Tall Buildings

SPG BH note 15
supplementary planning guidance

What is an SPG?

A Supplementary Planning Guidance Note (SPG) is one of the material considerations that can be taken into account when determining a planning application. It is intended to provide helpful guidance for the developer, consistent with the provisions of the Local Plan. This SPG Note is one of a series produced by Brighton & Hove City Council and it is to be read in conjunction with the Brighton & Hove Local Plan. Each SPG note has been subject to a period of consultation and Council approval. .

1 Introduction

1.1 This supplementary planning guidance note has been produced in response to the current urban policy agenda. A Tall Building Study, prepared by urban design consultants, Gillespies, on behalf of the council, has informed this planning guidance and is available as a background paper. The aims of the study were to set out clear design guidance for considering proposals for tall buildings and to identify strategic areas where there may be opportunities for tall buildings. These areas were identified via a process of urban analysis within the defined study area.

1.2 In this context, Brighton and Hove is an attractive city with few large brownfield sites. Its distinctive character is a consequence of its position between the sea and the downs, the topography of the city, its general townscape quality and the architectural quality of specific developments. This character is clearly seen in the many vistas and long panoramic views, down to the sea and across the valleys to hillside developments opposite. Overall the city has the feel of a predominantly small scale, low rise city, in which housing developments on hill sides, are prominent. The density of neighbourhoods varies, but amongst the 19th century developments, densities are already high. Some existing high rise blocks intrude on the city's historic core, and the city as a whole, to its visual detriment because of their siting or poor architectural quality. Proposals for tall buildings are once more coming forward in increasing numbers, and it is the council's intent that these should be considered in the context of this city's exceptionally fine historic environment, and its cultural identity.

1.3 This guidance note provides a 'checklist' of planning and design issues that the council will require applicants of all tall building proposals to address in their detailed planning submissions.

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Applications submitted without the required details will not be registered. Outline planning applications will not be acceptable. This note also identifies areas within the city where opportunities for tall buildings exist, and where the council accepts that some taller developments may be appropriate, subject to them making a positive contribution to their surroundings.

1.4 **For the purpose of applying the design guidance, tall buildings are defined as buildings of 18m, or taller, (approximately 6 storeys), above existing ground level. Within the strategic areas, the guidance will apply when tall buildings are either18m or taller or are significantly taller than their surroundings.** This is explained in more detail in section 5. This guidance will apply to building extensions, where the extended building will rise above 18m. Lower buildings may be tall in their immediate context; but are not subject to this guidance note, nor will they trigger all the requirements of the design guidance. Nevertheless a high standard of design will be required. They will be assessed on their merit having regard to the policies of the Brighton & Hove Local Plan.

2 Status

2.1 This Supplementary Planning Guidance Note has been the subject of a 6 week period of public consultation during November/December 2003. It was approved by the council's Environment Committee on 29th January 2004.

2.2 The Tall Building Study, which has informed this planning guidance note can be viewed at the council's City Direct centres. Copies are available on request from the council's planning strategy group. CD rom versions are available at a reduced cost. The Tall Building Study was completed by Urban design consultants Gillespies. It was received by the council's Environment Committee on the 23rd October 2003. The purpose of the study was to assess whether and where tall buildings might be acceptable in Brighton and Hove and to introduce design codes to enable the delivery of well sited, well designed and good quality tall buildings. Its recommendations have informed this SPG, which has been further amended in the light of comments received during the period of public consulation.

2.3 This SPG supersedes the council's Interim Tall Buildings Guidance Notes for Applicants which was agreed for consultation in December 2002; the content of which is largely incorporated in this note.

3 Policy Context for Tall Buildings

3.1 The protection of the countryside, the regeneration of city centres and encouragement of city centre living, are key to the **Urban Renaissance** concept promoted in the findings of the Urban Task Force. In response to this new agenda for sustainable urban regeneration, national policy now actively promotes:

- increased urban residential densities,
- maximum use of brownfield land,
- high quality design;
- improvements to the quality of the built environment including public open spaces;
- greater investment in urban areas (particularly in town centres);
- sustainable developments,
- reduced car dependency,

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- mixed use developments;
- improved partnerships between the public and private sectors.

3.2 The council agrees with the Tall Building Study's advice that tall buildings can contribute to this 'urban renaissance', but that equally there are other means of achieving increased densities, by for example a denser form of low or medium rise developments, which should not be overlooked. The council is committed to the enhancement of Brighton and Hove's unique heritage and distinctive character, and to its various neighbourhoods, wherein further detailed appraisal of their character will inform any future significant change to the cityscape.

