

Cllr. John Allcock
BH2020/01403 - 64-68 Palmeira Avenue & 72-73 Cromwell Road

13th July 2020:

This application has been developed without any consultation with the community on which it will impact. This is not a material planning consideration, but I am extremely disappointed that the developer has made no efforts to consult neighbours or ward councillors about this major development which would have given the developer the opportunity to listen and address a range of issues.

I am objecting to planning application BH/2020/01403 based on the following concerns:

1. The viability assessment:

The viability assessment produced for this planning application states that the developer will not be able to offer any affordable housing and does not even intend to pay S106 contributions. So, the development if approved, will not contribute to the public estate or in any way to the desperate need for affordable housing in our city. The Council's current policy requires all developments of five or more dwellings to provide an affordable housing contribution ranging from 20% for smaller schemes rising to 40% in developments of 15 or more homes

I am aware that the viability assessment currently still requires District Valuers Services (DVS) assessment, so the costs used in the viability assessment may be over-stated and the DVS would need to validate the other fees and finance charges.

The estimated build costs (excluding land acquisition, finance and other fees/charges) is approx. £16.8m. Interestingly, Norwich City Council recently built 93 award-winning, sustainable, flats and houses to Passivhaus standards for a total construction cost of £14.7m at their Goldsmith Street Development.

2. Location & Conservation Area:

The plan is for a massive 9 storey building including lower ground floor and basement parking levels. The building sits exactly on the boundaries of the Willett Estate Conservation Area and is clearly incompatible with the area.

3. Transport:

The proposed development would impact significantly on traffic congestion, and on street parking in CPZ O, which is already close to full capacity (2201 of 2288 available parking permits were issued in May 2020). This negative impact would compound the consequences of the planned nearby large developments at Lyon Close and 113-119 Davigdor, which are still to be built.

4. Impact on services and community infrastructure:

The development will create further burden on the local GP practice (Charter medical centre) and Brunswick Primary School. Again, there will be no Section 106 money to help offset this pressure.

5. Environmental issues:

Brighton and Hove Council have committed to carbon neutrality by 2030, so we need considerably more robust measures to address the climate emergency. I would expect this development to commit to compliance with the standards defined in the UK Green Building Council framework for Net Zero Carbon buildings. It is doubtful whether the glass curtain walling specified for the upper 2 floors of the proposed building would achieve anything like the required U-values and need for natural ventilation. According to the section details provided, there appear to be significant risks of cold bridging at the edges of floor slabs.

The government has announced that gas boilers will be replaced by low-carbon heating systems in all new homes built after 2025 as a contribution to reducing Co2 output. The planning application details that the developer will install **gas boilers**, prior this deadline. In addition, the City is trying to phase out the use of gas boilers for heating, so the developer should be considering other options, such as heat pumps, “passive” heating/cooling measures, MVHR (mechanical ventilation with heat recovery). The developer’s proposals are inadequate to deliver a sufficiently sustainable, environmentally friendly way of generating energy for the building.

The planning submission includes incorrect statements about **64 Palmeira Avenue** having significant structural damage caused by a fire, being wrapped by structural scaffolding and in need of demolition. This building was repaired to a high standard in 2019 and the financial and environmental consequences of demolishing this attractive and useful building are unacceptable.

Major reduced level excavation, in the order of 5m in depth, over a large proportion of the site area and the construction of a deep retaining wall structure will require numerous HGV movements on and off the site. This will also result in major disruption to residents and additional pollution.

6. Design concerns:

- **Loss of Daylight & Sunlight:** There will be some loss of day- and sunlight to the neighbouring buildings such as 62 Palmeira Avenues, Bell Mead Court in Holland Road and housed on Cromwell. The BRE report isn’t available at the time of submitting this objection.
- **Loss of Privacy:** Residents in the neighbouring buildings will suffer from a loss of privacy.
- **Glass curtain walling panels** are proposed for some elevations of this development and for the whole of the fifth and sixth floors. Glass curtain walling is inappropriate for this development, as it raises concerns of inadequate thermal insulation, solar gain, natural ventilation, service penetrations and abutment details with internal partitions, bathroom and kitchen fittings.

- **Basement parking:** The drawings do not show any structural columns in the basement parking area, so insufficient consideration appears to have been given to how the 8 floors above will be supported, without affecting the proposed car park layout.
- **Landscaping/drainage:** The landscaping proposals, mimicking/referencing Brighton Palace Pier, West Pier, Brighton Pavilion & the Dome with a water feature, timber decking steel box posts, angled paths, etc appear inappropriate and over complex. It is also unclear where the green roofs will be located and how the Parapet box hedges will be safely planted and maintained on the roof slabs. In addition, there is no indication of how the proposed trees will be planted on, or inside, the retaining wall structures.
- **Drainage:** Large additional areas of impermeable surfaces will put great strain on the drainage system and, according to the table on page 12 section 5.8 of the SUDS Drainage report, the limited open space round the building will limit the SUDS options available.

I would respectfully ask the Planning Committee to reject this application for the reasons outlined above.

