



PLANNING COMMITTEE LIST

Brighton & Hove COUNCILLOR REPRESENTATION **City Council**

Cllr. Alistair McNair and Cllr Anne Meadows
BH2022/02232 – Patcham Court Farm

9th August 2022:

Please accept this letter as our objection to this planning application.

We have four reasons for objecting to this application: not in line with planning policy; insufficient parking on site; intensive traffic movements; risk of flooding.

Not in line with planning policy of the Council

We are of the opinion that this site has been allocated to office use (B1) in the City Plan, not storage & distribution use (B8), which applies to this application. This is an important departure from the local plan and is against our own local policy CP3. Patcham Conservation area, with its historic church dating back to the 12th century, is an unsuitable location for a modern and extremely large storage and distribution site. We presume that the site was originally allocated for office purposes B1 so that it did not destroy the local amenities and infrastructure of the area. This proposal in a residential setting is not conducive to supporting the local conservation area, and would not respect or maintain the character of the area. In addition, it would also be unsightly as this site is in a prominent position and can be seen from the South Downs National Park. As admitted by the Planning Statement, the two proposed sub-stations would be viewable from vantage points and would not be in keeping with this sensitive location.

Insufficient parking on site

The parking provision is inadequate for up to 400 employees on site with just 85 bays available. This is a highly residential area already lacking in parking provision. The area acts as an unofficial park & ride area used by those who then car share, and there is football parking which spills over into this area. The Royal Mail proposal has already shown in their own submissions that 46% of staff will use their cars for convenience. This is because there is no adequate bus service for the early morning shifts, and there is still a considerable walk to the site from the nearest bus stop which the proposal claims are merely 700 meters away. The poor public transport links will result in inconsiderate parking in and around the local roads which is not usually considered acceptable in highways or planning terms. Parking is already limited in the area and this would cause distress to families trying to park near their homes. In addition, it is already hazardous to cross this road and with so many more cars in the area it will become even more dangerous. Clearly residents would also suffer from “disturbance [including] factors such as speed, volume and type of traffic, noise” (QD27), potentially leading to residents suffering from sleep deprivation.

Intensive traffic movements with this proposal

B8 traffic movement and use this intense would be completely out of character with the location, which borders a quiet conservation area, with its scale and continuous traffic movements from staff entering and exiting the site as well as the HGVs and articulated lorries arriving possibly 24 hours daily. According to the Royal Mail's own Traffic Plan, of the 180 responses, car trips will actually increase from the current 70 per day to 82, and the number of car shares will also increase from 3 to 8. Walking and cycling trips will decrease substantially. This



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must be contrary to the council's environmental aims. Also, it is expected that there will be 162 staff arrivals between 6 and 7am and 213 staff departures each day between 2 and 3pm, at least some of which will coincide both with workers leaving in the morning and with the afternoon school run. If only some of these arrivals and departures are by car there will be severe traffic congestion and increased pollution.

The Royal Mail may claim that they use electric vehicles, but they have not been developed enough for intensive use of this kind and look to be several years away from normal production. It is also important to know that this area already suffers from pollution as the traffic is at a standstill during peak periods and term times due to the proximity of the A27/A23. To introduce heavier traffic in this area is an accident waiting to happen.

Despite the reconfigured entrance from Vale Avenue, it is likely large HGVs will find it very difficult to navigate the small roundabout and narrow road, causing lengthy tailbacks. This will have a tremendous impact on noise, disturbance at all times of the day and night, and, on top of this there will be pollution from HGVs which would adversely affect the neighbourhood. This planning application will not remove traffic from the city centre as lorries will still need to go into the town centre so that residents can pick up undelivered parcels and letters.

Risk of flooding

We understand that the proposed site is within the Inner Source Protection Zone and is a Zone 1 groundwater aquifer. Next to this is an allotment area designated as a Zone 2 area.

This particular part of our natural water infrastructure directly supplies the water of local residents for the majority of the year. There are concerns from residents that the development of this site could pollute our drinking water, as there will be 85+ cars parked here at most times and vehicle pollutants could enter our water system.

