Brighton Old Town Conservation Area Management Plan

Summary of comments raised and responses

September 2018

Respondent	Comment	Response	Change/Amend
Brighton Hippodrome	 Welcome comments about the Hippodrome. State of disrepair and dilapidation by 		
cic	successive owners has had a long-term deleterious effect on the Conservation Area.	Noted and agreed.	
	Repair and restoration would have a significant positive impact on the whole area and could be stimulating in regeneration.	Noted and agreed.	
	Auditorium is the most important heritage asset on the site; its full restoration has the	Noted and agreed.	
	 highest priority. Needs both back-of-house space and other facilities including vehicle/service access Front of house needs upgrading Pleased to see the references to these requirements in the management plan (7.72). Removal of the fly-tower should be resisted. Proposals including a theatre need to be sustainable. 	The importance of the Hippodrome is well noted in the Management Plan including its significance; the fact that the car park is required for future servicing is acknowledged.	Add additional sentence to para. 7.66 to read: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome itself."
	 Having regard to view eastward from Boyce's Street the dormers are 1990's additions. The idea of a 'lane' between Duke Street and Hippodrome sites, linking Ship Street and Middle Street would have a beneficial effect 	No reference has been made to the removal of the fly tower.	The text at paragraph 7.72 has been amended to state 'adjacent to the fly tower.' for clarification.
	on permeability, improving footfall and access.	Noted and welcomed.	
Theatres Trust	Brighton Hippodrome, top of our Theatres at Risk register and Historic England's Heritage at		
	Risk register. Grade II* listed, its significance reflective of it being considered the UK's most	Noted.	
	architecturally significant circus theatre and finest surviving example. The Hippodrome can be brought back to	Noted.	
	 The Hippodrome can be brought back to active use as a large-scale performance venue, which would fill a gap in provision within the local area and provide Brighton with a number one touring venue. Restoration is achievable, would stimulate improvement within the surrounding area. Paragraph 184, NPPF (2018) and Policy C15.1, City Plan Part 1 supports the conservation and enhancement of the city's historic environment and clear in respect of assets of the highest significance which includes Grade II* listed buildings where any harm or loss must be 'wholly exceptional' and must be given great weight. Draft Policy 	Noted and agreed.	
	 DM27 of the Draft City Plan Part 2 (2018) is consistent with these principles. Draws attention to other policies relating to supporting and promoting the city's cultural infrastructure, acknowledging that it is a way of attracting valuable off-peak visitors reflecting comments about restoration, which supports regeneration and sustainable communities. Note paragraph 4.55 identifies the Hippodrome as an example of the city's 	Noted.	
	cultural infrastructure that should be protected and enhanced for such use.		No change.

- The default position must be to support the restoration and reopening of the Hippodrome as a cultural venue without alteration detrimental to its historic, cultural value and significance.
- Object to the wording of the Management Plan as currently drafted. It appears to be informed by potential development proposals rather than helping to guide potential applicants in a manner which would positively preserve the function, significance and opportunity afforded by restoration.
- In relation to the Hippodrome the document conflicts with national policy and guidance as well as the Council's own Local Plan, both adopted and draft.
- Paragraph 7.66 support the principle of improving the character and appearance of the streetscene but we consider the wording to be inappropriate within this paragraph. The Hippodrome car park has an important servicing function which must be maintained.
- Redevelopment within that space is not necessarily appropriate unless full servicing access to the Hippodrome is maintained.
- We would accept that irrespective of this the appearance of the car park and its relationship with surrounding buildings could be improved.
- Paragraphs 7.7.1 7.73 Concur that the Hippodrome is the single most significant vacant building or site in the Old Town area and benefits it will bring.
- Fully support the Council's expectation that restoration should retain the auditorium as a single open volume conducive to offering a performance function along with other front and back of house spaces that contribute to its significance.
- Would recommend the insertion here of further text that refers not just to maintaining its significance, but also its function – see comments on paragraph 7.66.
- If proper access and servicing is compromised it would be detrimental to the Hippodrome's ability to cater to the types of shows and performers necessary to viably sustain it.
- Object to the Management Plan's support for development that "would fill the gaps" on Middle Street as currently implied although there may be some scope for development on Ship Street.
- Troubled by the text advocating greater height to the centre of the site, as this implies the Council sees development over the theatre as acceptable whereas it could have a detrimental impact on both the significance and function of the Hippodrome. Object and recommend this text is removed.
- Paragraph 7.83 support the improvement of public realm around the area of the Hippodrome.
- Paragraph 8.9 if land to rear is to be released for development, it must be made clear that servicing access is maintained.
- Contest that the site is only under-used because the Hippodrome is vacant.
- Caution against supporting residential development without appropriate mitigation as it otherwise tends not to be compatible with