3.3 This guidance should be read in conjunction with government guidance issued in **Planning Policy Guidance Notes PPG 1, PPG 3, PPG 13 & PPG 15**. These address issues regarding design and sustainability, housing, transport and the historic environment. This SPG has been prepared to conform to current government guidance. PPG 3 is currently under review., with a view to supporting the greater delivery of new housing and particularly affordable housing.

3.4 **English Heritage and the Commission for Architecture and the Built Environment (CABE)** produced their own **Guidance on Tall Buildings** in March 2003. They have endorsed a strategic plan based approach to identify opportunities for tall buildings, as a prelude to more detailed urban design analysis within any identified tall building zones. This SPG is a response to their recommendations, and endorses their view that **any new tall building should be in an appropriate location, should be of first class design quality in its own right and should enhance the qualities of its immediate location and setting.**

3.5 Local Planning Background

3.5.1 This SPG supplements the Brighton & Hove Local Plan Second Deposit Draft, on which the inspector's recommendations are awaited following the public inquiry into the local plan.

3.5.2 Relevant policies covering planning issues relating to tall buildings include:

- Transport – TR1(Development and the Demand for Travel), TR2 (Public Transport accessibility and parking), TR3 (development in areas of low public transport accessibility), TR3a (Travel Plans), TR4 (Sustainable transport corridors and bus priority routes), TR17 (parking standards).
- Sustainability – SU1 (environmental impact assessment), SU2 (Efficiency of development in the use of energy, water and materials), SU16 (Infrastructure).
- Design, safety and the quality of the environment - policies QD1-QD4 are most relevant to tall building proposals. Other relevant policies are QD5 (Design – street frontages), QD7 (Crime prevention through environmental design), QD15 (Landscape design), QD20 (Urban open space), QD27 (Protection of amenity), QD28 (Planning Obligations).
- Housing – HO1 (Housing Sites and mixed use sites with housing), HO2 (Affordable Housing), HO4 (Dwelling densities), HO4a (Provision of private amenity space), HO5 (Provision of outdoor recreation space in housing schemes), HO6 (car free housing).
- Employment – EM1-EM5 (general employment policies), EM9 (Mixed uses and key mixed use sites), EM12-EM17a (site specific proposals).

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- Shopping, recreation and leisure – SR2-SR7 (retail policy), SR20 (Seafront recreation), SR22 (Protection of public and private outdoor recreation space).
- Nature Conservation and Countryside – all policies are relevant background.
- Historic Built Environment – all policies are relevant background.

3.5.3 Key policies are:

QD1 Design-quality of development and design statements (part only)

All new development will be expected to demonstrate a high standard of design and to make a positive contribution to the visual quality of the environment. In areas of drab and uninteresting character, the planning authority will expect the opportunity to be taken to create new buildings and areas of distinction on suitable sites.

The following design aspects will be taken into account in all developments:-

a. scale and height of development

b. architectural detailing

c. quality of materials

d. visual interest particularly at street level; and

e. appropriate levels and type of landscaping.

QD3 Design-efficient and effective use of sites (part only)

New development will be required to make efficient and effective use of a site, including sites comprising derelict or vacant land and buildings.

To secure the efficient and effective use of a site, proposals will be expected to incorporate an intensity of development appropriate to: the locality and/or prevailing townscape; the needs of the community; the nature of the development; and proposed uses. Higher development densities will be particularly appropriate where the site has good public transport accessibility, pedestrian and cycle networks and is close to a range of services and facilities.

QD4 Design - strategic impact

In order to preserve or enhance strategic views, important vistas, the skyline and the setting of landmark buildings, all new development should display a high quality of design. Development that has a detrimental impact on any of these factors and impairs a view even briefly due to its appearance, by wholly obscuring it or being out of context with it, will not be permitted.

The following features and buildings are considered to be of strategic importance:

a. views of the sea from a distance and from within the built up area;

b. views along the seafront and coastline;

c. views across, to and from the Downs;

d. views across valleys;

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e. **views into and from within conservation areas;**

f. **the setting of listed buildings and locally well known landmark buildings of townscape merit;**

g. **vistas along avenues, boulevards and steeply rising streets; and, initial views of Brighton & Hove from access points by all modes of transport.**

These criteria have been tested in the process of identifying opportunities for tall buildings at a strategic level.

