

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
Overall approach of masterplan		
Welcome new partnership approach of council and university to developing three sites. Support creation of new academic neighbourhood and range of land uses.	Regency Society of Brighton & Hove	Welcome expressions of support.
Support ambition of mixed use, mixed tenure development across sites.	Susannah Hagan	
Believe that this is a thorough and well considered plan for this mostly derelict waste of space.	Gregg Virostek	
Broadly in favour of brief – believe its focus will allow release of much needed family homes in Moulsecoomb and Bevendean areas, thereby giving people from all walks of life the opportunity of a home.	Simon Kirby MP	
Support for: <ol style="list-style-type: none"> 1. Comprehensive approach to development and looking at all sites together 2. Focus on improving public realm 3. Mix of development – student housing, residential, community uses, university buildings and employment opportunities. 	City Sustainability Partnership Working Group	
Concerned about: <ol style="list-style-type: none"> 1. Lack of mention of Biosphere Reserve and how this development could help support the bid 2. Possible additional car parking and its impact on traffic and pollution levels, particularly when 	City Sustainability Partnership Working Group	<ol style="list-style-type: none"> 1. Sustainability is integral to the brief and a reference to the Biosphere Reserve bid will be added to the document. 2. It should be noted that no

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>considered alongside other developments</p> <p>3. Lack of ambition for looking at whole transport corridor which will need to be done to make this development 'work' properly</p> <p>4. Lack of ambition in draft planning brief on zero carbon and producing an exemplar development</p>		<p>additional car parking is proposed in respect of university-related development. However, the site is not centrally-located and it is necessary to accept the principle of some car parking in order to attract a developer, particularly in respect of the employment floorspace. The brief seeks so strike an appropriate balance being struck between sustainability and financial viability considerations.</p> <p>3. The purpose of the planning brief is to focus on the university and Preston Barracks sites. Sustainable transport solutions would inevitably address a much wider area, but existing planning policies, the planning brief and the council's Local Transport Plan all allow for this factor.</p> <p>4. The council would be applying its emerging policy that seeks zero carbon development. Text will be added to the brief to clarify and emphasise this point.</p>
<p>Support planning brief's general approach to the site,</p>	<p>Natural England</p>	<p>Welcome support.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>with its sustainability aims and the integration of urban greening to the site (including nest boxes, green wall, and roofs) and the linking of greenways through the City.</p>		
<p>The whole scheme could be smaller and still utilise the empty site. A public square would not be pleasant beside the busy, noisy and air polluted road. If the idea is to benefit residents then much needed play areas and shops are desperately needed within the estate, and an expansion of the university will only magnify the economic disparity of the area, possibly inciting vandalism and bad behaviour.</p> <p>If the students vacate the local estate private accommodation into the new university residences, I fear the houses will become cheap lodging houses for the unemployed thus reinforcing the nature of the area as disadvantaged.</p> <p>As a resident I would support: 20mph limit for the Lewes Road therefore reducing pollution, noise (which rises up the valley and is relentless) and increase pedestrian and bike safety. Safe Play and social areas up the empty ground in the centre of the avenue catering for the whole spectrum of ages and a supermarket within the estate. These provisions may encourage the local residents to feel that they two are part of the grand</p>	<p>ID 7 - Received via consultation portal (respondent did not register name)</p>	<p>Comments noted – the purpose of the brief is to guide a truly sustainable development that will assist in reducing carbon emissions and will benefit both the existing and future local communities by providing employment, recreational, shopping and educational and work opportunities. Any future masterplanning of the site and resulting development proposals will need to take on board these objectives.</p> <p>The mixed use nature of the development across the three sites within the development area is intended to promote inclusivity, rather than exclusivity in respect of the higher education element and will provide and promote an interface between academia and the city that will benefit local residents and workers</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>schemes of Brighton and not just the forgotten poor. Council money should not be directed to the already privileged students who neither pay tax nor have any attachment to Brighton. The existing buildings on the barracks site could be adapted to workshops, accommodation offices etc and more built besides with some imagination.</p> <p>The economic climate surely favours conservation and economy of design. An exciting brief: to see how little can be spent and other projects also funded in the area.</p>		<p>as well as students and staff working at the university.</p> <p>The scarcity of developable land in the city has informed the floorspace figures and quantum of development sought by the brief – it is important that land is developed efficiently, whilst avoiding town cramming. The brief encourages efficient use of land and a high quality of design, due to the important nature of this site. The cheapest possible form of development would not necessarily represent the most sustainable or desirable outcome for the city.</p>
<p>Proposed development of Preston Barracks site - In para 6.7 there are 2 options proposed. One is keeping the university uses on the university owned land and using Preston Barracks site for employment , residential and other uses. The second option is a more mixed development on all 3 sites, i.e. a mixture of university and market uses across all sites. DIO would prefer option 1 as it is likely to push the site value higher and so maximise the value of the clawback.</p>	<p>Defence Infrastructure Organisation (Ministry of Defence)</p>	<p>Noted – the approach being mooted by the DIO reflected the previous approach of the council with regard to seeking an employment-led mixed use development on the barracks site alone. This approach failed in achieving a commercially viable development during a prolonged period of economic growth, hence the new approach reflecting the shared vision of the council and the</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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		university and the opportunity it provides to achieve a more exciting and integrated mixed use neighbourhood across a wider area.
Other policy documents		
Brief should not attempt to reconcile proposals in outdated B&H Local Plan, SPG 14 (Preston Barracks) or SPG 15 Tall Buildings, which are now irrelevant in light of new partnership approach and changes in economic situation.	Regency Society of Brighton & Hove	These documents continue to provide relevant planning guidance in many respects – the purpose of the brief is to identify other material considerations (such as the economic situation and the partnership with the university) that should help to guide development proposals.
<p>While the brief has in it much to be commended, BHFOE is concerned that it still lacks ambition, particularly around reducing carbon emissions, the Biosphere Reserve and on transport. This is illustrated by the fact that in the planning policy context, no mention is made of national planning policy statements on transport or biodiversity.</p> <p>In the list of what has changed since the Preston Barracks SPG was adopted in 2003, no mention has been made of the Sustainable Community Strategy (SCS) (launched June 2010) with its targets on reducing the city’s ecological footprint and its carbon emissions. Also, since 2008, the city has been working on</p>	Brighton & Hove Friends of the Earth	It was not intended for the section on the national planning context to refer to all relevant documents - sustainable transport and biodiversity issues are covered in detail in the document. Nevertheless, a reference to the national planning policy statements on transport and biodiversity will be added. Likewise, a reference will be added in respect of the Sustainable Community Strategy and the ambition for UNESCO Biosphere Reserve designation.