The importance of the Hippodrome is recognised in the Management Plan but it is not an SPD or development brief. The Plan recognises that it should be restored and brought back into long term viable use in a manner that is consistent with the building's conservation

The wording is consistent with the council's published approach to heritage at risk. There is considered to be no conflict with national or local policy. Any balancing of harm vs public benefits is a matter for future planning applications.

Given the concerns expressed about the car park, an additional sentence has been added to end of paragraph 7.66 to provide clarification.

Noted.

Welcomed. The importance and benefits are recognised in the stated paragraphs. The Management Plan recognises that it should be brought back into a long term viable use that is consistent with the building's conservation

Notes and agreed.

The gaps in the street frontages are detrimental to the conservation area but text slightly amended.

This is a misinterpretation of the text. The Plan is not advocating any particular form of development but simply identifying potential constraints and opportunities.

Welcomed.

Noted and covered by amendments.

Noted.

Noted.

No change.

No change.

Amend paragraph 7.66 to read "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome itself."

Amend paragraph 7.72 to include sentence 'Such development must not, however, prejudice the appropriate reuse and future servicing of the Hippodrome itself.'

Paragraph 7.72 amended to include wording "would partially fill the gaps."

Amend paragraph 7.72 to read: "The centre of the site adjacent to the fly tower may potentially accommodate greater height than the street frontages but must be mindful of longer views."

.Amend paragraph 8.9 to add: "whilst safeguarding the future ongoing servicing requirements of a functioning Hippodrome."

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	 cultural uses. In the case of theatres, noise-related conflict tends to arise as a result of servicing rather than performances. Recommend that the Management Plan is significantly amended in relation to the Hippodrome so that it better advocates and promotes its full restoration as a priority. 	Noted and agreed. Some changes to the text have been made but the Management Plan covers the Old Town Conservation Area, not just the Hippodrome site. Para. 7.72 states that "the council will expect any acceptable scheme for the site to fully restore the Hippodrome" and the Plan makes clear it is the most important vacant building/site in Old Town.	Reference to potential residential use deleted from paragraph 8.9. No further change
CAG	On the whole generally agreed with the management plan's remit and would approve in principle the document. The Group looks forward to its implementation. Felt that the document did not mention some points such as: • graffiti, • rubbish issues, • the reduction in the many different types of paving in the CA, at present to be as many as seventeen. • Also the instigation of Article 4 Directions is needed.	All of these matters have been referred to and addressed in the Management Plan. The Plan also recommends that the council consider an Article 4 Direction.	No changes arising from comments.
The Regency Society	T.10 confirms that as well as single dwellings, small HMOs enjoy permitted development rights, while flats above commercial premises have no such entitlement. There is no suggestion of considering an Article 4 Direction for loss of architectural features. This is inconsistent with 7.18 on removing the permitted development right to repaint shop fronts and 7.44 on controlling external decorations. The phrase "worthwhile to consider the need for an Article 4 Direction" could be made more forcefully. T.61 et seq - Street Furniture. There is no	Paragraph 7.12 refers to "the potential for the consideration of Article 4 Directions for single residential dwellings and HMOs". Paragraph 9.3 in the section on future actions states that "the council should consider the introduction of an Article 4 Direction to control harmful permitted development tights".	No change. No change.
	mention of controlling electric car charging points. T.77- Ship Street Gardens. "The Council should consider enforcement action" and if necessary compulsory purchase.	Noted and added. The phrase 'enforcement action' is used as a catch all term to include all potential notices and action under the Planning acts.	Paragraph 7.62 has been amended to include electric vehicle charging points. No change.
Resident 1	 The Council's intentions (copied below) in regard to the Hippodrome cannot be faulted Might not amount to an excessive constraint on commercial development given the state of the building A developer may be driven to Asset-stripping the Hippodrome Yard in conjunction with Saks House leaving behind the bulk of the Hippodrome to collapse or be sold for £1. Work on the Middle Street frontage is a priority Hippodrome and Hippodrome House is a vacant listed building at Risk It is the single most important vacant site in Old Town and key to revitalizing Middle Street and wider Old Town. 	Concerns regarding the car park to the rear of the Hippodrome which is noted as being important for access and servicing. Noted. This is acknowledged. Noted and has been acknowledged	Add additional sentence to end of paragraph 7.66 to read: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome itself." Amend paragraph 7.72 to include sentence 'Such development must not, however, prejudice the appropriate reuse and future servicing of the Hippodrome