3.6 Local Transport Plan and Local Plan (transport policies)

3.6.1 The local transport plan provides a detailed strategy for the ongoing management, improvement and investment in the city's transport system. Accessibility and the capacity of movement networks will play a major role in determining appropriate locations for tall buildings within the city. The development of tall buildings and the resultant increase in urban densities places significant additional pressures on the transport systems of the city.

3.6.2 The designation of sustainable transport corridors proposed in the local transport plan and the introduction of a rapid transport network provides opportunities for higher density developments in their vicinity, in conjunction with contributions to improve accessibility.

4 Pre application planning advice

4.1 Owners and prospective applicants for tall buildings are advised that it will be necessary to enter into pre-application discussions with the City Council. In turn the Council will often consult with English Heritage, as a statutory consultee and CABE, who are a non-statutory consultee for significant projects; both also actively encourage pre-application consultation. The council will be unable to determine an application without responses to each and every planning/design consideration listed in section 7.

5 Determining if a Building is 'Tall'

5.1 Trigger for Design Guidance - Any new building of 18m or taller (approximately 6 storeys), will trigger the tall building guidance set out in section 7 of this SPG. This height threshold will include extensions to existing tall buildings and will include the addition of plant or structural projections.

5.2 Any new building of 18m or taller (approximately 6 storeys), which is significantly taller than surrounding buildings should be located in the areas described in section 8 (see paragraphs 8.2 & 8.8). Reference to 'mid rise' tall buildings means buildings 6- 8 storeys in height; reference to 'very tall' tall buildings means buildings over 15 storeys in height. In order to establish whether a building is significantly taller, applicants will be required to provide an assessment of the mean height of surrounding existing development; this assessment will extend to 100 metres in all directions from the proposed footprint. Where the100m zone comprises sub areas, each with its own common height, the overall mean height calculation will require the extent of these areas to be measured a calculation for each will be requiredThe city council will then determine 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. It follows therefore that the proposed development may be 'significantly taller' and yet not the tallest building within the zone.

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5.3 The council advises that outside of these identified areas, buildings significantly taller than their surroundings, even if less than 6 storeys in height, will normally be judged inappropriate having regard to this guidance and policies QD1, QD2 and QD4 of the Local Plan.

6 Planning applications for tall buildings - supporting information

6.1 Proposals that trigger the tall buildings design guidance will be required to include a thorough and detailed **tall buildings statement**. This will indicate how the proposals have responded to the planning and design guidelines, described in section 7. This submission must include written and illustratative 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, for the purpose of calculating whether the proposed building is significantly taller than its surroundings,**
- **a plan illustrating the relationship of the proposed site to one of the tall building areas,**
- **an in-depth design statement that sets out the rationale for the proposal, its architectural intent and design philosophy and the particular qualities of the site that make it suitable for tall buildings.**
- **evidence of exploration of the viability and appropriateness of other forms of high density development**
- **a statement describing how the proposal addresses the guidance checklist (see section 7) and will provide a safe, positive, attractive addition to the city.**

6.2 Proposals that are identified as significantly taller than their surroundings should be restricted to areas where opportunities have been identified for taller development. The detailed boundaries of these areas have not yet been arrived at. Until such time as these areas are defined, through an urban design framework, applicants will be required to complete a similar level of analysis ie:

- **Submit an urban design assessment, including a 3D analysis, within their proposal's area of visual impact to support the appropriateness of their site for significantly taller development.**

6.3 An Environmental Impact Assessment (EIA) is likely to be required for tall buildings because there is a significant environmental effect; the most likely trigger will be its impact on the historic built environment and on the setting of the town in the surrounding land/seascape. To avoid duplication, it will be acceptable for applicants to include responses to the tall buildings checklist within the EIA. The 'EIA: guide to procedures' explains the way in which the EIA process operates.

Applicants may be required to:

- **Submit a screening report as to the necessity for a EIA.**

6.4 Major tall building developments are also likely to require a separate transport assessment, as referred to in policy TR1 of the Local Plan.