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>achieving the UNESCO Biosphere Reserve designation, as outlined in the SCS, and the Council has also stated its ambition to become a low Carbon City. Neither of these ambitions have been mentioned either.</p>		
Development principles		
<p>There is not much to argue with the development principles except that they are not particularly ambitious. Minimising or reducing carbon emissions is not stated as a principle, neither is the need for the development to support the Biosphere Reserve bid, or that any development must not compromise the ability to improve walking, cycling and public transport along the A270 and pedestrian and cycling links into neighbouring areas.</p> <p>BHFOE would also question the need to maintain car parking at existing levels throughout all phases of the development. The aim should be to reduce the amount of car parking needed by the university, particularly if sustainable transport links are being improved and a large amount of student housing is being provided, reducing the amount of travel that students will have to make to the site.</p>	<p>Brighton & Hove Friends of the Earth</p>	<p>The development principles are intended to focus on issues that are specific to this particular development area, rather than repeating the council's more generic planning policies (e.g. zero carbon development). However, given the withdrawal of the draft Core strategy, it would be useful to provide more emphasis on issues such as zero carbon and carbon minimisation (as set out in policy CP1 of the Core Strategy). Additional references to sustainability will be added in appropriate parts of the document.</p>
Floorspace quantum		
<p>Support majority of Core Strategy policy DA3 as quoted in masterplan, but not requirement for proposals to deliver the amounts of development as set out in the</p>	<p>Regency Society of Brighton & Hove</p>	<p>It should be noted that the brief does not seek 445 residential units within the development area (this is the figure</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>policy as sites may not have capacity to deliver specifications of 445 residential units and 18,600 sq m of employment floorspace whilst creating development at a human scale.</p>		<p>referred to in the Core Strategy that would be spread over a wider area along the Lewes Road). The brief suggests approx. 318 units of residential. It recognises that 18,600 sq metres of employment floorspace may well be unviable – this is one of the reasons for preparing the brief in the first instance. The proposed floorspace figures represent a balance that could be comfortably fitted within the development area. It should be noted that the brief is not a masterplan, although a masterplan will need to be prepared to provide more detail on the distribution of land uses, buildings, public realm, building heights etc.</p>
<p>Employment floorspace: unhelpful for council to incorporate unrealistic allocations in the brief, putting onus on developer to include land use allocations that are no longer relevant – at worst this will discourage development in site – at best, potential developers would have to waste money demonstrating requirements were no longer relevant.</p>	<p>Regency Society of Brighton & Hove</p>	<p>The brief provides planning advice to reflect the new partnership between the council and the university, whilst paying due regard to adopted council policy and delivering phased development on the site. However, it does not have the status to formally override the adopted development plan.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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Urban design		
<p>Site is both a gateway to and departure point from the city. New neighbourhood should be treated as new urban quarter, embodying urban design principles characterising existing quarters close to city centre – including greenways linking to other green areas further out of town along Lewes Road. Development should be coherent and legible – not an iconic statement</p>	<p>Regency Society of Brighton & Hove</p>	<p>Agree that the site is both a gateway to and departure point from the city - this is noted and a suitable reference will be added. The need for new development to be coherent and legible is already referred to in the document. There is no reference or requirement in the brief for an 'iconic statement', although a high quality of design is required and would be appropriate, given the prominent role and location of the development area.</p>
<p>Strongly suggest appointments through open competitions to ensure high quality urban design and architecture, which is vital to success of scheme.</p>	<p>Susannah Hagan</p>	<p>Noted – this is an issue for the development partners to determine.</p>
<p>Oppose tower blocks – blocks should be no higher than existing university buildings.</p>	<p>Ann Mead</p>	<p>Noted – should development proposals include one or possibly two 'taller' buildings, the brief refers to the need for these to be fully justified with regard to the council's tall Buildings SPG. It should be noted that the latter document already identifies the Lewes Road as a 'corridor' where tall buildings may be appropriate, subject to the detailed testing and</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>BHFOE is also surprised that the Biosphere Reserve bid is not mentioned under public realm as it has the potential to steer how the public realm is made more sustainable while improving people’s quality of life and helping people adapt to climate change.</p>	<p>Brighton & Hove Friends of the Earth</p>	<p>justification. A reference to the Biosphere bid is being added to the introduction of the document as an over-arching strategic objective of the council.</p>
<p>Support the statement that any development proposal “should be designed to provide vibrant high quality open spaces that are accessible to all, surrounded by a range of land uses generating activity throughout the day and into the evening, including a mixed-use central square of distinct destinations linked by easily navigable routes, active frontages and high quality hard and soft landscaping”.</p>	<p>Brighton Society</p>	<p>Welcome support.</p>
<p>The brief suggests that a tall building of up to 18 storeys could be positioned around the central square. This would be problematic if say the Mannoock Building is used to front the square – the difference in scale would be unacceptable.</p> <p>We note that the area has been designated as having a potential for taller buildings but we are of the opinion that the height should not exceed that of the Cockroft building. There are low buildings to the south (retail complex) and Mithras House (even allowing for its elevated position) is only five storeys in height.</p>	<p>Brighton Society</p>	<p>Any tall buildings would need to meet the detailed guidance set out in the Tall Building SPG, if they were deemed to be acceptable in design terms. The height and setting of nearby buildings would be key elements that would require full consideration.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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Restricting the total height of buildings to that of Cockroft would ensure a cohesive overall development		
<p>As a resident of Saunders Park View, welcome the plans of redevelopment. Only concern is that the houses that would be built in front of existing houses will be higher and reduce the amount of light they would get. At the moment they only get a couple of hours of sun in the morning over the gardens and a couple of hours in the afternoon, so if that light is taken away in the morning they would only get a little bit of light in the afternoon. Hope that this has been taken in consideration to the plans.</p> <p>Also, hope that existing road be widened, as with double the amount of families parking in the street would be a nightmare.</p> <p>Hope these comments help and that plans will be made with consideration of existing residents.</p>	Kurt Cutajar	The amenities of existing residents and scale of new development in relation to existing buildings in the area will all need to be carefully considered when drawing up a masterplan and any future detailed development proposals.
<p>Development of up to six stories would be appropriate for the sites concerned In my opinion 8 stories would be too high since no existing buildings are this height. Anything close to the 18 stories mentioned would be completely inappropriate being totally out of scale with anything in the surrounding area.</p> <p>With this kind of building the site would become a complete eyesore rather than an attractive gateway</p>	ID 15 - Received via consultation portal (respondent did not register name)	Building heights are indicative and would be dependent on a successful masterplan – any tall buildings would need to meet the rigorous design testing as set out in the council's Tall Buildings SPG, as referred to in the planning brief.

