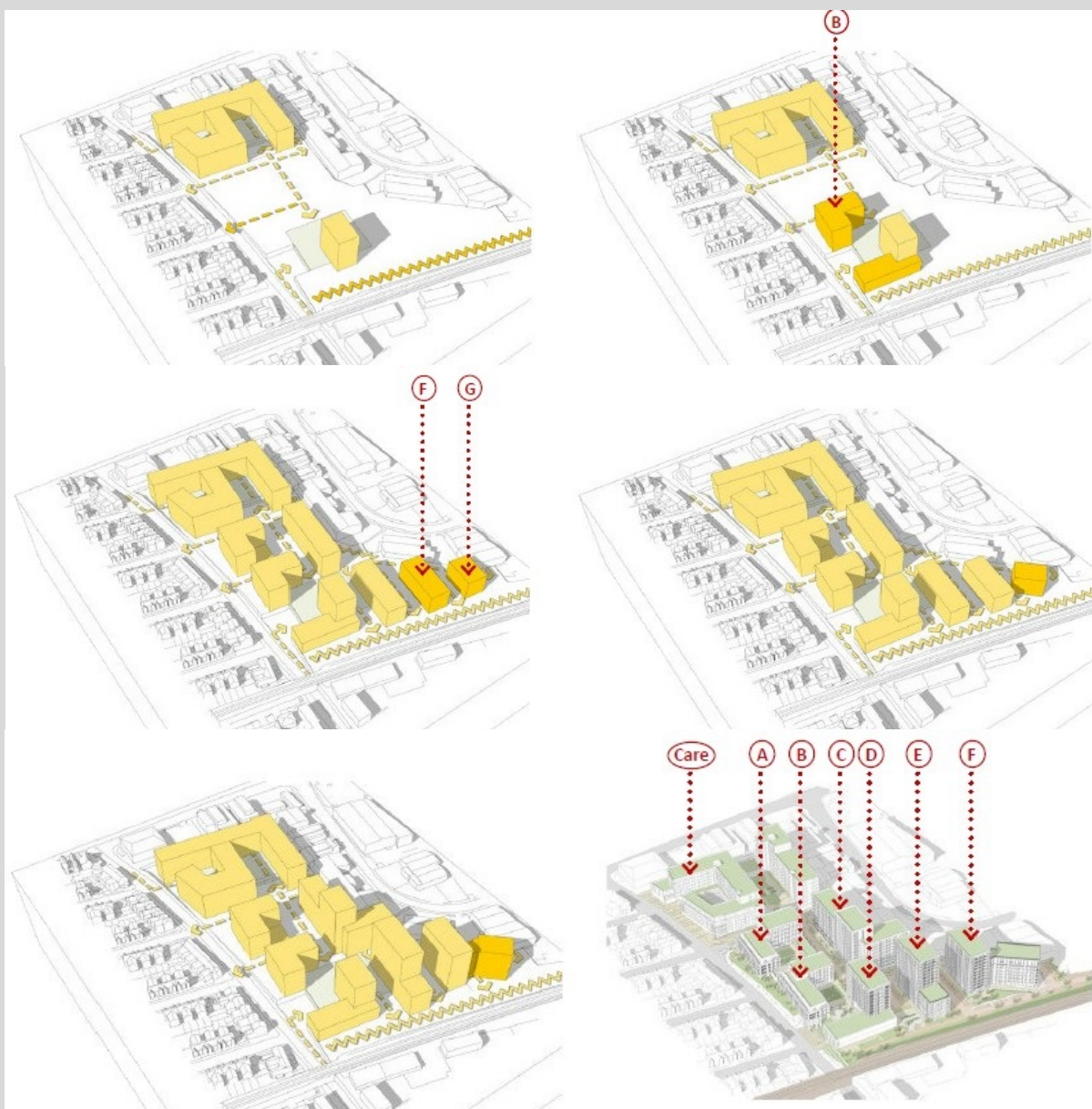
Spaces between buildings

- Do conceptual design options focus primarily on the spaces between buildings, the hierarchy and functionality of routes and spaces and their character?
- Do they successfully define between public and residential areas?
- Do they integrate green infrastructure and active transport networks?
- Has a public realm strategy been developed to support proposed functionality of spaces?

Buildings

- Do conceptual design options ensure proper functionality and appropriate adjacencies to public and private landscape areas?
- Do they consider building performance?
- Do they consider uses, focal or landmark buildings, servicing, fronts and backs, primary entrances and/or gathering points?

Good practice



Above: 3D storeboarded stages in design development leading to a conceptual design option.

Below: Conceptual design options exploring site plan in relation to context. [Brighton & Hove Council](#) application BH2019/02578.



7.3. Preferred design concept

This stage sees the selection of one or a combination of several conceptual design options that represents the most holistic creative response to overall ambitions and design principles and which best responds to context.

Design information may be in sketch form but should be as informative as possible to provide further detail regarding landscape and building layouts, sustainability, form, appearance and materiality. The site layout should be formalised and set as the design concept solidifies and becomes less flexible leading to developed design.

At this stage, the council expects would-be applicants to submit design information including:

- Preferred design concept presented in a similar format to the conceptual design options and supplemented by a written design development statement.
- Drawings presented in greater detail at a larger scale including a ground floor site plan, parking plans, typical floor plans, sections, sectional perspectives and elevations at a variety of scales.
- More detailed 3D visualisation and/or models.
- Landscape proposals presented as part of the site plan or separately.
- An emerging sustainability strategy developed for landscape and buildings which addresses whole life carbon, circular economy principles, water management and biodiversity gains.
- A placemaking and public realm strategy describing the functionality and social benefit of proposals.
- More detailed analysis of 'a day in the life' of future occupants. See sub-section 9.1
- An updated community and stakeholder engagement report to show how design proposals have/will develop in response to feedback.

At this stage, the council would look to assess with regard to local design priorities:

Context

- Is the preferred design concept the most appropriate response to contextual attributes and components of the built environment, particularly in instances where it may not be appropriate to reflect existing character, form and scale?
- In selecting or developing a preferred design concept, have opportunities been taken to refine proposals relative to context?
- How has the community engagement process progressed and how has it informed the development of a preferred design concept?

Spaces between buildings

- Is site layout and landscape design the most holistic, creative and successful response to combined local priorities?
- Are routes and spaces defined and developed in line with a public realm strategy to a level of detail concurrent with developing building design?
- Is the landscape design developed to a level of detail which is indicative of layout, surface treatments, drainage strategies and planting typologies and does it achieve nature enhancement and biodiversity gains?

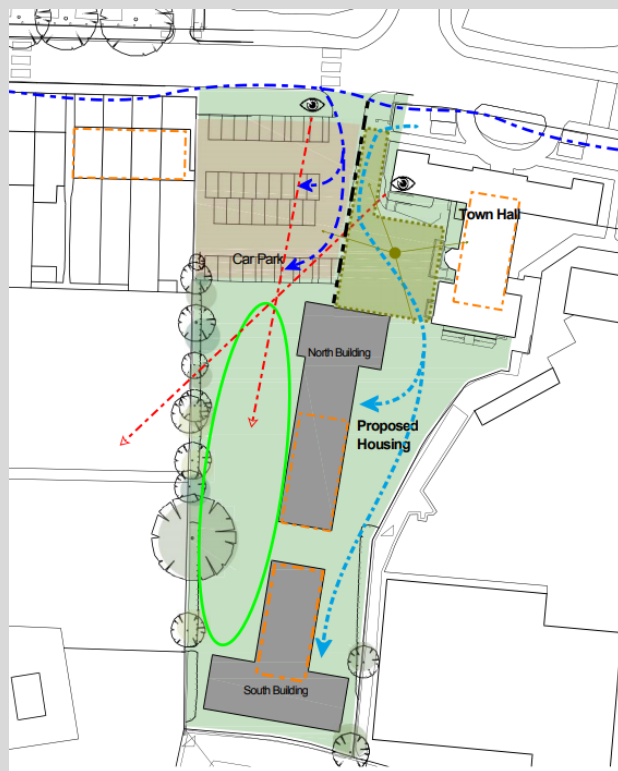
Buildings

- Are building layouts developed to indicate mixed use adjacencies, housing type and mix, orientation, aspect and provision of private and communal amenity?
- Is the servicing of buildings developed and functioning well?
- Is appearance and materiality developed to a level of detail which is indicative of architectural form and roof scape, elevational composition and fenestration design, balcony typologies and materiality?
- Has a sustainable buildings strategy been developed? Has it addressed whole life carbon, including circular economy principles?

