



PLANNING COMMITTEE LIST

Brighton & Hove City Council

Cllr. Gill Williams

BH2025/00264 – Brighton College

I am writing to OBJECT to the above planning application a elected councillor for Whitehawk and Marina as this area bd residents are directly affected by the expansion of Brighton College I am extremely concerned that there is no discernible benefit to residents of this proposal. Its impact will be to cause considerable inconvenience and it is not clear what social value this would bring to the area.

Further, I contend that Brighton College's proposal does not comply with the National Planning Policy Framework, or the Brighton and Hove City Plan because it:

1. Undermines balanced neighbourhoods
 - The recent rejection by the planning inspectorate of Brighton College's appeal for retrospective planning for Walpole Road boarding houses cited **maintaining a balance of housing types referencing local planning policies CPP1 SA6, CPP2 DM20** "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)
2. Increases traffic congestion and carbon emissions that will aggravate existing residential parking problems
 - **Higher car and coach usage** will place yet more pressure on limited parking spaces. A boarding house on Walpole Road and the transfer of the prep school to the St Mary's site just moves **all the traffic and parking problems down Eastern Road, around the hospital** and those residential streets.
3. Increases traffic congestion and this conflicts with Policy CP9 (Sustainable Transport)
 - Policy CP9 requires **new developments to reduce car dependency, support public transport and ensure safe pedestrian and cycle access**. This proposal increases traffic pressure due to increased drop offs/pick ups at St Mary's Hall, additional boarding students requiring very large coaches, and inadequate mitigation measures for parking and transport demand. Additional delivery traffic will cause severe disruptions in narrow, residential areas ill-equipped for high-volume service vehicles.
 - **Bristol Gate and emergency services will be compromised (conflicting with City Plan Policies TR4, TR7 and NPPF Paragraph 111)** because the proposed exit opposite the Brighton Trauma Centre's main entrance **risks obstructing emergency vehicles** and **compromises patient care** and response times.
4. Undermines Conservation Areas and conflicts with Policies CP15, DM26



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and DM29 in the City Plan.

- The East Cliff Conservation Area (St Mary's Hall site) is protected and the proposal to build a new Prep School **does NOT preserve and enhance heritage assets**, including a **Grade II listed flint wall** and other nearby heritage assets such as the fragment of a **Victorian terrace** at the south-western corner. It also changes the visual character of the site to its detriment.
- Re: The College Conservation Area which is protected as a residential area: the planning inspectorate's rejection of Brighton College's appeal to put more boarders in three houses in Walpole Road is very material in that it establishes the principle that residential buildings should be prioritised over more institutional buildings. I also note that a noise assessment for the new boarding house, paid for Brighton College, complies with NPPF in relation to noise. It is telling that the **Inspector from the Secretary of State was not convinced by the noise assessment for Walpole Road**, with far fewer students.

5. Damages living conditions and increases light pollution and noise impact

- The Planning statement does not adequately address the noise that a significant increase in pupil numbers (including the intent to make the site accessible to the entire prep school) and school traffic will have on the living conditions of residents. Residents have been complaining about noise and disruption by Brighton College for many years without any serious and constructive response from the school or the council.
- The sports field will be 'improved' to increase utilisation and will be available to all prep school children. There is no further information about how and when this will be used and what the lighting requirements will be for the sports field given that no doubt they plan to increase use of the field given the loss of sports space on the Convent site. I will not be surprised if a planning application for flood lighting - that does not require public consultation – will quietly appear in the future. We already experience a lot of light pollution from buildings adjacent to and behind the site.
- The plan does not provide adequate measures to mitigate noise impact for residents overlooking the site. The area is already plagued by noise sources at the site from road traffic along Eastern Road, which includes buses and heavy goods vehicles, as well as noise from activity in the sports areas..

6. Lacks sustainability and does not properly consider environmental factors

- The **National Planning Policy Framework emphasizes sustainable development**, yet this proposal has **no detailed strategy for addressing increased waste, pollution, or carbon emissions** from the expansion.
- **Policy CP16 and DM38 protects important green spaces, including school playing fields. This proposal results in a net**



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loss of 624 sq metres of school playing field at the St. Mary's Hall site.

- The proposed buildings are **overbearing in bulk**, with **insufficient open areas** and are **inappropriate to their neighbours on both sites**. The buildings will **diminish access to natural light**, **increase overlooking and infringe on residential privacy**, particularly for residents on Belle Vue Gardens.
- The **NPPF promotes genuine biodiversity enhancement**. This proposal fails to demonstrate substantial on-site ecological benefits beyond minimal policy compliance.

7. **Lacks demonstrable public benefit to outweigh its harms**

- The City Plan's strategic vision prioritises community-led development. Brighton College argues that the new proposed boarding house helps reduce pressure on local housing stock, i.e. BC will stop buying it for boarders. **But this doesn't justify the loss of open space and the traffic and transport impacts.**

8. **Risks chalk dissolution and subsidence**

- The **Ground Investigation Report** (Appendix 4) does not provide sufficient clarity on the **protection of nearby buildings, including listed structures** on Eastern Road. Concentrated infiltration into the chalk may erode natural fissures, **leading to sinkholes, foundation settlement, or structural damage over time.**

9. **Does not adequately address surface water management and structural concerns**

- The St Mary's Hall site slopes toward existing structures, and the **Grade II listed retaining wall along Eastern Road may be at risk from prolonged water exposure**. The drainage plan acknowledges that some pipes are surcharged or at flood risk, raising concerns that **overflows or blockages could lead to surface water accumulation**, further increasing **subsidence risks**.

I hope that my objections will be given serious consideration by the planning committee and that this planning application is rejected by them.