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
from the East.		
Crossing the Lewes Road		
Welcome walkway bridge proposal but not as a tiered or enclosed structure which would be aesthetically unpleasing and provide a poor work environment (particularly when traffic at standstill)	Alan Cowen, Head of Health and Safety Dept, University of Brighton	The provision of a walkway over the Lewes Road is an option for consideration, as opposed to a specific requirement of the brief (although dramatically improving pedestrian linkages across the road is a specified requirement). Should a bridge option be pursued as part of a masterplan or any future development proposals, any such proposal – whether by way of a simple foot bridge, an enclosed structure, or ‘living square’ - would need to be carefully assessed with regard to aesthetics, amenity, functionality and other detailed planning and environmental considerations. With regard to providing improved pedestrian facilities at grade, these would need to be carefully considered within the wider strategic context of traffic movements along the Lewes Road. It would be vital that traffic is slowed down in good time if
Priority should be given to slowing down traffic on Lewes Road to improve pedestrian crossing facilities. A wide pedestrian bridge may be a solution, but might result in inhospitable area beneath.	Regency Society of Brighton & Hove	
Support a simple footbridge over the Lewes Road to join sites, then removing pedestrian lights at Natal Road	Ann Mead	
Improved pedestrian movement across Lewes Road would be a real contribution to the connectivity of Moulsecomb. A building bridging the road, useable only by the building's inhabitants, therefore misses an opportunity for a public connection and a formal set piece that could provide visual identity and a literal 'gateway' to the city. Something like a 'Living Bridge' could provide a pedestrian connection <i>either</i> lined with one storey shops/ cafes or planted with trees, and could join the 'central square' on the west side of Lewes Rd with a smaller square on the east - outside, for example, student housing in front of the Mithras building. Retail on both sides of Lewes Rd would	Susannah Hagan	

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>increase footfall over the bridge. The idea, however, that the Lewes Rd is an appropriate candidate for a 'shared space' approach to pedestrian and vehicular traffic is, sadly, unworkable. The example given – Kensington High St – bears no resemblance to the Lewes Rd. The first is a densely populated commercial high street in which traffic is slow anyway. The second is a highway on which cars reach speeds of up to 60 mph.</p>		<p>pedestrians are to be given greater ease and encouragement to cross the road. This would necessitate an approach to traffic management that extended at least some distance beyond the development area. It should be noted that the council is already committed to implementing more sustainable transport solutions along the length of this road and has recently been successful in its funding bid under the Local Sustainable Transport Fund.</p>
<p>Looking at the connectivity between the two parts of the site either side of the A270, BHFOE would argue that even if a bridge is built, 'at grade' pedestrian and cycle facilities would still be required. This links into the need to move the 30mph speed limit further north to improve safety.</p>	<p>Brighton & Hove Friends of the Earth</p>	<p>See above</p>
<p>We do have concerns with regard to the proposals to use elevated walkways linking buildings within the site and for a bridge across the Lewes Road. Elevated walkways can create sparse and unfriendly environments and their use for many housing developments in the 60's and 70's is now regarded as a major cause of failed housing schemes. Movement around the site should be concentrated at street level</p>	<p>Brighton Society</p>	<p>See above</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>which would provide a far more flexible and friendly environment.</p> <p>We would consider that a bridge across the Lewes Road would cause major difficulties on the west side of the road where steps and lifts would be required to enable access between the bridge and ground level. Street level (grade) crossings of the Lewes Road would provide more flexibility in that a number of crossing points could be implemented. These crossings could then contribute to improving the environment of Lewes Road – creating through routes into the developments on either side of the road which would help to prevent Lewes Road becoming an unfriendly environment for pedestrians. A degree of traffic engineering for Lewes Road would be required, as suggested in Section 9.9, and we would suggest that the implementation of a continuous 30mph limit along the Lewes Road to Coldean would make a major contribution to improving the environment of the area.</p>		
Land Uses		
<p>Student accommodation: New student accommodation could help relieve pressure elsewhere in city. For same reason, question merits of mixing with family accommodation.</p>	Regency Society of Brighton & Hove	Section 9.5 of the brief states the necessity for student housing to be located apart from other forms of residential.
<p>Student accommodation: Support as much student accommodation as possible.</p>	Ann Mead	Noted

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>Student accommodation: As for the integration – or not – of the proposed student housing, the University may wish to revisit precisely what it means by student residences, opening up the possibility of new typological and programmatic combinations.</p>	<p>Susannah Hagan</p>	<p>Noted</p>
<p>Student accommodation: Particularly happy that council and university have realised need to develop student accommodation. This site is a very good location as it is the midpoint for all the various campuses of the university, has good shopping and is generally a safe and healthy place for students to be.</p>	<p>Gregg Virostek</p>	<p>Noted. Welcome support.</p>
<p>Student accommodation: The location and numbers of student housing needs to be carefully considered and planned so that the concept of mixed communities is maintained and that a wide range of people are able to access housing in all areas of the city.</p>	<p>Simon Kirby MP</p>	<p>Noted.</p>
<p>Student accommodation: BHFOE supports the proposed housing, including student housing, on site as this will help potentially to free up housing in the surrounding residential areas for families.</p>	<p>Brighton & Hove Friends of the Earth</p>	<p>Noted. Welcome support.</p>
<p>Student accommodation: It's positive that the plans allow for 750 beds of student accommodation. Although there is a need for all kinds of land use including office space and residential, in other parts of the city the drive for more student housing is causing</p>	<p>ID 4 - Received via consultation portal (respondent did not register name)</p>	<p>Noted. Welcome support.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>family houses to be converted at a rapid rate which is adversely affecting communities, for example in Hanover and Elm Grove. So family housing is being displaced in other parts of the city. There are also problems with noise and anti-social behaviour, and it's better for student accommodation to be apart from other residential areas, as planned here. There is a case I believe for more emphasis on this site to be placed on student accommodation, so that less family housing is displaced in other parts of the city. It's a great location for student housing as it's convenient for the main sites, would provide better value accommodation and reduce the need for travel. In the meantime, there would be less pressure to convert family homes elsewhere in the city into student accommodation, and this would help maintain cohesive communities.</p>		
<p>Student accommodation: Concerned about putting even more student accommodation in an already heavily student populated area of Brighton. The new accommodation proposed won't alleviate the demand for student housing in the area. It just means there are even more students in the area. When you walk around the various roads near the university you can tell a student house a mile off. Students don't care about keeping the outside of a property nice (including leaving rubbish in a mess), and why should</p>	<p>ID 23 - Received via consultation portal (respondent did not register name)</p>	<p>Concerns noted. Purpose built and managed student accommodation would be expected to contribute positively to the development are and the wider area. Development proposals are aimed at addressing a wide variety of local needs. Consultation with local communities will accompany future development proposals, where specific concerns</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>they when they are paying a large amount of money to landlords. There is also the noise issue that students generate. There is proposed a square that students can use for outside activities. Whilst it can be built in such a way that the noise is contained within the area, what happens when students leave the area to go home. I agree that something needs to be done to improve the land along the Lewes Road as it has been empty for too long, The proposals for making it a green corridor, if done well will be really good. However, I do wonder how much benefit the people of Brighton are going to have from the land. Whilst it is proposed that there will be new housing and small retail outlets, how long before these will be taken over by the University of Brighton, whether directly or indirectly. Some of the properties could be rented out to students and all the proposed retail outlets being geared up for students and not the wider community. There needs to be more consultation with the people of the area before any further developments are made.</p>		<p>can be discussed and resolved in greater detail.</p>
<p>Housing: Question where is it possible to meet brief's requirement for new housing to be integrated with existing housing wherever possible. The site is shut off to the west by the railway line, and to the east by Mithras House. It is more realistic, surely, to make the new housing a desirable place in its own right, with</p>	<p>Susannah Hagan</p>	<p>The existing housing referred to in the brief concerns that on Saunders Park View, immediately to the west of and overlooking the Preston Barracks site – this is more fully explained in section 9.5 where the opportunity is identified</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>amenities on offer to existing communities? There is an intention to provide 200-300 units of housing, including family housing. There is one mention of affordable housing at the end of the consultation document, as something requiring further input. Who is going to live in this development? If it is higher income groups, then <i>social</i> integration with the existing neighbourhoods will be a considerable challenge.</p>		<p>for new housing to provide an eastern edge to this particular road.</p> <p>The need for the new housing to be desirable in its own right is at the heart of the development principles for the site, where the objective is to create a viable and successful community and a true sense of place. Affordable housing is a standard planning policy requirement as set out in the Local Plan, but it would be appropriate to add some further detail to section 9.4 of the brief to clarify this issue.</p>
<p>Retail: Strongly support statement that large food-based superstores are not considered appropriate for this site. However, this should be expanded to cover all large retail superstores, which are generally car based and are likely to have significant impacts on congestion and air pollution in the area if allowed.</p>	<p>Brighton & Hove Friends of the Earth</p>	<p>Welcome support. Text will be added to the sentence concerning large food-based superstores in section 9.6, so that it reads “<i>Retail warehouses or food-based superstores and are not considered appropriate elements of any development proposals</i>”</p>
<p>Housing: Would welcome opportunity to be considered as a development partner on the site. Housing Co-ops have access to a new funding vehicle, developed through the Finance Group of the Commission on Co-operative and Mutual Homes. Independence of this funding stream gives Starlings a</p>	<p>Starlings Housing Co-operative</p>	<p>Noted – this is an issue for the development partners to consider.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>unique negotiating position that other housing options are unlikely to be able to provide in the current economic climate. The ability of a local housing co-operative to access this fund, known as a 'warehousing solution', can provide a replicable model or template for future development in the city for other co-ops and council-owned sites.</p> <p>Starlings' scheme would include:</p> <ul style="list-style-type: none"> ▪ showcase sustainable building with innovative architecture ▪ tenant involvement in the design ▪ a new self-governing co-operative preferably on a single site ▪ communal areas and workspace ▪ a mixture of family housing, smaller flats and shared housing ▪ wheelchair accessible flats ▪ accommodation available to people on the council housing list <p>The scheme is intended to house those seeking rented affordable housing, and who want to live co-operatively. We are confident that the planned new development will demonstrate that co-operative housing is one of the best ways of providing sustainable housing where people want, and can afford, to live.</p>		