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	 The Council will expect it to be fully restored, retaining the auditorium as one a one volume performance function The land adjoining offers great opportunity to development to fill gaps in Middle and Ship Street, enhance those streetscenes may include a mix of uses, sympathetic in scale and massing The site may accommodate a greater height but must be mindful of longer views, terminating views Should be restored as per historic drawings Must make positive progress with a reasonable time frame Requires a development brief. 	Noted and clarified. An increase of height at the centre of the site adjacent to the fly tower was noted as a possibility reflected in the word 'may'. However the sentence has been amended to include 'may potentially' as this is dependent on a number of matters.	itself.' Amend to "partially fill the gap". Sentence has been amended to read: "The centre of the site adjacent to the fly tower may potentially accommodate greater height than the street frontages but must be mindful of longer views."
		A 'planning brief' is referred to at paragraph 7.73.	Amend paragraph 7.73 to refer to a planning brief being an "option".
Resident 2	 As a committed Save Our Hippodrome supporter I was alarmed to see under para 8.9 the suggestion of building on the Hippodrome yard. Creating a new lane would wreck any chance of it ever being used as a touring theatre again, the yard being essential to provide truck access for scenery etc. The Hippodrome, as your consultants should be aware, is No. 1 on the Theatres Trust 'At Risk' register and has the potential to be jewel in the crown of the Lanes conservation area drawing in theatre goers from the whole of the county. 	pedestrian lane, not a vehicular lane. Paragraph 8.9 has been reviewed and amended.	Add additional sentence to end of para. 7.66 to read: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome itself." Amend paragraph 8.9 to include text: "whilst safeguarding the future ongoing servicing
		The importance of the Hippodrome is understood by the consultant and the fact that it is 'at risk' is referred to in the Plan.	requirements of a functioning Hippodrome."
Resident 3	As a committed Save Our Hippodrome supporter I was alarmed to see under para 8.9 the suggestion of building on the Hippodrome yard and even creating a new lane, as this would wreck any chance of it ever being used as a touring theatre again, the yard being essential to provide truck access for scenery etc, it being one of the key differences that sets it apart from the smaller Theatre Royal which has no truck access. The Hippodrome, as your consultants should be aware, is No. 1 on the Theatres Trust 'At Risk' register and has the potential to be jewel in the	Concerns regarding the car park to the rear of the Hippodrome which is noted as being important for access and servicing. The reference to a new lane in paragraph 8.9, bullet pt 5 is for a pedestrian lane, not a vehicular lane.	Add additional sentence to end of paragraph 7.66 to read: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome itself."
	crown of the Lanes conservation area drawing in theatre goers from the whole of the county.	Paragraph 8.9 has been reviewed and amended. The importance of the Hippodrome is understood by the consultant and the fact that it is 'at risk'.	Amend paragraph 8.9 to include text: "whilst safeguarding the future ongoing servicing requirements of a functioning Hippodrome."
Resident 4	The document is well researched and excellently put together Figure 18 on page 13 is incorrectly labelled as the approach to Pool Valley. I think it might actually be Market Street The same could also be said of the entrance	Noted and welcomed. Noted.	Corrected.
	to Pool Valley which is also obscured by A boards and restaurant boundary poles.	A-boards and street clutter has been referred to in the	Text amended to refer to both Market Street and Pool

