



**Brighton & Hove  
City Council**

**PLANNING, EMPLOYMENT,  
ECONOMY & REGENERATION  
CABINET MEMBER MEETING  
ADDENDUM**

**Item 35 Lewes Road (Preston Barracks  
and University of Brighton) Planning  
brief**

**4.00PM, THURSDAY, 15 SEPTEMBER 2011**

**COUNCIL CHAMBER, HOVE TOWN HALL**



# ADDENDUM

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**PLANNING**

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<b>Subject:</b>	<b>Lewes Road (Preston Barracks and University of Brighton) Planning Brief</b>		
<b>Date of Meeting:</b>	<b>15 September 2011</b>		
<b>Report of:</b>	<b>Strategic Director, Place</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Alan Buck</b>	<b>Tel: 29-2287</b>
	<b>Email:</b>	<b>alan.buck@brighton-hove.gov.uk</b>	
<b>Key Decision:</b>	<b>Yes</b>	<b>Forward Plan No: PEERCMM24006</b>	
<b>Ward(s) affected:</b>	<b>All</b>		

**FOR GENERAL RELEASE**

**1. SUMMARY AND POLICY CONTEXT:**

- 1.1 This report seeks approval of the planning brief for Lewes Road (Preston Barracks and University of Brighton) following a six week consultation on the draft version of the document that was undertaken between 5 April and 16 May this year.
- 1.2 The brief has been prepared to assist the shared vision of the council and the University of Brighton in bringing forward development that will meet the planning policy objectives of employment-related development (as set out in the adopted Local Plan) along with emerging planning policies to secure zero carbon development, housing, higher education, student accommodation and place-making.

**2. RECOMMENDATIONS:**

- 2.1 That the Cabinet Member for Planning, Employment, Economy & Regeneration notes the results of the public consultation held in April and May and the resulting changes that have been proposed to the planning brief.
- 2.2 That the Cabinet Member for Planning, Employment, Economy & Regeneration approves the amended planning brief and that it be adopted by the council for development control purposes.

**3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:**

- 3.1 An earlier draft version of the brief was approved for consultation purposes at the Environment Cabinet Member Meeting on 10 March this year.
- 3.2 A six week public consultation was held between 5 April and 16 May. Details of the consultation process are set out in section 4 below. The results of the consultation revealed:

- General support for the brief's principles to provide a mixed use neighbourhood based around employment, housing, further education and student housing
  - General support for the level of student housing proposed, although some concerns from local residents concerning 'studentification' in the area
  - Support for development options that would preserve the Mannoock and 'Crimean War' buildings on the former barracks site, although representations opposing the retention of these buildings were also received – principally from Defence Infrastructure Organisation (the Ministry of Defence's Estates) with regard to any potential listing of the Crimean War Building which they own and where a cadet force continues to be based and operate. It should be noted that the brief requires the principal of retaining the above buildings to be explored, but does not necessarily insist on retention should this prove a significant constraint on realising the optimum potential of the site with regard to access, movement, development capacity and viability.
  - Support for sustainability objectives and a desire for these elements of the brief to be strengthened towards greater encouragement for a zero carbon development, more sustainable forms of transport and for development to provide for a reduced level of car parking than proposed in the draft version of the document.
- 3.3 In the light of the comments received, a number of changes have been made to the document, in order to further strengthen references to sustainability and the encouragement of a zero carbon development, including deletion of proposed car parking figures, encouragement for more sustainable transport solutions and a reference to the availability of finance to assist achieving these objectives along the Lewes Road corridor between 2011-21 via the recently approved Local Sustainable Transport Fund Bid.
- 3.4 A number of additional changes are proposed to the document in the light of comments that have been received. Appendix 3 of this report provides a version of the brief that has been marked up with changes tracked to reveal proposed amendments that have been made in the light of consultation. A full schedule of comments received and a proposed council response is given in appendix 1 of this document. These comments and responses are summarised in appendix 2.
- 3.5 The brief has been prepared to reflect the adopted Local Plan, emerging planning policy relating to the Lewes Road (as most recently set out in the Local Development Core Strategy Proposed Submission Document) along with the council's shared vision with the University of Brighton for the area covered in the brief. Assuming that the council and the University continue to co-operate and work together in taking forward their shared vision, it is envisaged that the planning brief effectively supersedes the supplementary planning guidance adopted in 2003 relating to the Preston Barracks Site (SPGBH 14). The brief would be used to guide future decision making in its place, in conjunction with the Local Plan and emerging planning policy where relevant.

## 4. CONSULTATION

4.1 The six week public consultation comprised the following:

- letters of notification to statutory undertakers and local stakeholder groups and organisations;
- a mail out to 1889 addresses in the vicinity of the development area, with details of the availability of the document and the public exhibition;
- a press release, giving details of the consultation, the availability of documents and supporting material and a public exhibition;
- a public exhibition held for three consecutive days in Mithras House, part of the university's Moulsecoomb Campus, as well as Hove Town Hall;
- availability of the draft planning brief, the public exhibition material and details on how to comment on the council's website;
- availability of the above documents and a facility to comment on their contents through the consultation portal.

