

# **PLANNING COMMITTEE ADDENDUM Late List/ Additional Representations**

**2.00PM, WEDNESDAY, 2 JULY 2025**

**COUNCIL CHAMBER, HOVE TOWN HALL**

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## **ADDENDUM**

<b>ITEM</b>		<b>Page No.</b>
<b>108</b>	<b>TO CONSIDER AND DETERMINE PLANNING APPLICATIONS</b>	<b>3 - 12</b>

## 2nd July 2025 Planning Committee – Amendments and Additional Representations

Page	Site Address	Application No.	Comment
Item A	Brighton College Preparatory School Walpole Lodge 2 Walpole Road And Pre-Prep School Eastern Road, 2 Belle Vue Gardens And 141 And 143 Eastern Road Brighton	BH2025/00264	<p><b>19<sup>th</sup> June</b> – A representation has been received from Councillor Mackey <b><u>objecting</u></b> to the proposal. A copy of their representation is attached to this Late List.</p> <p><b>23<sup>rd</sup> June</b> – An additional representation has been received <b><u>objecting</u></b> to the development for reasons which are mostly already referenced within the office report, however an additional point is raised in regards to the effect upon availability and cost of housing within Brighton and Hove. Whilst this is noted, the application does not propose the direct loss or additional provision of housing within City.</p> <p><b>25<sup>th</sup> June</b> – An additional representation has been received <b><u>supporting</u></b> the development on the grounds of good design and has referenced that as a local resident within the Whitehawk and Marina Ward they have not had their views canvassed by other objectors nor Councillors.</p> <p><b>25<sup>th</sup> June</b> - A representation has been received from Councillor Allen <b><u>objecting</u></b> to the proposal. A copy of their representation is attached to this Late List.</p>
Item B, page 107- 108	9 - 12 St Catherines Terrace Hove BN3 2RH	BH2023/03293	<p><b>13 June 2025</b> – Comments received from the Council’s Local Employment Scheme Officer as follows:</p> <ul style="list-style-type: none"> <li>• A financial contribution of £9,200 towards the Local Employment Scheme</li> <li>• Submission of an Employment &amp; Training Strategy</li> </ul> <p><b>24 June 2025</b> - Amended Proposed Site Plan 134D received - revised to accurately show proposed pitched roof element / dormer. List of approved drawings amended:</p>

			<table> <tr> <th>Plan Type</th><th>Reference</th><th>Version</th><th>Date Received</th></tr> <tr> <td>Location and block plan</td><td>109</td><td>C</td><td>11-Dec-23</td></tr> <tr> <td>Proposed Drawing</td><td>120</td><td>D</td><td>23-Apr-25</td></tr> <tr> <td>Proposed Drawing</td><td>121</td><td>F</td><td>15-May-25</td></tr> <tr> <td>Proposed Drawing</td><td>122</td><td>D</td><td>23-Apr-25</td></tr> <tr> <td>Proposed Drawing</td><td>123</td><td>E</td><td>22-May-25</td></tr> <tr> <td>Proposed Drawing</td><td>130</td><td>C</td><td>06-Nov-24</td></tr> <tr> <td>Proposed Drawing</td><td>131</td><td>B</td><td>11-Dec-23</td></tr> <tr> <td>Proposed Drawing</td><td>132</td><td>B</td><td>06-Nov-24</td></tr> <tr> <td>Proposed Drawing</td><td>133</td><td>A</td><td>11-Dec-23</td></tr> <tr> <td>Proposed Drawing</td><td>134</td><td>D</td><td>24-June-25</td></tr> <tr> <td>Proposed Drawing</td><td>135</td><td></td><td>06-Nov-24</td></tr> <tr> <td>Proposed Drawing</td><td>142</td><td>A</td><td>15-May-25</td></tr> <tr> <td>Proposed Drawing</td><td>143</td><td>A</td><td>15-May-25</td></tr> </table>	Plan Type	Reference	Version	Date Received	Location and block plan	109	C	11-Dec-23	Proposed Drawing	120	D	23-Apr-25	Proposed Drawing	121	F	15-May-25	Proposed Drawing	122	D	23-Apr-25	Proposed Drawing	123	E	22-May-25	Proposed Drawing	130	C	06-Nov-24	Proposed Drawing	131	B	11-Dec-23	Proposed Drawing	132	B	06-Nov-24	Proposed Drawing	133	A	11-Dec-23	Proposed Drawing	134	D	24-June-25	Proposed Drawing	135		06-Nov-24	Proposed Drawing	142	A	15-May-25	Proposed Drawing	143	A	15-May-25
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Item C, page 135	The FreeButt 1 Phoenix Place Brighton BN2 9ND	BH2025/00889	<p><b>18<sup>th</sup> June 2025</b> - Minor amendments to the plans were received after the publication of the report – the revisions omit one of the cycle stands under the stairs and clarify the level access arrangements to the proposed commercial unit.</p> <p>As a result the list of approved drawings is updated:</p>																																																								

