

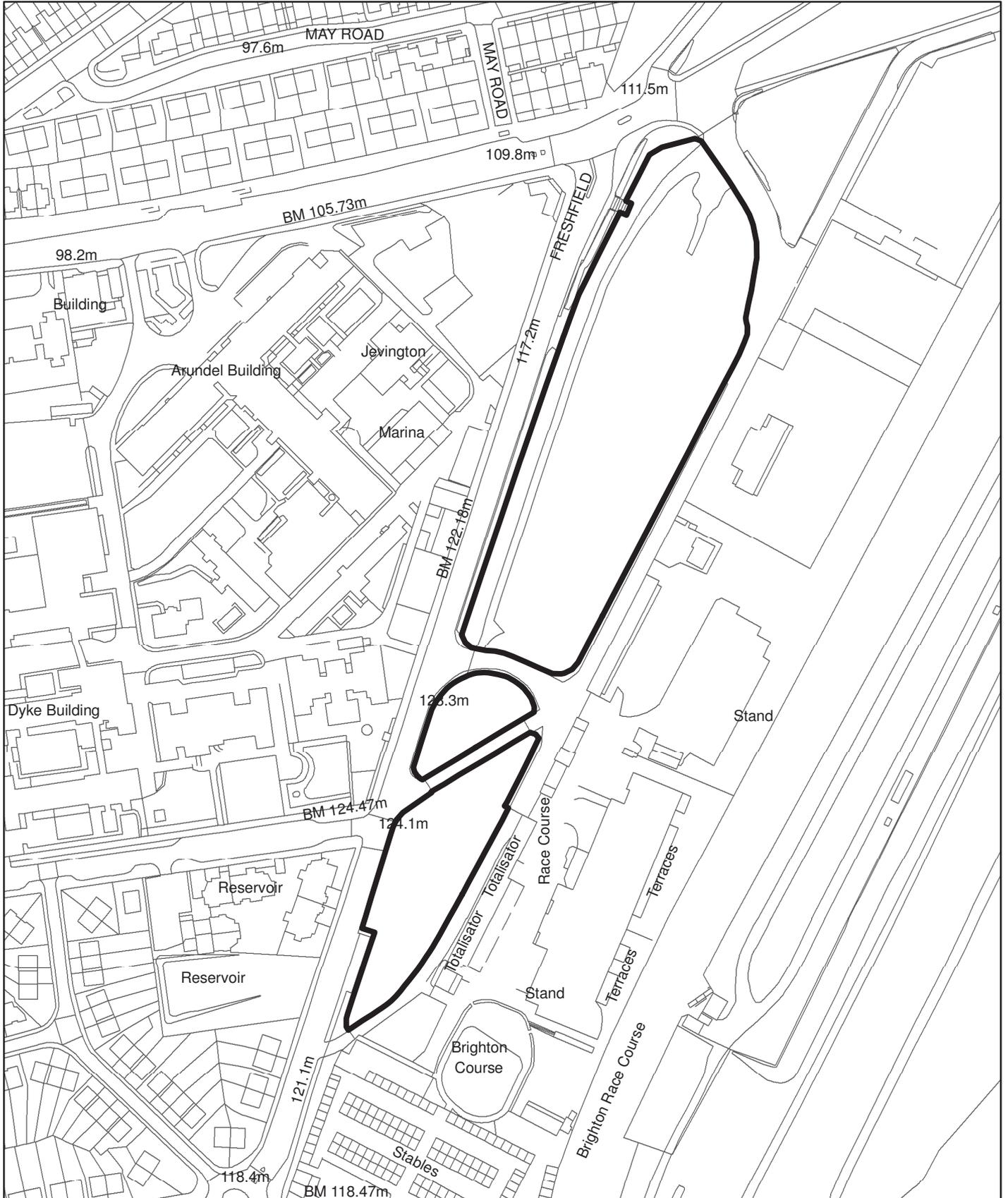
**PLANS LIST
ITEM B**

Brighton Racecourse, Race Hill, Brighton

**BH2013/01242
Full Planning**

17 JULY 2013

BH2013/01242 Brighton Racecourse, Race Hill, Brighton



**Brighton & Hove
City Council**



Scale: 1:2,000

<u>No:</u>	BH2013/01242	<u>Ward:</u>	EAST BRIGHTON
<u>App Type:</u>	Full Planning		
<u>Address:</u>	Brighton Racecourse Race Hill Brighton		
<u>Proposal:</u>	Permanent use of land for park and ride facilities for up to 700 cars in conjunction with outdoor events (no more than 50 per year) at the American Express Community Stadium Falmer.		
<u>Officer:</u>	Kathryn Boggiano Tel 292138	<u>Valid Date:</u>	23/04/2013
<u>Con Area:</u>	N/A	<u>Expiry Date:</u>	23 July 2013
<u>Listed Building Grade:</u>	N/A		
<u>Agent:</u>	DMH Stallard, Gainsborough House, Pegler Way, Crawley, RH11 7FZ		
<u>Applicant:</u>	The Community Stadium Limited , Mr Martin Perry, American Express Community Stadium, Village Way, Brighton, BN1 9BL		

1 RECOMMENDATION

- 1.1 That the Committee has taken into consideration and agrees with the reasons for the recommendation set out in section 11 and the policies and guidance in section 7 and resolves to **GRANT** planning permission subject to the Conditions and Informatives set out in section 11.

2 SITE LOCATION & DESCRIPTION

- 2.1 The site comprises the land to the west of the racecourse stand and garden centre and to the east of Freshfield Road. The land is currently grassed with some areas of access routes which are hardsurfaced.
- 2.2 The parking area itself is formed of 3 parcels of land. The site has been used as a Park and Ride site for the last two years in connection with the AMEX Community Stadium.
- 2.3 The area is also used for varying amounts of parking for the racecourse, depending on the scale of the event being held. The land slopes up in an eastern direction from Freshfield Road.
- 2.4 Other areas utilised by the racecourse for parking include the triangular piece of land to the west of the garden centre car park, and the linear areas to the west of the racetrack and stand.
- 2.5 Brighton General Hospital is to the west of Freshfield Road.
- 2.6 The racecourse is not within the National Park.