4.2 The consultation resulted in attendance at the public exhibition by around 50 individuals, 17 written communications from individuals or organisations and 23 comments posted online via the consultation portal.

4.3 Members of the council's Preston Barracks Project Board have been informed of the outcome of the consultation and the proposed changes to the planning brief. Any consequent comments arising from members of the Project Board will be reported verbally at today's meeting.

## 5. FINANCIAL & OTHER IMPLICATIONS:

### Financial Implications:

5.1 The costs of preparing the draft planning brief have been met from within the Planning revenue budgets for 2010-11 and 2011-12, and the cost of the consultation has been met from the Major Projects and Regeneration budget.

*Finance Officer Consulted: Karen Brookshaw Date: 22/08/11*

### Legal Implications:

5.2 Although the Brief has been subject to consultation it cannot be accorded full statutory weight insofar as it has not have gone through the full statutory process required of local development documents under the provisions of the Planning and Compulsory Purchase Act 2004. However, once adopted the Brief will nonetheless be a material planning consideration in the determination of relevant planning applications, as referred to in Section 3 of the draft Brief. No adverse human rights implications arise from the report.

*Lawyer Consulted: Hilary Woodward Date: 01/09/11*

### Equalities Implications:

5.3 The brief interprets emerging planning policy in respect of part of the Lewes Road Area as defined in policy DA3 of the Local Development Framework Core

Strategy, for which an equalities impact assessment has previously been undertaken. The brief seeks to bring forward an accessible and safe environment that will benefit existing local neighbourhoods as well as communities that will be residing, working, studying or otherwise using any future development within the area it covers.

Sustainability Implications:

- 5.4 The brief seeks to bring forward a zero carbon development that will benefit the city as a whole and assist in the implementation of the Sustainable Development strategy.

Crime & Disorder Implications:

- 5.5 The draft brief seeks the creation of a high quality, mixed use, pedestrian-friendly environment that will be conducive to providing a safe and successful neighbourhood.

Risk and Opportunity Management Implications:

- 5.6 The Preston Barracks site has remained undeveloped for many years. Through providing for a partnership approach between the council and the University of Brighton across a wider area than the Preston Barracks site alone, the brief sets out a range of uses in development phases that should attract funding to enable some elements of development to take place in the shorter term, which will act as a catalyst towards ensuring the longer term completion of the relevant sites.

Corporate / Citywide Implications:

- 5.7 As a large brownfield site, Preston Barracks is of significant importance to the council. With precious few such sites available in the city, it offers a rare opportunity to deliver a genuine mixed-use development capable of generating substantial employment and inward investment opportunities. It was the strength of this case, together with the risks posed by potentially unacceptable development, which led to the city council's decision, supported and funded by SEEDA, to take up the opportunity to purchase the site from the Ministry of Defence.

**6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1 An alternative to preparing a planning brief would have been to do nothing, thereby relying on out of date policy guidance that does not reflect changing circumstances that have arisen over the last three years.
- 6.2 A further alternative would have been to prepare a supplementary planning document (SPD). Although they do not carry the same statutory weight as SPDs, planning briefs can be prepared more rapidly in response to development pressures and changes in situation. The fact that this planning brief has been the subject of widespread community and stakeholder consultation should afford it status as a valid material consideration in the planning process. It takes due account of national planning guidance, adopted and emerging development plan policies and applies them to the development aspirations of the council and the



university with regard to the Preston Barracks, Moulsecoomb Campus and Mithras House sites.

## **7. REASONS FOR REPORT RECOMMENDATIONS**

- 7.1 The report asks the cabinet member to note the results of the consultation, the resulting changes that have been proposed to the brief and to approve the adoption of the document for development control purposes, in order to ensure that stakeholder and community consultation has been taken into account and that the brief will be a useful and democratic tool in guiding future planning decisions and development in the area.

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. Schedule of Representations and Proposed Responses
2. Summary of key representations received and resulting actions
3. Lewes Road (Preston Barracks and University of Brighton) Planning Brief (amended version with changes tracked)

### **Documents in Members' Rooms**

1. Summary of key representations received and resulting actions (as appendix 1 above)
2. Lewes Road (Preston Barracks and University of Brighton) Planning Brief (amended version with changes tracked, as appendix 3 above)

### **Background Documents**

1. Brighton & Hove Local Plan 1995
2. Preston Barracks Supplementary Planning Guidance (SPGBH 14)
3. Local Development Framework Core Strategy (Proposed Submission 2010)
4. Local Sustainable Transport Fund Bid – Lewes Road Corridor 2011-2014



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

<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<b>Overall approach of masterplan</b>		
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 Moulsecomb and Bevendean areas, thereby giving people from all walks of life the opportunity of a home.	Simon Kirby MP	
Support for: 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: 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	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

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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 to 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>

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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>

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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>

