

The revised spatial strategy

The council's overarching spatial strategy for the city to 2026 is to accommodate future development within the built up area of the city by optimising development on brownfield land and thereby preserving the countryside.

This will be achieved by directing significant development to seven broad areas of the city where it is possible to make full use of public transport/ public transport interchanges and where identified capacity exists to accommodate future development.

The development areas are proposed to accommodate a significant amount of development because they contain opportunities for change, they can deliver development of city wide or regional importance and/or because they are in need of regeneration. These seven areas are:

- Brighton Centre and Churchill Square area
- Brighton Marina and Black Rock
- Lewes Road
- New England Quarter and London Road
- Eastern Road and Edward Street
- Hove Station area
- Shoreham Harbour and South Portslade.

Proposals for these areas and indicative amounts of development are set out in DA1- DA7 alongside local priorities. CP11 sets out the full 15 year supply of housing sites.

Additional areas of the city are identified as part of the Spatial Strategy as they require a special or coordinated approach to managing future change in these areas. Proposals are set out in SA1- SA5.

Further proposals are set out to improve the sustainability of remaining residential areas of the city with the priority to reduce inequality. These are set out in SN1 and SN2.

The indicative amount and type of development to be delivered by the Development Areas is set out in the following table:

Table 1 - Indicative minimum amount of development by type and by Development Area 2006-2026 (as at 1st April 2006)

Development Areas.	DA1 Brighton Centre and Churchill Square Area	DA2 Brighton Marina and Black Rock Site ⁹	DA3 Lewes Road	DA4 New England Quarter and London Road ¹⁰	DA5 Eastern Road Edward Street	DA6 Hove Station Area	DA7 Shoreham Harbour and South Portslade ¹¹	Totals
Land Uses								
Offices		500 sq m	24,800 sq m	45,000 sq m	14,900 sq m	20,000 ¹² sq m		105,200 sq m
Industrial		4,000 sq m ¹³			1,610 sq m			5,610 sq m
Retail	20,000 sq m	5,000 sq m		4,446 sq m				29,446 sq m
Hotel	317 bedrooms ¹⁴			17,000 sq m hotel				2 hotels
Leisure	28,000 sq m conference centre and 6 screen cinema	3,470 sq m International Arena/ice rink	22,374 all purpose seater stadium					
Residential	8 units	2,000 units	358 units	795 units	311 units	295 units	107 units	3,874 units ¹⁵
Community Use		1,000 sq m		17,000 sq m	GP Surgery			18,000 sq m
Other			2,000 sq m teaching and learning space University expansion ¹⁶		17,000 – 34,000 sq m hospital space Univ. Library, Dance studio & Creative workspace			

⁹ Includes outstanding commitments from Brunswick Scheme as at 1st April 2006.

¹⁰ Includes outstanding commitments from Brighton Station developments as at 1st April 2006.

¹¹ Identified sites with planning permission/ suitable for housing outside Shoreham Harbour. Awaiting detailed proposals from SEEDA and outcome of further technical studies.

¹² Exact potential requires further work but includes unimplemented planning permission.

¹³ Indicative minimum for Gas Work Site

¹⁴ Net gain of 175 bedrooms

¹⁵ Strategic Housing Land Availability Assessment. Please see Housing Land Supply table in CP11 for full details on how the 11,000 dwelling requirement set out in the draft South East Plan will be met.

¹⁶ 10% (c.11,000 sq m) over next 5 yrs at University of Brighton and 25% within Sussex University over next 15 years; 2,500 student units.

Reason for the Revised Spatial Strategy

2.8 The council's preferred option is still to accommodate future development by optimising development on brownfield sites throughout the existing built-up area of the city, in order to preserve the countryside, directing significant growth and development to key broad areas identified for regeneration or renewal to bring about sustainable communities. Following the assessment of the 10 broad areas the following areas are no longer part of the spatial strategy:

Portland Road - following consultation comments and further assessment whilst opportunities were identified for townscape improvements and improvements to the local shopping centre there was not sufficient capacity to accommodate significant development to warrant its inclusion as a specific Development Area. The proposed Sustainable Neighbourhoods Proposals and general Core Policies were considered sufficient policy guidance for future development in this area. The EDF site on Portland Road is proposed for inclusion in the wider Shoreham Harbour/ South Portslade area.

Old Shoreham Road corridor – following consultation comments and further assessment, it is considered that whilst there is the potential for improvements relating to the sustainable transport corridor and north-south links in the Hove area along the corridor, the majority of sites along Old Shoreham Road have been identified within the Employment Land Study as requiring safeguarding for employment uses and therefore do not present significant development opportunity. However links to Old Shoreham Road have been made in the Hove Station Area as they relate to that area and in the Shoreham Harbour and South Portslade area.