3 RELEVANT HISTORY

Stadium Site

BH2013/01356: Application for removal of condition 1 and variation of condition 36 of application BH2011/03861. (Variation of condition application to increase maximum number of spectators at American Express Community Stadium to 30,750 and to change parking provision within 1.5km to between 1500 and 3000

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vehicular parking spaces). Wording for condition 1 to be removed currently reads - "Of the additional 8,250 capacity hereby approved, only 5,991 seats of the additional capacity shall be brought into use for the 2012/2013 football season". Wording for condition 36 to be varied to read as follows - "When the 650 space temporary car park on land to the east of the Stadium (planning application reference LW/11/0466) ceases to be in use, of the additional 8,250 capacity hereby approved, only 5,991 seats of the additional capacity shall continue to be in use. None of the remaining capacity of 2,259 seats shall be returned to use unless details of a permanent park and ride solution, or other permanent transport solution to the satisfaction of the Local Planning Authority, to replace the 650 space temporary car park, has been agreed in writing by the Local Planning Authority and until the permanent park and ride solution, or other permanent transport solution, has been implemented." Under consideration.

BH2011/03861: Application for variation of conditions 39 and 43 of approved planning application BH2001/02418 and variation of conditions 35 and 38 of approved planning application BH2008/02732. Condition 39 of application BH2001/02418 and condition 35 of application BH2008/02732 seek to reduce the minimum number of car parking spaces from 2000 to 1500 and increase the maximum number from 2200 to 3000 and to read as follows - " Unless otherwise agreed in writing with the Local Planning Authority, no use of the Stadium for Outdoor Events shall occur unless a minimum of 1500 car parking spaces and a maximum of 3,000 car parking spaces at Sussex University and land at the former Falmer High School or at alternative locations within 1.5km of the Stadium as shown on the car parking plan within Document 6 of the Addendum to the Transport Assessment (Appendix 2.1 of Environmental Statement) which was received on the 15 March 2012, are made available for use by persons attending the said Outdoor Event. Any proposed change to the approved aforementioned parking would need to be submitted to and approved in writing by the Local Planning Authority." Condition 43 of application BH2001/02418 and condition 38 of application BH2008/02732 seek to increase the maximum number of people in attendance from 22,500 to 30,750 (additional 8,250) and to read as follows - "No event shall take place at the Community Stadium with an attendance in excess of 30,750 people". Approved 04 May 2012.

BH2010/03905: Change of use of part of ground floor of East stand from educational space to medical centre. Approved 15/02/2011.

BH2010/03817: Reduction in height to the landscape adjacent to the east stand. (Part retrospective). Approved 11/03/2010.

BH2010/02808: Non material amendment to BH2008/02732 for external elevational changes to the north, east and west stands. Approved. 22/09/2010.

BH2010/02013: Non material amendment for the reduction in chalk spoil levels and amendment to profile of contours on land south of Village Way. Amendment to scheme approved under BH2008/02732 for community stadium. Approved 28/07/2010.

BH2010/01976: Proposed revision to the North stand approved under planning application BH2008/02732 to include increased floor area for the club shop, new staff restaurant, new floor area for club offices, new museum, new floor area for storage and minor revisions to the North stand elevations. Approved 05/05/2011.

BH2008/02732: Revision to stadium permitted under 2001/02418/FP including change in roof design and elevational treatment, increase in useable floor area

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and amendments to use of internal floorspace. Proposed re-contouring of land south of Village Way with chalk and soil arising from excavations required to construct community stadium. Granted 22 April 2009.

BH2001/02418/FP: A Community Stadium with accommodation for Class B1 business, educational, conference, club shop merchandise, entertainment and food and road works, pedestrian and cycle links, coach/bus park and set down area, shared use of existing car parking space at the University of Sussex and shared use of land for recreation and parking at Falmer High School. Granted July 2007.

Racecourse Site

BH2011/03498: Change of use of land known as Market Site at Brighton Racecourse for car boot sales on each Sunday throughout the year and additionally on Wednesdays during the months of April to October each year, with additional car parking to South of Manor Hill. (Retrospective). Withdrawn by the applicant.

BH2011/01152: Proposed use of land for park and ride facilities for up to 700 cars in conjunction with outdoor events (no more than 50 per year) at the American Express Community Stadium Falmer. Approved for a 2 year period which expired on 30 June 2013.

BH2007/03144: Conversion of existing house into two flats for staff accommodation. Approved 12/10/2007.

BH2003/02595/FP: Refurbishment of existing storage building into offices, improve existing turnstiles, creation of new toilets. Approved 25/09/2003.

BH2003/01199/FP: Change of use of unit from hot food takeaway (A3) to offices (B1). Approved 03/06/2003.

BH2001/01021/FP: Use of land at east car park as a Sunday market/car boot sale between 09.00 and 18.00 hours, stall holders 07.00 to 19.00 hours. Withdrawn by the applicant.

BH2000/00167/OA: Demolition of existing Silver Ring grandstand and erection of a single storey multi-function hall. Approved 17/03/2000.

BH1999/02359/FP: Single storey extensions on west side to existing members and tattersalls enclosures in grandstand. Refurbishment of ground floor halls. Approved 16/12/1999.

BH1999/01849/FP: Renewal of BH1998/02436/FP to allow use of land as a Sunday market (for a period of 14 week, commencing 7/05/2000.). Approved 08/12/1999.

BH1999/00554/FP: Reconstruction of a parade ring (part retrospective). Approved 04/06/1999.

BH1999/00299/FP: Creation of a hardstanding area track on south side of racecourse (between 7 furlongs and 2 furlongs markers) for use by race day vehicles. Approved 31/03/1999.

BH1998/02436/FP: Use of land (between racecourse and running track and 'east car park') as a Sunday market and car boot sale. Market to open between 09.00 and 16.00 hours with stall holders on site between 07.00 and 19.00 hours. Approved 10/03/1999.

BH1998/02339/FP: New viewing gallery, refurbishment/re-cladding of part of main grandstand and various elevational alterations. Approved 22/10/1998.

BH1998/01982/FP: Erection of new entrance gates to main entrance and grandstand. Approved 22/10/1998.