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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<p>Community use Strongly suggest that provision is made within the community space for a youth arts centre. This would meet the need for youth provision in the east of the city and could provide jobs, work experience and training and accreditation opportunities for 16-19 year olds who are not in employment , education and training . This could be focused on the arts also utilising the provision of a public arts and performance space. This could be established as a social enterprise so being self sufficient and meeting new initiatives around the 'Big Society'.</p>	<p>ID 5 - Received via consultation portal (respondent did not register name)</p>	<p>Noted – the brief recognises the need for community uses within the development area in order to help engender a sense of place. The types and range of community uses would be defined at a later stage, possibly during masterplanning or as part of future development proposals.</p>
<p>Development principles</p>		
<p>There is not much to argue with the development principles except that they are not particularly ambitious. Minimising or reducing carbon emissions is not stated as a principle, neither is the need for the development to support the Biosphere Reserve bid, or that any development must not compromise the ability to improve walking, cycling and public transport along the A270 and pedestrian and cycling links into neighbouring areas.</p> <p>BHFOE would also question the need to maintain car parking at existing levels throughout all phases of the development. The aim should be to reduce the</p>	<p>Brighton & Hove Friends of the Earth</p>	<p>Further references will be added to the brief.</p> <p>Noted – as a planning document the brief needs to adopt a pragmatic and balanced approach that takes on board the operational needs the</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

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amount of car parking needed by the university, particularly if sustainable transport links are being improved and a large amount of student housing is being provided, reducing the amount of travel that students will have to make to the site.		development partners – it is understood that the university is actively seeking sustainable transport solutions, although is inevitably reliant on public transport providers. The parking issue will need to be more fully assessed with regard to masterplanning and future development proposals.
Development Scenarios		
Halls of residence inappropriate on Mithras House – not sufficient space and position on main road would provide poor quality environment for students	Alan Cowen, Head of Health and Safety Dept, University of Brighton	The masterplanning process will need to determine the precise layout and location of blocks. Environmental issues need to be taken on board in respect of any residential accommodation, whether it be for students or other groups.
Showing buildings as circles in outline plans is too vague. Sense of overdevelopment on university sites.	Alan Cowen, Head of Health and Safety Dept, University of Brighton	See above.
Of the three options, the Society tends to prefer the third as it present the most integrated approach, with university uses spread across the three sites.	Regency Society of Brighton & Hove	Noted. The scenarios are for illustrative purposes and are intended to convey the sense that land uses are to be mixed – there are however, many possible permutations and these would need to be more fully

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
		considered and agreed at the masterplanning stage.
Option to keep student accommodation near the Watts Building and residential accommodation further away seems most logical and would help to keep relations between students and residents on an even keel, which does not seem to be the case on the local estate due to 'differing' requirements from accommodation. Support concept of central square, which draws people together.	Wendy Worrall	See above.
The spatial consequences of building in phases is not illustrated in any of the 'scenarios'.	Susannah Hagan	See above.
Not knowing the thinking behind these particular configurations, it's difficult to be able to comment on the specifics. Generally, bubble diagrams are not intended to provide spatial information, and yet we're being asked to comment on a programme distributed in bubbles across a real site, that is, spatially. Without a clearer sense of the dimensions and heights of buildings, it's impossible to do this, as their relative sizes and forms will heavily influence their disposition on site.	Susannah Hagan	See above.
Not knowing what the contractual relationships between city, University and developers are going to be, it's impossible to comment on whether the scenarios in which there is a mix of university buildings and others across the sites, or whether scenarios in	Susannah Hagan	See above.