At a time of great climatic change with long hot summers and increasingly large downfalls of rain, we are going to need all the water supplies we have. However, as the proposed tarmacked area will no longer allow rainwater down into the natural storage system beneath, significantly less water will be collected for resident use.

As sporadic rainfall increases it is questionable whether the site will cope with the large amounts of water and that the Suds system will be adequate. If it is inadequate in any way, not only is contamination of the water supply at risk but also the increased gathering of groundwater in Old London Road. This could cause considerable damage to the nearby conservation area which is liable to flooding - The Wellsbourne river begins at Patcham and travels down through the town, through the Steine and out via Poole Valley. If the water comes off the hill and joins existing groundwater it will flood. Floods occurred in 2000, and almost happened in 2021 when the water nearly broke the surface.



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How much of the drinking water will the proposed green roof collect as this water will not be entering the Aquifer? Are the planned storage tanks large enough to prevent flooding? We also assume that if the storage tanks are large enough, the water would be too heavy for the site. When the site was being considered for the Park and Ride scheme in 2005, Peter Brett Associates reported that

The natural soils are likely to be suitable founding strata for lightly loaded structures associated with park and ride. The design CBR values of 2% have been determined for natural soils. Soakaways into the underlying chalk are likely to be suitable for drainage subject to EA approval. There are not likely to be restrictions on excavations on site although there is a potentially high risk of the presence of solution features” (Section 7.5.5)

A solution feature is another word for sink hole. We are concerned that the land is riddled with sink holes and the structure suggested for this site, coupled with the rainwater collected, would be too heavy and would be at risk of collapsing the ground underneath it.

We would like to call for a site visit and we reserve our right to speak to our letter and the application.



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10th August 2023:

Please accept this letter as our objection to this planning application.

We have five reasons for objecting to this application: not in line with planning policy; insufficient parking on site; intensive traffic movements; environmental impact; risk of flooding and water contamination.

Before we begin with the key points, Royal Mail's lack of engagement with the local community has been very disappointing. There have been no in-person consultations despite there being ample time to organise ones. There were only two online consultations in January 2022, with only 84 residents in attendance, and with the opportunity to ask questions heavily restricted. Not all residents could attend the online consultations because of lack of access to IT, or because of the timings. For such a large development it does rather raise questions as to why the Royal Mail have not met with the public.

Since the slightly modified plans have been published, Royal Mail has only deigned to update their website and publish a leaflet which had a few inaccuracies and has led to confusion: there have been differing figures regarding staff planning to travel by car; there has been lack of clarity over pavement widths; there have been conflicting numbers provided of HGV movements - between 11 and 28; we are also still confused as to whether there will be a collection point or not. The Royal Mail, through their PR company, has also been slow to respond to resident queries, which is disappointing especially as the official window to object to a development which will change the character of a location permanently is narrow.

Not in line with planning policy of the Council

We are of the opinion that this site has been allocated to office use (B1) in the City Plan, not storage & distribution use (B8). This is an important departure from the local plan and is against our own local policy CP3. Patcham Conservation area, with its historic church dating back to the 12th century, is an unsuitable location for a modern and extremely large storage and distribution site. We presume that the site was originally allocated for office purposes B1 so that it did not destroy the local amenities and infrastructure of the area. This proposal in a residential setting is not conducive to supporting the local conservation area and would not respect or maintain the character of the area. In addition, it would also be unsightly as this site is in a prominent position and can be seen from the South Downs National Park. As admitted by the Planning Statement, the two proposed sub-stations would be viewable from vantage points and would not be in keeping with this sensitive location.

Insufficient parking on site

The parking provision is inadequate for up to 400 employees on site with just 85 bays available. This is a highly residential area already lacking in parking provision. The area acts as an unofficial park & ride area used by those who then car share, and there is football parking which spills over into this area. The Royal Mail proposal has already shown in their own submissions that 46% of staff will use their cars for convenience. This is because there is no adequate bus service



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for the early morning shifts, and there is still a considerable walk to the site from the nearest bus stop which the proposal claims is merely 700 meters away. The poor public transport links will result in inconsiderate parking in and around the local roads which is not usually considered acceptable in highways or planning terms. Parking is already limited in the area, and this would cause distress to families trying to park near their homes. In addition, it is already hazardous to cross Vale Avenue and with so many more cars in the area it will become even more dangerous. Clearly residents would also suffer from “disturbance [including] factors such as speed, volume and type of traffic, noise” (QD27), potentially leading to residents suffering from sleep deprivation.

