

June/July Public Consultation Questions & Answers

During the early part of this first public consultation we had a number of common questions submitted to us by email and during the webinars held for the first stage of public consultation in June/July 2020.

Below we set out our answers to these questions. For ease the questions have been grouped by theme.

Housing

What is the precise number and mix of homes? How many new people does this mean?

The proposals are at an early stage so it is too early to know this right now. We currently anticipate between 600-700 new homes, subject to the final mix of unit sizes and the final massing.

The number of homes and mix of home sizes will be refined as the design moves forward in more detail. There are many factors which will influence this, including ongoing review of local need and demand, discussions with the Council and the outcome of a viability appraisal process with the Council and their independent viability assessor, in accordance with National and Local planning policy.

The number of new people in the development is very dependent on the mix and number of homes so we will provide more details on this in future consultation events.

How many affordable homes will you provide? What tenure will they be and will they be genuinely affordable?

Developing gasworks sites is extremely complex and the sites are unique in terms of cost and risk, however we aim to maximise the number of affordable homes that can viably be delivered. The final number will be determined through a viability appraisal with the Council which will be carried out when the design of the proposal is more settled.

We expect the affordable would include a mixture of affordable rented and shared ownership homes that meet the Council's assessment of affordability and will be working closely with the Council to deliver appropriate types of affordable homes.

Who are you anticipating buying and living in the homes? Will they go to foreign investors?

Given the site's location we expect that the homes would be popular with a broad range of users, including existing residents looking to buy their first property or upgrade or downsize from their current homes, those moving to Brighton from other areas, and commuters. Berkeley Group has a policy of releasing homes to the UK market before releasing them overseas, in circumstances when it is anticipated that there might be overseas interest.

Have you considered providing more larger homes in light of Covid-19?

Yes, we are considering this. As a minimum all homes will meet national space standards as and we expect that several may exceed these standards. All of our homes are designed with our customers in mind and it is greatly important to us that we create homes that provide a very high standard of living for residents.

All homes will be provided with a private balcony or terrace, and in addition we will deliver communal residential gardens to be enjoyed by residents. It is also possible that home offices will have more appeal given the current circumstances, and we will continue to consider this moving forward.

How much will the market homes cost?

The pricing has not been determined yet given that we are in a very early the stage of the design process. The properties will be priced at market values for the area, which are constantly changing and therefore it is not possible to determine the pricing at this time. This is separate to affordable homes which would be set at a value agreed with the Council to be genuinely affordable, supporting those in the greatest housing need.

Is there a need for this many homes?

The adopted City Plan Part 1 sets out Brighton's housing target which is for a minimum of 13,200 new homes over a plan period of 2010-2030. This housing target is informed by the City's objectively assessed housing need, which actually identifies a need for 30,120 new homes over the same period however due to the fact that the City is heavily constrained by the sea to the south and the South Downs to the west, north and east of the city, this does not translate directly into the housing target for BHCC.

In the context of the City Plan housing target, BHCC has not been meeting these targets and the residual requirement results in a need to deliver 852 dwellings per year between 2019 and 2030 instead of 660 homes per annum.

Employment

What commercial enterprises will take place on the development? Why are they needed and what is this based on? We are concerned employment uses could sit empty, especially in the current climate of Covid-19.

The precise type of commercial enterprises is still being determined however we are seeking to deliver 2000sqm of Use Class B1a/c employment uses in line with the site's planning allocation. The uses classes include uses such as office, coworking or creative/'maker' type space which we think could work well in this location.

The type and amount of space we are seeking to drive is expected in planning policy however we need to watch the market closely to ensure that the provision meets up-to-date requirements.

Moving forward we will be continually carrying out market research and we will engage with the Council to ensure the employment space is meeting a genuine employment need and can be successfully let out. We want to ensure the employment space genuinely adds to the sense of place and to a mixed-use development which means ensuring the space provided is actively used.

Will there be any retail?