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>which the University's programme is separate from the city's, will work better. There is a contradiction between the general development aims – "The University and other uses are mixed" – and the aims in Scenario C – "University uses provided mainly within University land". Is Scenario C then able to override what seems to be an agreed development aim for ALL scenarios? Ownership, liability and maintenance would suggest more of a separation of the two clients' programmes than a mixing. But if these are more easily negotiable than not, then there are opportunities for a genuine sharing of space and facilities between 'town and gown' through innovative design. Both entities have public engagement responsibilities and a shared landscape is one way of undertaking them together.</p>		
<p>BHFOE doesn't have a strong opinion at this stage on the various development scenarios suggested, provided the key principles are adhered to along with the suggestions made in this response. The one concern BHFOE does have is the suggestion to have a link road across the A270 in scenario 3 as this could be very expensive, but it could also compromise sustainable transport links along the A270. Any link road would need space to reconnect with the A270 and other roads and the necessary ramps could take up quite a lot of land which could be needed for improved cycle facilities.</p>	<p>Brighton & Hove Friends of the Earth</p>	<p>There is no proposal for a link road – rather, the suggested link is for pedestrians and would be via a possible building (this issue is dealt with above in the 'Bridging the Lewes Road' section of responses).</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>Support Scenario A as it has the aim of retaining the historic existing buildings and integrating the Mannoek Building into the design of the central square.</p> <p>All of the scenarios have proposals for improving the accessibility and routes to Moulsecoomb Station. All of these proposals will face the problem of the barrier of the Cockroft Building and the Engineering Laboratories to the west of Cockroft. There is only one small access road between these buildings. If the station remains at the current location then the access difficulties should need to be addressed in more detail within the Planning Brief.</p>	<p>Brighton Society</p>	<p>Noted. The physical issue of the Cockroft Building is recognised. Whilst the planning brief sets out the principles of connectivity, the challenge of successfully providing workable linkages will need to be more fully addressed and resolved at the masterplanning stage. The brief encourages inventive design solutions to meet these challenges.</p>
<p>In respect of the planning exhibition/public consultation, we much preferred Option 3 as the best scheme. It looked very impressive and contained all the vital elements in respect of the environment and the area. We welcome anything that will possibly release housing for families in the Moulsecoomb Bevendean and Coombe Road areas.</p> <p>From the exhibition it appeared that option 3 offered more on site accommodation for students. Hopefully the rubbish problem that we live with, in this area will diminish allowing us to raise our heads again and not be ashamed of the area in which we live.</p> <p>Hopefully we will get back an ordinary community again and not leaving us with thoughts that we are living ON CAMPUS.</p>	<p>Ian and Jackie Dennie</p>	<p>All three scenarios contain the same amount of student accommodation (750 units). The support for provision of such accommodation is noted.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
Transport		
<p>There are a number of areas where greater thought needs to take place, particularly around sustainability and transport. It is particularly disappointing that there are some real issues with transport in the area, yet these are not mentioned, such as the Vogue Gyrotory. These will need to be tackled at the same time as this development if the development is to be successful in minimising its impact and maximising the benefits for the city.</p>	<p>Brighton & Hove Friends of the Earth</p>	<p>The planning brief focuses on the Preston Barracks and two university sites, although the wider strategic transport issue is recognised by the council and has been the subject of a successful bid for funding to the Local Sustainable Transport Fund.</p>
<p>We support the statement that “cycling should be strongly encouraged as a means of commuting to the site”. The route from the development site into the centre of Brighton is ideally suited for cycling as unusually for Brighton it is entirely flat. There is currently a large student population based on the site and the development presents the opportunity of encouraging students to use cycles by creating a safe and pleasant cycle route into the city centre. A cycle route could be created within the site which could then run south through the retail complex and Saunders Park</p>	<p>Brighton Society</p>	<p>Noted. Welcome support.</p>
<p>No concerns, as proposals would have limited impact on Lewes District Council, although support proposals to improve public transport down corridor, as these will also benefit Lewes.</p>	<p>Lewes District Council</p>	<p>Noted. Welcome support.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
Parking		
Replacing surface parking with covered parking presents security problems.	Alan Cowen, Head of Health and Safety Dept, University of Brighton	The loss of surface car parking is an inevitable by-product in making more productive use of the land. Any security considerations arising from covered parking arising would need to be addressed as an operational issue, but should be resolvable.
The intention to avoid any net loss of parking for the university will not solve the problem of greatly reduced parking at these sites. An extended Park and Ride shuttle service from the new parking lots to these sites will need to be factored in to any development plans. Trains from Brighton don't run often enough and are already overcrowded at rush hour. Buses are slow and again, overcrowded at rush hour. With the proposed dramatic increase in density, transport becomes crucial to the development's success, and is at present unable to sustain the proposed increase in users.	Susannah Hagan	The brief sets out the normal planning policy requirement for planning applications to include a Transport Assessment and Transport Plan for occupiers and users of the development.
<p>Page 14 of the draft brief suggests that close to 1,200 car parking spaces will be required on site, approximately double what is there at present. This suggests that the development will double car use and increase congestion and air pollution.</p> <p>Car parking is also expensive to build and this will add to the cost of the development. Spending this money</p>	Brighton & Hove Friends of the Earth	Whilst sustainable transport considerations are inherent within the brief, the site is not within the city centre and elements of the development mix -the employment floorspace in particular – will require some parking provision in order to make them attractive to a developer

