

Dear Planning Committee,

I write to submit my objection to this planning application as Cabinet Member holding the remit for Public Realm.

Brighton College has developed at least 12 new buildings in Kemptown since 2008. Local residents have significant concerns about overdevelopment on the character of the conservation area, the balance and cohesiveness of the local community and the further disruption and traffic chaos the proposal will bring, particularly to Eastern Road.

I am particularly interested in robustly defending our planning policy on conservation areas (DM26):

Development proposals within conservation areas, including alterations, change of use, demolition and new buildings, will be permitted where they preserve or enhance the distinctive character and appearance of that conservation area, taking full account of the appraisal set out in the relevant character statement.

The designs are unsympathetic to both the Conservation Area and the original Brighton College buildings. Heritage advice has not been heeded in the design of these proposed new buildings to an acceptable extent, and I feel none of their plans enhance the Conservation area.

The planning application and recent responses from Lichfields make it clear that the applicant does not see the need to create a design that preserves or enhances the views from heritage assets and surrounding streets. This is particularly the case at the St Mary's site.¹ Indeed their response rejects the conservation team's view that 'an opportunity has been lost to make this building (the St Mary's site) fit into the landscape better and therefore enhance the views from the conservation area...' ² and appears to be satisfied with a 'neutral' design.

Specific concerns include:

- Substation/Gate Design Changes: The Heritage Team notes that there "Isn't significant change to the building after our last comments which is disappointing".
- Lack of Sufficient Flint: The Heritage Team "agree with the Urban Designers comments that there needs to be more flint" incorporated, specifically

¹ See p7 File 6_BH2025_00264-HERITAGE_RESPONSE_DOCUMENT-20212602 ² See p7 File 6_BH2025_00264-HERITAGE_RESPONSE_DOCUMENT-20212602

"obtaining to the base of the new building. The materials or design detail provided for these elements are still not satisfactory".

- St. Mary's Building Design: As mentioned above the applicant shows disregard for residents and the surrounding environment by suggesting the building need only make a 'Neutral Enhancement': The Conservation Officer "still maintain[s] that the proposed development gives a neutral enhancement to the views from and towards heritage assets".
- A 'neutral' design and low less-than-substantial harm is an acceptable position: LPAs should actively "look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance". Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably' *ibid.* NPPF paragraph 219 states that the LPA's responsibility is to "push for proposals which make a positive contribution, not a neutral one". The Heritage team fundamentally disagrees with the applicant's apparent position that a neutral effect is acceptable, seeing it as a "missed opportunity".

The applicant's response offers little public benefit in design or willingness to provide off site enhancements. This is at variance with the applicant's initial heritage statement which claims 'this design quality is argued to enhance the street-scene and introduce significant visual interest to an area otherwise characterised by modern buildings of no architectural distinction'². I conclude that there is net public harm in the overall scheme.

I therefore recommend refusal of this application.

Yours Sincerely,

Jacob Allen
Labour Councillor for Woodingdean Ward

² HERITAGE_STATEMENT-20048193 paras 6.13