



Brighton & Hove City Council City Plan 2041

Submission from Living Streets Brighton and Hove¹

We welcome the opportunity to contribute at this early stage to the development of Brighton & Hove City Council's City Plan 2041. We recognise the vital role that planning has in creating a positive future for our city and we are keen to encourage the inclusion of policies which support a safe, accessible and sustainable walking environment in the city, for the benefit of residents, visitors, biodiversity and the climate.

We have completed the survey and also want to take the opportunity to make some detailed comments on some specific aspects of the draft City Plan and the Key Issues document.

As requested, this note largely follows the key issues for the consultation; in three sections:

1. Spaces Between and Safe Streets
2. Comments on the key issues outlined in the consultation
3. Conclusions.

1. Spaces Between and Safe Streets

It is well understood that cities are full of excitement, challenge, creativity and innovation. They can also be dirty, dangerous, crowded, noisy, lonely, depressing places. Urban spaces – quiet streets, green spaces, open areas – provide places where people can interact, wander, gather, relax. These **spaces between** buildings contribute significantly to making life in cities more liveable, sustainable and pleasurable. Access to safe streets, open and green spaces – a vibrant public realm – helps local residents to come together and supports strong, sustainable and resilient communities. Planning is and should be as much about these **spaces between**, this public realm, as the buildings being developed but their importance is often unrecognised and ignored².

We warmly welcome the general tone and approach of the Council Plan, which provides the opportunity for the city to create a “sustainable, safe and clean environment” where people can live “healthy and fulfilling lives”³: a positive vision of a better future for our city.

¹ Living Streets Brighton and Hove is part of Living Streets, the UK-wide charity for everyday walking. We support the development of safer, cleaner, greener streets and neighbourhoods that create a better walking environment and inspire people to walk more. See our Brighton and Hove local group webpage <https://www.livingstreets.org.uk/get-involved/local-groups/brighton-and-hove>.

² *Spaces Between* by Diane Warburton and Wendy Lutley. National Council for Voluntary Organisations and the Open Spaces Society, 1991.

³ Council Plan 2023 to 2027, page 4

We also welcome the approach of identifying clear Outcomes for the Plan, with indications of how progress towards these outcomes will be measured. However, we have concerns about some of the current progress measures and how they relate to the policies being suggested.

There are welcome promises of action to ensure “our streets, public spaces and facilities are well maintained, clean and attractive”, and providing “a safe, more accessible and attractive environment that enables people to walk, wheel and cycle more” and to “protect and enhance the city’s natural environment “. However, these actions are not reflected in the progress measures, nor is there a single measure of progress in creating a safer and more walkable environment even though there are measures for maintaining roads and bus services.

We suggest that additional progress measures could include more focus on the spaces between buildings to improve the city, particularly improving the **safety of streets** (fewer accidents), better pavements (fewer complaints about obstructions or accidents), and protecting and enhancing public open spaces (removing barriers to the public and planting trees), all of which are eminently achievable. On the basis that ‘what gets counted counts’, it is vital that measures are included for the spaces between – the public realm – to support walking, public spaces and enhancing the natural environment.

Further we suggest that walking in the city could provide a cross-cutting theme which would contribute to many of the specific Outcomes (walking always to include wheelchairs). For example:

- Walking, especially in greener environments, is widely recognised as good for human *health*⁴ and is the most *inclusive* mode of transport (being universal, free and unconstrained), as well as the most socially cohesive as people see and meet each other in public spaces when they are walking.
- Walking is the most *sustainable* mode of transport, with no emissions.
- Development for walking contributes to *design and place-making* by keeping a focus on real human beings and their use of spaces and places, to enhance abstract concepts of ‘place’.
- Walking helps residents and visitors appreciate and support the *heritage and character* of the city, and increases the use of and value accorded to these assets.

Walking is an essential element of transport and infrastructure but it is barely mentioned in the draft Council Plan, even though roads and buses are covered. We recognise that there are other plans that cover walking in detail (the LCWIP and the forthcoming Transport Plan). We also recognise that the City Plan Part 2, which is expected to be integrated with the new City Plan 2041, has some valuable policies around walking. However, unless walking is *explicitly* covered in the City Plan alongside other modes of transport, there is a danger that it will be relegated to a minor role which does not reflect the majority who walk and wheel.

Walking is more than simply about moving from A to B. It is an essential part of being a citizen. Improving the walking environment is an essential part of a positive future of the city and must be considered in all new developments as well as a valuable development in its own right.

⁴ £2.1 billion per year could be saved in health costs if everyone in England had good access to greenspace (Public Health England 2020). Public Health England (2020). *Improving access to greenspace. A new review for 2020*. Public Health England, London.