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	Poor state of the Old Town is frequently discussed at our LAT	document.	Valley.
	Residents are concerned about street clutter, particularly A boards in the narrow Lanes, ugly tagging graffiti, particularly in Ship Street and Middle Street, large litter bins obstructing public highways, and unsightly advertising obscuring heritage assets such as railings or the historic built environment.	The requirement for a balance in respect of A-boards is noted.	No change required.
	Traders, on the other hand, are worried that the removal of these advertising materials will result in a decline of trade, so there is a balance to be struck	Noted and covered in body of document.	No change required.
	We have a healthy mix of traders and residents in our LAT and I know traders will be seeking some reassurance that the removal of A boards and other advertising will not compromise their business.	Noted.	
	 Residents will want to see stricter enforcement of street licensing; traders may wish to have some incentive to reign in advertising, parasols, tables, chairs and restaurant boundary poles. Paragraph 7.79 is of particular interest to LAT 	The need for liaison with other council services is noted. The new Field Officers will have a role to play in this.	No change required.
	members who live in Clarendon Mansions on East Street. After months of months of cajoling the leaseholder and freeholder of the derelict public house on the ground floor, Whitbread have finally painted over the unsightly tagging and have left residents with a reasonable quantity of paint so we can remove tagging as soon at re-appears. Unfortunately, Whitbread will not be renewing the lease when it expires next year so the ground floor of this building faces an uncertain future.	Noted. The council has been working with Whitbread to secure short term improvements and a longer term resolution.	No change required.
	The introduction of the new Field Officer role may assist with the enforcement of street licensing issues and could positively contribute to the management of the Conservation Area.	Noted and agreed.	
Resident 5	As a committed Save Our Hippodrome supporter I was alarmed to see under para 8.9 the suggestion of building on the Hippodrome yard and even creating a new lane, as this would wreck any chance of it ever being used as a touring theatre again, the yard being essential to provide truck access for scenery etc, it being one of the key differences that sets it apart from the smaller	Concerns regarding the car park to the rear of the Hippodrome which is noted as being important for access and servicing. Paragraph 8.9 has been reviewed and amended.	Add additional sentence to end of paragraph 7.66 to read: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome.
	Theatre Royal which has no truck access. The Hippodrome, as your consultants should be aware, is No. 1 on the Theatres Trust 'At Risk' register and has the potential to be jewel in the crown of the Lanes conservation area drawing in theatre goers from the whole of the county.	The reference to a new lane in paragraph 8.9, bullet point 5 is for a pedestrian lane, not a vehicular lane.	Amend paragraph 8.9 to include text: "whilst safeguarding the future ongoing servicing requirements of a functioning Hippodrome."
		The importance of the Hippodrome is understood by the consultant and the fact that it is 'at risk'.	
Resident 6	As a committed Save Our Hippodrome supporter I was alarmed to see under para 8.9 the suggestion of building on the Hippodrome yard and even creating a new lane, as this would wreck any chance of it ever being used as a touring theatre again, the yard being essential to provide truck access for scenery etc, it being one of the key differences that sets it apart from the smaller Theatre Royal which has no truck access. The Hippodrome, as your consultants should be aware, is No. 1 on the Theatres Trust 'At Risk'	Concerns regarding the car park to the rear of the Hippodrome which is noted as being important for access and servicing. The reference to a new lane in paragraph 8.9, bullet pt 5 is for a pedestrian lane, not a vehicular lane.	Add additional sentence to end of paragraph 7.66 to read: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome.