Good practice

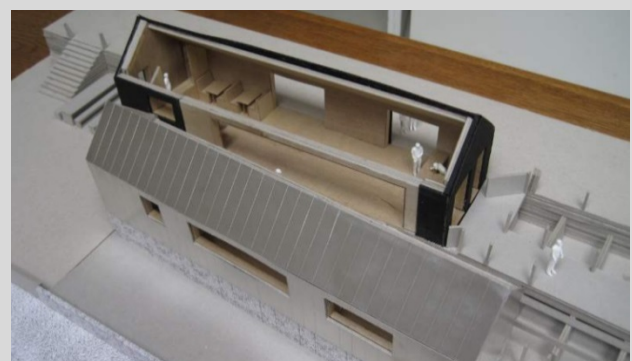


Above: A rendered elevation illustrating fenestration composition, materiality, form, scale, depth and planting more clearly than a simple line drawing. [Brighton & Hove Council](#) application BH2013/03461.



Left: A preferred design concept presented in a similar manner to conceptual design options, illustrating that the design solution is the most holistic response to contextual influences. [Brighton & Hove Council](#) application BH2019/02578.

Below: A physical model illustrating the true scale, form, materiality, internal layout and interaction with public spaces. [Brighton & Hove Council](#) application BH2015/01649.



7.4. Developed design

This phase sees the preferred design concept progress to a level of detail sufficient to submit a planning application. The final stage of pre-application advice can serve as a 'dummy run' for the review of a planning application and can seek to minimise any further development leading to the submission of a planning application.

Details of landscape design should include outline specification of planting, SUDS, hard surfaces and street furniture. Details of building design should include fully realised internal layouts, elevational compositions, fenestration design and outline material specification.

Special areas such as primary public squares or residential entrances, as well as typical cladding systems, boundary treatments and balcony typologies should be identified and developed further to show a level of detail which would be visible in reality.

Sustainability strategies should be as near to completed as possible.

At this stage, the council expects would-be applicants to submit design information including:

- **Plans, sections and elevations at a range of scales to show proposals within context and at a level of material detail which will be visible in reality.**
- **3D visualisations and/or models to convey the atmospheric and visual qualities of proposals and show a level of material detail which will be visible in reality.**
- **Details and 3D bay studies of special and typical components of the landscape and building design, presented at a scale of between 1:20 and 1:5.**
- **Highly developed sustainability strategies which address whole life carbon, circular economy, water management and biodiversity gains.**
- **A Design Statement or Design & Access Statement which collates previous design stages to tell the story of design development leading to final detailed proposals.**
- **An updated community and stakeholder engagement report to show how design proposals have/will develop in response to feedback.**

The council would look to assess with regard to local design priorities:

Context

- How have architectural and landscape character been further refined to positively respond to or enhance local context?
- For example, are brick patterns, native tree species or special details clearly identified?

Spaces between buildings

- Do landscape proposals identify planting typologies, materials and street furniture with regard to functionality, climate resilience, inclusivity and longevity in accordance with local priorities?

Buildings

- Do internal layouts ensure user comfort and proper functionality?
- Is appearance and materiality fully realised, especially for any feature or landmark buildings?
- Are proposed structural materials indicated (e.g. cross-laminated timber or low-emission concrete frame)?
- How will the sustainable buildings strategy be implemented? Will accreditation from a well-known sustainable building design assessment method be sought?



Above: A collection of 3D visualisations illustrating materiality at a level of detail which would be visible in reality, as well as the atmospheric qualities of key external spaces. [Brighton & Hove Council](#) application BH2013/03461.

Left: Rendered bay studies at a large scale illustrating material detail and specification such as brick patterns, balustrades and windows. [Brighton & Hove Council](#) application BH2017/00492.

Below: A rendered elevation showing specified materiality and streetscene context. [Brighton & Hove Council](#) application BH2018/03651.



8. Design advice services

Design review is supported by the National Planning Policy Framework (NPPF) as a useful means of ensuring high standards of design in new development.

Applicants for major schemes¹ are encouraged to use the council's DesignPLACE panel review service as well as to seek advice from the council's Urban Design Officer, while those for non-major schemes are encouraged to pursue the latter only.

These are chargeable services paid for by applicants as outlined in the council's [DesignPLACE](#) and [Pre-application](#) webpages respectively.

To make the most of the council's review services it is important to keep in mind that conversations around design tend to produce better results when:

- undertaken as early as possible prior to the submission of a planning application;
- applicants are open to reviewing what they are doing and making changes; and
- reviewers benefit from an understanding of local context and take a constructive approach to the review process.

This can be a good means to incrementally improve the scheme and resolve issues early on which can help to speed up the overall application assessment process.

8.1. Community and stakeholder engagement

Effective community engagement is fundamental to achieving contextually appropriate designs. This can help to highlight issues and concerns that applicants may be unaware of and enable for these to be addressed early in the design process, potentially minimising objections at planning application stage.

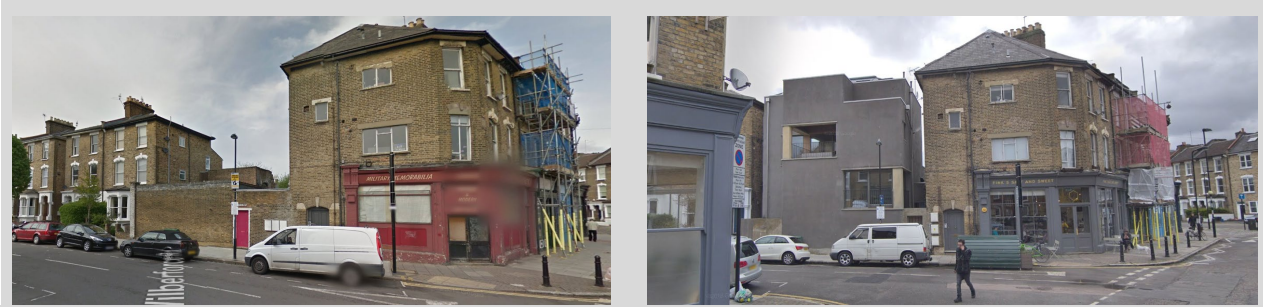
In the case of non-major development, the council would expect applicants to have discussed proposals with neighbours. Organising an event or informal meeting to present proposals at an early stage in the design process can be beneficial.

In the case of major development, the process can be more complex depending on the range of people and stakeholders that are likely to be affected by design proposals. In such cases, community engagement can be broken down into stages to align with those identified in the planning/design process set out in sub-section 7 above.

The council encourages applicants to submit a report describing the outcomes of consultation sessions/events and how these can/have been positively addressed as early as possible, as part of the design information for review.

As well as neighbouring properties and residents, other consultees applicants can reach out to could include local residents, local amenity societies, environmental and transport charities and equality/minority groups (e.g. BME communities, disabled people and LGBTQ).

¹ Major schemes are, as defined in article 2 of the Town and Country Planning (Development Management Procedure (England) Order 2015, those that involve 10+ dwellings / over half a hectare / building(s) exceeds 1000m²; office / light industrial - 1000+ m² / 1+ hectare; general industrial - 1000+ m² / 1+ hectare; retail - 1000+ m² / 1+ hectare; Gypsy/Traveller site - 10+ pitches; and/or site area exceeds 1 hectare.



Above: Infill of site located in a residential area predominantly formed of Victorian terraces. Favouring a contemporary design approach to the development, the applicant consulted neighbours and the local residents' association and sought design advice from the council's planning team over a period of two years prior to submitting an application. When the planning application was submitted, of the 75 neighbours invited to comment, only one letter of objection was received by the council. [London Borough of Hackney](#) application 2013/0755.