4 THE APPLICATION

- 4.1 The planning application proposes the permanent use of the land to the east of Freshfield Road and to the west of the racecourse stand and garden centre, as a park and ride site for events at the AMEX Community Stadium for up to 50 times per annum.
- 4.2 The application proposes parking for up to 700 vehicles for up to 35 times a year for the Club's league and cup match day events and outdoor concerts, and for other events at the Stadium on the remaining 15 times per year parking for up to 500 vehicles is proposed.
- 4.3 Park and ride at the race-course for the stadium should not take place when there is a race event or other large scale event taking place at the race-course.
- 4.4 As with previous years, eight buses would be in operation running to and from the Stadium. The route to the stadium is via Warren Road to Woodingdean traffic lights where they turn left and travel along the B2123 to the stadium. The route from the stadium back to the racecourse is via Lewes Road and Elm Grove. Buses are brought onto the site from Freshfield Road and egress onto Warren Road via the existing access points.
- 4.5 The parking opens two and a half hours before kick off and the scheme finishes when the last vehicle has left the car park.
- 4.6 The parking areas are mainly grassed although the access into each area consists of gravelled areas and hardstanding access routes surround each parking area. It is not proposed to hard-surface the parking areas.
- 4.7 The route the buses use within the race-course is already hard-surfaced.
- 4.8 The Club is required to provide a minimum of 1,300 parking spaces at park and ride sites. At the public inquiry into the original planning application for the Stadium, the racecourse site was identified as an additional park and ride site needed to fulfil the transport demands of the Stadium.

5 PUBLICITY & CONSULTATIONS

- 5.1 **External**
Neighbours: One letter of representation has been received from **Flat 3 122 Pankhurst Avenue**, which comments that they would not want to see all of the grass tarmaced over and people enjoy walking dogs there. They also ask if there will be an improvement to the junction of Elm Grove and Freshfield Road or will there be traffic direction by police during events.
- 5.2 **Brighton & Hove Archaeological Society:** Strongly suggest that the Council consult the County Archaeologist.
- 5.3 **County Archaeologist:** Although the site is within an Archaeological Notification Area, as the site is currently used for car parking and there are no

proposed groundworks associated within this new proposal, do not consider that any archaeological remains are likely to be affected by these proposals.

5.4 **Sussex Police:** No objection.

5.5 **Internal:**

Air Quality: The Department of Environment has mapped background air pollution levels. The area of Brighton around the racecourse has excellent long-term air quality; the hill top location is remote from the high-density city and its constantly used road junctions. The Council's kerbside monitoring on Elm Grove showed concentrations of Nitrogen Dioxide below the limit value for eight years; 2001 to 2008. After that time it was decided to cease monitoring at this location so resources could be better directed at the inner priority locations.

The proposal would not affect air quality levels around the vicinity of the site. (Freshfield Road and Elm Grove). Additional buses may contribute towards very short term air quality levels on Lewes Road, however they would not contribute towards the National annual air quality objectives.

5.6 **Environmental Health:** No comment.

5.7 **Sustainable Transport:**

Comments made on 2 July 2013

The applicant should:

- Revise sections 6.4 and 6.5 of the Transport Report as the additional demand for P&R cannot be allocated to Mill Road, Mithras House and Cockcroft as they are regularly above capacity. Therefore all additional demand must be assumed to go to the Racecourse P&R site.
- Provide clarification on Appendix 3 on-street parking demand.
- Provide clarification on Woodingdean crossroads.

5.8 The Highway Authority does not agree with the adopted approach with regard to the calculations for the predicted modal split and the on street parking data, and consider that the applicant should amend the Transport Report. However, based on the Highway Authority's own assessment of the modal split data and on street parking data, even if the prediction calculations are amended and a worst case scenario presented, there is still adequate capacity within the racecourse park and ride site and on street capacity to accommodate the forecast additional demand. Therefore a reason for refusal could not be warranted.

5.9 ***Comments made on 26 June 2013***

The Highway Authority cannot currently recommend approval of this application, as the applicant has not addressed queries originally raised by the Highway Authority on 26/05/2013. The applicant should provide clarification on these points which are detailed further below.

5.10 On-street car parking data

The applicant has used the worst case scenario in terms of vehicles parking in the areas to be the CPZ for Coldean and Moulsecoomb for the 2012/13 season. The worst case scenario is a weekday and constitutes 569 cars parking in these

areas. The applicant has increased the estimate by 15% to ensure a robust approach. This means that within the Transport Report the applicant has assumed that 655 vehicles will park in this area. However, the 2012/13 on-street parking survey data for Coldean and Moulsecroomb does not take account of any potential future increase in stadium capacity of 2,259 people. This is because the on-street parking data used is from games in the 2012/13 season where smaller attendances were recorded. Therefore for the games versus Crystal Palace and Wolves when the attendance was at near full capacity a higher number of on-street car parking in Coldean and Moulsecroomb could have been recorded.

- 5.12 As previously stated, the applicant has applied a 15% increase to the number of cars parking in these areas. It is assumed that this uplift is to take account of a potential increase in the stadium capacity of 2,259 and the potential additional people who may park in the Coldean and Moulsecroomb areas, as a result. This approach is welcomed but the uplift should be based on the proportional increase in the number of seats, as a result of full capacity (30,750) above the average attendance at the stadium in the 2012/13 season. This will ensure that the assessment takes full account of the potential increase in stadium capacity.

5.13 Use of modal split data

As previously highlighted in the Highway Authority's original comments, the Highway Authority has some concerns in relation to the use of the 2012/13 modal split data to proportion the overspill car parking from the Coldean and Moulsecroomb CPZ areas to alternative modes. The applicant has responded by stating it is standard practice to use such data and that the Council should provide evidence to support their assertion that the assumptions made on modal split data is optimistic.

- 5.14 The Council would recommend that the 2012/13 modal splits act as a guide but that the applicant undertakes some form of testing to provide evidence of the impact, should more people who currently drive and park in the Coldean and Moulsecroomb areas transfer to park and ride sites. The Highway Authority consider that if a spectator currently drives to Coldean and Moulsecroomb, they are more likely to continue driving and parking somewhere else rather than switch to a different mode completely (bus, train cycle walk). Therefore the applicant could assume a higher percentage of fans that currently drive and park in Coldean and Moulsecroomb are more likely to use a park and ride site than the average fan when the CPZ becomes operational. The modal splits for park and ride could be amended to reflect this likely outcome. This approach is deemed to be reasonable and will ensure the worst case scenario is assessed, as is standard practice when assessing the transport impact of a proposed development.

5.15 Car park and Park & Ride site usage

In Section 6.1 the applicant states that for the last 2 games of the 2012/13 season there was a total of 3257 vehicles either parking in one of the dedicated car parks or a park and ride site. The applicant demonstrates the maximum capacity of all the available park and ride sites for a weekday and weekend in Section 6.2. We have previously requested that the applicant should specify what the average usage is for each parking and park and ride site and provide original survey

results. The applicant should also provide survey results for the demand for each park and ride site for the recent Wolves (4/5/2013) and Crystal Palace (13/5/2013) games. The applicant has not provided this necessary data and must provide this to ensure the assumptions made in sections 6.4 and 6.5 of the report are appropriate.