Western Seafront (Kingsway and Wellington Road) - following further investigation of opportunities for additional development beyond existing commitments it was felt that this area did not present significant development potential and opportunities regarding townscape improvements and improved links to the seafront could be better dealt with in a revised Seafront Preferred Option (see SA1).

The following areas were combined to create a larger broad development area:

Brighton Station/ New England area and London Road/ Preston Road Corridor have been merged as one Development Area because it was considered following further investigation and the findings of the LR2 Regeneration Strategies (2007) that the close proximity of the New England area to London Road town centre and the Preston Road corridor suggested that these areas were better treated comprehensively and this would also offer greater clarity for investment decisions and coordination of strategies.

Inclusion of Shoreham Harbour in the Spatial Strategy

2.9 The potential for significant regeneration of Shoreham Harbour to create a mixed-use sustainable community around a consolidated, modern port operation has previously been recognised. However, implementation has been frustrated by a number of complex infrastructure costs.

2.10 In response to concern raised at the 'issues and options' stage about the lack of apparent means to fund infrastructure requirements necessary for development to go ahead at the port, Option E – identification of strategic development sites was not pursued as part of the Spatial Strategy in the Preferred Options document and Shoreham Harbour was therefore not included in the list of 10 broad areas where the bulk of the city's development was expected to be accommodated. The city council recognised the potential for the Harbour in the long term and the requirement to take a pro-active response and included a specific policy for Shoreham Harbour.

2.11 Since then the South East England Development Agency (SEEDA) has been working with Shoreham Port Authority and the three local authorities involved (Brighton & Hove, Adur District Council and West Sussex County Council) to develop a new set of proposals for the Harbour with a view to producing a deliverable redevelopment programme.

2.12 The new proposals are considering a redevelopment scheme that is much more significant in scale and scope than previously. The scheme that is now emerging looks at a wider area than just the Harbour, comprising South Portslade (plus Southwick and Fishergate in Adur District). In order to accommodate the scale of investment in infrastructure the proposal is likely to involve 5,000 to 10,000 homes (2,000 to 6,000 in Brighton & Hove) and 7,000 to 8,000 jobs in total. The details of the scheme are currently under active discussion.

2.13 Discussions have reached the stage where a delivery plan setting out the potential to implement a scheme in the long term can now be devised. This is likely to include the preparation of an Area Action Plan by the three authorities with financial support from SEEDA. For this reason Shoreham Harbour/South Portslade has been added to the list of Development Areas in the Core Strategy.

2.14 However, there are still a number of significant issues to be addressed. A key area is that of flood risk. The Strategic Flood Risk Assessments for Brighton & Hove and Adur have identified parts of the Port as being of high flood risk. Therefore, PPS25 requires the application of a sequential/exceptions test to be passed before certain developments could be permitted on these sites. The designation of a wider area including South Portslade within the Area Action Plan might also assist in this process by allowing flexibility as to the location of the various uses, particular those classified as vulnerable uses in areas identified of lower flood risk.

2.15 Due to the proposals being at an early stage, no contribution from development in this area to strategic requirements of the Core Strategy has been assumed.

Exclusion of the Urban Fringe from the Spatial Strategy

2.16 Whilst consultation responses suggested a lack of consensus as to the role of the urban fringe, the option of allowing limited development within the urban fringe in the longer term (beyond 10 years) was reconsidered as part of the overall strategy for accommodating development and growth in the city. Further assessment suggests that:

- The extent of the urban fringe could be much reduced following the 2007 proposed boundary modifications to the South Downs National Park which indicates some additional areas of the urban fringe to be included in the proposed boundary.
- the opportunities for developing sustainable communities on urban fringe sites are limited compared with regeneration opportunities within the built up area;
- there is a need for a coordinated approach to the urban fringe rather than allowing piecemeal development;
- Initial findings of the SHLAA suggest greenfield sites are not required to meet the city's housing land supply.
- Housing development on greenfield sites would not be in accordance with the expectation of the sub-regional strategy of the Draft South East Plan.

It has therefore not been included in the spatial strategy and the approach to the Urban Fringe is therefore addressed in SA4.

Conformity with National and Regional Policies

2.17 It is considered that the overarching spatial strategy best articulates national planning policy in the local context. It is considered to be the option that best promotes and integrates environmental, economic and social objectives in the pursuit of sustainable communities (meeting PPS 1). It is informed by an initial assessment of Housing Land Supply as required by PPS 3 on Housing. It concentrates on the redevelopment of previously developed land ('brownfield' sites) for housing and plans for mixed use development and aims to reduce car dependence and improve linkages by public transport, in accordance PPS 3. It also reflects the emerging guidance in draft PPS4 Planning for Sustainable Economic Development by proactively encouraging economic prosperity by identifying broad locations for economic development and mixed use development. It also makes efficient use of land within and around town centres, including higher-density development where appropriate, in accordance with PPS 6 on Planning for Town Centres. Further, this option articulates advice in PPG 13 on Transport that Plans should:

- Actively manage the pattern of urban growth to make the fullest use of public transport and focus major generators of travel demand in city, town and district centres and near to public transport interchanges; and
- Accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling.