Page 136 and 137			<b>Plan Type</b>	<b>Reference</b>	<b>Version</b>	<b>Date Received</b>
			Location and block plan	TA1119/01	A	31-Mar-25
			Proposed Drawing	TA1419/10	F	18-Jun-25
			Proposed Drawing	TA1419/11	K	18-Jun-25
			Proposed Drawing	TA1419/12	G	05-Jun-25
			Proposed Drawing	TA1419/13	E	18-Jun-25
			Proposed Drawing	TA1419/14	F	18-Jun-25
			Proposed Drawing	TA1419/15	E	05-Jun-25
			Proposed Drawing	TA1419/16	F	18-Jun-25
			Proposed Drawing	TA1419/17	E	18-Jun-25
Page 140			<p>The wording of conditions 4 and 6 it to be updated accordingly to reference the latest drawing version and date of receipt.</p> <p>The wording of condition 9 is to be altered to require compliance with the newly submitted plan:  <i>The development hereby permitted shall not be occupied until the cycle parking facilities shown on the approved plans have been fully implemented and made available for use. The cycle parking facilities shall thereafter be retained for use by the occupants of, and visitors to, the development at all times.</i>  <i>Reason: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than private motor vehicles and to comply with policy DM33 of Brighton &amp; Hove City Plan Part 2, and SPD14: Parking Standards.</i></p>			
			<p><b>27<sup>th</sup> June 2025</b> – comments received from the Local Highways Authority, requesting:</p> <ul style="list-style-type: none"> <li>• Off-site footway improvements to be secured by s106 and s278 agreement</li> <li>• A Construction Environmental Management Plan (CEMP)</li> <li>• Further details of the location of bin stores for the commercial unit</li> </ul>			
Page 137						