5.16 The assumption that the overspill car parking from Coldean & Moulsecoomb can be proportioned to the park and ride sites on the basis of the demand as occurred in the 2012/13 season needs to be supported with appropriate usage data as stated above. Obviously, if a park and ride site is regularly operating at capacity it cannot accommodate any displaced car parking from the Coldean and Moulsecoomb area and this may add extra demand at other P&R sites, such as the racecourse. It is noted that within the Planning Statement submitted to support this application the applicant states: “... *both the Mill Road and Mithras House Park and Ride sites both reach maximum capacity regularly prior to matches.*”

5.17 Woodingdean Crossroads assessment

In order to assess the impact on the Woodingdean crossroads the applicant has made reference to the Transport Statement submitted to support the original racecourse P&R application (BH2011/01152). Figure 1, of this TS sets out the forecast network trip distribution forecast at the time of the original application based on ticket buyers for the Withdean stadium; as is indicated in section 8.3 of this most recent report.

5.18 The applicant states that 8% of home supporters are forecast to travel through Woodingdean crossroads, as detailed in Figure 1 of the original TS. The applicant then states in section 7.4 of the report that 80% of supporters using the racecourse travel from the east, this contradicts the network trip distribution detailed in Figure 1 of the original racecourse TS. The applicant also states in section 8.3 of this report that the recent postcode data should be considered more accurate. Therefore the applicant should produce revised calculations that demonstrate the impact on Woodingdean crossroads. This should be based upon the more accurate post code data that demonstrates 80% of people travelling to the racecourse park and ride site travel from the east. The 20% of trips from the east and 80% from the west could be proportioned out based on the home supporters trip distribution in Figure 1 of the original racecourse TS. The applicant must demonstrate that the proposals do not have a significantly negative impact on the operation of Woodingdean crossroads.

5.19 Conclusion – worst case scenario

The applicant states in the conclusion that “*The worst possible case scenario suggests that next season demand could increase by 19 cars, taking the maximum usage up to 346 cars, including on-street demand.*” This is not deemed to be the worst possible case scenario by the Highway Authority in light of the comments made above.

5.20 **Comments made on 26 May 2013**

The Highway Authority cannot currently recommend approval of this application, as clarification is required on certain aspects and further assessment is required

in relation to the potential increase in capacity of the stadium by 2,259 in the 2013/14 season.

- 5.21 The number of cars quoted within the Transport Report as parking in Coldean and Moulsecoomb (1,100) is significantly different to other estimates of the number of vehicles parking in Moulsecoomb and Coldean. The 2011 Transport Assessment (TA) (BH2011/03861) estimated that the number of spectators parking in Moulsecoomb and Coldean to be 1500 spectators. While the counts available at the time of writing the Planning Committee report for planning application (BH2011/03861) estimated the number of cars parked in Moulsecoomb as being 314-338 and 282 in Coldean; a maximum of 620 vehicles (for a maximum capacity of 22,500). Therefore, clarification is requested on this matter and details of where this data is taken from. It would also be useful if the applicant could make use of existing parking survey data in the Moulsecoomb and Coldean areas.
- 5.22 The applicant must provide further clarification as to how they have calculated the number of supporters parking in Moulsecoomb and Coldean.
- 5.23 The applicant has assumed that the 1,100 vehicles that currently park in Coldean and Moulsecoomb will transfer to alternative modes of travel based upon the observed modal split detailed within the Travel Management Plan. However, this is assuming that people who could have regularly travelled by car to the stadium and have had their travel habits set over two football seasons will change to alternative modes of travel. For example it may be optimistic to assume that 35.4% of these supporters will now travel by train, when they have got used to travelling by car. It might be more realistic to assume that a majority who currently drive and park near to the stadium would look to continue to drive but park elsewhere or use a P&R site and only consider an alternative means of transport as a second option. It would be useful if the applicant could provide supporting information to justify the assumption that supporters will transfer to alternative modes based on this modal split.
- 5.24 In relation to car parking demand in and around the Park & Ride sites the applicant states: *“Current car parking demand, as recorded for the four games up to and including 17th March 2013 has averaged 3288 spaces. It should be noted that this is the total volume of parking demand across all sites whether near site parking or Park & Ride...”* The applicant must specify what the average demand is for each Park & Ride site and provide original survey results. The applicant should also provide survey result for the demand for each P&R site for the recent Wolves (4/5/2013) and Crystal Palace (13/5/2013) games. If some of the Park & Ride sites are operating at capacity, which they appear to be, this would affect the assumptions made in terms of percentage increases across the sites made in paragraphs 6.4 and 6.5 of the report. Obviously, if a P&R site is operating at capacity it cannot accommodate any displaced car parking from the Coldean and Moulsecoomb areas and this may add extra demand at other P&R sites, such as the racecourse.
- 5.25 The 2012/13 TMP states that there are 520 car parking spaces at Mill Road but paragraph 6.2 states that it is 450. The applicant should provide clarification on

this matter. While the applicant states that Bennett's Field has 650 spaces. However, 70 spaces are staff spaces so it should actually be 580 spaces for supporters. Clarification should also be provided as to levels of staff car parking at all the other sites.

- 5.26 This assessment of increase in parking demand (416 vehicles) only takes account of the existing parking that occurs on-street in Coldean and Moulseccomb. No account has been taken of the implications of an increase in capacity of 2,259 which could be undertaken in the 2013/14 season. No assessment has been made to see whether this increase in demand can be accommodated within the racecourse or other P&R sites. This assessment should therefore be undertaken to fully understand the impact should the capacity increase to its full capacity in 2013/14.
- 5.27 It is not apparent how the applicant has concluded that there will be an increase in vehicles of 175 turning right from Falmer Road to Warren Road and 25 travelling straight on from Warren Way to Warren Road as is stated in paragraph 7.3 of the Transport Report. The applicant should therefore provide further clarification as to how these figures have been assumed.
- 5.28 The applicant concludes that the worst case scenario at the racecourse P&R would be an increase of 38 vehicles. They state *"The worst possible case scenario suggests that next season demand could increase by 38 cars, taking the maximum usage up to 339 cars, including on-street demand."* Again, this does not include any assessment of the potential increase in stadium capacity by 2,259; which could happen in the 2013/14 season. This should be amended as detailed above for paragraph 6.3.