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7 Assessment of Tall Building proposals

7.1 The council requires all new tall buildings to be of a high quality of design, such that they can make a positive contribution to the city's urban form and skyline, support the city's continued regeneration, and are generally well received. The council will expect very tall developments in particular to be, at least in part, accessible to the public. All tall buildings must be integrated into the public realm, be responsive to environmental conditions and embrace principles of sustainability. The council will determine all planning applications for tall buildings, in an objective and consistent manner, and in order to do so will require applicants to provide the following information in a comprehensive design statement as part of a coherent explanation of any tall building project:

7.2 Planning principles

7.2.1 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:**
  - **maximisation of brownfield resources(including an explanation of the density of dwellings that is to be achieved for proposals for residential development)**
  - **energy management, including production**
  - **resource conservation**
  - **materials specification**
  - **waste management**

- **A recognised method (e.g BREEAM) must be used to assess a proposal's sustainability.**

A heightened public awareness of environmental issues, advancements in construction technology and a raised awareness of design in general have paved the way for sustainability to be recognised as a crucial element in the future planning and development of cities.

7.2.2 Land use.

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.**

Tall buildings can contribute to maximising efficient use of the land. The inclusion of a mix of uses can help give greater vitality to the public realm and create activity throughout the day increasing a perception of greater safety. The council promotes mixed use development, and will encourage use diversity and social inclusion. Ensuring very tall buildings have some community or public function can significantly help in integrating new development into the lives of surrounding communities. Mixed use developments can moreover assist the regeneration of existing commercial sites or premises.

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7.2.3 Infrastructure.

Applicants will need to:

- **Assess the current capacity of local public infrastructure and facilities.**
- **Identify additional infrastructure and facilities required as a result of the proposed development, and how these will be achieved and delivered.**

All new tall building proposals must assess the current capacity of local infrastructure and facilities such as the road network, waste water/sewage disposal systems, public transport services, open spaces, playgrounds, schools, and child and health care facilities to support the increase in local population that the development will bring to the city. 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.

7.2.4 Transport.

Applicants will need to:

- **Describe which, if any, existing transport services such as rail stations, bus routes, or sustainable transport corridors are 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 innovative and sustainable approaches to transport issues.**
- **Describe the measures incorporated in the proposal which will help to achieve the overall objective of reducing private vehicle use and improving access to public transport.**

The development of more intense urban forms should respond to the local plan policies that encourage sustainable transport choices. 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, either by reducing the required levels of parking associated with new development in central areas, by encouraging shared use of vehicles eg through car clubs, by encouraging public transport use, and by encouraging greater trips on foot or by cycle.

In line with best practice, and 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. Concentrating tall building development in proximity to existing transport interchanges contributes to a more active and vibrant sense of place and strongly promotes a more sustainable approach to urban living.

7.3 Wider urban context

7.3.1 Visual Impact

Applicants will need to provide:

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- **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**
    - **conservation settings and listed buildings**
- **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.**

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. Tall buildings should complement, not compromise, strategic views and important vistas in the city. 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 defined in the tall building study, and are appended to this guidance note.

7.3.2 Siting of buildings

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.**

Groups of tall buildings should be staggered or stepped to respond to natural slope contours and not mask natural valley formations, or blocksignificant strategic or local views within and across the city. 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 .

7.3.3 Conservation

- **Tall building proposals within conservation areas or affecting the setting of listed buildings or conservation areas or registered historic parks and gardens will only be approved if applicants can demonstrate, through a conservation 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 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. 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.

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7.4 Detailed design considerations

7.4.1 Alignment

Applicants will need to:

- **Describe how the proposal responds positively to any characteristic alignment and setbacks of surrounding buildings.**
- **Describe its effect on local views or vistas.**

New tall buildings should make reference to their surroundings though 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.

7.4.2 Massing

Applicants will need to:

- **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 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..

7.4.3 Scale

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.**

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.

7.4.4 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.**

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Form will be influenced by the site's location, the use of the building and its status, and its contribution within the wider urban context, for example as a landmark focus or as a response to other established or emerging consistent townscape forms. The highest design quality of architectural expression and form is paramount to the creation of elegant and pleasing landmark buildings.

7.4.5 Urban Pattern

Applicants will need to:

- **Describe how the proposal responds to and complements the prevailing urban pattern, through an analysis of the neighbourhood's sense of place, and how the development will contribute to or improve upon this.**

New tall buildings in Brighton and Hove must take account of the intricacies of the broader context within which they sit, including the existing urban rhythms, local architectural language, the fine grain urban detail and the historic setting. They must contribute to their surroundings through an appropriate form, massing, setback and architectural language.

Around the world, there are many examples of new tall building developments that deal effectively with these issues. This can be through the articulation of the lower floors of the building, to reflect the character of the street, or through the set back of the upper floors, to create the impression of a continuous streetscape, or through the use of materials that respond to or positively contrast with surrounding buildings. These approaches help to ensure that the streets remain legible, coherent and at a human scale.