9. Communicating design ideas well

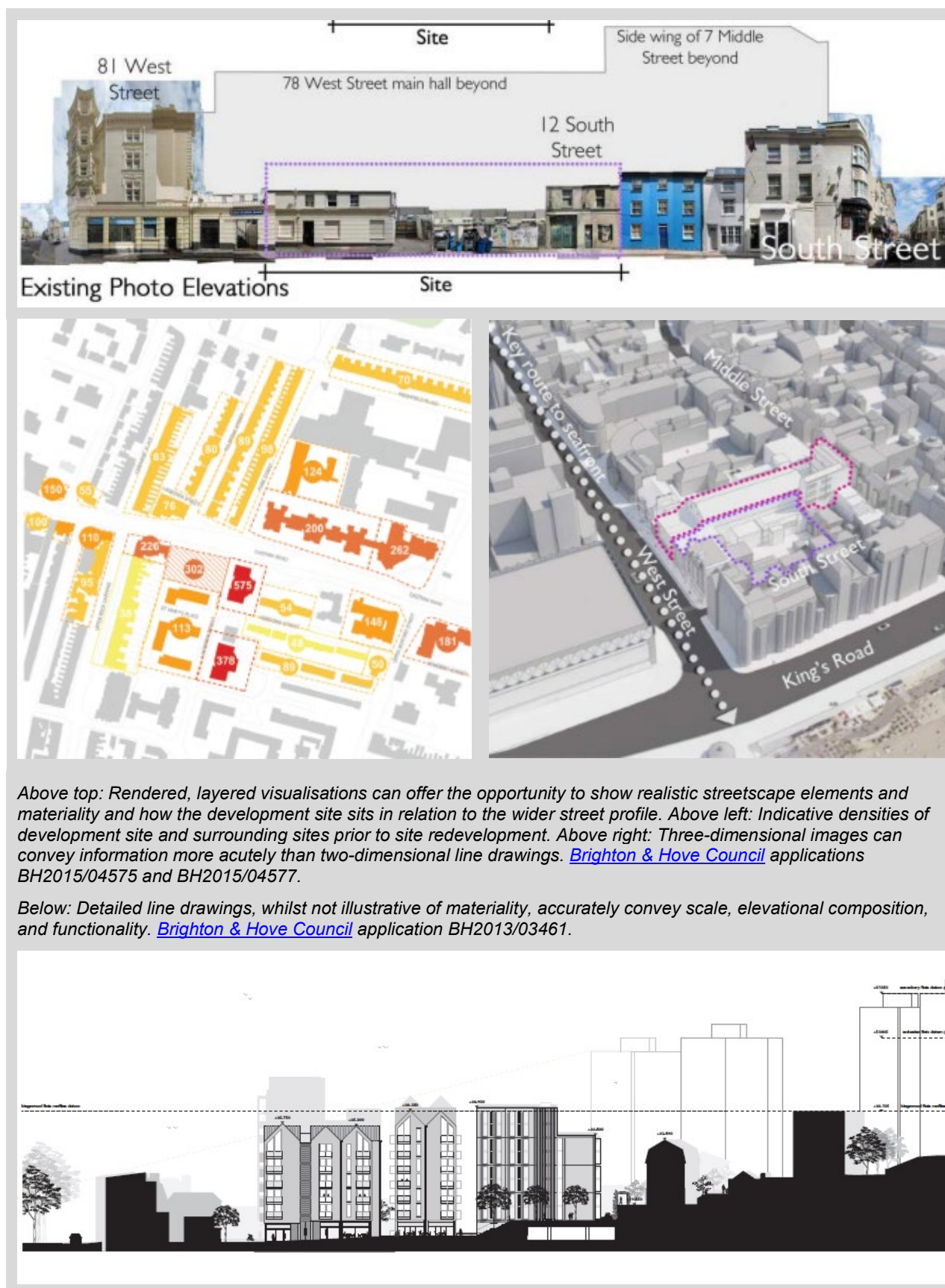
For schemes of all sizes, graphical communication and description of key design principles will be essential in conveying your design for assessment by the Local Planning Authority.

To communicate design ideas well, applicants should produce informative and expressive text and graphics which represent the design concept and are a legible conclusion to the design development process. The submitted design information should provide clarity, legibility, variety and artistic expression. Graphical information may include diagrams, collages, 2D drawings and 3D visualisations, and may be supplemented by physical 3D models which often convey design information more easily than drawings do.

This information should be communicated as part of a design statement or, where applicable, Design & Access Statement. This is a written and graphical report setting out how the design is rooted in the site and wider context and how it addresses experiential and atmospheric qualities. It sets out the physical attributes that influence the layout, form, appearance and details of a proposed development. The Design Council offer online guidance on how to right, read and use design and access statements, which can be found [here](#).

Design information and supporting documents should be as short and concise, whilst conveying as much detail of the proposals, as possible. Clarity is key. This can help to aid pre-application discussions, speed up the assessment of a planning application and/or provide the basis for an appeal statement.

When preparing design information, planning applicants may want to consider the good practice examples identified below by officers assessing applications as well as those identified in previous chapters.



Above top: Rendered, layered visualisations can offer the opportunity to show realistic streetscape elements and materiality and how the development site sits in relation to the wider street profile. Above left: Indicative densities of development site and surrounding sites prior to site redevelopment. Above right: Three-dimensional images can convey information more acutely than two-dimensional line drawings. [Brighton & Hove Council](#) applications BH2015/04575 and BH2015/04577.

Below: Detailed line drawings, whilst not illustrative of materiality, accurately convey scale, elevational composition, and functionality. [Brighton & Hove Council](#) application BH2013/03461.



Above: a rendered 3D visualisation can successfully illustrate material and atmospheric qualities of proposed spaces, as well as social activities, and can demonstrate how the proposals would appear at different times of the year. [Brighton & Hove Council](#) application BH2017/00492.

Below: A physical contextual model very clearly illustrates scale, form and density against existing urban grain, and can illustrate materiality as well as indicate focal buildings and functionality. [Brighton & Hove Council](#) application BH2013/03461.



9.1. A day in the life

The sequential unfolding of spaces that make up a new development and links to its surroundings will determine the quality of the daily life of residents and users within and around the development.

It is important that applicants describe and illustrate how different residents/users will live in the new development and how their experience has informed design ideas.

A helpful technique for reviewing how well a design concept or detailed design will work and bring to life design discussions with stakeholders is to consider 'day in the life' scenarios of users.

This involves thinking through the spaces in and between buildings and the sequence of activities that future occupiers (i.e. a resident, wheelchair user, office worker, cleaner and/or visitor) will go through from first approaching these spaces to carrying out their designated role and leaving afterwards.

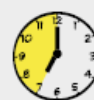
It entails asking questions to test how it would feel to be a user such as, for example, how easy it would be for a wheelchair user to move in, around and out of the development site and access surrounding facilities?

This assessment is an opportunity to ensure that building and landscape functionality is not only efficient and enjoyable but is also as fair and inclusive as possible by considering the daily experiences of a number of minority groups such as a single mother, a disabled cyclist, a transgender person and/or a resident living in affordable housing accommodation.



>RESIDENTS: Families (WEEKEND)

1. Grab a morning coffee at Hammersmith Arrival Square
2. Go down Queen Caroline Street to the Flyover farmers' market
3. The mother goes for a yoga lesson at the Lyric Square and the dad takes the kids to the rowing lesson at the Furnival Rowing Club
4. Later they all meet up at the Arches for a nice lunch
5. In the afternoon they pass the temporary playful sculpture at the Town Hall Square, and after they return home walking along the new vibrant high street.



Extract of [Restoring the Heart of Hammersmith - Delivering a Fly-Under](#) setting out key routes users can use to travel through the development and access nearby services and facilities during weekends.

SECTION D: Appendices

10. Extended list of policies and documents

New development is expected to demonstrate how the requirements of national and local planning policy can be met with the aim of producing consistently high quality design outcomes. The following provides an overview of the key policies as they relate to design.

Brighton & Hove City Plan Part One (adopted in 2016)

CP12 Urban Design is the key and overarching policy regarding development design along with **CP13 Streets and Open Spaces** that focuses on the spaces between buildings.

The UDF is also referenced in a number of policies across the Plan including:

- SS1 Presumption in Favour of Sustainable Development;
- SA6 Sustainable Neighbourhoods
- DA2 Development Areas Brighton Marina, Gas Works and Black Rock Area;
- DA3 Lewes Road;
- DA5 Eastern Road and Edward Street;
- DA6 Hove Station Area;
- CP1 Housing Delivery;
- CP5 Culture and Tourism,
- CP8 Sustainable Buildings;
- CP14 Housing Density; and
- CP15 Heritage.

Design however is a cross cutting issue and guidance provided in the UDF can be relevant to most, if not all policies in this Plan.

Brighton & Hove Local Plan (adopted in 2005)

There are a number of retained Local Plan policies that deal with design issues.

Most form part of Chapter 3 and cover a range of issues including, for example, QD27 Protection of Amenity, QD14 Extensions and alterations and QD14 Landscape design.

These policies will be replaced through Brighton & Hove City Plan Part Two which the council expects to adopt in 2021.