6 MATERIAL CONSIDERATIONS

- 6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."
- 6.2 The development plan is:
- Brighton & Hove Local Plan 2005 (saved policies post 2007);
 - East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (Adopted February 2013);
 - East Sussex and Brighton & Hove Minerals Local Plan (November 1999); Saved policies 3,4,32 and 36 – all outside of Brighton & Hove;
 - East Sussex and Brighton & Hove Waste Local Plan (February 2006); Saved Policies WLP 7 and WLP8 only – site allocations at Sackville Coalyard and Hangleton Bottom and Hollingdean Depot.
- 6.3 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and is a material consideration which applies with immediate effect.

- 6.4 Due weight should be given to relevant policies in the development plan according to their degree of consistency with the NPPF.
- 6.5 The Brighton & Hove City Plan Part One (submission document) is an emerging development plan. The NPPF advises that weight may be given to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies to the policies in the NPPF.
- 6.6 All material considerations and any policy conflicts are identified in the “Considerations and Assessment” section of the report.

7 RELEVANT POLICIES & GUIDANCE

The National Planning Policy Framework

Brighton & Hove Local Plan:

TR1	Development and the demand for travel
TR2	Public transport accessibility and parking
TR6	Park and ride
TR7	Safe development
TR14	Cycle access and parking
TR19	Parking standards
SU2	Efficiency of development in the use of energy, water and materials
SU9	Pollution and nuisance control
SU10	Noise disturbance
SU13	Minimisation and re-use of construction industry waste
QD1	Design – quality of development and design statements
QD2	Design – key principles for neighbourhoods
QD3	Design – efficient and effective use of sites
QD4	Design – strategic impact
QD15	Landscape design
QD16	Trees and hedgerows
QD27	Protection of Amenity
SR22	Major sporting venues
SR23	Community stadium
NC6	Development in the countryside/downland

Supplementary Planning Guidance:

SPGBH4	Parking Standards
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Brighton & Hove City Plan Part One (submission document)

SS1	Presumption in favour of sustainable development
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8 CONSIDERATIONS & ASSESSMENT

8.1 Background

In 2007 planning permission was granted for the Community Stadium at Falmer, including road works, pedestrian and cycle links, coach/bus park and set down area, shared use of existing car parking space at the University of Sussex and shared use of land for recreation and parking at Falmer High School. In 2009

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(BH2008/02732), permission was granted for a revision to the stadium approved in 2007, including a change in roof design and elevational treatment, increase in useable floor area and amendments to use of internal floorspace.

- 8.2 As part of the 2007 permission (BH2001/02418/FP), a minimum number of 1300 park and ride parking spaces are required by condition 22, which states that:
“No use of the stadium shall take place for Outdoor Events unless and until park and ride facilities with a minimum capacity of 1,300 car parking spaces are available for use by persons attending Outdoor Events at the Stadium and such spaces shall be maintained for such use in accordance with the Travel Management Plan.”
- 8.3 There were existing park and ride facilities at Mithras House, Lewes Road and Mill Road which were used in connection with games played at Withdean Stadium. However, an additional site was needed in order to cope with the additional demand and as part of the public inquiry into the original application for the Stadium, the racecourse site was accepted as being necessary as an additional park and ride site.
- 8.4 Permission for park and ride at the racecourse was granted at Planning Committee on the 29 June 2011 (BH2011/01152) for a temporary period of two years which expired on the 30 June 2013. The Club had applied for a permanent permission, however, Planning Committee members considered that it was more appropriate to permit a temporary consent for two years, so that the Club could assess the traffic and parking implications, air quality implications and congestion that might be created over this time, and then the relevant information could be presented back to Planning Committee.
- 8.5 The numbers of parking spaces available at the Park and Ride sites are:
- Mill Road: 450 spaces
 - Mithras House & Cockcroft: 500 spaces
 - Racecourse: 700 spaces
 - Total = 1650 spaces.
- 8.6 The number of spaces therefore exceeds the 1,300 minimum required by condition. However, the spectators at the Stadium has since increased from the original maximum crowd of 22,500 spectators.
- 8.7 On the 25th April 2012, Planning Committee resolved to mind to grant a variation of condition application (BH2011/03861) to the original Stadium permissions, in order to permit the following:
- Increase in spectator capacity at the Stadium from 22,500 to 30,750 and change to the number of vehicular parking spaces which must be provided within 1.5km from between 2,000 and 2,200 spaces to between 1,500 and 3,000 vehicular parking spaces.
- 8.8 Condition 1 of BH2011/03861 requires that the additional capacity of 8,250 be brought into use in two stages. Within the 2012/13 football season the Club can use up to 28,491 of the seats. From the 2013/14 football season onwards the Club can use the full capacity of 30,750.

- 8.9 Condition 36 of BH2011/03861 is also of relevance to the number of seats the Club can bring into use. This condition specifically states that:
 “No more than 5,991 of the 8,250 (total 28,491) additional capacity hereby approved shall be brought into use unless details of an additional permanent park and ride solution, or alternative transport solution, has been agreed in writing by the LPA in consultation with the Highway Authorities (B&HCC and Highways Agency) and until the permanent park and ride solution has been implemented.”
- 8.10 The Club has now submitted another variation of condition application (BH2013/01356) to remove condition 1 completely and to vary the requirements of condition 36 to:
 “When the 650 space temporary car park on land to the east of the Stadium (planning application reference LW/11/0466) ceases to be in use, of the additional 8,250 capacity hereby approved, only 5,991 seats of the additional capacity shall continue to be in use. None of the remaining capacity of 2,259 seats shall be returned to use unless details of a permanent park and ride solution, or other permanent transport solution to the satisfaction of the Local Planning Authority, to replace the 650 space temporary car park, has been agreed in writing by the Local Planning Authority and until the permanent park and ride solution, or other permanent transport solution, has been implemented.” This application is still under consideration by the Council.
- 8.11 Despite the above conditions, the Club have used the stadium for full capacity games (30,750) at the end of the last season, specifically the final league home game on Saturday 4 May 2013 and the home leg of the play off semi-final on 13 May 2013.
- 8.12 As part of the increase in capacity application BH2011/03861, a Controlled Parking Zone (CPZ) within Moulsecoomb and Coldean has been required through the legal agreement accompanying the planning decision and this should be in place by the start of the 2013/14 football season.
- 8.13 Therefore, it is considered that the Racecourse park and ride site is needed in order for the Stadium to operate at a maximum capacity of 28,491 (2012/13 season), and is needed for the Stadium to operate at its future maximum capacity of 30,750 spectators (either during 2013/14 or 2014/15 season dependant on the outcome of application BH2013/01356) and is also needed to accommodate the potential additional vehicles as a result of displaced parking from the Moulsecoomb and Coldean CPZs (start of the 2013/14 season).
- 8.14 The Travel Management Plan (TMP) for the Stadium sets out the wider travel arrangements for the Stadium. The recorded demand and recorded modal split figures (Transport Statement, BH2013/01356) are included below:

Travel Mode	2012/13 Demand (number of spectators)	Recorded of	2012/13 Modal Split	Recorded
Bus	2390		8.6%	
Bus specials	3180		11.5%	

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Coach	2100	7.6%
Train	9800	35.4%
Park & Ride	3860	13.9%
Parking (includes parking in Moulsecoomb and Coldean)	5020	18.1%
Cycle/Walk	1370	4.9%
Total	27720	100%

8.15 Free travel on the Park and Ride buses is available for all home spectators with a valid match ticket. The transport levy is added onto the price of a match/season ticket. There is not a separate fee for parking.