It has been noted that the new plans provide for a pedestrian crossing, but its location is on the brow of a hill, and visibility of and for pedestrians using it would be extremely limited. The plans seem not to have taken into account the actual geography of the area.

It also appears that the Royal Mail’s discussions about the use of public transport have been extremely limited and naïve. No clear plans have been produced with the local bus service. The idea that the no.5 or 5A bus can be diverted via Church Hill illustrates the lack of Royal Mail’s knowledge of the area. Church Hill is extremely narrow and steep, and really completely unsuitable for any bus service to navigate.

Intensive traffic movements with this proposal

Traffic movement and use this intense would be completely out of character with the location, which borders a quiet conservation area, with its scale and continuous traffic movements from staff entering and exiting the site as well as the HGVs and articulated lorries arriving possibly 24 hours daily. According to the Royal Mail’s own Traffic Plan, of the 180 responses, car trips will actually increase from the current 70 per day to 82, and the number of car shares will also increase from 3 to 8. Walking and cycling trips will decrease substantially. This must be contrary to the council’s environmental aims. Also, it is expected that there will be 162 staff arrivals between 6 and 7am and 213 staff departures each day between 2 and 3pm, at least some of which will coincide both with workers leaving in the morning and with the afternoon school run. If only some of these arrivals and departures are by car there will be severe traffic congestion and increased pollution.

The Royal Mail may claim that they use electric vehicles, but they have not been developed enough for intensive use of this kind and look to be several years away from normal production. It is also important to know that this area already suffers from pollution as the traffic is at a standstill during peak periods and term times due to the proximity of the A27/A23. To introduce heavier traffic in this area is an accident waiting to happen.

Despite the reconfigured entrance from Vale Avenue, it is likely large HGVs will find it very difficult to navigate the small roundabout on the A27 at the entrance to Vale Avenue, causing lengthy tailbacks. The entrance, despite its width, would not be easy to access. This will have a tremendous impact on noise, disturbance at all times of the day and night, and, on top of this there will be pollution from HGVs which would adversely affect the neighbourhood. Residents who live at the



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far west end of Vale Avenue, Saxon Way and Court Close will find exiting from their road extremely difficult. If HGVs get stuck turning into or out of the new entrance, the residents will find themselves unable to leave. Access to the far end of Vale Avenue, Saxon Way and Court Close must surely be of concern for emergency services too. This planning application will not remove traffic from the city centre as lorries will still need to go into the town centre so that residents can pick up undelivered parcels and letters.

It is very disappointing that National Highways have not had all their questions responded to by the Royal Mail. This includes vital questions about the impact this development would have upon the strategic road network which this site sits next to.

Environmental impact

It is with considerable bemusement that the Royal Mail has objected to two housing developments, one in Aberdeen and one in Belfast, both in the vicinity of a sorting office. The Royal Mail objected by claiming the new properties would need noise mitigation as the depots create a substantial amount of noise, and the residents would also be at risk from light pollution. The Royal Mail were concerned that new residents would complain to Environmental Health and curtail the Royal Mail's operating hours. How can these depots cause considerable noise and light pollution, but the proposal in Patcham not?

The new plans will require most of the trees in the Patcham Court Site to be removed. While there may be Ash dieback present in a few trees, and trees of low quality in the site, the majority appear to be in fair or good condition, and such wholesale destruction of a considerable amount of overgrowth will surely destroy innumerable wildlife habitats. It is hard to see how new trees will provide the sufficient screening from residents vital for noise and light reduction for a number of years. To the east, Patcham Court Farm borders allotments and Horsdean Recreation Ground, and will act as home to a number of species which travel between these large contiguous areas. So, while the Patcham Court Farm site might be considered 'small', it is connected to a much larger area that is home to a range of wildlife – six species of bats, and Hazel Dormice, for example, have been detected there. North is the South Downs National Park. It should be noted that the South Downs National Park is concerned about the affect the development would have on its International Dark Skies Reserve designation, and the Park has provided requirements it would seek in mitigating any light pollution.