7.4.6 Streetscape

Applicants will need to:

- **Describe how the proposal contributes to the streetscape. Key issues for consideration include the need for:**
  - **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.**

New tall buildings 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 the building.

7.4.7 Public Realm

Applicants will need to:

- **Describe how the proposal has been designed to create high quality public spaces within the site and nearby. Particular consideration should be given to:**
  - **High design quality**
  - **Climatic comfort**
  - **Need for light, sun and shade**
  - **Adjacent uses**
  - **Quality of materials.**
- **Describe the arrangements for long term maintenance and management.**

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Tall buildings need to be designed in such a way as to create safe, comfortable and attractive spaces around them, and to mitigate any harm to the wider public realm. New spaces between a collection of tall buildings should have their edges well defined by development and activated by public uses with transparent facades on the ground floors.
Tall buildings need to provide the public realm with a strong sense of spatial definition and robust character. At a detailed level, individual proposals should seek to create well orientated and lively spaces that contribute positively, day and night, to the wider public realm.

7.4.8 Public Access

Applicants will need to:

- **Explain how any tall building proposed, which comprises mixed or commercial uses, will encourage public access.**

Public access to new tall building, particularly mixed use or commercial buildings, helps to foster a more positive perception of the building and contributes to a stronger sense of community.

7.4.9 Accessibility

- **Applicants must be able to demonstrate that their proposal will provide equal access for all.**

All new tall buildings in Brighton and Hove must comply with current building codes, current building regulations and must also be fully compliant with all aspects of disability discrimination legislation. 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. Attention should be paid to means of evacuating disabled people from the building in emergencies, and providing alternative means of access if a lift fails.

7.4.10 Open Space

Applicants will need to:

- **Explain whether the proposal meets or exceeds the Local Plan requirement for the provision of public and private open space, and if so how?**
- **Developments should incorporate internal private, and in mixed use schemes with a large footprint, some public open space.**
- **Describe how the proposed development maximises provision of outdoor and indoor amenity space.**

The Brighton and Hove Local Plan outlines requirements for the provision of open space within new developments. 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.

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Regardless of the amount of open space that can be achieved, new tall buildings should strive to provide occupants with high quality private open space. Such spaces give occupants vital breathing space, and can contribute to a more human scale perception of the development.

7.4.11 Climatic Impact

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:**
  - **overshadowing**
  - **the diversion of high speed winds to ground level**
  - **heat islands**
  - **glare reduction.**

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 shadows at different times of the day and throughout the year will need to be assessed. The use of architectural devices such as screens, terraces and awnings and also facade set backs 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.

7.4.12 Neighbourliness

Applicants will need to:

- **Describe and analyse the impact of the proposals on neighbouring properties.**

Tall buildings in close proximity to neighbouring residential properties will impact on the amenities of occupants. Issues of aspect/outlook, privacy, daylight, sunlight, noise, light glare, and general good neighbourliness are planning considerations that will require careful assessment.

7.4.13 Technology

Applicants should:

- **Explain how the proposed construction technology enhances the efficient management and operation of the building, and its performance.**

Advances in construction technology combined with a growing body of architectural knowledge mean that, subject to quality specification and finishes,contemporary tall buildings can provide sensitive design responses to their setting. New contemporary tall building proposals should clarify any advantages that the technology used in their construction, has to sustainability including for example, renewable energy and/or to the building's architectural form.

7.4.14 Materials

Applicants will need to:

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- **Describe the palette of materials, and its association to the local character.**
- **Describe the appropriateness of the materials used, in terms of their sustainability.**
- **Provide supporting information on the method used to measure the materials' performance in sustainability terms, both initially and throughout the building's life cycle.**

New tall buildings should make reference to their physical, cultural and historic surroundings through their architectural language and high quality materials. Materials should show a sensitivity to their surroundings and should aim to be of the highest quality, directly responding to the existing urban fabric, whether by utilising similar or sympathetic materials or by positive contrast.

Materials should also be chosen with regard to their performance in sustainable terms. The use of local or recycled materials, and/or materials from renewable resources will be expected.

7.4.15 Maintenance

Applicants will need to:

- **Describe what long term maintenance commitments will be established.**
- **Outline the maintenance programme.**

The maintenance of a tall building is critical to the image it projects within the public realm. Applicants need to have explored a variety of internal and external materials and finishes that have long lives, require low maintenance and which also meet the best practice requirements of sustainability standards. This is also of key importance for the management of spaces around tall buildings.