2.18 In all these respects the preferred option is also considered to conform with the draft South East Plan; in particular it conforms with the sub-regional strategy for housing development on new strategic brownfield allocations. The preferred option also conforms with the Regional Housing Strategy and the Government's Sustainable Communities Plan for the South East. It is further considered that a focus on mixed use development around major sustainable transport nodes and corridors would help to develop Brighton & Hove's roles as a regional hub and as a catalyst for growth within the coastal south east.

Local Priorities

2.19 With regard to local matters, the spatial strategy is considered to be consistent with the findings of the Urban Characterisation Study (2007). It has regard to the Local Transport Plan's long term objectives to improve accessibility at sustainable transport nodes and to reduce road traffic, pollution and congestion. As well as the proposed rapid transport system, it also takes account of the existing sustainable transport corridors (A270 Vogue Gyratory, Church Road/Western Road, A23 London Road and A259 from Ovingdean eastwards) and traffic management measures proposed for Valley Gardens. The spatial strategy further has regard to strategic priorities 1, 2, 3 and 6 of the Economic Strategy and strategic objectives 1, 4, 5, 8 and 10 of the Regeneration Strategy, and has been informed by the Employment and Skills Plan and the Reducing Inequalities Review. It has also taken into account the overarching priorities of the council's Housing Strategy and the Refreshed Tourism Strategy.

2.20 The revised Spatial Strategy was also informed and appraised through a number of assessments. Government guidance requires that a **Transport Assessment** for the Core Strategy proposals is undertaken to test the potential traffic impacts of development proposals and to provide robust evidence for the Highways Agency on the impacts of growth on key road junctions (the A23/A27 interchange at Patcham). Whilst initial

findings of the study confirms anecdotal evidence that continued and concerted effort is required to tackle growing traffic growth and congestion resulting from current development trends, the impact of the proposed spatial strategy on top of the underlying growth forecast was found to be very small because the seven development areas were identified due to their location in core urban area; they are adjacent to major public transport corridors; and a large proportion of development is employment-related. The **Strategic Housing Market Assessment** has informed the spatial strategy through its recommendations on planning for the right 'mix' of new housing (in terms of housing tenure, type and size) to ensure that new development meets local housing need and demand and contributes to the creation of mixed and sustainable communities. The initial assessment of housing land supply in the city (**the Strategic Housing Land Availability Assessment**) has indicated in broad terms, the major contribution the seven development areas will make in accommodating new housing development. At this stage, the 'interim' results indicate that the city is likely to meet PPS3 requirements for housing delivery over a 15 year period but this will require the inclusion of a realistic allowance for the development of (small) windfall sites given the significant development constraints affecting the city and the lack of opportunity to identify specific sites.

2. 21 Through the Brighton & Hove **Strategic Flood Risk Assessment** (SFRA), the proposed approach to accommodating growth in the city has been screened against all types of flood risk and the SFRA has informed the preferred spatial strategy and identification of Development Areas, whereby development has been steered to the areas of lowest flood risk first (the sequential test). An exception test has been required for Brighton Marina and Black Rock Development Area as the sequential test indicates that it lies outside Flood Zone 1 (area of low probability of flooding). For Shoreham Harbour the sequential test concluded that the more vulnerable land uses, such as residential development, should be directed to the parts of the Development Area that lie in Flood Zone 1, whilst water-compatible development may be appropriate in the areas of higher flood risk. Specific requirements to ensure future development is defended and residual risk is minimised are reflected in the wording for these Development Areas. Article 6 of Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive) requires an **Appropriate Assessment** to be undertaken to assess the impacts of a plan or project against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. The Brighton & Hove City Council administrative area includes the Castle Hill Special Area of Conservation and a number of other European or Ramsar wildlife sites are located in the wider area. The Core Strategy has been assessed under the provisions of the Habitat Regulations to ensure that it will not have an adverse effect on any European or Ramsar wildlife site and this assessment has been recorded. The Core Strategy does not support any project proposal where it cannot be demonstrated that the development would not have an adverse effect on the integrity of any European or Ramsar site. Any subsequent plan following this Core Strategy will similarly adhere to the requirements of the Habitat Regulations. This conclusion was confirmed by Natural England April 2008.

2.22 Further justification is set out alongside the Development Areas, Special Areas and Sustainable Neighbourhoods proposals. The full range of council and city strategies and background studies used to inform the spatial strategy is indicated with each preferred options and further details on these studies can be found in the separately published Supporting Evidence Document.