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	register and has the potential to be jewel in the crown of the Lanes conservation area drawing in theatre goers from the whole of the county and further afield.	Paragraph 8.9 has been reviewed and amended. The importance of the Hippodrome is understood by the consultant and the fact that it is 'at risk'.	Amend paragraph 8.9 to include text: "whilst safeguarding the future ongoing servicing requirements of a functioning Hippodrome."
Resident 7	As a committed Save Our Hippodrome supporter I was alarmed to see under para 8.9 the suggestion of building on the Hippodrome yard and even creating a new lane, as this would wreck any chance of it ever being used as a touring theatre again, the yard being essential to provide truck access for scenery etc, it being one of the key differences that set it apart from the smaller Theatre Royal which has no truck access. The Hippodrome, as your consultants should be aware, is No. 1 on the Theatres Trust 'At Risk' register and has the potential to be a jewel in the crown of the Lanes conservation area drawing in theatregoers from the whole of the county.'	Concerns regarding the car park to the rear of the Hippodrome which is noted as being important for access and servicing. The reference to a new lane in paragraph 8.9, bullet pt 5 is for a pedestrian lane, not a vehicular lane. Paragraph 8.9 has been reviewed and amended. The importance of the Hippodrome is understood by the consultant and the fact that it is 'at risk'.	Add additional sentence to end of paragraph 7.66 to read: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome. Amend paragraph 8.9 to include text: "whilst safeguarding the future ongoing servicing requirements of a functioning Hippodrome."
Resident 8	 Need for empty buildings to be actively used Hippodrome is an iconic building that should be a vibrant social hub rather than a derelict site. The Synagogue and tall buildings opposite can be put to valuable uses – residential, office, holiday or other uses. Other examples including former Dentists on Ship Street Bringing buildings back to life will raise the environment for people to live work Keen to help support the development of the area 	The Management Plan seeks to encourage the reuse of empty buildings, including the Hippodrome and Synagogue. It is also acknowledged that there are other empty properties which require new uses to improve the vitality of the area, including in Ship Street Gardens.	Changes are indicated to various paragraphs including 7.66, 7.72, 7.73, 7.74 and 8.9 (see above).
Resident 9	As a long term resident of Brighton and Hove I am appalled to read, possibly between the lines, of your intentions re this building (the Hippodrome). I have been watching the lack of action re this beautiful building for a while, but haven't before expressed my sadness, frustration and disbelief not against progress, understand that you have a really difficult job at the moment making ends meet, but such a mistake to get rid of a building like this.	Importance of car park is noted.	Amend paragraph 7.66 with additional sentence at end: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome itself."
	 People can see new buildings anywhere, and we certainly don't need more retail space do we? Alarmed to see under para 8.9 the suggestion of building on the Hippodrome yard and even creating a new lane, as this would wreck any chance of it ever being used as a touring theatre again. The yard being essential to provide truck access for scenery etc. it being one of the key differences that set it apart from the smaller Theatre Royal which has no truck access. The Hippodrome, as your consultants should be aware, is No. 1 on the Theatres Trust 'At Risk' register. It has the potential to be a jewel in the crown of the Lanes conservation area drawing in theatregoers from the whole of the county. 	Small retail units are a key positive characteristic of Old Town. Paragraph 8.9 has been amended to reinforce importance of the rear car park for servicing. The reference to a new lane in paragraph 8.9, bullet point 5 is for a pedestrian lane, not a vehicular lane. The importance of the Hippodrome is understood by the consultant and the fact that it is 'at risk'.	Para. 7.81 amended to say "Small retail units are a key positive characteristic of the Old Town and should be protected and, where appropriate, replicated". Amend para. 8.9 to include text: "whilst safeguarding the future ongoing servicing requirements of a functioning Hippodrome." No change.

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Resident 10	As a born and bred Brighton resident I wish to state strongly my objection to the proposed plans for the development of the Hippodrome site, and in particular the suggestions for a new 'lane' that would severely curtail the potential to reestablish the Hippodrome as a major theatrical and performance venue. Having been an adviser to the Festival in the past, as a professional filmmaker, and as a member of local contemporary dance company Three Score Dance. I am well aware of the limited larger scale performance venues in the city. The Hippodrome could provide a major boost to cultural activity as well as remaining an important part of Brighton's architectural heritage.	Noted. Importance of car park for the future is noted. The reference to a new lane in paragraph 8.9, bullet point 5 is for a pedestrian lane, not a vehicular lane.	Add additional sentence to paragraph 7.66: "In the case of the Hippodrome car park, any development must not prejudice the appropriate future reuse and servicing of the Hippodrome itself." Amend paragraph 8.9 to include text: "whilst safeguarding the future ongoing servicing requirements of a functioning Hippodrome."
Resident 11	Main concerns are: vacant buildings and shops poor quality shop fronts and signs the loss of historic features and materials the clutter of street furniture and waste bins poor quality street paving/surfaces graffiti.	Noted and agreed. These issues have been addressed in the Management Plan.	No changes.
	Also raised street cleaning and litter, tree maintenance (e.g. watering the tubs in North Street), the lack of coordinated heritage signage and the lack of enforcement of all of these issues.	Noted. These issues have been referred to in the Management Plan where relevant.	