This has not been decided yet and is subject to further assessment of local demand. Planning policy allows for some ancillary retail but this is not a requirement, therefore we will continue to review whether it is appropriate on this site. When delivering non-residential uses on the site our priority is to deliver employment uses required by the site allocation, however retail may be popular with new and existing residents.

What are your proposals for accommodating existing businesses on this site? I like the helpful businesses and mix of semi-industrial uses on the site.

We recognise that the businesses on the site are well liked by many and make a positive contribution to the local economy. These uses evolved on the site informally as the need for the use of the site as a gasworks declined, however the site is allocated for less industrial uses and unfortunately the existing business uses are less compatible with residential-led redevelopment due to the nature of their work. We are engaging directly with the existing tenants to help them to plan to relocate, within the local area if possible.

How many jobs will you create?

The proposals for the employment uses are too early to be able to calculate this however the planning application will set out an assessment of the socioeconomic impact of the proposals, and this will include the employment changes.

Community uses

What is the proposal to ensure that access and provision of education and health care will be available for the residents of this development? Will a GP surgery, dentist and school be included in the plans?

Our early assessment indicates that there is sufficient capacity in local schools, GPs and dentists to cater for the residents of the new development however we will be engaging with the Council to ensure this. The planning application was also assess this and, if a need is identified for more services as a result of the development, we would be required to provide for this under the planning permission. To do this the Council collect S106 contributions from new developments, which are put towards items including local health and education.

Will you provide communities off site, e.g. basketball court and adventure play ground in East Brighton park?

We do not currently have plans to do this however we will also keep this under review. We intend for the new public square and green link to feel like truly public spaces that will add to the local community. For example for to be a multi-use space that may be able to host events such as open-air market, whilst the green spaces will provide opportunities for incidental play by children.

Would you consider providing a garden for food growing or composting to support local food self-sufficiency and bring a sense of community?

We had not considered this however this is a very good idea that we will consider moving forward.

Design

How many people do you estimate will use the green link?

We expect this would vary significantly based on the time of day and the weather. Whilst the physical connectivity this link will bring is a benefit in its own right, the purpose of the green link is not just to connect two places but to bring a sense of nature into the site that the new and existing communities can enjoy, forming a meaningful symbolic connection between the South Downs and the City.

Would it make more sense for the green link to run through the site away from Marina Way?

This is a good suggestion. We will consider this moving forward and look at whether to relocate the green link or whether a buffer could be created benefit from widening the link and incorporating more dense planting.

After connecting the north east and south west of the site how will you resolve the linkage across the A259 down to the paths below the cliff?

Our transport consultant is reviewing this to understand what improvements, if any, would be needed. We will provide an update on this at a later date.

How much of the site is dedicated to open space?

The site is circa five acres and the amount of landscaped space is just under 3 acres including podium gardens, and just under 2 acres excluding podium gardens.

What consideration have you given to disability access and awareness in the design?

We have considered this from the outset and despite the significant level change across the site, the site will be fully accessible to those with disabilities and wheelchair users. Homes for people with disabilities will also be included alongside parking spaces for disabled persons which are located within appropriate distances of apartments, in line with local policy and building regulations.

What is the height of the tallest proposed building in relation to the existing gasholder frame, and to the buildings in the surrounding area including Marine Gate and the Courcels building?

Please refer to this [heights plan](#).

The gasholder frame is equivalent to eleven storeys and in this location we are proposing an eleven storey building to sit in its place.

The tallest building, at fifteen storeys, is located more centrally to the site where it is furthest from our neighbours and acts as a marker of the central public square in the site. It should be noted that there is in effect a two-storey drop in level between the north of the site and this taller building therefore meaning it would read as lower than fifteen storeys.

In the south of the site, again due to level changes across the area the two taller southern blocks at 11 storeys would read as being very similar heights to Marine Gate and the Courcels building.

The buildings along Roedean Road have shoulder heights of six and eight storeys along their northern edge and step up to eight and eleven storeys within the site. The linear form of the blocks has been chosen allow for north-south views from Roedean Road through the site, and the set backs allow more light to Roedean Road.

