

## **Consultation on policy options for Brighton and Hove's City Plan**

### **Response from the Regency Society of Brighton and Hove**

The Regency Society is pleased to comment on the policy options and looks forward to commenting in greater detail as the Plan evolves.

Our comments focus on strategic issues, which, we feel, underpin all four policy areas covered by the consultation. At this early stage, we feel it more appropriate to take a holistic view than to engage with specific detailed questions, which, in their current iteration, do not enable us to express our concerns adequately.

#### **Vision**

We look forward to the publication of the council's wider vision for the city, which will give the context for these policy areas and for the future of Brighton and Hove. It is clear that the vision is now different to that embodied in the previous Core Strategy and we look forward to commenting further when that new vision is subjected to public consultation.

We trust that will be well before the draft City Plan is published.

#### **Development principles**

- We would like to see a commitment to high quality design and consideration of townscape in all aspects of the city plan, reflected in planning briefs.
- We would also like to see evidence that the various elements of the plan are being integrated – for example, that transport proposals are linked effectively with land use proposals – and that there is proper consideration of the impact of development on existing infrastructure.
- We would like to see plans that involve the use of the many smaller brownfield sites and smaller areas of underdevelopment that are scattered around Brighton and Hove, rather than an exclusive focus on plans for large, ambitious schemes and new, greenfield sites.
- We would similarly wish to see policies that encourage optimum use of the existing built stock, by for example making full use of the accommodation above shops and offices.
- We are concerned that housing density is given adequate consideration – including sensitive and appropriate use of increased density inspired by 19th and early 20th century, high density models within the city.
- The plan should include forward planning for the replacement of existing housing stock.

#### **Areas where it is unclear that a case has been made (because of a lack of background information)**

- The proposed policy for Toads Hole Valley would appear to be at variance with the area's low rating in the SHLAA – we would like this clarified.
- There does not seem to be evidence of practical proposals to deal with increased traffic in the absence of Park and Ride other than increasing charges.

- It is not clear how immediate and pressing issues (such as the length of the waiting list for social housing and the need for job creation in the short term) are to be addressed.

**Proposals that the Regency Society is able to support at this time**

- We support policies that would prevent further agglomerations of student dwellings and other HMOs.
- We would like to see policies that support the universities providing halls of residence, which would help to prevent further family homes becoming student dwellings.