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>on sustainable transport solutions is likely to bring a far greater overall social, environmental and economic benefit. Car parking also takes up space, and with the concerns that there might not be enough room on site for all the employment floorspace originally required, reducing the amount of car parking would help with this.</p>		<p>and end user.</p>
<p>All three scenarios include the construction of student accommodation at the Mithras House development site. Dewe Road, and its surrounding area, is already heavily utilised for vehicle parking for students/staff at the University of Brighton, such that during term-time it is impossible for residents who have vacated their space to repark until some time in the evening. As the proposed development area is at this time a car park the loss of parking facilities will have a huge impact on the surrounding area, resulting in even greater problems for the residents. If this development takes place greater consideration should be given to this problem - a suggestion would be the provision of 'residents-only' parking in this area.</p> <p>The staff/students of the University of Brighton already benefit from free parking - I work at the University of Sussex and have to pay £300/year for parking privileges.</p>	<p>ID 11 - Received via consultation portal (respondent did not register name)</p>	<p>The brief is seeking a sustainable development and, as a result of comments received, the planning policy objective of seeking a zero carbon development has been reinforced. This means that measures to reduce car usage and encourage and provide more sustainable transport options will be essential. Funding has recently been acquired under the Sustainable transport Fund to implement a range of measures in the near future along the Lewes Road corridor. Further measures will be expected as part of any development in the area covered by this brief, the details of which will need to be carefully considered with regard to masterplanning, phasing and specific</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>The student car parking in this road is already a cause of problems for people who live in Dewe Road, and they, (the students), regularly have the arrogance to park in the disabled bays, even when there are spaces in the front car park. We were promised, when Eastbourne amalgamated with Brighton to Mithras house many years ago, that sufficient parking would be provided for the extra students, but it never happened and since then life is miserable for residents who come home from work, or pop out to the shops only to come home to find no spaces, resulting in them having to circle the streets looking for alternative parking. Resident parking, at a reduced price, or even free, would be one option, as this problem is on the increase due to the influx of students who have rather large cars and don't park sensibly. The idea of a car park in FRONT of Mithras House is a good idea but judging by past performances of the council, is this just another red herring which will not go ahead, leaving us with hundreds more students with cars and nowhere to park them. When a charge was put on the parking at the Watts car park, it got even worse, so if the thought of parking fees is on the agenda, then the problems will escalate even further. Stop thinking only of the students and start considering the residents please.</p>	<p>ID 13 - Received via consultation portal (respondent did not register name)</p>	<p>development proposals. Noted – see response above.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>The growing University of Brighton at Moulsecoomb needs more car-parking, otherwise it will be unable to do its job properly. Current parking is inadequate and has pushed cars out onto surrounding streets, annoying residents. It is also ridiculous to expect businesses, lecturers and researchers to come to collaborate with the University if the welcome they get is the threat of a parking ticket from a jumped-up parking nazi. Public transport is still over-priced and overrated, even in Brighton.</p>	<p>ID 12 - Received via consultation portal (respondent did not register name)</p>	<p>Noted – see response above.</p>
<p>Consideration of the traffic impacts of a development on this scale are completely inadequate in this document. Lewes Road is already a highly congested artery to and from the centre of the city and adding over 300 housing units and so much commercial development will make this considerably worse. Improving public transport and cycling provision will only marginally mitigate this since the vast majority of people are still heavily car dependent. Added to this will be the impact of the Falmer Stadium on the Lewes Road - how much more car traffic does the Council think can be accommodated on Brighton's already heavily congested roads? In addition any talk of improving air quality and sustainable development while significantly increasing vehicle movements is pie in the sky. Either the scale of the development or the</p>	<p>ID 14 - Received via consultation portal (respondent did not register name)</p>	<p>Noted – see response above.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
provision for car parking needs to be drastically reduced in order to keep traffic levels manageable.		
Existing buildings		
Mithras House should be replaced with more suitable building fit for purpose	Alan Cowen, Head of Health and Safety Dept, University of Brighton	Noted – Whilst the brief does not preclude the replacement of Mithras House, this is not part of the university’s estates strategy at this moment in time and the brief doe not therefore seek or cover this development option.
Mithras House Adding yet another floor to Mithras House would certainly NOT be acceptable for the residents of Dewe Road, as it would result in the substantial loss of even more natural light to the houses opposite. That would be complete disregard of the rights of residents to have at least some sunlight during the Summer months and could even cause health problems by having to live in darkened conditions, i.e., SADS complaint, which is well documented as a real cause of depression. (Possibly some of us would be willing to go to court to fight this idea).	ID 13 - Received via consultation portal (respondent did not register name)	Noted. Text has been added to highlight the need for an acceptable design and setback to ensure that the amenities of nearby residents are protected.
Mithras House I am a resident of Dewe Road and my house is directly behind Mithras House. An additional floor to Mithras House would further reduce the level of light in the vicinity , a situation that is already compromised by the existing height of the building.	ID 12 - Received via consultation portal (respondent did not register name)	Noted. See response above.

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>Moulsecoomb Station: Although LR2 Strategy appears still relevant, any prospect of relocating Moulsecoomb station is unrealistic in current economic climate and should be deleted as will not encourage interest from good quality developers.</p>	<p>Regency Society of Brighton & Hove</p>	<p>Although a reference is made to the LR2 study's proposal to relocate Moulsecoomb Station, the brief does not require this, precisely because it is unlikely to be viable, but rather seeks to improve connections to the existing station.</p>
<p>Barracks buildings: There are enough on-site constraints without adding the preservation of unlisted, low density, low quality barracks to the list.</p>	<p>Susannah Hagan</p>	<p>The issue of retention vs demolition would need to be more fully explored at the masterplanning stage. It should be noted that whilst the brief requires full assessment of the "Crimea War" or Mannock Buildings with regard to their potential as heritage assets, it does not insist on their retention should this prove to be commercially unviable. It is, however, proposed that the text be slightly amended to clarify that the viability issue extends beyond financial viability, to include the need to achieve the primary objectives of the brief – i.e. a sustainable development that is legible, accessible and provides for the proposed range of land uses, floorspace quantum and a high quality public</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
		The "Crimea War" Building is occupied and owned by the MoD and there are no known plans for the MoD to vacate this facility (although see representation below) – the assumption is therefore that this building would stay, unless the masterplanning process and/or future development proposals result in the MoD agreeing to being re-housed and relocated.
<p>Barracks buildings: The "Crimean War " building is not listed, but the brief says that this and the Mannock Building have the potential for listing, <i>the qualities of which should be fully assessed and their retention considered in development proposals</i>. The cadets may agree to move to a new building elsewhere within the site, but this could be compromised if the "Crimean War " building is listed. If this happens, the developer would be less likely to reprovide elsewhere on the site. Also a listed building would entail more liabilities for MOD if listed. MOD does not support a listing of this building and does not consider it worth of retention.</p>	Defence Infrastructure Organisation (Ministry of Defence)	See above.
<p>Barracks buildings: Page 80 of "The Brighton Garrison 1793 – 1900" by RC Grant suggests that the "Crimea War building" may actually date from 1793, albeit in much altered form. If this is correct, although unlisted it</p>	Phyllis McDonald	Noted.

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>would be a shame to lose if without a proper examination. If it is an original Georgian barracks building it would be very interesting to incorporate it into the plan, perhaps as part of the central square.</p>		
<p>Barracks buildings: Starlings Housing Co-operative would be interested to explore the potential to bring the Mannock Building into residential use. On the northern side, the existing building design lends itself to an enclosed garden and vegetable growing area, or perhaps the addition of a small swimming pool for public use, creating a leisure focus and employment.</p>	<p>Starlings Housing Co-operative</p>	<p>Noted.</p>
<p>Barracks buildings: We would agree with the statement that the Crimean War and the Mannock buildings “should be fully assessed and their retention considered in development proposals.”</p> <p>This area of Brighton has few buildings of architectural merit so retention of these two historical buildings should be a priority for any proposed development.</p> <p>The Crimean War building was constructed in 1793 as a canteen but converted to a hospital and mortuary c.1820. It is apparently still in use.</p> <p>The "Mannock" building was constructed in the early 1900's as officers' quarters. It was built to a high standard which is reflected in its present external</p>	<p>Brighton Society</p>	<p>Noted, but see response above.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>appearance. Even after over 100 years of use it remains in good condition. It has stone-edged gables and mullioned windows. Inside it has large stone fireplaces, wood-panelling and impressive staircases. Like the Crimean building it is part of Brighton's history and every effort should be made to convert and save it.</p> <p>Retention and conversion would therefore appear to be an achievable option. Information in RC Grant's book "The Brighton Garrison 1793 - 1900" (page 80) illustrates the historical and architectural significance of both buildings and we would consider that their retention should be a priority for any development proposals.</p>		
<p>Barracks buildings: Quality modern developments can be attractive but need some anchor in the past to give them meaning and soul. Brighton is fortunate that the Preston Barracks site still has two historical buildings. These buildings, with a backdrop of the Watts Banks, would provide an attractive contribution to the proposed public square. Any proposals for the public square would need to be designed to in sympathy with the scale and architecture of the existing buildings.</p>	Brighton Society	Noted, but see response above.
<p>Barracks buildings:</p>	IDs 2, 6, 9, 18, 19 20 -	Noted, but see response above.