We appreciate that loss of light and views is a concern to many. The development is being designed to minimise impacts on surrounding properties as far as possible and as the proposals develop further we will carry out technical assessments which will be included as part of the application which will demonstrate the impacts on the surrounding properties with respect to sunlight, daylight and overshadowing.

What is the width planned from the properties that back onto Boundary Road and how tall are these?

The current width of Boundary Road is approximately eight metres. The proposals would widen this to circa thirteen metres and the new buildings along this road would have a three-storey shoulder height and, further back into the site, they step up to a variation between four and five storeys.

How dependent is the financial viability of the redevelopment scheme on constructing buildings up to fifteen storeys?

The financial viability is not dependent on specific heights but it is dependent on achieving an overall massing. Our current proposals seek to optimise the use of the site in a way that has been informed by and is appropriate to the local townscape. We feel the proposed variations in the heights are more successful overall than a proposal would be if it delivered the same massing in more uniform heights.

The result of providing less massing overall would be to not contribute so fully to meeting Brighton & Hove's significant housing need, and that the development would not be able to provide as much community benefit in terms of items such as affordable homes or S106 contributions.

I am concerned that the size and density of the development is not in keeping with the surrounding area. What will you do to integrate its appearance and height to be more outwardly considerate of and 'permeable' to the surrounding neighbourhoods?

We have sought to balance the massing in a considered way by viewing the proposals from many angles. In the next stage of the process when the proposals have been developed we will provide a model of the proposals in its context to demonstrate this. We will consider this feedback moving forward and if you have any specific suggestions as to how the buildings could change to be more outwardly considerate then please let us know.

Are there other ways to help people orientate themselves to the Downs rather than through the use of tall buildings?

Yes, other options are available such as signage, use of landscape and open views to the Downs, however this would be less effective on a development of this scale. This site is one of Brighton & Hove's last remaining brownfield sites and it is therefore an important opportunity to ensure the site is used to its fullest potential.

Why aren't the buildings sea-facing like Marine Gate and Lewes Crescent?

We considered many iterations of the masterplan layout including the use of buildings in similar shapes to Marine Gate. The outcome of building forms such as this is that the properties situated on the south of the most southern buildings would have fantastic views, however the homes behind these – both new and existing – would have no view at all of the sea. We feel that the use of linear building forms is more egalitarian in that almost all properties have balconies from which they will get a partial sea views, whilst north-south views through the site to the sea can be retained.

How will you protect the integrity of Kemptown which has many artists and creatives? The Marina development has not done this aesthetically

This is a good question and something we will consider closely as we develop the architecture of the proposed buildings. We feel that the site should really celebrate its position in Brighton and at the entrance of East Brighton park and the South Downs by finding a sense of interest and playfulness in the architecture, as one statutory consultee said: an architectural treatment that allows the development to really feel that it is 'of Brighton'.

In addition we feel the employment spaces in the development provide another opportunity for the development to knit into the area, for example through smaller work units which might include creative/'maker' space suitable for local businesses.

Will you retain the flint wall?

The wall is in quite poor condition in many areas and our current proposals would see this wall removed in order to create an active street along Boundary Road and to maximise the distances between buildings within the site. We are looking at ways to preserve the memory of this wall whilst optimising the opportunities with redeveloping the site, for example reincorporating it into the architecture along Boundary Road within the walls to ground floor front terraces.

Why aren't you building within the gasholders?

We recognise that for some people the existing gasholder frame may be a familiar sight and a recognisable landmark for the local area.

Gasholder retention is rare in the redevelopment of gasworks sites because it is extremely costly and it takes up a large amount of land that could otherwise form part of the development. This significantly affects the ability to bring these already challenging sites forward for redevelopment.

Therefore, gasholder retention only typically occurs where the gasholder is of sufficient heritage significance and the values generated by the development could support the very high costs involved in its restoration.

In this circumstance the gasholders on site are not listed and are relatively recent structures in relation to other gasholders previously constructed on the site and more widely across the country.

