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Please refer to the Core Strategy Revised Preferred Options document and the Quick Guide before completing this response form. Your completed form should be returned to the address given below by no later than **5.00pm on Friday 8th August 2008**

Respondent details			
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Return this form to:

Local Development Framework Team  
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Or fax 01273 292379

Or email [ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)

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#### Next Stages

Do you wish to be notified that the Core Strategy has been submitted to the Secretary of State for independent examination and of the adoption of the Core Strategy?

Yes

No

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Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: Page 203

Preferred Option Reference (Letter/Number e.g. SA1, CP11, CP13 and DA2):

Do you support, partly support or object to the Preferred Option or part of the document?  
(please put 'yes' in one box)

Support		Partly Support	x	Object		
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Please give further details of your support or objection in the box below

**SA1. (Special Area 1). The Seafront.** The Preferred Option addresses the seafront as a whole including Brighton Marina and I partly agree that with the synopsis.

1. The Seafront “is mainly a leisure/visitor destination”. It is “inappropriate for higher density mixed use development”. (Summary of Consultation of Preferred Options). **AGREED.**
2. By 2008/9 100% of bathing water samples taken off Brighton Beach to meet minimum European Standards. **AGREED.**
3. Eastern of Brighton Pier to the Marina. 2.106 **DISAGREE.** To site an ice rink (new arena – Executive Summary) for Black Rock or any other development as a preferred or likely development is not valid when **no planning application has been filed** for such a development. Such auto-suggestion of feasibility of uses is unacceptable prior to consultation and declared intent of the developer. Priorities have now changed in the light of new economic conditions, affecting Brunswick, the BIA and King Alfred Centre. This fact is also highlighted under bullet points 3 and 4 SA1 - Summary of Consultation.
4. **The SEAFRONT is Brighton’s greatest nature asset.**

It is its PRIMARY ATTRACTION. If the Tourism Strategy document is to be followed as a priority – Brighton as a tourism hub (SE Plan TSR7) – and **tourism is the primary source of revenue for Brighton’s businesses (£378Mil P. 150)**, then this must be the dominant force behind the city’s allocation of development funds. The sea and our famous heritage buildings are the backcloth for all other reasons for visitors to come to Brighton. The 8 million visitors must be rewarded for their effort and expense to visit the city and return with an enriched vision of the magnificence of the place and want to return. Dirty and **unmaintained infrastructure tarnishes the image** or promotion of the city as a showcase of either its heritage or its progressive intentions.

(CP18, 3.148 - P. 150 Regency Brighton regionally significant historic built environment). The investment made by our forebears in building **Europe’s finest promenade** has not been responsibly maintained. It dilapidation is a disgrace. Resources **MUST BE** redirected before it is too late. Now it is being blighted with large commercial **waste bins. These are unacceptable street furniture.** Eyesores, whether public or privately owned. The least imaginative and least costly approach to waste collection is unacceptable for a city, which claims to have pride in its appearance and public spaces.

*It runs contrary to the stated policy CP3 Public Street Spaces item 3. “Preserving or enhancing the setting of the city’s built heritage”.* Management of the seafront and respect for the heritage, which is the key drawing of people to the area has been pushed aside by conflicting pressures. Poor or non-existent maintenance and inappropriate waste management. Waste management is not a permanent priority and must be made to take a backstage to the upkeep of the uncluttered visual richness of the whole seafront.

5. **The “the seafront ..development must be of the highest quality”. (Summary of Preferred options)**

The Council must take its own advice. It is highly desirable that any future development is of the highest quality. But the current public seafront realm is hardly maintained to an acceptable standard. The primary duty of the Council is to **maintain the quality of the seafront railings, lamp posts and other heritage structures.** Its failure to do so in any comprehensive way, in my opinion, forbids any other expenditure to be made for other purposes until these items are incorporated into any masterplan for the City’s regeneration and budgeted accordingly. **THE RAILINGS ARE FALLING APART AND THE LAMPS ARE NOT ATTENDED TO AS REQUIRED. THE FLOWER BEDS AND GARDENS ARE LEFT TO DILAPIDATE.** Any work is piecemeal. It should become comprehensive.