8.16 The management plans for all of the park and ride sites is detailed as part of the Travel Management Plan, which includes information on stewarding, signage and the routes the buses will take. Operational arrangements are open to discussion with the bus company and through the Travel Management Group.

8.17 The number of outdoor events which can be held at the Stadium is controlled by condition to no more than 50 in any 12 month period, of which no more than two shall be music concerts. There was no demand for Park and Ride as a result of the Fatboy Slim concerts which were held in June 2012. In reality it is very unlikely that there would be more than 35 Brighton & Hove Albion home games in any season (including all cup competitions).

8.18 Principle of development

The application site at the racecourse is within the countryside/downland as designated by policy NC6 of the Local Plan. The site is also covered by policy SR22 which identifies the racecourse as a major sporting venue and prevents the redevelopment of the site for non-sporting uses. The area which is the subject of this application, is also used as a parking area in connection with race days and other larger scale events at the racecourse. The site is located between the racecourse stand and the garden centre, and is therefore viewed against the backdrop of these buildings along with the car park of the garden centre.

8.19 When permission was granted for the two year consent (BH2011/01152), it was considered that the use would not have a significant adverse impact on the countryside/downland, and that its location within the countryside was justified. The proposal was not considered to be contrary to policy NC6. As the park and ride use would not compromise the use of the overall racecourse site as a major sporting attraction, it was also considered that the proposal was not contrary to policy SR22. These considerations are still relevant and the principle of park and ride at the racecourse is considered to be acceptable and forms part of the overall package of transport measures needed for the successful operation of the Stadium.

8.19 Sustainable Transport

Traffic impact on road network

The impacts on the local highway network from both spectator traffic and from the park and ride buses must be assessed.

8.20 *Spectator traffic*

The park and ride at the racecourse has been underutilised in the last 2 years. The data is included within the below table:

	Average Crowd	Average number of cars	Average number of spectators per car
2011/2012 Season	20,028	259	2.7
2012/13 season	25,271	265	2.9
Last two games of 2012/13 season	29,761	327	2.8

8.21 Apart from the average of the last two games of the season, the average usage of the recourse for the 2012/13 season, did not significantly increase when compared to the average usage 2011/12 season. The full capacity at the Stadium (30,750 was utilised on the last 2 home games) and the average number of cars increased from 265 to 327 cars. 388 cars used the racecourse site for the weekday Crystal Palace play off semi final game. Parking for the weekend Wolves game was less at 267 cars.

8.22 It is considered that the average of 327 cars could be reflective of the situation either next season or the 2014/15 season (depending on the outcome of application BH2013/01356), when the full capacity of 30,750 could be in permanent use. However, the survey data does indicate that more people may use the racecourse for a midweek game. However, this data has to be treated with caution as there have only been two games with a maximum capacity crowd. In addition to the increase in spectators from 28,491 to 30,750, there could also be an increase in spectators wanting to use the racecourse site when the CPZs become operational at the start of the next season.

8.23 The applicant has estimated that with a full capacity crowd (30,750) operation of the CPZs could potentially displace an additional 654 cars (1700 spectators based on 2.6 per car). As the Highway Authority disagree with the calculation for the predicted increase in cars as a result of the increase in capacity, the Highway Authority consider that these figures should be 674 cars (1752 spectators). These are the numbers of cars and spectators which would need to be accommodated over all of the other different modes of transport including the racecourse park and ride site. The difference in the calculations would only result in an additional 2 cars at the racecourse site, so 94 instead of 92 so this is not considered to be material.

8.24 The applicant has used the existing modal split percentages in order to calculate what the increase in usage at the Park and Ride sites may be as a result of the displaced CPZ parking. So for example, all the park and ride sites

have an existing modal split percentage of 13.9% for a capacity crowd of 28,491. Of this 13.9%, Mill Road equates to 38.5%, Mithras House equates to 40.2% and the racecourse equates to 21.2%. Therefore the applicant has assumed that the increase in spectators will be spread evenly over all modes and evenly over the 3 park and ride sites and that the increase in demand at the racecourse will be for 19 spaces (out of a total 92 -94 spaces for all park and ride sites).

- 8.25 The Highway Authority disagrees with this approach as the other two park and ride sites (Mill Road and Mithras and Cockcroft) are at capacity in terms of usage, and also because those spectators which currently drive and park in Coldean and Moulsecomb are likely to continue to drive but park somewhere else rather than switch to another mode (bus/train/cycle/walk). Therefore, the Highway Authority considers that the worst case scenario for the displaced parking as a result of the CPZs would be the full 92 – 94 additional cars parking only at the racecourse site and not distributed over all 3 park and ride sites.
- 8.26 In addition, the Highway Authority consider that the overall park and ride modal split percentage may actually increase as a result of implementation of the CPZs, as spectators may still chose to drive but could park somewhere else. If a worst case scenario of 35% of the additional trips going to park and ride and is applied to the racecourse (rather than the applicant's predicted increase of 14%) this would equate to an additional 236 cars.
- 8.27 The two final games of last season when the full capacity was in use (30,750) showed that the number of cars parking at the racecourse increased over the average for the rest of the season by 2 cars (Wolves Saturday game) and by 123 cars (Palace mid week game). Therefore if the Palace game is used as a worst case scenario for a 30,750 capacity game (388 cars) and the worst case scenario added as a result of displaced parking from the CPZs (19 predicted by the applicant and up to 236 predicted by the Highway Authority), the worst case scenario is 624 cars parked at the racecourse. Given that the capacity is for 700 at the racecourse, there is still enough capacity to cater for a maximum capacity crowd of 30,750, to cater for any displaced parking as a result of the CPZ and to cater for any significant increase in the park and ride modal split.
- 8.28 It is important to note that it is impossible to predict exactly how spectators will change their travel modes as a result of implementation of the CPZs, and that the worst case scenarios are based on the assumption that the racecourse park and ride site is attractive to all spectators in terms of its location. However, the low usage of the racecourse would indicate that it is not as attractive as the other park and ride sites.
- 8.29 Despite the under usage of the racecourse, the impact of 700 spectator trips on the road network needs to assessed.
- 8.30 Analysis of postcode data from spectators using the racecourse park and ride site shows that 80% of spectators are travelling from the east. Clarification regarding the number of trips though Woodingdean traffic lights has been requested from the applicant and this will be reported via the late list of

supplementary information. The trips through Woodingdean traffic lights as a result of the racecourse park and ride site occur outside of peak times. Subject to the clarification regarding the Woodingdean traffic light flows, it is not considered that 700 spectator trips would cause an adverse impact on the local highway network.