Retaining it would mean that the other benefits of redevelopment such as affordable homes, public open space and S106 contributions towards wider community benefits cannot be delivered. In some cases, gasholder retention would render the redevelopment completely unviable.

For these reasons it is not feasible or appropriate to retain the gasholders at Brighton Gasworks.

We aspire to reflect the industrial history of the site in a more creative way, for example through public art, or details in the design of the building or the landscape.

Why aren't you building round buildings in place of the gasholder?

Round buildings typically provide lower quality amenity for residents because of the irregularly shaped rooms and curved walls they create, however we will certainly consider this moving forward.

How will the buildings be fire safe?

Health and safety is at the forefront of everything that we do. The proposals are being designed with input from fire engineers from the outset. We continually review the latest regulations and take their application very seriously to ensure the buildings are safe.

Construction

What will be impact on local the local area in terms of traffic, noise and pollution? What will the construction hours be? Will there be a further consultation on this?

We appreciate that the impacts of construction are often a concern for neighbours. Before starting any works on site we will prepare plans to specify measures to manage the impact of construction on our neighbours. This will address impacts including noise, dust, light and traffic.

Due to the early stage in the process we do not have precise details of transport and other construction impacts, however this will be assessed as part of the planning application for the Environmental Impact Assessment process and if there is any mitigation required to resolve undue impacts then this will be agreed with the Council through the planning process and secured by planning condition.

We then anticipate submitting a Demolition and Construction Environmental Management Plan to the Council before starting works, which would include measures to limit disruption for construction traffic and noise. This is a standard condition on many planning permissions and we expect the Council will require this here.

Construction hours will also be controlled by the planning authority preventing disruption during anti social hours.

The Environmental Impact Assessment and planning condition submissions will be make public and will be open for comment. During the course of construction we will also be seeking to continue a process of engagement with local residents and you will be able to raise any concerns.

The Berkeley Group are also members of the Considerate Construction Scheme which is an initiative that seeks to minimise the impact of construction on neighbouring residents as well as maximising the working conditions and welfare for everyone on site.

How long do you estimate this development will take from start to finish?

Subject to progress with planning we are targeting obtaining planning permission towards the middle of 2021, starting works on site in the latter half of 2021. We then anticipate the first homes could be delivered in 2024, building out the remaining homes over circa 8-10 years.

I work from home and will be forced to rent office space during this development. What plans for compensation are there?

Through the assessment and mitigation processes outlined above we aim to minimise disruption to local properties and thereby avoid the need for local people who work from home to rent out work spaces.

Will you extend construction employment opportunities to local people?

Yes, absolutely. Across all of our sites provide employment and apprenticeships for local people during the construction stage. We are proud to currently have more than 750 apprentices working on over 60 of our sites and offices, and Berkeley has more than 2,450 direct employees and over 12,750 people working across our development sites.

Operational impacts

How will you promote sustainable means of transport? Will you support local bus operators to improve local infrastructure? Will you provide secure cycle parking?

We understand that this is an important issue to local people. We are considering ways we can reduce the amount of parking on site and promote sustainable means of transport, including walking, cycling and public transport, whilst balancing against any additional pressure that may be experienced on local streets from new car movements.

Whilst cars are popular with many, there are lots of measures we can implement to encourage residents to take up other means of transport. For example, we will be providing adequate secure cycle parking within the podium car parks to encourage residents of all apartments to cycle wherever possible.

We will be engaging with local transport operators to consider how we can tie into the existing public transport network. The area is well served by buses and has good access to the sea front meaning we expect walking and bus use to be a popular means of getting around locally and of reaching the train station.

We have also appointed a highways consultant and will be engaging with the Council to ensure the appropriate level of parking is provided for the site and that the local highway network can accommodate the traffic movements arising from the development. This will be assessed and evidenced through the planning application.

How many cars parking spaces will you provide and how will you prevent residents parking on surrounding streets?