Given that design is a cross cutting issue, the UDF guidance can be relevant to most policies in this Plan, including:

- DM16 Markets;
- DM18 High quality design and places
- DM19 Maximising Development Potential
- DM20 Protection of Amenity;
- DM22 Landscape Design and Trees;
- DM33 Safe, Sustainable and Active Travel;
- DM35 Travel Plans and Transport Assessments;
- DM36 Parking and Servicing;

- DM37 Green Infrastructure and Nature Conservation;
- DM38 Local Green Spaces;
- DM40 Protection of the Environment and Health – Pollution and Nuisance;
- DM42 Protecting the Water Environment;
- DM43 Sustainable Urban Drainage;
- DM44 Energy Efficiency and Renewables;
- DM45 Community Energy; and
- DM46 Heating and cooling network infrastructure.

Supplementary Planning Documents (SPD) and Guidance (SPG)

The Adopted City Plan and retained Local Plan Policies are supported by a range of detailed guidance on how these will be implemented. If adopted, the UDF SPD will form part of this set of planning documents.

Some of the relevant guidance already provided by the council on design include:

- SPD01 - Brighton Centre: Area Planning and Urban Design Framework;
 - SPD02 - Shop Front Design;
 - SPD03 - Construction and Demolition Waste;
 - SPD06 - Trees and Development Sites;
 - SPD07 – Advertisements;
 - SPD09 - Architectural Features;
 - SPD10 - London Road Central Masterplan;
 - SPD11 - Nature Conservation and Development;
 - SPD12 - Design Guide for Extensions and Alterations;
 - SPD13 - Shoreham Harbour Flood Risk Management Guide;
 - SPD14 - Parking Standards;
 - SPD15 - Toad's Hole Valley; and
 - SPD16 - Sustainable Drainage Systems.
-
- SPGBH 2 External paint finishes & colours;
 - SPGBH 9 A guide for Residential Developers on the provision of recreational space and Ancillary Update Document – Updated Open Space Contributions Calculator ;
 - SPGBH 10 King Alfred/RNR Site: Planning brief;
 - SPGBH 11 Listed Building interiors;
 - SPGBH 19 Fire Precaution Works to Historic Buildings; and
 - SPGBH 20 Brighton Marina "An Urban Design Analysis" and Brighton Marina "Development Brief".

Planning Advice Notes and site briefs

Design advice is also available in the form of advice notes and development sites. More information on strategic council projects is available on the council's [Major Developments webpage](#).

Some of the relevant advice notes include:

- PAN 03: Lifetime homes revisions
- PAN 05: Design Guidance for the Storage and Collection of Recyclable Materials and Waste
- PAN 06: Food Growing and Development
- PAN 09: Householder guidance on energy efficiency for historic houses in Conservation Areas
- Special Guidance A: Swift Boxes and Bricks for New Developments

11. Neighbourhood sensitivity to change and priorities for enhancement

The council's Urban Characterisation Study (UCS) of 2009 provides a comprehensive understanding of the diversity and quality of the city's urban character and the pressures affecting it.

That study identified 32 distinct neighbourhoods within Brighton & Hove, in addition to the central conservation areas. These are shown on the map at Section A, sub-section 1.2. A more detailed version of [this map is available to be viewed online](#).

Each of these neighbourhood has now been considered in terms of their sensitivity to change and the need for any positive intervention, having regard to the following matters:

- Topography;
- Landscape character (as defined in the UCS);
- Townscape type (as defined in the UCS);
- How many separate character areas each neighbourhood contains;
- Broad existing density;
- Townscape and public realm quality assessment (as described in the UCS);
- Inclusion of or proximity to designated constraints (e.g. National Park, Conservation Area, Listed Buildings, Historic Park or Garden, Scheduled Monument, Site of Special Scientific Interest);
- Whether the neighbourhood includes a tall building area;
- Whether the neighbourhood includes one of the Development Areas set out in the City Plan Part One;
- Number of potential residential sites and potential residential units identified in the Strategic Housing Land Availability Assessment;
- The presence within a neighbourhood of any employment sites suitable for mixed use development (as identified in the City Plan Part One).

Based on these factors each of the city's neighbourhoods has been assessed on a scale of 1 to 3 for sensitivity to change (where 1 is the most sensitive) and split into those that are predominantly urban or predominantly suburban in character (suffix A or B).

Four neighbourhoods have been categorised as very mixed areas which do not fall into the above assessment and which require a more specific policy approach.

The central conservation areas have not been included, as each of these conservation areas must be preserved or enhanced according to its identified special character and appearance. Conservation area character statements for each area should guide future change.

The following table sets out which neighbourhood falls into each sensitivity grouping and what each typology broadly means with regard to the potential for future development and enhancement.

Ref.	Typology	Urban Characterisation Study Neighbourhoods
1A	Urban areas to be conserved largely as existing.	Preston Round Hill Tivoli & Prestonville
1B	Suburban areas to be conserved largely as existing.	Ovingdean Rottingdean Surrenden Westdene & Withdean
2A	Urban areas suitable for localised, incremental development and enhancement.	Bear Road West Hove Wilbury
2B	Suburban areas suitable for localised, incremental development and enhancement.	Bevendean Coldean Hangleton Hollingbury Mile Oak & Portslade Village Patcham Saltdean Tongdean Woodingdean
3A	Urban areas where positive and pro-active measures are required to secure major enhancement.	East Brighton Hanover & Elm Grove Pankhurst & Craven Vale Portslade-by-Sea Sackville
3B	Suburban areas where positive and pro-active measures are required to secure major enhancement.	Hollingdean Knoll Moulsecoomb West Blatchington
4	Mixed approach areas.	Black Rock Lewes Road London Road University

The character of each neighbourhood typology is briefly summarised below. For each of the neighbourhood typologies there are a number of common or shared urban design issues that warrant the provision of a consistent approach to development proposals. In this way such proposals, where appropriate, will make a positive contribution to local character and distinctiveness or help to maintain or establish a strong sense of place in neighbourhoods.

In assessing appropriate density of residential development, consideration must be given to the prevailing density of the neighbourhood and the specific characteristics of the site. The following general ranges will apply (as net density):

Range	Net dwellings per hectare (dph)
Very Low	Up to 30dph
Low	30 – 50 dph
Medium	50 – 100dph
High	Over 100 dph
Very High	Over 200 dph

Design issues that are relevant for each neighbourhood type are set out in more detail below.

1A - Urban areas to be conserved largely as existing

These are predominantly residential neighbourhoods, mainly low rise but of medium to high density, with a tight-knit urban grain and historic and fairly rigid street patterns but clear local landmarks. Townscape is cohesive and attractive and has a planned appearance, with mature street and garden trees often a notable feature. Housing is varied but building lines are consistent and terraced forms are most typical. The topography often affords attractive views. Significant areas of public open space are readily accessible. These neighbourhoods are very legible.

Future development will be modest in scale and will be expected to maintain or reinforce these positive qualities and to be of similar density. This may include infilling unsightly gaps in street frontages or replacing poor quality buildings. Opportunities for higher density development may exist where site-specific conditions and amenity issues allow.

1B - Suburban areas to be conserved largely as existing

These are low density outlying neighbourhoods whose suburban form relates strongly to the topography and landscape, being generally developed from the base of a valley or valleys up the sloping sides and responding positively to the contours. They developed around historic rural cores and some have heritage sensitivities. Unfolding views are common. Development is spacious and low rise on mostly generous plot widths, with a preponderance of detached and semi-detached forms. Townscape has pleasing variety and contrasts, arising from development that has evolved over time, unified by scale and materials. Commercial or civic/community clusters are notable and give the neighbourhoods a focus. Local landmarks aid navigability.

There are few identified opportunities for future development on any significant scale and little scope for increased density without harming the positive characteristics of the neighbourhoods. However there may be scope for medium density development around cores of commercial or community uses. Development should respond positively to the contours of the site, respect the adjacent Downland/National Park and reflect the prevailing stepping of rooflines on the valley sides. The spacious layout of streets should be maintained and particular emphasis given to spacing between buildings and visual permeability.

2A - Urban areas suitable for localised, incremental development and enhancement

These neighbourhoods generally have a tight-knit urban grain and medium to high range density in mixed residential form, with a fairly cohesive townscape and mature street trees. Building lines are consistent and terraced forms are most typical. There are pockets of larger scale commercial and civic/community uses on primary routes, as well as some taller apartment or institutional blocks, which depart from the prevailing urban form without adversely affecting the overall coherence of the areas. These neighbourhoods have significant public open space and good accessibility to services and are largely legible.