6. **Redevelop the simple pleasures of the seafront – pedestrian and cycle pathways.**

SF1 Preferred Option Bullet 3 P 63. It must be obvious to anyone studying the whole aspect of the SEAFRONT as a tourist attraction that the extension of the seafront to the UNDERCLIFF walk as desired by visitors and residents alike, whether on foot or bicycle (legal or not) is of primary importance to all those who value the seafront as Brighton's primary "raison d'être". The Regency and Victorian housing extending to the white cliffs is part of the healthy living and core value of the city. Inadequately defined pathways, cycle routes and maybe additional "roller blade or skate board pathways, with interesting resting places and flowerbeds would enrich the use of the Seafront's eastern arm of Madeira Drive from the Pier to Black Rock. Accordingly, the redevelopment plans of the Marina, which will cause the loss of a comprehensive view of the cliffs and detract from the heritage seafront must be curtailed to integrate with the seafront vista.

7. **The Brighton Marina.**

**No redevelopment without comprehensive clarity.** Under SA1 2.107, the redevelopment of the Spending beach site and Asda sites must be considered on the basis of the impact on the change it will make on the whole infrastructure of the seafront. (**Correction to 2.107.** The cliffs start behind the Marina – not to the east of them!)

The application by Explore Living and Parkridge should be put in abeyance until the new SPD is prepared and put forward for local consultation. The development above the cliff height is unacceptable. **Similar to London, approval of high buildings should be subject to review in the light of majority public opposition and the financial impracticality of them in the new economic climate.**

The Preferred Option basis of selection of the Marina Site should be adopted on the basis of "accessibility – led", not "identification of large strategic development sites". SEE PAGE 190. This is due to the single access road limiting traffic in and out of the site.

The development of the western portion of the Marina should be only undertaken when the whole site is planned. i.e. Parkridge must also put any intended planning application of the commercial lands prior to any approval of the Explore Living Site. Use it or lose it.

8. **AGREED: The GAS HOLDERS SITE should be incorporated into any Marina redevelopment plans.** A long term and comprehensive solution to open up much needed access to the City and its seafront from the A23 and A27 would be to **build a tunnel** from the A27 to Wilson Ave and enter Brighton at this location. The gasholders site should be redeveloped to include a large bus and transport terminus.

It is a **wasted opportunity to allocate 4,000 SQ M** (43,000 sq. ft.) as industrial space to the Gasholders site. Such space is not needed, when the priority for transport and parking for the Marina is at such a premium.

9. **Transportation** into and out of the Marina onto the A259 needs to be reviewed **on the basis of what the ramp capacity will allow**, their lifespan and the cost of replacement over their economic life. The Brighton Marina Management Company should not be saddled with its early replacement caused by development impact and excessive use any future marina occupiers.

A259 current congestion (not a real problem if not impeded by increased use of traffic lights and speed restrictions) needs to be resurfaced along much of the eastern seafront where there is some subsidence. It appears more than capable to handle current and anticipated future needs. Especially as some quarters argue that the ramps can handle the added traffic of 2,000 or more homes.

10. **Rapid Transport System and sustainable transport system is a bus service.** So call it such. The bus service along the seafront in poor because of inadequate scheduling.

Many buses come along at the same time as a result of keeping to a similar arrival time

Bus lanes are not the answer along the seafront or between Brighton and Rottingdean other than an acute inconvenience to motorists. Limiting choice of freedom of movement is not good policy, when many have no alternatives. Brighton is not London or should pretend to be when it comes to congestion and transport priorities.