The number of spaces has not been decided yet. We will be working with the Council to ensure that the parking spaces provided have an acceptable impact on the local highway network. We will also be installing electric vehicle charging points to encourage uptake of more sustainable cars when they are used.

the Council do not typically allow residents of new developments have obtain parking permits on surrounding streets. We expect this approach would be taken here.

How will the new cars affect traffic on my road/street?

Like construction traffic, we do not have the answers to this question yet because of the early stage in the process however we will assess this as the proposals become more settled. The full findings would be reported in the planning application through a Transport Assessment and any mitigation, such as junction improvements or measures to reduce uptake of vehicles, would be agreed with the Council.

Before occupying the development we also anticipate submitting travel plans which would address how to minimise the impact of operational traffic on the local areas. These are standard conditions on many planning permissions and we expect the Council will require these here.

Where will the entrances to the site be for vehicles?

The proposals intended to use the existing entrances on Boundary Road and Marina Way.

What measures are you proposing to preserve levels of light to the houses to the east on Cliff Road, to the west on Arundel Street and to the north on Roedean Court? Have you done an assessment of the impact and can you tell us what will the impacts be?

We are mindful of impacts on surrounding properties including on their levels of light and try our best to avoid impacting neighbours negatively.

In developing this massing we are seeking to balance many different considerations including amenity to immediate neighbours, appearance from near and far views, ensuring we can deliver affordable housing and other S106 benefits, and many others. Where impacts do unfortunately result from the scale of the proposals we also have to consider how best to distribute the massing across the site to ensure the impacts are as even and positive as possible

The proposals have been designed to position the tallest building in the centre of the site, and to use set backs, breaks between buildings and variegated rooflines to allow light through to properties.

The impact of daylight on neighbouring properties will be assessed fully through the planning application, with detailed results submitted as part of the Environmental Impact Assessment. The assessment is complex and takes several weeks to model and run, and the design is constantly evolving therefore details are not currently available.

Can you tell me how the development will affect the view from my home?

Unfortunately it is not possible to model the development from all locations however at the next stage of consultation we will provide more views of the development to help everyone to visualise the development once we have more detail. It is not possible to viability redevelop the site whilst preserving all current views and we hope a high quality and considered development solution will present an improvement from many perspectives.

How will the introduction of taller buildings and the layout of the buildings impact windspeeds in the surrounding streets and gardens? What research have you done on this?

The proposals have been informed by early microclimate modelling and we will continue to do this as the proposals develop to ensure they continue to be appropriate. We will be taking great care to incorporate any necessary mitigation needed to ensure the conditions on and around the site are suitable. A key opportunity to do this is through planting resilient landscape species that can help to filter and slow wind speeds.

How will the increased demand for water affect local water pressure?

We will engage with the statutory undertakers to ensure there is sufficient capacity in the network to meet the needs of the new population. If there is not capacity currently we will work with the statutory undertaker to ensure there is sufficient new capacity, this is something we do across many sites and the undertakers are required by law to make new capacity where it does not currently exist.

I live in a development with a basement and podium car park that has flooded in the past. How will you prevent flooding in the podium car park?

We will be working with our engineers and drainage consultants to ensure that the podium does not flood. This is something we think about from the outset. This site benefits from a sloping gradient in the site from north to south which will help generally with the drainage strategy and no basement is proposed.

Sustainability

How will the development be sustainable to meet the challenge of climate change?

The Berkeley Group is committed to being one of the most sustainable companies in the UK. We aim to make a significant, long-term contribution to the environmental, social and economic fabric of the communities in which we work.

To this end we set ourselves minimum standards across all of our sites. These include creating a net biodiversity gain, to creating zero-carbon ready homes, making use of prefabricated elements and minimising construction waste; across all of our sites we divert 95% of construction waste from landfill.

Through the design process we will be considering which sustainability measures suit this ethos and are appropriate for this site. The first step will be remediating the land which brings significant environmental benefits in its own right

What is 'zero-carbon ready' and why can't you be zero carbon from the outset?

