

**Cllrs O'Quinn / Ebel / Allcock**  
**BH2020/01403 - 64-68 Palmeira Avenue & 72-73 Cromwell Road**

Dear officer

Councillors Ebel, Allcock and I would like to make some further objections to this application.

It has been most disappointing that throughout the two applications (with the 2<sup>nd</sup> one having been revised as well) that the developers have never sought to offer any public consultation. This is a major development in a residential area, it is also what is termed a 'windfall' development meaning that it is not in the city plan. It is in effect a piece of opportunism by a developer. Thus, there is even more need for a public consultation. There has been no offer to meet with local councillors either. There is fierce local opposition to this development and growing anger at the developer's lack of engagement with the local community. This is in sharp contrast to the recent application from Hove Cricket ground where they held several public exhibitions, had meetings with local councillors and attended a LAT to exhibit their plans and answer questions.

Many of the letters of objection have referred to the density of the proposed development – 313 per hectare, which is exceptionally dense for this particular neighbourhood. This means a considerable strain on local amenities and the local infrastructure, which are heavily stretched as it is. The local GP surgery – The Charter Surgery, has over 25,000 patients and no room for anymore. Green spaces are lacking in this ward as we only have St Anne's Well Garden which is heavily oversubscribed.

This development will create a tunnel effect on Cromwell Road as it is so dense and tall and it is not set back from the road as are Cromwell Court and Hovedene, which thus do not create that tunnel effect. At present, you can walk down Cromwell Road at this point and it appears open and there is no effect of feeling closed in or oppressed by tall, heavy buildings.

This is a poorly designed building, using cheap materials, in particular the glass curtain walling is more reminiscent of commercial buildings. The fact that it offers only a small commuted for affordable is a major negative

### **Environmental Issues**

#### **Gas Boilers**

*The government has announced that gas boilers will be replaced by low-carbon heating systems in all new homes built after 2025 in an attempt to tackle the escalating climate crisis. And yet, the planning application details that the developer intends to install gas boilers, just before this deadline. The developer has failed to suggest a more sustainable, environmentally friendly way of generating energy for the proposed building.*

***Demolition of Newly Built Property in 64 Palmeira Ave***

*There is a great concern amongst councillors and residents that the development will result in demolishing the existing buildings on the proposed site. The property in 64 Palmeira Ave burned down in a fire three years ago and has been rebuilt to a high standard. Demolishing a newly built house is a waste of resources and contradicts our city's aim to become carbon neutral by 2030. The embodied carbon in manufacture and transport of construction materials is a major factor in the carbon footprint of a building. Demolishing a newly built property will unnecessarily increase the carbon footprint of the planned development.*

***Loss of Habitats***

*The development will also result in the loss of habitats and biodiversity as established gardens belonging to the properties currently situated at the site will be demolished.*

***Additional Traffic***

*The new development will bring more traffic to the area, and with it higher levels of air pollution. The new development will provide parking for 47 cars, which is about one parking space for every two housing units. It is to be expected that the new development will have an impact on the CPZ O, which is already at almost full capacity (2201 of 2288 available parking permits were issued in May 2020). This will make it more difficult for permit holders to find a parking space in CPZ O and will result in more drivers driving around to find a parking space, thereby increasing congestion and air pollution.*

***Affordable Housing***

*Affordable homes are one of the Council's top 3 priorities. Our City needs genuinely affordable and sustainable housing to meet the needs of the 9,100 local people on the housing waiting list. 33% of households earn below £20,000 pa. The high costs of housing are clearly an unsurmountable barrier for many in our community.*

*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.*

*The viability assessment produced for this planning application states that the developer will not be able to offer any affordable housing on site.*

*A Section 106 outline (still to be signed) offers relatively small commuted amount for affordable housing in the city. So, the development if approved, will contribute very little to the public estate or in any way to the desperate need for affordable housing in our city.*

*The planning Officers report in para 5.61 states 'The lack of any affordable housing is very disappointing and the applicant's viability evidence in this regard should be independently scrutinised'.*

*The committee will be aware that affordable housing has been offered in all other recently approved developments on brown field sites in the Goldsmid and Hove Park wards (KAP 22% and MODA 10%). The Ellen Street Site to be considered on 2 September is also offering 10% affordable housing. Yet this opportunist development fails to deliver any on site and only a modest last minute commuted sum in the proposed Section 106 contribution.*

We ask that the committee will refuse this application.

Jackie O'Quinn  
Goldsmid Ward Councillor

Marianna Ebel  
Goldsmid Ward Councillor

John Allcock  
Goldsmid Ward Councillor