8 Areas Identified as Suitable for Significantly Taller Buildings

8.1 Tall Buildings Area Strategy

8.1.1 Following a detailed urban analysis of Brighton and Hove carried out at a strategic level as part of the Tall Buildings Study, areas of opportunities for tall buildings have been identified. Those areas considered suitable are generally visually recessive, have limited impact on conservation settings, are well serviced or are capable of being well serviced by public transport, support local commercial/shopping centres, relate to existing tall buildings (ie those buildings where opportunities to improve upon these or mitigate their impact exist), and are in the vicinity of existing open spaces. By reason of the strategic level of the study, exact boundaries have not as yet been defined, nor appropriate heights established. (see paragraph 6.2)

8.1.2 The areas, where taller developments may be appropriate, have been classified as either 'nodes' or 'corridors'. The corridors are linear zones, primarily around transportation routes. The nodes are physically more contained areas with opportunities for a more focussed form of development. Areas within these nodes and corridors have varying degrees of suitability for taller development. Not all sites within a node or corridor will necessarily be suited to a tall building. These nodes and corridors will require further detailed investigation, potentially in the form of Urban Design Frameworks, which will define precise boundaries and identify the precise locations,types and appropriate heights of tall buildings that will be suitable.

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8.1.3 These frameworks will illustrate how tall buildings will be integrated within the existing urban fabric, whilst maximising their potential benefit and minimising their negative effects.

8.1.4 Proposals for tall buildings in the corridors and nodes, which are submitted in advance of such investigations will require applicants to complete a similar analysis within their site's zone of visual impact (see paragraph 6.2).

8.2 Nodes Suitable for Taller Development

8.2.1 These are areas that provide a focus for possible taller development and which may be appropriate for more intense assemblies of taller development. They are nevertheless limited by factors such as topography, proximity to conservation settings, and intact residential areas, and other geographical and planning constraints. They offer the opportunity to develop comprehensive planning/ design frameworks, which determine the type, location and form of future tall buildings within each area.

8.2.2 The **nodes** are:

- the marina,
- central seafront e.g. Brighton Centre and vicinity,
- adjoining Brighton station,
- adjoining Hove station ,
- Shoreham Harbour.

Taking each in turn:

8.3 Marina

8.3.1 The Marina, mainly because of the topography and the existence of a district shopping centre in the complex, has potential as a node for tall buildings. The marina has a number of special characteristics in terms of tall building opportunity. 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 increase the amenity for residents and occupiers of any tall building by providing links to extensive open spaces. The existence of a district shopping centre within the marina, and the opportunity to 'bookend' the edge of the city, contribute to the tall building opportunity within this area.

8.3.2 The Marina is a node with particular sensitivities of building due to the relative proximity to Kemp Town and housing on the adjacent hillside which provide challenges for designers. Tall buildings in this node will need to have regard to their visual impact on the residential areas to the north of the cliffs and their overall composition when viewed along the coast. Proposals for this area should seek to resolve transport issues, as this node has the least developed transport services and infrastructure of all the areas.

8.4 Central Seafront

8.4.1 This central node in the cultural, retail and commercial core of the city is a 'natural' location for additional high quality tall buildings.

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8.4.2 This node is made up of a small area to the 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, the tallest building in Brighton and Hove. A number of sites in the node, such as the Brighton Centre and Odeon cinema, are also under utilised and/or are of poor architectural quality.

8.4.3 Whilst opportunities might therefore exist for tall buildings in this area, particular consideration must be given to the visual effect on strategic views along the seafrontand on the prospect on arrival from Brighton Station. The visual impact of tall buildings on the adjacent historic Old Town and Regency Square area must also be addressed in any development proposal. In transport terms there is a need for improved pedestrian and cycle links to Churchill Square and Brighton Station

8.4.4 The central seafront node, because of its relatively compact size is particularly suitable for an in-depth three-dimensional 'urban design' analysis to ascertain the optimum siting and height of development in terms of maximising the sites' development potential within the area, whilst minimising negative impacts on adjacent conservation areas and the seafront. An 'all round' visual impact assessment from the adjoining conservation areas and from middle and long distance views will be essential.

8.5 Brighton Station East

8.5.1 The Brighton Station East node adjoins the former station land and provides an opportunity for tall buildings in proximity to the retail and commercial core of the city. Situated to the east of Brighton Station, to the north of Trafalgar Street and along New England Street, this node has the potential to invigorate this part of the city with a high quality public realm, to support the development approved and in part already constructed on former station land.