Risk of flooding

We understand that the proposed site is within the Inner Source Protection Zone and is a Zone 1 groundwater aquifer. Next to this is an allotment area designated as a Zone 2 area.

This particular part of our natural water infrastructure directly supplies the water of local residents for the majority of the year, and by local that could be up to 160,000 residents. There are concerns from residents that the development of this site could pollute our drinking water, as there will be 85+ cars parked here at most times, HGV and delivery vans, and vehicle pollutants could enter our water



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system. It is already known that nitrate levels are uncomfortably high. Any accident during the construction stage – any oil leak from diggers for example - could pollute the drinking water for thousands of residents. At a time of great climatic change with long hot summers and increasingly large downfalls of rain, we are going to need all the water supplies we have. However, as the proposed tarmacked area will no longer allow rainwater down into the natural storage system beneath, significantly less water will be collected for resident use.

As sporadic rainfall increases it is questionable whether the site will cope with large amounts of intense rainfall and that the Suds system will be adequate. If it is inadequate in any way, not only is contamination of the water supply a severe risk but also increased gathering of groundwater in Old London Road. This could cause considerable damage to the nearby conservation area which is liable to flooding - The Wellsbourne river begins at Patcham and travels down through the town, through the Steine and out via Poole Valley. If water comes off the hill and joins existing groundwater it will flood. Floods occurred in 2000, almost happened in 2021 when the water nearly broke the surface, and again in 2023 when water did break the surface.

How much of the drinking water will the proposed green roof collect as this water will not be entering the Aquifer? Are the planned storage tanks large enough to prevent flooding? We also assume that if the storage tanks are large enough, the water would be too heavy for the site. When the site was being considered for the Park and Ride scheme in 2005, Peter Brett Associates reported that

The natural soils are likely to be suitable founding strata for lightly loaded structures associated with park and ride. The design CBR values of 2% have been determined for natural soils. Soakaways into the underlying chalk are likely to be suitable for drainage subject to EA approval. There are not likely to be restrictions on excavations on site although there is a potentially high risk of the presence of solution features” (Section 7.5.5)

A solution feature is another word for sink hole. We are concerned that the land is riddled with sink holes and the structure suggested for this site, coupled with the rainwater collected, would be too heavy and would be at risk of collapsing the ground underneath it.

There are also serious concerns over the Hydrological Risk Assessment. It seems that differing figures have emerged between 2005 and 2023, with the 2023 assessment only having been undertaken in one location of the site. It is absolutely crucial that there is an accurate California Bearing Ratio to ensure the safety of the site and its longevity. There should be no doubts about this crucial information, but unfortunately there are.

Southern Water lack confidence in the proposals, and have not received all the information they require to be able to approve the development. We cannot afford to take a risk with the city's drinking water, and we should be rightly worried not only about the process of the building but its long-term impacts which would be impossible to reverse.



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There are many questions from many important stakeholders yet to be answered by the Royal Mail, despite the length of time this application has been worked on. Some solutions to issues regarding the safety of our water are based on questionable predictions at best. There are such serious questions across a range of crucial issues – water, environment, traffic – that one wonders why this site was chosen. Residents and stakeholders are being asked to comment on plans which are not complete or inaccurate: imagery in biodiversity and arboricultural reports are wrong; noise assessments have been based on fewer HGV movements than necessary; vehicle movement data may not have been collected at weekends.

We feel strongly, along with hundreds of residents, that this potential development would endanger much of the city's water supply; would cause gridlock on the A27 and Vale Avenue; would not bring any environmental benefits to the area; would endanger wildlife; would increase noise, light and air pollution at a time when everyone is conscious of the importance of reducing pollution; would increase greatly on-road parking in Patcham, and driving across the city; and would destroy the historic and rural feel of Patcham Old Village.

If this proposal is approved, there will be no going back, and any problems that may arise could be of a very serious nature which may be insurmountable. It is because of the substantial risks outlined above – risks highlighted by a range of stakeholders – that we strongly object to the proposals.

We would like to call for a site visit and we reserve our right to speak to our letter and the application.