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>5 comments urging retention of Mannock Building and Crimean War Building on grounds of their historic character, heritage, history etc, typified by and variations on following comment:</p> <p>The Crimean War building was constructed in 1793 as a canteen but converted to a hospital and mortuary c.1820, and the "Mannock" building was constructed in the early 1900's as officers' quarters. The Crimean War building is apparently in use and there seems no reason it could not stay so, demonstrating that conversion is an achievable option. The Mannock building was built to last, to a design and quality deemed fitting for officers (and gentlemen) at a time when class still ruled, skilled labour was cheap and the nation's coffers were still inflated with the plunder of empire. This is reflected in its present external appearance which even after 100+ years appears hardly touched by time. It has stone-edged gables and mullioned windows. Inside it has a large stone fireplace still intact but elsewhere much damaged wood-panelling and once impressive staircases. Like the Crimean building it is part of Brighton's history and every effort should be made to convert and save it. Quality modern developments can be attractive but need some anchor in the past to give them meaning and soul. Brighton is fortunate that the Preston Barracks</p>	<p>Received via consultation portal (respondents did not register details of name)</p>	

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>site still has these survivors and, in an area encompassing something like 15 acres, surely large enough to provide for all needs, any scenario requiring these buildings to be demolished seems quite perverse. These buildings, with a backdrop of the Watts Banks, would provide an attractive corner to the proposed public square and scenarios involving their demolition should not be contemplated.</p>		
<p>Barracks buildings: With regard to the potential retention of Mannock House, I would like to draw the planners attention to my business very nearby, Brighton Electric studios, 43 - 45 Coombe terrace (Lewes Rd) we are within 100metres of the development site. We are a large successful professional studio complex needing to expand. We have proposed that Mannock House be renovated and converted internally into a studio complex, containing production studios, recording facilities, retail and bar areas. We work with local charities and educational bodies and are very over subscribed in our current 6000ft2 premises in Tramway House. This business success shows how a period property (Mannock House was constructed in the same few yrs as Tramway House) can be sympathetically internally converted into contemporary media industry usage without affecting</p>	<p>Brighton Electric Studios</p>	<p>Noted – this is an issue for the council as development partner to consider.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
the exterior. We will create new jobs, opportunities & business for Brighton that we are currently losing to London. We will submit a full proposal if there is further interest from the Council.		
Trees and vegetation		
Vegetable growing areas not sustainable – better targeted at purpose-built allotments	Alan Cowen, Head of Health and Safety Dept, University of Brighton	Vegetable growing not referred to in the planning brief, although opportunities for food growing in developments would be welcomed and encouraged and have been successfully incorporated elsewhere in the city (e.g. the One Brighton development).
Understands that trees on Preston Barracks Lewes Road frontage have been there for many years and hopes they will stay as the assist with high rate of pollution in area, especially in summer and fact that it takes many years to re-establish trees. This also goes for other flora around site.	Wendy Worrall	The role of existing vegetation needs to be considered in relation to the masterplanning process and balancing with other considerations to achieve the overall place-making objectives of the brief. Providing for bio-diversity and greenery will be important elements of any eventual development and certain existing elements within the site – notably the Watss bank SNCI – will need to be considered and improved as fundamental requirements, along with greening and landscaping throughout

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
		the sites.. Any decisions around existing trees and flora will need to be considered within this wider context.
<p>SNCI The SNCI has obvious value to the City for its nature importance and the designation summary sheet and the City's ecologist should be able to provide more information about how it could be better enhanced for nature conservation. In addition there are other green corridors and sites nearby include the railway line sidings (non-accessible but good for nature), the allotment gardens (SNCI reduced access) on the other side of the railway line and Saunders Park including its eco-area (full access).</p> <p>Natural England would like to see the SNCI on this proposed site conserved and further enhanced as part of this development in line with PPS9 principles. Planning authorities should seek to avoid direct harm to biodiversity and it is good practice to work on the principle of 'no net loss' of biological and geological diversity, and to aim for a 'net gain' in these resources as a result of the development proposal. The planning brief discusses many new roles for the SNCI including: contributing to an informal recreation area, a new natural green space route to the station, accessible and well used green space, and enhance its nature conservation importance. Whilst 'green space / green</p>	<p>Natural England</p>	<p>Noted. The brief, along with the local plan and other documents (such as the Biodiversity SPD) will help to ensure that the role and function of - along with access and improvements to - the SNCI, are all fully taken on board.</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>infrastructure' can deliver multiple benefits on one site care needs to be taken to ensure that the nature conservation features are not lost due to the 'inappropriate /over use of the site'. Natural England would wish to see an enhancement of the SNCI for nature conservation and not a reduction in biodiversity due to the site being converted to 'low grade green-space'. Whilst it may be possible to combine multiple functions these need to sit well with the conservation aims, e.g. water management (storm water runoff), climate amelioration, reducing air pollution, education and appropriate accessible etc.</p> <p>The City has set itself a commendable ambition to achieve Urban Biosphere Reserve status, in order to achieve this it must ensure that the wildlife sites of the City are well maintained. The brief highlights the increasingly high environmental standards that have been achieved in recent developments (e.g. the Jubilee Library and the One Brighton development in the New England Quarter). Natural England recognises the sustainability value of these developments, however the Jubilee Library delivers little 'natural environment' benefits on site and the One Brighton development which has a new extensive green way for people to use and contributes to urban biodiversity did not manage to conserve features of the SNCI that</p>		