8.5.2 The node 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.

8.5.3 The interface with the North Laine conservation area requires particular attention when considering tall buildings in this area. Similarly, visual impacts on St. Bartholomew's Church, the viaduct, railway station and on views from the Valley Gardens Conservation area and from across the valley need to be considered in detail. For sites adjoining the railway land, further study will be necessary to provide a detailed three-dimensional framework for development in the area so that the setting of surrounding conservation areas and listed buildings are preserved. The housing tower block, Theobald House, north of Trafalgar Street, should not be used as a guide to height, or building typology appropriate to future developments in this area.

8.6 Hove Station

8.6.1 The Hove Station node is situated on both sides of the rail corridor and focuses on Hove railway station. This node extends westward to include an existing group of tall residential buildings north of Clarendon Road and the adjoining industrial areas. The combination of existing tall buildings, good transport links, and limited conservation constraints provides the Hove Station node with opportunities for tall building development.

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8.6.2 The Hove Station area has a number of special characteristics, which include its local and regional connectivity, strong linear linkages to the seafront, proximity to the city's second largest rail station, good bus services, proximity to open space, and a number of under-utilised sites in adjacent areas. Substantial parts of the area are allocated as employment sites; tall buildings may represent an opportunity to contribute to the delivery of the council's employment policies.

8.6.3 Further investigation should aim to set out a longer-term vision and development framework for new tall buildings in the vicinity of Hove Station. Such study should also identify the appropriate quantum of tall buildings for the area, having regard to the employment requirements, opportunities for other development types, appropriate phasing, any necessary infrastructure and public realm improvements and the way in which new development could support local communities and businesses. Piecemeal redevelopment proposals will be considered premature.

8.7 Shoreham Harbour

8.7.1 The Shoreham Harbour node represents one of the largest brownfield regeneration opportunities in the city. The multiple waterside edges and strong industrial heritage make this an attractive area in meeting the city's future housing and employment requirements. The Shoreham Harbour area is focused on the eastern most area of the harbour within the Brighton and Hove City boundary and includes both the docksides, and the commercial area north of Wellington Road. The Shoreham Harbour tall building node is bounded in the west by the local authority boundary between Brighton & Hove and Adur.

8.7.2 The utilitarian character of the area offers significant opportunities for development that maximises the use and potential of this brownfield asset.

8.7.3 A further planning study will be required to clarify the capacity of the entire harbour area to absorb tall development, having particular regard to the traffic impact, employment issues and to the need to clarify the various agreements that will need to be in place to ensure a cohesive approach to the development of the area, and to guide development proposals.

8.8 Corridors Suitable for Taller Development

8.8.1 A number of corridors suitable for tall buildings have been identified. These are linear zones generally occurring along major transportation routes. They are less rigidly contained than the nodal areas but do also have different physical and planning constraints, which will determine the extent and nature of future tall building activity. In general terms it may be possible for incremental development to occur within these corridors.

8.8.1 The **corridors** where opportunities exist are along and in the vicinity of:

- London Road/Preston Road
- Lewes Road
- Eastern Road
- Western Seafront/Kingsway

Taking each in turn:

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8.9 London Road/Preston Road

8.9.1 The London Road/ Preston Road corridor provides a number of opportunities, whilst respecting the green residential character of the area, through a pattern of tall buildings and open spaces that emphasises the linear form of the corridor and provides a more unified approach to built form. Separated slightly from the city centre there are opportunities to reinforce the existing tall buildings and utilise the significant level change to the west to better integrate tall buildings within the townscape.

8.9.2 Situated along the A23/ London Road corridor this area incorporates stretches of existing 'mid rise' tall buildings that front the western edge of Preston Park, Surrenden Field and Withdean Park.

8.9.3 The unique aspects of this corridor include the complex array of development types 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. There are significant opportunities to enhance the appearance of the existing tall building frontage to the west of Preston Park.

8.9.4 A further planning /urban design study is required to analyse the relationship between any future tall buildings, existing tall development, Preston Park, and the London Road district shopping centre to ensure a coherent approach to development.

8.10 Lewes Road

8.10.1 The Lewes Road corridor is centred on the University of Brighton's Moulsecoomb Campus and the Preston Barracks site.

8.10.2 Lewes Road, an academic corridor and major route into the city has the ability to build on excellent bus and rail services, the adjacent university, and existing tall buildings along the valley bottom to become a focus for tall building investment.