On all of our developments we develop zero carbon transition plans which is a strategy for a development to consider future energy and heat sources and how it can become zero carbon over time. This is to reflect the uncertainties around gas and electricity decarbonisation as well as future policy and regulatory requirements, but its ultimate aim is that over time all of our new developments will have zero or negative carbon emissions associated with their operational energy.

Not all developments can be zero carbon currently due to the uncertainty in the long term low carbon supply and there being no reliable technology that has been tested at scale we have chosen to take a long term view to provide the right solutions for our customers.

Developers also cannot control the amount of energy that is used in a home as this is often determined by user behaviour. Instead we will create net zero ready developments where we focus on reducing the operational energy use and then the customer can create a zero carbon home by choosing renewable energy supply or carbon offset payments.

Will the homes have recycling facilities?

Yes, our homes include facilities for segregating recyclable materials from general waste.

Will there be a combined environmental impact assessment with the Marina and Black Rock?

A full environmental impact assessment will be carried out which will include an assessment of other ongoing and committed future developments. This will ensure that the development is assessed not just in isolation but in combination with other works in the area.

What risk does the stated uncertainty and risk over below ground obstructions and contamination pose for our health? What happens if the contamination underground can't be contained?

St William is a joint venture that was set up between the Berkeley Group and National Grid to bring together our respective expertise to unlock the development of gasworks sites such as Brighton Gasworks.

These sites are complex and challenging and are quite unique compared to typical brownfield sites and many developers would not take them on. However, we have worked across a great number of sites now so have a strong understanding of how to address contamination associated with historic gasworks uses.

Health and safety is at the forefront of everything we do. Through the planning process we will be required to report on ground conditions and any planning permission granted would be subject to conditions that require us to do further assessments, to carry out decontamination and remediation works and to undertake monitoring to ensure that the work has been done to safe standards. We will also need to submit information to the Environment Agency who have their own regulatory process on this matter and they would not allow the site to be opened if the site was not safe for residents, workers, or visitors.

Consultation

Have you had any discussions with the Council to-date on the proposals?

Yes we have been speaking with the Council regularly in getting to this point and will continue to engage with them over the following months and the proposals develop.

Why aren't there any rendered views of your proposals, only precedent images?

The proposals are at an early stage and we do not have detailed proposals to show you at the moment. This consultation is being carried out now to gain local input on the masterplan principles and approach.

Once we have collated your feedback we will develop the proposals in more detail, and then hold another consultation with more detail and images of the proposals so that we can get your feedback and respond to this before submitting the planning application.

Why was the local area not leafleted sooner?

In mid-June we appointed a firm to distribute consultation invitations to 7000 properties in the local area, starting with those closest to the site. We were then made aware that many properties did not seem to have received their invitations. We are very disappointed about this and took steps to fix this ourselves with the second round flyer drop that we carried out ourselves before the second webinar.

We are committed to having a meaningful process of engagement with the local community and so sought to advertise the consultation through several measures to maximise the chance of the local community hearing about and engaging in the consultation.

In addition to the flyer drop to individual properties this included advertising in the local newspaper (online and in print, and promoted on Facebook), and writing and emailing local residents' associations and other stakeholder groups, and all Councillors encouraging them to reach out to their local communities. Throughout the consultation period we have had high levels of engagement which suggests that the in combination the above measures have been effective.

We would like to reiterate that although we provided a target date of 13 July to receive submissions, we stated that we would accept feedback after this date and we stand by that. Please take the time you need to review the consultation and to ask questions and send the feedback when you are ready.

Will there be another consultation?

There will be a further event this year after we have reviewed your feedback. This will contain more detailed information and will take place before submission of the planning application, providing another opportunity for the community to input to the proposals before submission of the final proposals.

Is it proposed, in the future when lockdown measures have eased, to hold further seminars at which it will be possible for interested parties to meet with you in person

Yes, if lockdown measures continue to loosen and as a result we will be able to hold face to face meetings soon. In the meantime we would be pleased to speak with anyone by phone or video call to enable a more interactive process and we will keep the ability to host in-person events under review.