The street pattern and tight knit urban grain of the residential streets should be maintained and continuity of building line and rhythm of facades respected. Opportunities

to increase density should be taken for redevelopment in mixed use parts of the neighbourhood, on or adjoining main transport corridors or fronting public open space, where this would enhance the coherence of townscape. Such locations may be appropriate for contemporary, innovative designs. However, landmark developments are not necessary to aid legibility or enhance townscape. Development of up to 6 storeys in height may be appropriate where clusters of taller buildings already exist and where the width of the road and original plot size enable the height and massing to be in proportion to the street scene.

2B - Suburban areas suitable for localised, incremental development and enhancement

These are residential neighbourhoods on the periphery of the built-up area and the edge of the National Park, which consequently have strong physical and visual links with the Downs. They are low to medium density and predominantly low rise on the valley slopes and sometimes along the ridges. Development is often spacious with generous plot width and demonstrates deliberate planning in form and layout. Grass verges are common. Detached and semi-detached housing dominates. Townscape is fairly consistent but can lack local landmarks or navigable features. Pockets of commercial development vary considerably in scale and quality and are not always well integrated into the typical suburban grain.

Particular emphasis should be given to spacing between buildings and visual permeability and development should respond positively to the contours of the site, respect the adjacent Downland/National Park and reflect the prevailing stepping of rooflines on the valley sides.

Residential density should be medium density wherever compatible with the site context, and particularly where this would strengthen the townscape around local shopping centres/community centres or local parades, provide a legible local landmark (where this is currently lacking) and help to support local services. Buildings over 3 storeys in height should in other cases be confined to the lower valley slopes or where there are any existing clusters of such building heights.

Development should pay particular attention to the potential to introduce new, or enhance existing, pedestrian and cycle links to local services, public open space and transport facilities. The scope for some small scale backland or back garden development could be explored where such land or gardens are especially large and are not being used effectively.

3A - Urban areas where positive and pro-active measures are required to secure major enhancement

These are, to varying degrees, mixed and fragmented neighbourhoods where development in parts shows clear planning and in other parts has evolved in a piecemeal manner and often isolated manner, usually as a result of later 20th century development and redevelopment.

Overall street pattern and urban form are consequently fractured. Height and scale of buildings are variable, residential form is mixed and the neighbourhoods include some notably taller buildings in the form of apartment blocks, civic or commercial buildings. Residential density is medium to very high and access to good quality and usable public open space is variable but generally deficient. The public realm lacks coherence and is often poorly maintained.

New development should actively seek to reinstate the historic street pattern and urban grain of the area or, where no such precedent existed, to create a clearly defined street pattern that forms legible links to surrounding streets and services.

Residential density should be high unless this would cause visual harm to a street of coherent townscape. In particular, opportunities to increase density should be taken for redevelopment in mixed use parts of the neighbourhood, on or adjoining main transport corridors or nodes, around local community facilities or fronting public open space. Opportunities for clusters of taller buildings exist in most of these neighbourhoods. Major development should seek to enhance the quality and functionality of existing open space so that it better meets the needs of the local communities in conjunction with a more efficient use of available land.

3B - Suburban areas where positive and pro-active measures are required to secure major enhancement

These are, to varying degrees, mixed and fragmented neighbourhoods (part urban and part suburban) that are predominantly on lower valley slopes. They include areas of clearly planned, and often cohesive and attractive, residential development that is mainly medium density. But there are also significant areas of commercial or civic/community uses and sometimes also higher density residential blocks, which generally relate poorly to the prevailing urban form and which have an often piecemeal character. Access to local open space, particularly of a functional or recreational value, is variable and physical permeability or visual legibility within neighbourhoods can be poor.

New development should seek to help stitch the fragmented areas of the neighbourhood together through street pattern, urban grain and building line.

Density should be generally medium but opportunities for high density development exist on the lower level land around existing commercial or community uses. Buildings in these areas can be medium rise and there are opportunities to create local landmarks as part of a wider approach to enhancing the legibility of the neighbourhoods.

Major development should seek to enhance the quality and functionality of existing open space so that it better meets the needs of the local communities in conjunction with a more efficient use of available land.

4 - Mixed approach neighbourhoods

4a - Black Rock

This neighbourhood is split, in character terms, between the Roedean area and the Marina. Roedean is a low density and low-rise residential area set on the cliff top and with setting of open downland. It falls into typology 2B as a suburban area suitable for localised, incremental development and enhancement. However, the vacant Gas Works site is an exception to this and requires positive and pro-active measures to secure major enhancement akin to the category 3B areas.

The Marina is a mixed use, mixed scale and mixed form area of 20th century development on reclaimed land. The public realm is very much car dominated. It falls into typology 3A as an urban area where positive and pro-active measures are required to secure major enhancement.

4b - Lewes Road and 4c - London Road

These share the characteristic of being linear corridors rather than true neighbourhoods and they form two major routes into the city along the main valley floors. Each is marked by a transition in character from outer suburban through inner suburban to urban form and act as gateways into the city as they move from inner suburban to urban. Density, building line and scale of buildings reflect this transition.

Future development has particular opportunity to enhance the inner suburban segments of each corridor, where the built form is mixed and lacks a clear relationship to the road and where land is not always used efficiently or effectively. High density development, with taller buildings and a mix of uses, would enable these segments to fulfil their potential and create more attractive routes and more legible gateways into the city.

4d - University

This is a unique neighbourhood on the fringe of the city mainly comprising the two university campuses either side of the A27 but with a small 'island' of civic and commercial buildings between the A27 and the railway line.

The original University of Sussex campus is unified 1960s composition, containing eight listed buildings, with a close relationship to the downland and utilising a limited palette of materials. As development on the campus has moved northwards in later years that coherence has gradually been eroded. The buildings of the University of Brighton are architecturally mixed; they follow the contours but with a much less coherent layout and in a less generous landscape setting.

Both campuses are expected to significantly expand to cater for greater student numbers, for both teaching and residential buildings, and in each case development should be at a higher density than existing in order to use the campuses efficiently, whilst avoiding an urbanisation of the neighbourhood and respecting the Downland and National Park setting.

12. Strategic viewpoints and landmarks

12.1. Viewpoints



1. Foredown Tower

Above: Foredown Road (north of tower) 90 degree panoramic view south and south east.



2. Toads Hole Valley

Below: From north end of King George VI Avenue – looking south west.



3. Hollingbury Hill Fort

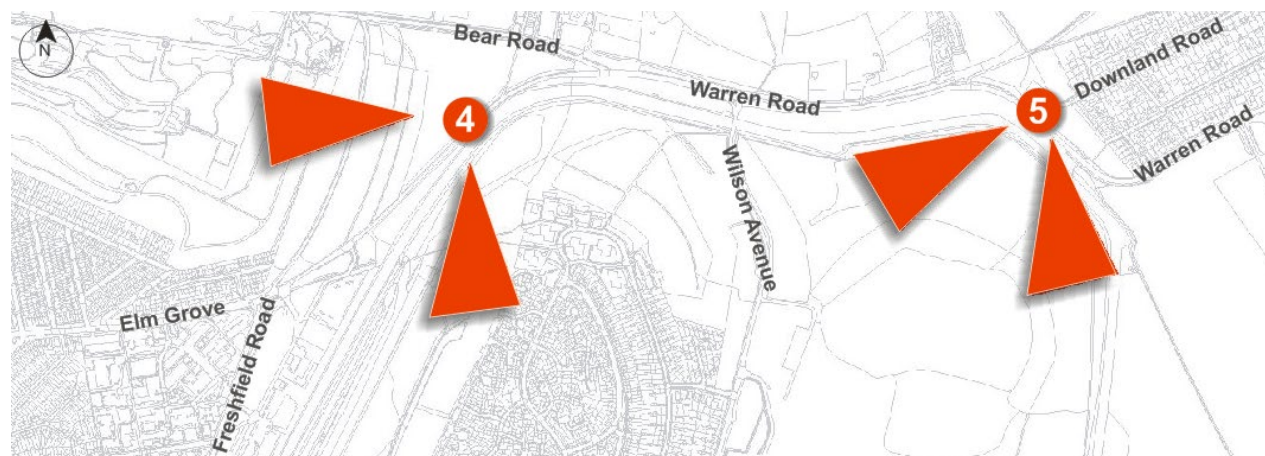
Above: From track to south – a wide arc view south to south west. This view is from within the South Downs National Park.