8.31 *Bus traffic*

The Travel Management Plan outlines the routes the buses will take. They travel to and from the stadium on a circular route, leaving the racecourse by turning right onto Warren Road, travelling to the Woodingdean crossroads and turning left onto Falmer Road travelling to the Stadium. On leaving the Stadium they turn left out of Village Way to access the A27 travelling westwards onto the A2270 turning left onto Elm Grove. 8 double decker buses are normally in use (this number can be amended if necessary through the Travel Management Plan and Travel Management Group). It is anticipated that when the bus improvement works are complete on Lewes Road, the buses will use this route to and from the Stadium and won't use the route via Warren Road and the Woodingdean Traffic Lights.

8.32 The double decker buses can accommodate up to 90 people. There are currently approximately 12 bus journeys before and after each game. If these carry approximately 90 people, based on an average of 2.9 people per car, and a maximum of 700 cars, this would equate to 23 bus journeys to and from the Stadium (both before and after the game). So this would be 46 bus journeys in total. The bus journeys are spread over a maximum of 2 to 2.5 hours and travel along existing bus routes on main roads. Therefore, the bus journeys are not considered to adversely impact on the capacity of the road network nor jeopardise highway safety.

8.33 *Parking on surrounding residential streets*

When the previous planning application was under consideration concerns by neighbours were raised regarding the possibility of fans parking on surrounding neighbouring streets. As part of the previous application 11 letters of objection were received from residents, however as part of this current application only one letter of comment has been received. There have been no complaints made to the Council or to the Club regarding the operation of the racecourse as a park and ride site for the Stadium.

8.34 Since December 2012, the applicant has been undertaking on street parking surveys on the residential roads surrounding the racecourse. This has shown that on average there are an additional 47 cars parking on street in the immediate area on Manor Hill, Firlie Road, Pankhurst Road, Freshfield Road and Elm Grove/Warren Road when the park and ride is in operation. The parking survey averages equate to 111 cars parking on a match day and 64 on a non match day. The 47 cars parking on street equates to 18% of the average number of cars parking within the racecourse site. The parking capacity results indicate that there are between 147 and 174 spare spaces on street. If a worst case scenario of 18% of 700 cars is taken this could result in a total of 126 cars parking on street which is an increase of 79 cars. However, the number of spare parking spaces within the surrounding area is at least 147 spaces. It is hoped that

spectators can be discouraged from parking in surrounding streets. However, even if the worst case scenario is used, the parking results show that there is spare capacity on street to cope with the additional parking demand.

8.35 The management, stewarding and publicity arrangements for the park and ride site are detailed through the Transport Management Plan. There have not been any complaints to the Council or the Club regarding spectators parking in the surrounding streets. However, it is recognised that if the numbers of people parking on the surrounding streets does increase in the future then this situation may change. If a problem does arise, it can be tackled through the Transport Management Group, and through amended management of the park and ride site or increased publicity to fans.

8.36 Impact on Amenity

Policy QD27 of the Brighton & Hove Local Plan states that planning permission for any development or change of use will not be granted where it would cause material nuisance and loss of amenity to the proposed, existing and/or adjacent users, residents, occupiers or where it is liable to be detrimental to human health.

8.37 Possible impacts on neighbouring amenity are noise and disturbance and pollution from increased traffic.

8.38 To the west of the site is Brighton General Hospital, which is opposite parking areas 2 and 3. Opposite a section of parking area 1 is a block of relatively new flats on the corner of Pankhurst Avenue and Freshfield Road. The former reservoir site is opposite the rest of parking area 1.

8.39 Given the separation between the residential properties and the site and the presence of Freshfield Road in between, it is not considered that manoeuvring on the parking areas would give rise to a significant adverse impact in terms of noise and disturbance. In addition, there have been no complaints made to the Council regarding the park and ride operation.

8.40 It is recognised that the use of the racecourse has been below capacity. However, it is not considered that the maximum capacity use of the racecourse would have a significant detrimental impact on neighbouring amenity.

8.41 Visual Impact

The site is within open downland and is protected by policy NC6 of the Local Plan. The site has been used by the Stadium for the last two years as a park and ride site and is also used for parking when large events are held at the racecourse.

8.42 The site is open with timber railings on the perimeter. It is considered that the site is always viewed with buildings such as the racecourse stand, garden centre and parking to the garden centre in the backdrop. These existing buildings provide a break between the grassed parking areas and the openness of the countryside to the east. Given this, and the fact that the areas can currently be used for racecourse parking, it is not considered that a permanent park and ride proposal

would cause any more harm to the visual qualities and openness of the countryside to the east.

8.43 Over the last two years the use of the areas for park and ride has not resulted in a loss to the grassed areas. Concerns were raised originally regarding the possibility of cars ‘churning up’ the grassed areas particularly during the winter months. However, this has not happened in reality. It is recognised that the use of the racecourse has been under capacity. However, it is considered that the Management, Monitoring and Maintenance Strategy for the parking areas should ensure that they are maintained to an acceptable level and should address concerns that in winter months the area may become muddy which would harm the visual qualities of the immediate surrounding area.

8.44 Other Considerations

One of the reasons Planning Committee granted a temporary consent previously was related to the concerns over the impact of the proposal on air quality levels along Lewes Road.

8.45 The additional bus trips along Lewes Road would be minimal compared with the daily flows, and would also be outside of the daily peak times. At present usage, the proposal generates approximately 12 bus journeys before and after a game. The worst case scenario based on 700 cars and 2.9 spectators per car would be 23 bus journeys before and after a game. When the Lewes Road bus improvements works are complete the buses may travel to and from the Stadium via Lewes Road so this would equate to 46 additional trips along Lewes Road before and after a game. Whilst these bus journeys may contribute to very localised short term air quality levels along Lewes Road, they are not considered to contribute towards the National objectives for Nitrogen Dioxide or Particulate Matter (PM_{10s}). Therefore the proposal is not considered to have a significant impact on air quality along Lewes Road.