8.10.3 The Lewes Road corridor forms an important approach into the city from the northeast and any tall buildings in this area will be required to enhance this approach, whilst safeguarding downland views and the setting of the Sussex Downs AONB.

8.10.4 Further, more detailed, studies into this area will be required to assess the way in which tall buildings will effect the specific characteristics of the valley bottom landform as well as assess the way in which tall buildings could relate to the strong university presence and large amount of affordable housing in the area.

8.11 Eastern Road

8.11.1 The Eastern Road corridor provides an opportunity for new tall development and the refurbishment of existing tall development.

8.11.2 The Eastern Road corridor 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 an existing district shopping centre. The existing tall buildings particularly those at the county hospital, provide unique opportunities to develop small clusters of tall buildings along the corridor, albeit of significantly lesser height to those existing residential tower blocks in this area. The Eastern Road corridor is within walking distance of open spaces provided at the beach

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and in Queens Park; additional open space requirements derived from new developments will require further study.

8.11.3 Special care must also be taken in relation to the impact of development on the setting of listed buildings and conservation areas in the vicinity. Further study should address the visual impact of tall development on the East Cliff and Queens Park conservation areas and the setting of listed buildings in the vicinity.

8.11.4 Of particular importance when considering this area is a long-term strategy for dealing with the existing tall buildings stock. A number of intrusive tall buildings exist within this corridor. If these are to be retained, then their visual impact might be diminished by the development of small clusters of more attractive, 'mid rise' tall buildings.

8.12 Western Seafront/ Kingsway

8.12.1 The Kingsway is designated a sustainable transport corridor and has scope for public transport improvements. That stretch of the Kingsway 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. Further appraisal will pay particular regard to the creation of an appropriate 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.

8.12.2 As the Tall Building Study points out, the western seafront area is unique in that it is the only part of the seafront to have development right up to the waters edge. This unusual relationship affords opportunities for different taller 'landmark' development form, creating a prominent and distinctive 'endstop' to Hove's Western Lawns. The seafront location offers opportunities to capitalise on the views to the sea and the open space to the west.. Adjacent conservation areas and listed buildings, strategic views and the general scale and form of surrounding residential areas will nevertheless make the development of tall or very tall buildings within this area challenging, and require further detailed analysis.

8.13 Station Road/ Boundary Road

8.13.1 The Station Road/ Boundary Road corridor merits an increase in its profile as a district shopping centre as well as reinforcing the investment that might occur in association with any Shoreham Harbour redevelopment. The corridor is a linear zone extending from the southern end of Station Road/ Boundary Road to Old Shoreham Road in the north.

8.13.2 It provides a variety of distinct sub zones either side of the 'high street' with opportunities for a variety of mixed use schemes, which should enhance this district shopping centre. Despite the recommendations in the Tall Building Study, it is the council's view that in this low rise residential and commercial area, there are unlikely to either piecemeal infill opportunities or comprehensive redevelopment opportunities for significantly taller buildings in these roads, or adequate open space to sustain an increase in density.

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8.14 Areas inappropriate for Tall Buildings

8.14.1 In refining areas of the city that are suitable for tall buildings a number of areas were identified early as being areas of exclusion, or areas that should not contain or would be adversely influenced by neighbouring tall buildings, and which are inappropriate in transport terms. These inappropriate areas broadly comprise:
Conservation areas - (but see paragraph 7.3.3).

- **Elevated areas -** including the open downland ridges and those that have been built upon**.**
- **Urban fringe/low rise areas -** areas that are generally on higher ground, have less extensive public transport services, and/orare more directly viewed in the context of the open downs.

9 Further Study

9.1 Detailed Urban Design Frameworks

9.1.1 The council is satisfied that at a strategic level the city has the visual capacity to accommodate tall buildings. The consultants' studyhas illustrated the benefits that could ensue. Each of the areas identified in this SPG, as having opportunities for tall buildings will require further detailed investigation to ascertain area boundaries, specific height limits, preferred land use mixes, urban capacity, public space potential and other urban design and planning issues. A process of rationalisation of the areas will be undertaken to ensure that area boundaries reflect local block patterns and ensure unified streetscapes.

9.1.2 Until the framework for a particular tall building area has been prepared, any tall building proposal within the general area would be required to include the submission of a report, which incorporates a similarly thorough investigation of the tall building's impact within its agreed zone of visual impact. This investigation shall include the identification of local views of importance, and their capacity for change.

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