4. Race Hill

Below: From Warren Road – a wide arc view south and west.

5. Woodingdean

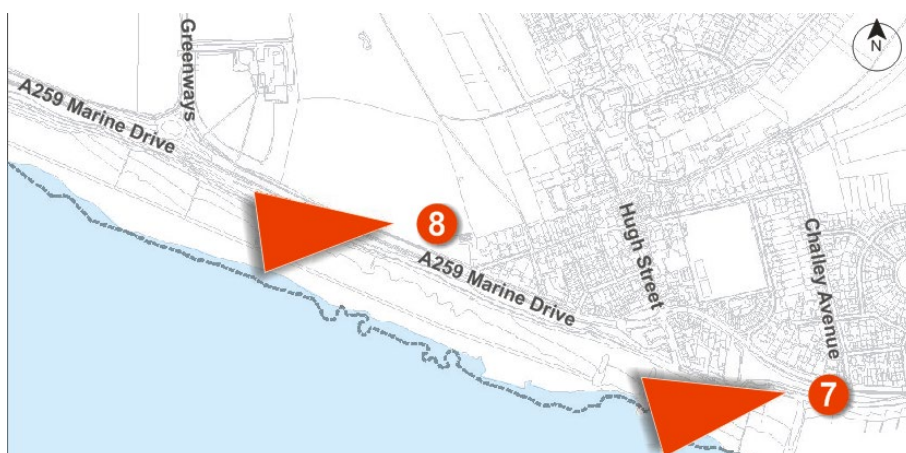
Bottom of the page: from Warren Road / Downland Road – a wide arc view south and south west.





6. Whitehawk Camp

Below: Whitehawk Hill Road – a wide arc view south to south west.

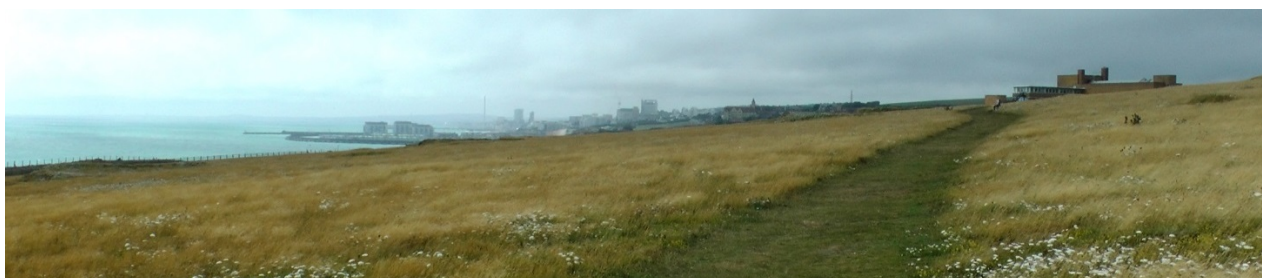


7. Rottingdean East

Above: Coastal path (near Chailey Avenue) - looking west.

8. Rottingdean Windmill

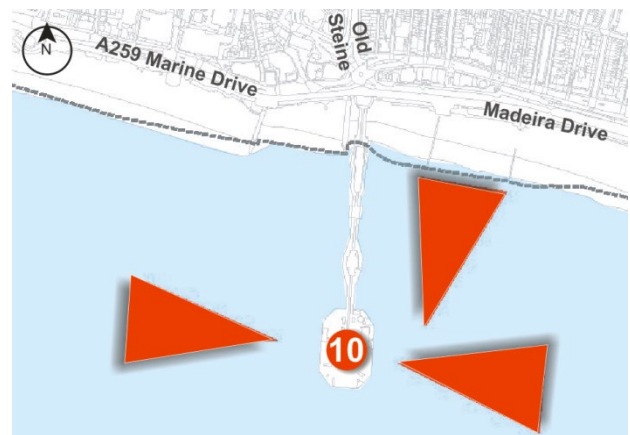
Below: 180 degree panoramic view south.





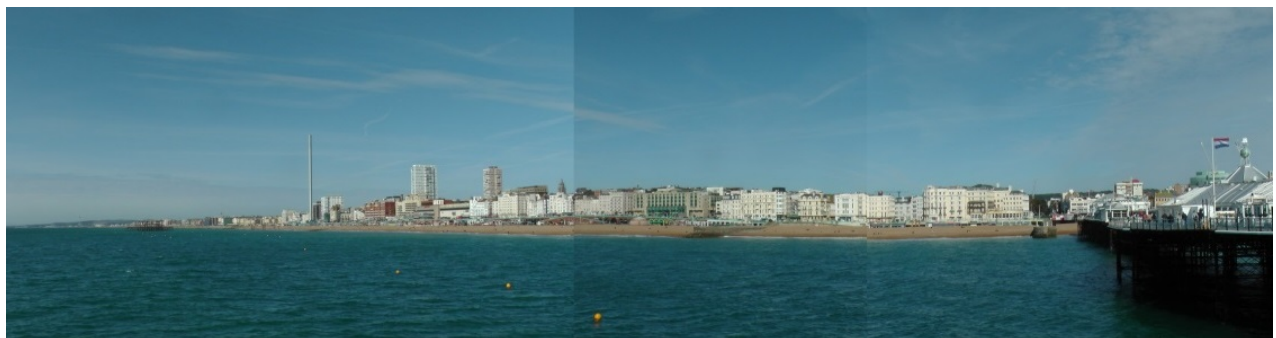
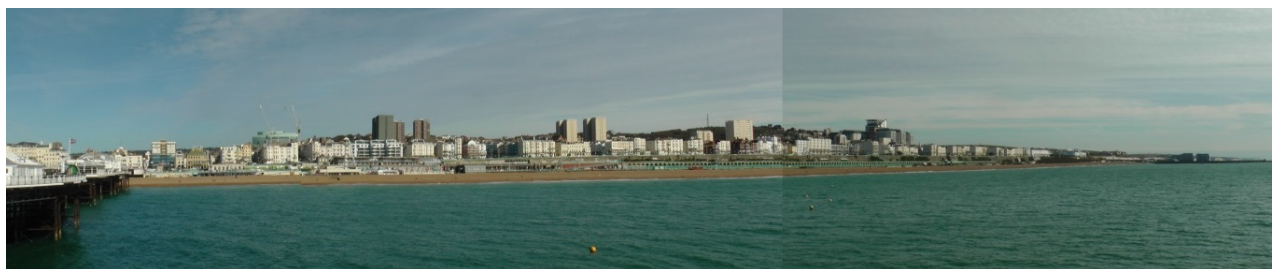
9. Marina

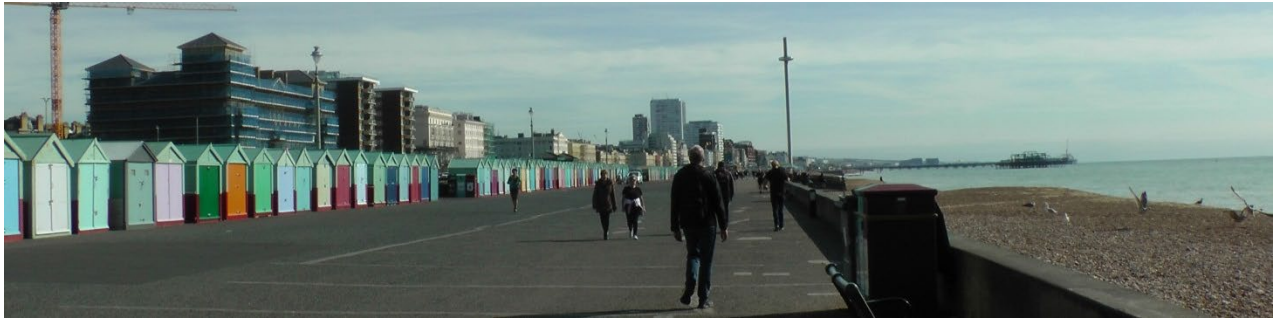
Above: Western breakwater— looking north west.



10. Brighton Pier

Below: 180 degree panoramic view north.





11. Kings Esplanade

Above: East of Courtney Gate – a seafront view eastwards.