9 CONCLUSION

9.1 Park and ride at the racecourse enables the Football Club to meet their obligations to provide park and ride sites in connection with the American Express Community Stadium. The principle for the need for this park and ride site has been established. It is considered that the park and ride at the racecourse has operated successfully over the last two years without causing an adverse impact on neighbouring amenity or the local highway network. Subject to a condition to prevent any clash of park and ride with major events at the racecourse, it is considered that the continued use of the park and ride would not cause an adverse impact on the local highway network nor would it jeopardise highway safety. The proposal would not significantly harm residential amenity, and subject to the management and maintenance of the area, the proposal would not be of detriment to the visual qualities of the area.

10 EQUALITIES

10.1 No disabled parking is to be provided, as this is provided within the car parks serving the Stadium (Sussex University, Bennett’s Field and the Bridge car parks).

11 PLANNING CONDITIONS / INFORMATIVES

11.1 Regulatory Conditions:

- 1) The development hereby permitted shall be commenced before the expiration of three years from the date of this permission.
Reason: To ensure that the Local Planning Authority retains the right to review unimplemented permissions.
- 2) The development hereby permitted shall be carried out in accordance with the approved drawings listed below.
Reason: For the avoidance of doubt and in the interests of proper planning.

Plan Type	Reference	Version	Date Received
Plan Number 5	N12034-03 Rev B	B	17 April 2013
Planning application boundary including marshalling area	N12034-05		

- 3) No other area at Brighton racecourse, apart from the 3 parking areas shown on Plan Number 5, referenced N12034-03 Rev B submitted on the 17 April 2013, shall be used as parking in connection with park and ride to the football stadium of Brighton & Hove Albion Football Club. The parking within these 3 areas referred to above, shall not exceed 50 days in any 12 month period. Of these 50 days in any 12 month period the number of vehicles within these 3 parking areas shall not exceed 700 vehicles for a maximum number of 35 days, and shall not exceed 500 vehicles for a maximum number of 15 days.
Reason: To limit the capacity of parking and number of days in order to minimise disruption to the local highway network and to residents by reason of noise and disturbance and traffic pollution, and to comply with policies TR1, TR7, SU9, SU10 and QD27 of the Brighton & Hove Local Plan.
- 4) Prior to the start of each football season, a Schedule of Events, which will include the dates and times of the days Brighton racecourse will be used as parking in connection with park and ride to the football stadium of Brighton & Hove Albion Football Club, along with the full details of any of events which are to be held at the racecourse on these days (including a description of the event, times of the day of the event, the anticipated likely capacity of people attending such an event, and number of parking spaces available for such an event), will be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing with the Local Planning Authority 7 days prior to any change, the parking for the park and ride to the football stadium shall only be permitted in accordance with the approved Schedule of Events.
Reason: To ensure that there is no clash of large scale events with park and ride at the racecourse in connection with the Stadium, which may cause disruption to the local highway network and to residents by reason of noise and disturbance and traffic pollution, and to comply with policies TR1, TR7, SU9, SU10 and QD27 of the Brighton & Hove Local Plan.
- 5) Unless otherwise agreed in writing with the Local Planning Authority, all spectator traffic shall access and egress the site via the site entrance on Freshfield Road.

Reason: In order to prevent spectator traffic using the site access located to the north of the site near to the junctions of Warren Road, Elm Grove, Tenantry Down Road and Freshfield Road, for highway safety reasons and to comply with policy TR7 of the Brighton & Hove Local Plan.

- 6) Before the parking areas are first brought into use as parking in connection with park and ride to the football stadium of Brighton & Hove Albion Football Club, a Management, Monitoring and Maintenance Plan for the parking areas shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include details and timeframes for the porous surfacing work for the first 10 metres of each access point into each of the 3 parking areas, and shall include the timeframes for regular monitoring and maintenance of the condition of the grassed areas. Monitoring and maintenance information must be submitted to and agreed in writing by the Local Planning Authority on an annual basis by the end of each football season.

Reason: In order to maintain the grass in good condition for highway and visual appearance reasons and to comply with policies TR1, QD2, SR22 and NC6 of the Brighton & Hove Local Plan.

- 7) Prior to the start of the 2013-2014 football season, full details of the cycle parking to be provided at the site shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented fully in accordance with the approved details prior to the start of the 2013-2014 football season and retained as such thereafter.

Reason: To ensure satisfactory facilities for the parking of cycles and to encourage cycle and ride to the Stadium and to comply with policy TR14 of the Brighton & Hove Local Plan.

- 8) The maintenance work required by the Management, Monitoring and Maintenance Plan, required by condition 6, must be carried out in accordance with the agreed Plan and within the agreed timescales.

Reason: In order to maintain the grass in good condition for highway and visual appearance reasons and to comply with policies TR1, QD2, SR22 and NC6 of the Brighton & Hove Local Plan.

11.2 Informatives:

1. In accordance with the National Planning Policy Framework and Policy SS1 of the Brighton & Hove City Plan Part One (submission document) the approach to making a decision on this planning application has been to apply the presumption in favour of sustainable development. The Local Planning Authority seeks to approve planning applications which are for sustainable development where possible.
2. This decision to grant Planning Permission has been taken:
 - (i) having regard to the policies and proposals in the National Planning Policy Framework and the Development Plan, including Supplementary Planning Guidance and Supplementary Planning Documents: (Please see section 7 of the report for the full list); and
 - (ii) for the following reasons:-

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Park and ride at the racecourse enables the Football Club to meet their obligations to provide park and ride sites in connection with the American Express Community Stadium. The principle for the need for this park and ride site has been established. It is considered that the park and ride at the racecourse has operated successfully over the last two years without causing an adverse impact on neighbouring amenity or the local highway network. Subject to a condition to prevent any clash of park and ride with major events at the racecourse, it is considered that the continued use of the park and ride would not cause an adverse impact on the local highway network nor would it jeopardise highway safety. The proposal would not significantly harm residential amenity, and subject to the management and maintenance of the area, the proposal would not be of detriment to the visual qualities of the area.

3. The management of the park and ride site which includes stewarding and the routing of buses, is a requirement of the Travel Management Plan, which is a conditional obligation of the original planning permissions for the Stadium BH2001/02418/FP and BH2008/02732.

