



PLANNING COMMITTEE LIST

Brighton & Hove COUNCILLOR REPRESENTATION **City Council**

Cllrs. Sarah Nield, Steve Davis and Jamie Lloyd
BH2021/03357 – Cinch Self-Storage, South Road

16th June 2022 (Letter):

Additional letter of objection, after seeing the results of the light survey and amended plans. To be read in conjunction with our objection submitted on May 17th.

Comment reasons:

- Adverse impact on a cluster of listed buildings of historical importance to the area
- Overdevelopment
- Increase in traffic, restricted access and parking
- Loss of daylight and sunlight, particularly in winter
- Adverse impact on residents' enjoyment of their homes

We wish to add to our objections to this proposed development now that the daylight and sunlight survey results have come in, online plans have received last-minute amendments, and questions have arisen over the facility's intended increase in capacity through the possible addition of a mezzanine floor not included in the plans.

Having seen the daylight and sunlight report we remain concerned that the proposed increase in height and scale of this development would have a significant detrimental effect on its neighbours, in particular the cluster of small, listed, historic cottages it abuts.

The BRE Guidance is the only tool of light measurement available. These are one-size-fits-all tests, here being applied to a very unusual cluster of 3-400 year old buildings whose rooms present a range of issues when it comes to ensuring they receive adequate daylight: low ceilings, single aspect, small windows in large rooms, rooms with low-set windows: even a small percentage of light lost will affect these rooms more than a similar percentage lost in a more typical modern home.

In the report, the percentage loss to each window of Annual PSH is small, but if the Winter PSH losses are examined they tell a different story. The loss to some of these windows in the Winter months would be bleak. From Sept 21st to March 21st the affected window of 9 South Road would lose 61% of its Winter sunlight. 11 South Road would lose 29%. Mulberry Cottage has a window which would lose 25% of Winter sunlight. Old Barn, whose small study/bedroom window already struggles with limited winter sun owing to the existing CINCH building would now lose 25% of that and be left with just over 5% of APSH during the winter months. These proposals may have passed the APSH test, but their impact on residents would nevertheless be considerable.

Likewise the garden test is limited by only examining sunlight lost on March 21st, when the early Spring sun is quite high in the sky. The overshadowing of the gardens in the Winter months would be much greater than the report reveals.



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We also regret that having decided the results of the 3 tests applied, (VSC, APSH and overshadowing) were satisfactory, the NSC tests, which the BRE Report says should also be done, and which assesses daylight within a room, were not undertaken. We feel that the unique nature of the situation – low historic buildings within such a small distance of (and in one case abutting) a large, tall industrial building – ought to merit every effort being made to be absolutely sure of the impact of the proposal, which may be greater on internal light levels for these low-ceilinged, small-windowed and single aspect rooms than for more average modern rooms. We are concerned that without these tests being done, planning decisions would be being made without all potential impacts being considered.

We also wish it to be noted that a late amendment to the plans, made after the light survey had returned its results, has added a parapet to the edge of the proposed development closest to the cottages, raising it by over half a metre, which would therefore increase the loss of daylight and sunlight to the windows of the cottages by a further, but unknown amount. The Old Barn bedroom/study window, which would already have lost 25% of its Winter sunshine under the unamended plans, being the closest to this parapet will be particularly affected by this increase in height.

Since the application has been submitted it has also been brought to our attention that a support structure has been built within the existing building, in preparation for the installation of a mezzanine floor in the Garage section. Some customers of the storage units have been emailed about the installation of this floor, which would add a further ~ 300 sqm of storage space, in addition to the 857.6sqm of extra storage space CINCH are applying to build. We would like to draw Committee Members' attention to the fact that if the floor space added by this mezzanine were included in the proposal, then it would have to be classed as a Major development, requiring a BREEAM rating of Excellent, rather than its current BREEAM rating requirement of Very Good. We feel this issue needs to be interrogated by Members, and that if the planning application is passed it should be with a condition that this mezzanine floor is not installed without a further application being made if they wish to do so.

Such an increase in capacity would also significantly impact on parking at the facility, which shares a narrow access road with the listed residences. Its car park can already be overfull at busy times, leading to overspill into residents' bays and blocking of the access road they rely on. Trip analysis data has ~25-30% of vehicles coming to the facility being vans, which residents tell us use 2-3 of the facility's 7 parking spaces each. Any increase in the size and capacity of this building, resulting in more users, in more vans, must be carefully considered, let alone the additional increase in capacity which would come were the additional mezzanine floor to be quietly added.

We remain deeply concerned by these proposals. This situation, in which a large industrial building has been built almost on top of the last precious, listed, remnants of Preston Farm, is already far from ideal. Were this storage building to now be allowed to be significantly increased in scale, height and bulk it would impose on, overbear and dominate its historic neighbours within the conservation area, particularly the almost unique small dwellings of Old Barn, Little Barn and



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Mulberry Cottage, for whom it would also create a sense of enclosure. These buildings are our history. It is our duty to do them no harm, and indeed to treat them with the greatest of care.