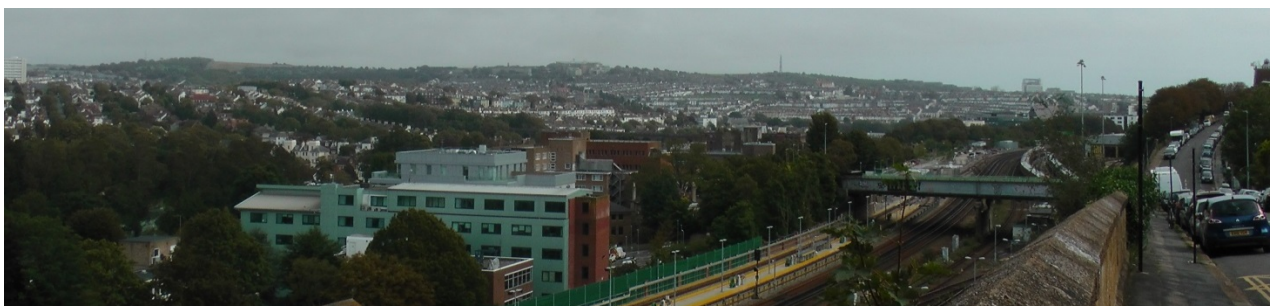
12. Basin Road South

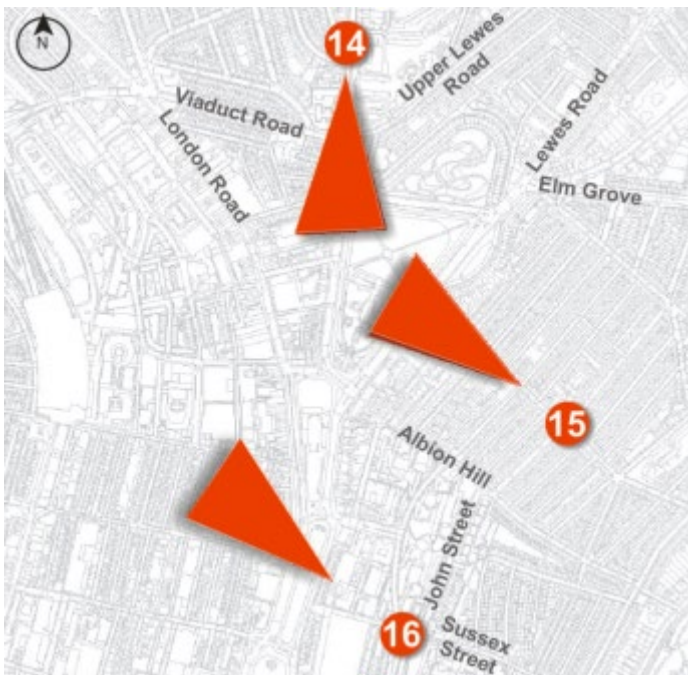
Below: At Brighton & Hove boundary – a coastal view eastwards.



13. Highcroft Villas

Below: At point where road straightens – a wide arc view south east to north east.





14. Ditchling Road

Above: Junction with Bromley Road - a narrow view southwards towards St Peter's Church.

15. Southover Street

Below: junction with Ewart Street - a narrow view north-westwards towards the Viaduct.

16. Ashton Rise

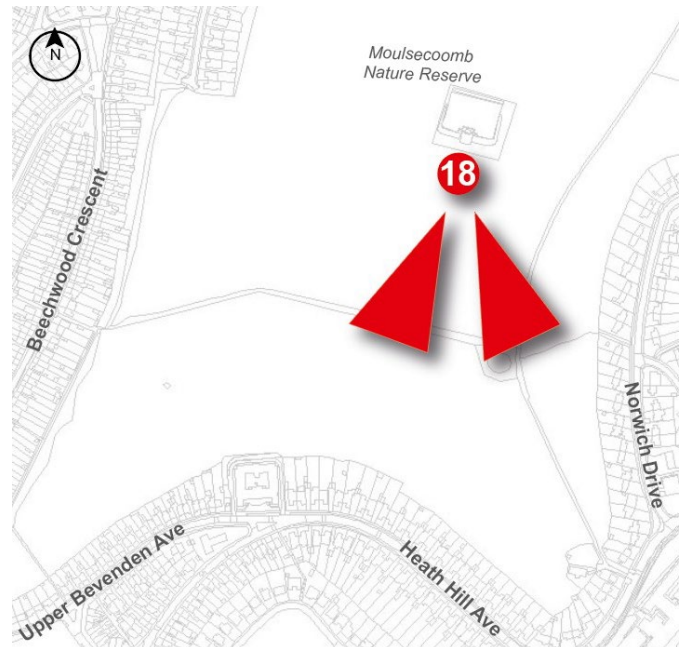
Bottom of the page: Junction with John Street – looking north-west towards St Peter's Church





17. Surrenden Road

Above: View to the sea.



18. Bevendean Down

Below: View to the sea.



12.2. Strategic approach points

The following strategic approach points have been identified where there will be a series of unfolding views:

- A. Dyke Road approach;
- B. London Road approach;
- C. Lewes Road approach;
- D. Approach to sea from Brighton Station; and
- E. Approach to sea from Hove Station.

In the case of the vehicular approaches (a, (b and (c, the nature of this visual experience usually involves a broad shifting view along a major route, part suburban and part urban, likely with numerous focal points and a variable edge condition along the way.

In the case of rail route approaches d) and e), the view is typically of a contained urban view type which involves the viewer with a round view of cohesive urban experience. Focal points serve to strengthen the overall visual experience. Views towards the sea as these emerge should be protected or enhanced. Station sites also offer the opportunity to improve first impressions of space upon arrival.

12.3. Landmarks

Identified strategic landmarks are:

- 1. Brighton Royal Pavilion;
- 2. St Peter's Church, York Place, Brighton;
- 3. St Bartholomew's Church, Ann Street, Brighton;
- 4. Brighton Station;
- 5. The Clock Tower, Queens Road, Brighton;
- 6. Brighton / Palace Pier;
- 7. London Road Railway Viaduct, Preston Road/Beaconsfield Road, Brighton;
- 8. Roedean School, Marine Drive, Brighton;
- 9. St Joseph's Church, Elm Grove, Brighton;
- 10. Brighton General Hospital, Elm Grove;
- 11. Sussex Heights, St Margaret's Place, Brighton;
- 12. Embassy Court, Kings Road, Brighton;
- 13. St John the Baptist Church, Church Road, Hove;
- 14. St Peter's Roman Catholic Church, Tamworth Road, Hove;
- 15. The Engineerium, Woodland Drive, Hove;
- 16. West Blatchington Windmill, Holmes Avenue, Hove;
- 17. Patcham Windmill, Mill Road, Brighton;
- 18. Rottingdean Windmill, Nevill Road, Rottingdean;
- 19. Lewes Crescent/Sussex Square, Brighton;
- 20. Adelaide Crescent / Palmeira Square, Hove; and
- 21. Brunswick Square, Hove.
- 22. i360, Kings Road, Brighton; and
- 23. Peace Statue, Kings Road, Brighton/Kingsway, Hove

13. Tall Building Statement guidelines

The council will require applicants to provide the following information as part of a Tall Buildings Statement

The [Tall Building Study](#) provides supporting information that applicants may also find helpful about the guidelines below.

13.1. Context

Visual impact

Tall buildings should be sited in areas of the city that have minimal visual impact on sensitive historic environments. Retaining and enhancing key strategic views through the careful siting of tall buildings is a key objective. They should protect and complement, not compromise, strategic views and important vistas in the city.

Applicants will need to provide:

360 degree evaluations of the potential visual impact of the proposal on the city's urban, marine and downland context must be provided. These may be illustrated through computer visualisations and photomontage techniques that consider, but are not limited to, the following:

- The built and natural environment;
- Key strategic views and approaches; and
- Heritage assets and settings.

A detailed urban design analysis of surrounding areas that details the positive and negative contributions that the proposed tall building makes to the visual quality of the area must be provided; the taller the building the more extensive the area of analysis.

Illustrations must be of a high quality, and capable of being easily understood and suitable for public consultation; they should illustrate any perceived negative as well as positive visual impact.

Key strategic views and approaches are set out in more detail in sub-section 12 above.

Siting of buildings

Groups of tall buildings are often best staggered or stepped to respond to natural slope contours and to avoid masking natural valley formations or blocking strategic or important local views within and across the city.

Applicants will need to:

Demonstrate, by means of a townscape/landscape impact assessment, how the proposal sits within the existing townscape and landform.

Describe the extent to which the proposal contributes to the creation of an attractive cluster of tall buildings or creates an individual landmark.

The construction of a scale model will often be helpful in assessing this impact. The proposal should also have regard to its likely impact on the future of adjoining buildings and possible future new developments in the near vicinity, and on local topography.