			<p><u>Officer note:</u> an additional condition relating to the commercial unit bin stores can be added. However, it would not be considered reasonable or necessary to secure off-site footway improvements or a CEMP as part of this application.</p> <p>Additional condition 10:  <i>The commercial unit hereby permitted shall not be brought into use until a scheme for the storage of refuse and recycling has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be carried out and provided in full in accordance with the approved details prior to first occupation of the development and the refuse and recycling storage facilities shall thereafter be retained for use at all times. Reason: To ensure the provision of satisfactory facilities for the storage of refuse and to comply with Policies DM18 and DM21 of Brighton &amp; Hove City Plan Part 2, policy CP8 of the Brighton &amp; Hove City Plan Part One and Policy WMP3e of the East Sussex, South Downs and Brighton &amp; Hove Waste and Minerals Local Plan Waste and Minerals Plan</i></p>																				
Item D, page 157	63 Lyminster Avenue Brighton BN1 8JL	BH2024/01962	<p><b>23<sup>rd</sup> June 2025</b> - Minor amendments to the plans were received after the publication of the report – the revisions pulled the terrace and privacy screens in 1.0m from each boundary. The amended drawings also added the steps from the decking to the garden. Plans were amended to include the adjoining neighbour's house. The block plan was amended to show two storey and single storey extensions. An updated proposed north side elevation was provided.</p> <p>As a result the list of approved drawings is updated:</p> <table border="1"> <thead> <tr> <th>Plan Type</th><th>Reference</th><th>Version</th><th>Date Received</th></tr> </thead> <tbody> <tr> <td>Location and block plan</td><td>LPEX007</td><td>003</td><td>17-Jun-25</td></tr> <tr> <td>Proposed Drawing</td><td>LAEX003</td><td>008</td><td>23-Jun-25</td></tr> <tr> <td>Proposed Drawing</td><td>LAEX004</td><td>007</td><td>23-Jun-25</td></tr> <tr> <td>Proposed Drawing</td><td>LAEX004</td><td>004</td><td>23-Jun-25</td></tr> </tbody> </table>	Plan Type	Reference	Version	Date Received	Location and block plan	LPEX007	003	17-Jun-25	Proposed Drawing	LAEX003	008	23-Jun-25	Proposed Drawing	LAEX004	007	23-Jun-25	Proposed Drawing	LAEX004	004	23-Jun-25
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			<p><b>30<sup>th</sup> June 2025</b> – An additional objection was submitted by a previous objector. This objection goes into further detail following an independent 3D scan of the proposal and raises concerns regarding the following:</p> <ul style="list-style-type: none"> <li>- Inaccurate drawings</li> <li>- Inconsistencies and inaccuracies in officer's committee report</li> <li>- Procedural issues and biases towards securing approval</li> <li>- Lack of dimensions</li> <li>- Conflict with planning policies</li> </ul> <p>3D images have been submitted as part of this representation to demonstrate the harm of the proposal.</p>
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Planning application BH2025/00264

I am a councillor for Kemptown Village writing to express my objection to the above planning application.

The number of residents opposed to this development had grown significantly. They are concerned that the proposed buildings are overbearing in bulk, with insufficient open

areas and inappropriate to their neighbours on both sites. The buildings will diminish access to natural light, increase overlooking and infringe on residential privacy.

The introduction of a large-scale boarding house fundamentally changes the character and appearance of the College Conservation Area and potentially conflicts with city plan policies.

The Council has previously highlighted the importance of preserving the area's residential nature, and the introduction of 150 boarders directly contradicts this aim without providing clear justification for expansion.

Local planning policies support maintaining balanced neighbourhoods that meet the needs of all residents and prevent the over concentration of institutional uses. Residents are concerned that Brighton College is prioritising its own expansion above the balance and cohesion of the conservation area neighbourhood in which it is located and the decision on the Walpole road appeal (APP/Q1445/W/24/3336535) sets an important precedent in this regard. The Planning Inspectorate stated: "But amongst other things, Policy SA6 of Brighton & Hove City Plan Part One, March 2016 (CPP1) seeks to maintain balanced neighbourhoods and communities that meet the needs of all residents and Policy DM20 of Brighton & Hove City Plan Part Two, October 2022 (CPP2) refers to the cohesiveness of Conservation Areas."(p.3). The new planning application for additional boarding accommodation in this stretch of Walpole Road would likewise be contrary to local planning policies CPP1 SA6, CPP2 DM20 as it would not maintain the balance of this neighbourhood and community, and it would not support the cohesiveness of this Conservation Area.

The School has generated 12 new buildings since 2007 and already occupies/owns large numbers of residential properties. Residents are concerned that this £90 million international business is focused on continuing its expansion at the expense of their community.

The Planning Statement acknowledges increased transport activity around Eastern Road, Sutherland Road, and Bristol Gate, yet offers no effective mitigation measures. It claims that the boarding house proposal is beneficial to residents because of reduced drop offs and pick ups but completely ignores the fact that the traffic nuisance, that has been hugely disruptive to residents around the Walpole Road area, will be transferred to the St Mary's site. Residents living near the St Mary's site already complain about the College traffic. This will significantly increase the traffic chaos.