### CP11 - Housing Delivery.

11. (11-12, a,b,c, is the personal opinion of the author and not necessarily of the KTS membership). There is nothing objectionable to wanting to house people on affordable terms. Indeed it is a worthy goal. However, the political drive reflected in 3.82 is a wish list of muddled thinking. Given the choice, nearly all would choose to live in a new house paid for and provided by someone else. The most expensive personal purchase for 99% of people is their house. So to state that 1,456 people p.a. NEED local government to supply their house is a **fantasy**.

12. Affordability really means providing a mechanism of **others paying** for the government supplying a selected sub-group they have identified for housing. It is no longer the poor. It is key workers, essentially, **government salaried workers**. To make housing affordable, there are three choices; **1. increase salary** to enable key workers and the poor to be able to afford market produced housing or **2. increase the cost of housing to those better off** so excess revenues from them can be re-directed to house those less able to afford them. **3. Supply cheap housing** which is sub- standard. When the central Government has raised taxes to unprecedented levels, so that it takes more than half the year before the average family can claim the money in their pocket is there, there is a rising resentment to these unfair demands of reallocation on those who feel they are more than entitled to keep their cash rather than allow another raid on their pocket by Central and local Councils encouraging excessive housing costs from the "targeted rich". This is seen as a mean-spirited attack on those who have taken steps to advance themselves.

- a. The Council duty and role is not to provide housing directly. Too much of the core strategy reflects the desire to alter the natural supply and demand of housing in order to accommodate political directives. This not the correct basis of selection of scarce resources. **The current economic climate has proven this.**
- b. The danger of blending natural stratas of society into the same confined areas is that the desire of people to advance to a higher standard of living by means of financial choice is curtailed. Generally, the better off elect to leave areas, which are sub-standard, poorly maintained or where there is a risk of crime, which inevitably happens in poor or poorer areas. The Marina would be such a case, if 2,000 homes are built there. **THE BETTER OFF WILL NOT BUY THERE! This will defeat the financial basis for the regeneration.**
- c. Hi-rise developments have proven they do not create or integrate communities. They are usually the place of violence and lack areas for children in which to grow up. Such areas are invariably not looked after and respected by its residents including good open spaces.

### CP 13. Housing Density

13. **The Marina Site.** The area of the Asda and Parkridge sites are about 5 – 6 acres (2 hectares) the whole of the 35 acre area of the Marina, i.e. 14%. (exact figures to be confirmed). To add 100 homes between now and 2012 is an increase of approx 12%. A reasonable increase, without straining the infrastructure of sewage, etc. To add 2,000 is a 240% increase.

14. On the assumption that the current housing is on 20 acres/8 Ha of the site, the housing density of the current Marina is a little over 100 units per ha. If the new housing of 2,000 homes is added on the 2 Ha available, then the housing density will be 1000 units per Ha. **The is over 3 times the average in the central core!**

15. **The Kemp Town Estate is made up of 700 homes/flats as per the Council records. This is approx 140 units per ha.**

16. **CP10. Flood Risk. The likelihood of flooding in the Marina is high in the event of a breach of the breakwaters or the Marina locks. To vacate all future occupants of say a maximum of 3,000 people under extreme conditions would not be readily done would not be readily achieved under emergency conditions.**

17. **The Tranquility of the eastern seafront must be preserved and strengthened. P204. WELL DO IT! Building a housing estate of unimaginable density and its unlikely social problems will not do anything of the kind.**

Any other comment

**This document is intended to be used in future consultation with the KTS with respect to the regeneration of the Marina, the road infrastructure to enhance the Gasworks site and A259, the redevelopment of the Black Rock site and changed access to the Marina. All the foregoing matters will have DIRECT impact on the build heritage and the environment in which such developments are set.**

**Please keep us on your records for any major issues, which would impact on the Estate as a whole and the Conservation area, which extends from the housing surrounding Sussex Square, Lewes Crescent, Arundel and Chichester Terraces, across the A259 and Madeira Drive to the beach (halfway between high and low tide).**