A focus on **Safe Streets** (as above) could help ensure the future of the walking environment across the city as a priority. Creating **Safe Streets** requires improving pavements (physical infrastructure improvements as well as removing unnecessary obstructions), greening streets (e.g. more trees) more and better road crossings, reducing pollution, controlling traffic speeds, reducing street crime, litter and graffiti, and considering the street level impacts of new developments on the attractiveness and safety of streets for people on foot or in wheelchairs. Action to improve streets and spaces would mean our city is more inclusive and accessible to everyone living in and visiting the city.

2. Comments on the key issues outlined in the consultation

- 2.1 Spatial Strategy.** We recognise the challenges of the geographical situation of Brighton and Hove in limiting sites for commercial and housing development, and the need to balance new development with the protection of the existing natural and built assets in the city. As above, however, there seems little attention paid to the ‘spaces between’ buildings which is important to any spatial strategy and individual buildings and sites.

We do not accept that ‘taller buildings’ are appropriate in any parts of the city (para 2.5). The scale of tall buildings can be overwhelming in our already compact, dense city. There are questions about safety for residents of tall buildings which can increase the costs to a level that makes development uneconomic (or unsafe), there are negative impacts on our historic skyline, landscape and views, as well as on light and shadow, creating wind tunnels and an unattractive walking environment – all of which always require mitigation.

Nor do we accept the focus on ‘larger scale regeneration’ (para 2.6), except for a very few specific sites (such as the Gas Works site). There are many small areas of under-developed land and buildings in the city which could be developed sensitively by the council, private and third sector developers. These sites could contribute to the unique character of the city, without losing its current charm and vitality. These smaller sites could be identified by working closely with community organisations that know their neighbourhoods intimately.

Unfortunately, the questions in the consultation are focused only on a limited set of options for sites for new development, and give no attention to the wide range of smaller sites which could be developed more quickly and cheaply. In addition, much stronger action could be a higher priority for the council to push forward the development of sites and buildings which already have planning permission, and which have been vacant for long periods, which would in itself help create a sense at street level of the city improving quickly by removing derelict and unused buildings and land.

- 2.2 Homes for Everyone.** We warmly welcome the priority given to the creation of new homes for rent and to buy in the city, and recognise the spatial constraints outlined in the previous point. However, we do not accept the need to focus entirely (para 3.2) on building on new development sites when there are so many under-developed buildings and sub-standard housing available from which to create new homes more quickly and cheaply by better use of existing buildings. This would have the double benefit of improving the streetscape for local people and visitors by tackling derelict and poorly maintained buildings and empty sites.

As above, we do not see the need for tall buildings to solve this problem. We do however warmly welcome the identification of ‘gentle densification’ which would be much more in keeping with the spirit and character of the city than tall buildings. The city is not only constrained by its geography but also by the Brighton and Hove Urban Design Framework (UDF) which places significant and welcome restrictions on the location and design of tall buildings, including on the impacts on the streetscapes where people walk.

Design constraints in the UDF include considering the impacts on the neighbourhood characteristics of any new development, on views and landmarks, on the spaces between buildings (particularly in relation to active and inclusive travel – especially walking), the climatic impacts on ground level (wind/shadow), on the streetscape and much more. All these issues affect the safety and attractiveness of streets where people walk. Brighton and Hove is already a dense city and tall buildings will always have a significant, usually negative, impact on all these aspects of the character of the city. New developments that contribute positively to these, and to the creation of sustainable neighbourhoods and communities, should be prioritised instead of seeking taller buildings which always require mitigation.

We suggest that, in terms of the types and sizes of homes that should be created, more attention is given to approaches that have more than one positive impact for local people. For example, HMOs, co-living and student accommodation (often the same thing) can be a valuable option (including for students, thus reducing demand for purpose built student accommodation), but can create neighbourhood problems if there are too many in one area. At the same time, if there were more 1 and 2 bedroom homes available, these could be taken by those who may otherwise be in larger HMOs etc, releasing larger properties for families and, at the same time, this wider mix of residents could improve the safety, sustainability and attractiveness of neighbourhoods, including safer streets and spaces. We would also point out that limiting the percentage of HMOs in any area only works if there is comprehensive and accurate data on which houses are currently HMOs, which is certainly not the case at the moment in many areas of the city.

We support Citizens Brighton and Hove's housing priorities of real affordability based on local incomes, availability especially for key workers, and the need to ensure that developments across the city help build and strengthen a sense of community.

We also suggest that any new development or improvement of homes should include the creation of the health, education and commercial services and facilities people need within 10 or 15 minutes walking distance, so that people do not have to use motor vehicles to access essential services – with obvious health, pollution, cost and other benefits.

- 2.3 Sustainability and Climate Change.** Walking is the most sustainable, inclusive and universal mode of transport, as well as having proven benefits for health and sustainable communities. Although the Key Issues paper states that the council is “working towards becoming an accessible, clean and sustainable city” (para 4.2), there is nothing in the planning policies around Sustainability and Climate Change to support this. The safety, character and attractiveness of streets and open spaces are vitally important to “promoting sustainable modes of transport” (para 4.3), and thus helping tackle climate change, but are not considered in any of the planning policies outlined in this section.