Policy CP9 requires new developments to reduce car dependency and support public transport but this proposal increases traffic congestion and carbon emissions in an already pressured urban area, particularly around the Royal Sussex County Hospital and the proposed exit opposite the Brighton Trauma Centre's main entrance risks obstructing emergency vehicle movements, potentially compromising patient care and response times.

Residential parking is already under strain in the area and this proposal will aggravate existing residential parking problems.

I am also concerned that the various College submissions have misled the officers and the public about the numbers of pupils at the St Mary's site rendering their impact assessments unreliable and misleading.

This application should be rejected.

Cllr Thérèse Mackey

Kemptown Ward ((Labour))

Dear Planning Committee,

I write to submit my objection to this planning application as Cabinet Member holding the remit for Public Realm.

Brighton College has developed at least 12 new buildings in Kemptown since 2008. Local residents have significant concerns about overdevelopment on the character of the conservation area, the balance and cohesiveness of the local community and the further disruption and traffic chaos the proposal will bring, particularly to Eastern Road.

I am particularly interested in robustly defending our planning policy on conservation areas (DM26):

Development proposals within conservation areas, including alterations, change of use, demolition and new buildings, will be permitted where they preserve or enhance the distinctive character and appearance of that conservation area, taking full account of the appraisal set out in the relevant character statement.

The designs are unsympathetic to both the Conservation Area and the original Brighton College buildings. Heritage advice has not been heeded in the design of these proposed new buildings to an acceptable extent, and I feel none of their plans enhance the Conservation area.

The planning application and recent responses from Lichfields make it clear that the applicant does not see the need to create a design that preserves or enhances the views from heritage assets and surrounding streets. This is particularly the case at the St Mary's site.<sup>1</sup> Indeed their response rejects the conservation team's view that 'an opportunity has been lost to make this building (the St Mary's site) fit into the landscape better and therefore enhance the views from the conservation area...' <sup>2</sup> and appears to be satisfied with a 'neutral' design.

Specific concerns include:

- Substation/Gate Design Changes: The Heritage Team notes that there "Isn't significant change to the building after our last comments which is disappointing".
- Lack of Sufficient Flint: The Heritage Team "agree with the Urban Designers comments that there needs to be more flint" incorporated, specifically

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<sup>1</sup> See p7 File 6\_BH2025\_00264-HERITAGE\_RESPONSE\_DOCUMENT-20212602 <sup>2</sup> See p7 File 6\_BH2025\_00264-HERITAGE\_RESPONSE\_DOCUMENT-20212602

"obtaining to the base of the new building. The materials or design detail provided for these elements are still not satisfactory".

- St. Mary's Building Design: As mentioned above the applicant shows disregard for residents and the surrounding environment by suggesting the building need only make a 'Neutral Enhancement': The Conservation Officer "still maintain[s] that the proposed development gives a neutral enhancement to the views from and towards heritage assets".
- A 'neutral' design and low less-than-substantial harm is an acceptable position: LPAs should actively "look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance". Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably' *ibid.* NPPF paragraph 219 states that the LPA's responsibility is to "push for proposals which make a positive contribution, not a neutral one". The Heritage team fundamentally disagrees with the applicant's apparent position that a neutral effect is acceptable, seeing it as a "missed opportunity".

The applicant's response offers little public benefit in design or willingness to provide off site enhancements. This is at variance with the applicant's initial heritage statement which claims 'this design quality is argued to enhance the street-scene and introduce significant visual interest to an area otherwise characterised by modern buildings of no architectural distinction'<sup>2</sup>. I conclude that there is net public harm in the overall scheme.

I therefore recommend refusal of this application.

Yours Sincerely,

Jacob Allen  
Labour Councillor for Woodingdean Ward

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<sup>2</sup> HERITAGE\_STATEMENT-20048193 paras 6.13