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>was previously on this site.</p> <p>This proposed development is an opportunity to ensure that the current proposal delivers fully on sustainability, people’s access to green space and nature, and the enhancement of an already important site for nature conservation.</p> <p>Finally care needs to be taken regarding the siting of development adjacent to the SNCI, different types of development (e.g. residential, business etc) bring their own impacts that will require different solutions in the design to protect the SNCI. Also the height of the buildings surrounding the SNCI need to be considered as potentially shading may become an issue.</p>		
<p>SNCI Whilst I support the general principle of encouraging access to areas of nature conservation interest, this plan shows a lack of knowledge about the ecology of Watts bank and the ecological concepts necessary to protect, conserve and enhance it. Thus: - access should not be throughout, or into the heart of, the site as this would fragment it and disturb sensitive species, such as lizards and breeding birds - the key to the conservation of the site is appropriate vegetation management, as at present the chalk grassland is succeeding to scrub. To maximise biodiversity benefits at the site, a mix of chalk grassland and woodland should be retained. The development proposals should</p>	<p>ID 13 - Received via consultation portal (respondent did not register name)</p>	<p>Noted – see response above</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
therefore include a nature conservation management plan for Watts bank and should fund the practical management of the site to implement the plan. - it is doubtful whether any planting is needed at Watts bank, but if it goes ahead, only native, locally sourced species should be used. More information is available in the University of Brighton Biodiversity Action Plan.		
Healthy living		
Plan should relate to other health issues – e.g. supermarket locations, restriction on hot food takeaway and unhealthy eating, especially in respect of increasing residential housing density.	Alan Cowen, Head of Health and Safety Dept, University of Brighton	Noted. The brief seeks a Health Impact Assessment (HIA) as part of any major planning application for the development area.
Sustainable development (general)		
Laudable. Is the council prepared to enforce environmental measures when developers complain of more investment up front to implement them?	Susannah Hagan	The degree of sustainability that is achievable will be an outcome of the development control process and will be dependent on a variety of factors and negotiation. The purpose of the brief is to set the bar high in this regard.
Linked with the University of Brighton's rebuilding of the 'House that Kevin Built' to research and develop sustainable building techniques, BHFOE would like to see far more ambition for a zero carbon development for this area. It is no good doing research and promoting working on sustainable development if	Brighton & Hove Friends of the Earth	The planning brief is intended to supplement existing planning policy. Seeking zero carbon developments and/or minimising carbon emissions are all fundamental objectives of existing council planning policy which

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>when the opportunity arises it is not put into practice. This development could put Brighton and the University at the forefront of sustainable building design with far reaching consequences for local jobs and investment as well as for improving the environment. However, it is not good enough just to focus on building design, the approach has to encompass all aspects of the development, particularly transport.</p>		<p>would be applied to any development proposals within the site are covered by the brief. A reference will be added to the brief in order to clarify and emphasise this issue. Integrating development with local neighbourhoods and across the Lewes Road, and creating a mixed use neighbourhood and sustainable destination in this part of the city are considered to be ambitious objectives.</p>
<p>There is not much to argue with the development principles except that they are not particularly ambitious. Minimising or reducing carbon emissions is not stated as a principle, neither is the need for the development to support the Biosphere Reserve bid, or that any development must not compromise the ability to improve walking, cycling and public transport along the A270 and pedestrian and cycling links into neighbouring areas.</p>	<p>Brighton & Hove Friends of the Earth</p>	
<p>Any development on this site should only be considered if it meets the highest sustainability standards - i.e. comparable with the One Brighton development near Brighton Station. In addition significant renewables generation should be incorporated on the site as a planning condition. Brighton & Hove already has one of the highest ecological footprints per capita in the country and any</p>	<p>ID 16 - Received via consultation portal (respondent did not register name)</p>	<p>Noted – see response above</p>

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
such development must do all it can to ensure this does not increase, and indeed should contribute to its reduction.		
Recreation, play space and sports provision		
Suggest inclusion of skateboard area or similar	Wendy Worrall	Noted – further details of play areas will be considered at the masterplanning stage.
Pleased to note inclusion of “recreation, play space and sports provision” within list of likely areas where contributions may be sought, which is consistent with Sport England policy objective 8, “to promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development.”	Sport England	Welcome support.
Infrastructure		
Water and wastewater disposal: Welcome recognition on page 36 that area lies above a major aquifer. Important that this is protected from contamination during construction and occupation thereafter. Agree that a sustainable drainage system may be an appropriate solution, but risk of contamination should be thoroughly investigated and assessed by development proposal before a water disposal strategy is formulated.	Southern Water	Noted. References will be added as requested.

Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief: Schedule of Representations and Proposed Responses

Topic	Respondent name	Proposed council response
<p>Existing underground sewer pipes serving sites are too small to accommodate the anticipated increase in wastewater flow. New and improved sewerage infrastructure would therefore be required to meet anticipated demand.</p> <p>Ofwat's view is that enhancements required to sewerage system as result of new development should be paid for by the development, to ensure cost is passed to those directly benefitting and to protect existing customers who would otherwise have to pay through increased general charges.</p> <p>Connection off-site to the nearest point of adequate capacity is the mechanism by which developers can provide the infrastructure required to service their sites. However, Southern Water has limited powers to enforce such connection, especially where new development is proposed on previously developed land. We therefore look to the planning authority to support off-site connection to the nearest point of adequate capacity through planning policies and planning conditions.</p> <p>It is important to give early warning to prospective developers of the need to connect off-site, as it will</p>		

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<p>add to the cost of the development. Early warning would facilitate delivery of the necessary infrastructure, contribute to the deliverability of the site and protect the environment. If the necessary infrastructure is not provided, the sewers would become overloaded which could lead to foul water flooding and pollution.</p> <p>In terms of a specific solution to overcome the sewerage constraint, removal and alternative drainage of surface water which currently drains to the combined sewerage system would release capacity for foul flows. However, it is unclear at this stage whether this would release sufficient capacity to accommodate the increased flows. This would need to be investigated when specific development proposals come forward.</p> <p>Any additional surface water run-off arising as a result of the development should not drain to the foul sewerage system. Instead, the surface water should be directed through a separate system. The system selected would need to ensure that there is no increase in the risk of flooding, and that the underlying aquifer is protected from the risk of contamination.</p> <p>In light of the above comments, we propose the following amendments to the draft Planning Brief:</p>		

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<ul style="list-style-type: none"> ▪ Insert a paragraph which recognises that potential developers will need to investigate and assess the risk of contamination of the underlying aquifer before a surface water disposal strategy is formulated for the site. ▪ Insert a paragraph to provide early warning to developers that existing local sewerage capacity is insufficient to accommodate the anticipated increase in demand. The development will therefore need to provide off-site sewerage infrastructure in order to connect to the nearest point of adequate capacity. ▪ Insert a paragraph which highlights that alternative drainage of surface water which currently drains to the combined sewerage system would release capacity for foul water drainage. This would contribute to meeting the demand from the development, but additional measures may also be required. 		
<p>Other issues This is not mentioned in the Planning Brief but the fact that the council owns much of the site and is also the planning authority will present a problem of conflict of interest. A high density development will provide a high level of income for</p>	Brighton Society	As a significant landowner in the city the council as local planning authority often makes planning decisions on council-owned sites.

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<p>the council but of course a high level of income should not be the deciding factor in granting planning permission. The Planning Brief should explain how such conflicts of interest are to be addressed.</p>		<p>Planning decisions are made, transparently, in public, with regard to adopted planning policy and other material considerations. Council members are accountable for the decisions they make. The consultation that is being carried out in the preparation of this brief is also part of the democratic process. It should be noted that the uses being proposed in the development area in no way represent profit maximisation of the site. At the same time, any development will need to be financially viable if it is to be implemented.</p>
<p>Request that map on the front page is made clearer to show where the site is located in B&H</p>	<p>ID 3 - Received via consultation portal (respondent did not register name)</p>	