For example, planning policies could consider the safety and attractiveness of streets for walking, including more than ‘asking’ that new buildings include Sustainable Drainage Systems (SuDS), and ‘require’ that this happens. SuDS and greening should also go beyond new developments and be considered in all public realm improvements. New buildings and refurbishments should include tree planting and greening, seats and shelter to improve the streetscape for people walking and wheeling, and support biodiversity, as well as ensuring that gardens are not paved over which causes significant run-off during the heavy rains which are increasing due to climate change.

- 2.4 **Design and Place-Making.** We warmly welcome the strong focus on Design and Place-Making, for the reasons already identified above. However, we suggest that the Urban Design Framework is 'promoted' from supplementary planning guidance to part of formal planning policy, so that it carries more weight and can be enforced more rigorously.

We support the 'gentle densification' proposed again here but are concerned about over-development which can reduce the sense of openness and spaces between buildings which are essential to safe and attractive streets. Design and place-making must consider the public realm, which is informed by the design and positioning of buildings, and interaction with the street level. This applies particularly to our objections to tall and very tall buildings for which arguments are again made in this section of the consultation document. It is concerning that the tall buildings that present such challenges to people living, working and walking are constantly offered as solutions.

- 2.5 **Culture and Tourism.** Clean, safe and attractive streets are as essential to the future of Brighton and Hove as a visitor destination (and the cultural and night-time economy), as they are to local people. This means safe from crime but also safe to walk at all times of the day and night. Unfortunately, there is not a single mention of the state of pavements, or of problems of crime, litter and graffiti, speeding traffic dominating popular routes to the sea, cultural centres and around shopping streets, and street lighting. The vibrant street life in Brighton and Hove is fragile and diverse. There are good features but the dirt, litter, graffiti and street crime are often major causes of complaint by visitors as well as residents and should be considered in all new developments as well as a vital development in its own right.

We also suggest that consideration is given to a better balance than currently exists between continued access for the public to walk and rest in open and green spaces and fencing off these spaces for cultural and commercial events. Residents and visitors need to be able to trust and rely on the availability of open and green spaces in the city centre.

- 2.6 **Healthy City and Communities.** A safe and attractive walking environment encourages people to walk rather than get in their cars. People need to be able to get around not just easily but safely. Walking is the healthiest form of transport as well as being a pleasure in itself. Attention needs to be given to *streets* as well as open spaces, not just for 'recreation', which sounds organised, but just to gather or pass through. The accessibility and safety of streets and open spaces, not allowing them to be fenced off, is vital if they are to continue to play a part in the regeneration of the city as is hoped in the consultation document.

- 2.7 **Biodiversity and the Natural Environment.** We welcome the focus on biodiversity and the natural environment as policies here can benefit the human beings in the city as much as the flora and fauna. We would suggest that these connections between people, biodiversity and the natural environment (as well sustainability and climate change) are spelled out more clearly in planning policies. For example, planting more trees makes streets considerably more attractive, as well as cleaning the air and providing shelter, and supporting biodiversity, and it would be good to see planning policies which increase tree planting wherever possible.

We do have concerns about using off-site Biodiversity Net Gain as an approach *if* it is used to justify the loss of much-loved existing biodiverse open green spaces, and their replacement elsewhere or differently. There is often a strong relationship created between people and nature, strengthened as people walk through and in spaces, which can be lost if these areas are lost or fundamentally changed to accommodate new development.

2.8 Transport and Infrastructure. Walking is partly about moving from A to B, but it is also about life in the streets: cafes, shops, informal meetings and pausing to chat, exercise, fresh air and more. To achieve net zero, and the aims of the City Plan, requires a completely new approach to living in and moving around the city: one which is more human centred. Walking (and wheeling) is already accessible to all; it is inclusive and free and needs to be more strongly supported in all planning policies.

In spite of the importance of these issues to all the previous themes of the Plan, and recognising the coverage of these issues in other local plans (the LCWIP and the Transport Plan, as well as City Plan Part 2) the only issues covered in this section of the Plan are parking standards for new developments, and transport hubs. In relation to new infrastructure, and funding for new infrastructure, only roads, railways, sewers, emergency facilities, schools and parks are mentioned. Nowhere are the state of pavements, speed controls, safer crossings, street lighting etc mentioned at all.

The small but vital infrastructure improvements which encourage more people to walk, for all the reasons outlined above, are needed throughout the city. The improvements of streets and pavements must be included alongside roads and other infrastructure for transport.

3. Conclusions

There is much to be welcomed in the proposals outlined in the City Plan Key Issues document, as is the opportunity to comment at an early stage on a variety of options. Our response in this document simply aims to encourage officers and members to consider the current missing component – the public realm in the spaces between buildings especially the condition of the streets and open spaces, and how that affects and is affected by all the other hopes and developments that are planned for the city.

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Many thanks to those who have commented on drafts of this note, including JoJo Dorrington-Ward and Nigel Ordish.