

Brighton Marina Neighbourhood Forum

01/06/2018

Policy, Projects and Heritage Team
First Floor
Hove Town Hall
Norton Road
BN3 3BQ

By email to planningpolicy@brighton-hove.gov.uk

Dear Sir/Madam

Re: Community Infrastructure Levy Draft Charging Schedule Consultation Response

We write as the Steering Committee of the Brighton Marina Neighbourhood Forum to provide our comments on the second formal consultation in the preparation of a CIL charging schedule. This response was also considered by the Annual General Meeting of the Brighton Marina Neighbourhood Forum on 16th May and received the approval of those present.

We would emphasise our support for development at the Marina; the current state of development at the Marina is far from satisfactory, in particular in respect of public realm and the 'sense of place' of the Estate and further development, including to address these specific deficiencies, is desirable.

We note the outcome of the preliminary consultation and welcome that this has acknowledged that there are particular challenges and costs associated with building at the Marina and that development could be discouraged by a high CIL zoning. This has of course been reflected in a proposed zero rate for CIL for the inner harbour site.

There are a number of concerns which we would request be considered in the current consultation.

Firstly there is certainly 'community infrastructure' required at the Marina and clearly if there is no CIL contribution from Marina developers then there is no neighbourhood portion of the CIL to be spent. Certainly there are other mechanisms within the planning process for ensuring that the public realm of any development takes account of the surrounding area to produce an integrated whole and this must be achieved for future developments at the Marina.

Secondly developments at the Marina will be subject to section 106 agreements and in the past we have been dismayed that some of the section 106 requirements have been, to be blunt, a waste of money. For this reason we would like to insist that the Brighton Marina Neighbourhood Forum be involved in the determination of the section 106 agreements for future developments at the Marina.

Thirdly the provisional consultation proposals have a zero rate CIL for the inner harbour site only at Brighton Marina. We imagine that this area of the Marina has been singled out as it is felt by

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planners to be the only significant development site at the Marina, based on historic planning applications and current land ownerships. This assumption may not always hold good in future and carries risk of future Marina developments repeating the faults of the past by not treating the Estate as an integrated whole. It would be more appropriate to treat the Marina as an integrated whole and apply the same CIL arrangements to the whole site, increasing the prospects for a cohesive overall development.

Finally we feel that arrangements for the Marina should acknowledge the DA2 Development and Special Areas policy of the Local Plan. We are of course especially interested in the Black Rock site, situated as it is directly next to the Marina. A fully built-out development of the DA2 area would create a very significant new district of the City and the impacts on infrastructure arising therefrom will be very significant and warrant more than a piecemeal approach in order to achieve, for example, transport infrastructure fit for purpose for the next 50 or more years. Brighton Marina Neighbourhood Forum requests that it be made a consultee for all future proposals and applications for the DA2 area.

We understand that the regulations allow for those making representations to request the right to be heard by the CIL Examiner and hereby formally request that the steering committee of the Brighton Marina Neighbourhood Forum be granted such a hearing.

Yours faithfully

Andrew Knight
Chair, Brighton Marina Neighbourhood Forum Steering Committee,
on behalf of the Steering Committee.