Climatic impact

Tall buildings over a certain height can adversely affect the environmental quality of surrounding areas through the diversion of high-speed winds to ground level and through the overshadowing of adjacent residential buildings including public/private garden spaces. The impact of both of these elements can be mitigated through good design and sensitive siting. The impact of sunlight and shadows at different times of the day and throughout the year will need to be assessed.

Applicants will need to:

Describe how the design has considered the local climate.

Explain how the proposals address the climatic effects of the proposal on its surroundings. Issues to be considered will include:

- Extended overshadowing;
- The diversion of high-speed winds to ground level; and
- Glare reduction.

The use of architectural devices such as screens, terraces and awnings and also facade setbacks can be adopted to minimise the effects of high-speed wind at the bases of tall buildings. Individual proposals should seek to create well orientated and lively spaces that contribute positively to the wider public realm.

Infrastructure

Development proposals must contribute to the provision of new facilities where there is a proven deficiency. The sequence/time scale of delivery of infrastructure in relation to new higher density developments must be made clear.

Applicants will need to:

Assess the current capacity of local public infrastructure and facilities to support the increase in local population that the development will bring to the city (i.e. streets, footways, cycle routes, waste water/sewage disposal systems, public transport services, access for emergency services, open spaces, playgrounds, schools, and child and health care facilities).

Identify additional infrastructure and facilities required as a result of the proposed development, and how these will be achieved and delivered.

Streetscape

Tall buildings increase pressure on ground floors with more plant equipment, servicing and parking. Hence, there is a need to create meaningful spaces at ground level.

Applicants will need to:

Describe how the proposal contributes to the streetscape in particular in relation to:

- Active frontages and natural surveillance;

- Legible entrances;
- An understanding of the relationship of the proposal to the existing streetscape; and
- A definition of the public realm.

Describe how the proposal responds positively to any characteristic alignment and setbacks of surrounding buildings.

Describe its effect on surrounding context and local views, in particular at podium level.

New tall buildings should make reference to their surroundings through footprint, setback and street and building alignment. Aligning tall buildings to terminate visual axis or frame scenes can create a strong reference point, which enriches urban legibility and aids navigation.

They should reflect their surroundings through the definition of their upper storey setback and by reinforcing the articulation of the streetscape. Any car parking should not be located in front of buildings, but contained within the development or located behind buildings.

Conservation

In general new tall buildings in Brighton and Hove should not be within conservation areas, nor should they visually impinge on the setting of/or important views of listed buildings or conservation areas. This particularly applies to the backdrops of groups of historic buildings or the visual envelope surrounding single buildings such as churches

Applicants will need to:

Demonstrate, through a heritage impact assessment, that the surrounding area's character or appearance or the setting of any listed building or historic park or garden will be preserved or enhanced.

In areas adjoining conservation areas where new tall buildings may be appropriate, tall buildings should, in general, relate well to the unique urban grain, visual axes, general context, sense of place, and topography of surrounding conservation areas, and this should be tested through detailed character and impact assessment. Conservation Area Character Statements should be referenced.

Mix of uses

Applicants will need to:

Describe the land use mix.

Describe how the proposed mix of land uses supports and complements the surrounding land use pattern and local community needs, and assists in delivering relevant housing and/or employment opportunities.

Amenity of neighbours

Applicants will need to:

Describe and analyse the impact of the proposals on neighbouring properties in particular aspect/outlook, privacy, daylight, sunlight, noise and light glare.

13.2. Spaces between buildings

Active travel

In the interests of achieving an efficient urban form, intensification of development should occur in areas that are within walking distance of either rail stations or major bus routes.

Applicants will need to:

Describe existing transport services such as rail stations, bus routes, car club, cycle hire provision or sustainable transport corridors within walking distance.

Assess the suitability of local transport infrastructure and services to accommodate the needs derived from new developments and identify means by which transport deficiencies will be overcome.

Provide a transport assessment/statement and travel plan (for non-residential development) demonstrating how the development will contribute to improvements to surrounding streets or the travel network within 500m.

Describe the measures incorporated in the proposal which will help to reduce private vehicle use, improve permeability and access to public transport.

The council has identified a number of sustainable transport corridors. These corridors are main routes into the city that will be altered to increase access for public transport users and by cyclists and pedestrians.

The aim is to reduce reliance on the car in the city by reducing the required levels of parking associated with new development in central areas, encouraging shared use of vehicles (e.g. through car clubs) public transport use and greater trips on foot or by cycle.

Public realm and open space

The City Plan outlines requirements for the provision of open space within new developments.

Applicants will need to:

Describe how the proposal has been designed to create high quality public spaces within the site and nearby, in particular with regard to:

- High design quality;
- Climatic comfort and water management;
- Need for light, sun and shade;
- Landscaping, biodiversity and ecology;
- Adjacent uses;
- Crime prevention and protection of crowded spaces;
- Quality and durability of materials; and
- Arrangements for long term maintenance and management.

Explain how the proposal meets or exceeds the City Plan requirement for the provision of public and private open space.

Demonstrate how the proposal delivers biodiversity gains and Nature Improvement Areas.

Describe how the proposed development maximises provision of outdoor and indoor communal and private amenity space.

Demonstrate that their proposal will provide equal access for all.

To a certain extent these might be accommodated through roof terraces, balconies and internal courtyards, providing occupants with high quality green space. Some of the open space requirements could be accommodated through the development of private external spaces. However these elements may not be sufficient to ensure that all residents and other users have access to adequate open space.

As a result, tall building developments may be required to contribute a proportionate financial sum to the enhancement of the existing public realm and parks in the vicinity. Location of tall buildings near open parkland must nevertheless not harm the peaceful enjoyment of the park/public open space by others, or reduce its sense of space.

13.3. Buildings

Sustainability

Applicants will need to:

Describe how the proposal contributes to social inclusion, environmental health and to the economic vitality of Brighton and Hove.

Provide a sustainability statement outlining how the proposal will apply best sustainable practices. Particular consideration should be given to:

- Maximising the efficient use of brownfield land (including an explanation of the density of dwellings that is to be achieved for residential development)
- resource management;
- energy and thermal performance;
- water efficiency performance;
- green infrastructure and biodiversity gains;
- materials specification;
- waste management; and
- a recognised method must be used to assess a proposal's sustainability (e.g. BREEAM, Passivhaus).

Scale and massing

The perception of the scale of new tall buildings is an important key in integrating the new development into an established urban pattern and grain. New tall buildings should respond positively to surrounding building heights and depths and street frontages and provide an appropriate scale compatible with their surroundings.

Applicants will need to:

Describe the strategy employed to integrate the building with the scale of its context.

Indicate how the proposed design ensures a feeling of human scale at street level.

Describe the massing strategy of the proposal.

Describe how the massing of the proposal is integrated into surrounding development.

Illustrate how the massing of the proposal creates an appropriate overall form.

New tall buildings should have regard to the existing built form massing and maintain the area's sense of place. In general, bulky, dominant massing of new tall buildings should be avoided.

Form

Applicants will need to:

Provide a statement that describes in detail the rationale for the form of the proposal.

In the case of 'landmark' buildings the statement should take into account the following key points:

- Inspiration
- Silhouette
- Articulation
- Cultural and climatic reference
- Describe and illustrate how the form of the roof top enhances the skyline of the city.

Accessibility and public access

Tall buildings must be fully compliant with all aspects of disability discrimination legislation.

Applicants will need to:

Describe how their proposal will provide equal access for all.

Explain how proposed tall buildings which comprise mixed or commercial uses will encourage public access to foster a more positive perception of the building and contribute to a stronger sense of community.

Attention should be paid to means of providing continuous, even access to disabled units and facilities and evacuating disabled people from the building in emergencies and providing alternative means of access if a lift fails.

New tall buildings should strive to be as accessible as possible to all people through the provision of ramps, lifts, gentle rising steps with landings, clear signage and branding, sensitive and appropriate lighting schemes, non-slip surfaces, contrasting colour and texture schemes, automatic opening doors, appropriately placed seating, and clear and legible internal layouts.

Materials and maintenance

Building and maintaining a tall building is expensive.

Applicants will need to:

Describe how enough investment has been factored into early feasibility studies and viability appraisals that will support ongoing maintenance of the building

Describe high specification of materials and details for tall buildings.

The Council will seek to ensure that enough investment has been factored into early feasibility studies and viability appraisals that will support ongoing maintenance of the building.

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