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<p><b>Other policy documents</b></p> <p>Brief should not attempt to reconcile proposals in outdated B&amp;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.</p>	<p>Regency Society of Brighton &amp; Hove</p>	<p>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>
<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>	<p>Brighton &amp; Hove Friends of the Earth</p>	<p>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.</p>

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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>		
<p><b>Development principles</b></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 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 &amp; 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>
<p><b>Floorspace quantum</b></p> <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 &amp; 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>



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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><b>Employment floorspace:</b> 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 &amp; 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>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<p><b>Urban design</b></p> <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 &amp; 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>

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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 &amp; 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 Mannoek 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 Cockcroft 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>

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<p>Restricting the total height of buildings to that of Cockroft would ensure a cohesive overall development</p>		
<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. Also, hope that existing road be widened, as with double the amount of families parking in the street would be a nightmare. Hope these comments help and that plans will be made with consideration of existing residents.</p>	<p>Kurt Cutajar</p>	<p>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>
<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. With this kind of building the site would become a complete eyesore rather than an attractive gateway</p>	<p>ID 15 - Received via consultation portal (respondent did not register name)</p>	<p>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.</p>

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Topic	Respondent name	Proposed council response
from the East.		
<b>Crossing the Lewes Road</b>		
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.
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 either 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	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

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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 &amp; 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>

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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>		
<p><b>Land Uses</b></p>		
<p><b>Student accommodation:</b> New student accommodation could help relieve pressure elsewhere in city. For same reason, question merits of mixing with family accommodation.</p>	<p>Regency Society of Brighton &amp; Hove</p>	<p>Section 9.5 of the brief states the necessity for student housing to be located apart from other forms of residential.</p>
<p><b>Student accommodation:</b> Support as much student accommodation as possible.</p>	<p>Ann Mead</p>	<p>Noted</p>

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Topic	Respondent name	Proposed council response
<p><b>Student accommodation:</b> 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>	Susannah Hagan	Noted
<p><b>Student accommodation:</b> 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>	Gregg Virostek	Noted. Welcome support.
<p><b>Student accommodation:</b> 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>	Simon Kirby MP	Noted.
<p><b>Student accommodation:</b> 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>	Brighton & Hove Friends of the Earth	Noted. Welcome support.
<p><b>Student accommodation:</b> 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>	ID 4 - Received via consultation portal (respondent did not register name)	Noted. Welcome support.



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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><b>Student accommodation:</b> 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 area 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>

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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>Susannah Hagan</p>	<p>can be discussed and resolved in greater detail.</p>
<p><b>Housing:</b> 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>

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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 social 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><b>Retail:</b> 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 &amp; 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 "Retail warehouses or food-based superstores and are not considered appropriate elements of any development proposals"</p>
<p><b>Housing:</b> 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>

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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"> <li>▪ showcase sustainable building with innovative architecture</li> <li>▪ tenant involvement in the design</li> <li>▪ a new self-governing co-operative preferably on a single site</li> <li>▪ communal areas and workspace</li> <li>▪ a mixture of family housing, smaller flats and shared housing</li> <li>▪ wheelchair accessible flats</li> <li>▪ accommodation available to people on the council housing list</li> </ul> <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>		

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<p><b>Community use</b></p> <p>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><b>Development principles</b></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 &amp; 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>

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<p>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>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.</p>
<p><b>Development Scenarios</b></p>		
<p>Halls of residence inappropriate on Mithras House – not sufficient space and position on main road would provide poor quality environment for students</p>	<p>Alan Cowen, Head of Health and Safety Dept, University of Brighton</p>	<p>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.</p>
<p>Showing buildings as circles in outline plans is too vague. Sense of overdevelopment on university sites.</p>	<p>Alan Cowen, Head of Health and Safety Dept, University of Brighton</p>	<p>See above.</p>
<p>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.</p>	<p>Regency Society of Brighton &amp; Hove</p>	<p>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</p>

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<p>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.</p>	<p>Wendy Worrall</p>	<p>considered and agreed at the masterplanning stage. See above.</p>
<p>The spatial consequences of building in phases is not illustrated in any of the 'scenarios'.</p>	<p>Susannah Hagan</p>	<p>See above.</p>
<p>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.</p>	<p>Susannah Hagan</p>	<p>See above.</p>
<p>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</p>	<p>Susannah Hagan</p>	<p>See above.</p>

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<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>Brighton &amp; 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>
<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>		



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<p>Support Scenario A as it has the aim of retaining the historic existing buildings and integrating the Mannock 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>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<p><b>Transport</b></p> <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 &amp; 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>

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<p><b>Parking</b></p> <p>Replacing surface parking with covered parking presents security problems.</p>	<p>Alan Cowen, Head of Health and Safety Dept, University of Brighton</p>	<p>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.</p>
<p>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.</p>	<p>Susannah Hagan</p>	<p>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>
<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>	<p>Brighton &amp; Hove Friends of the Earth</p>	<p>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</p>

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<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. 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>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<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>

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<p>The growing University of Brighton at Moulsecocomb 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>

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<p>provision for car parking needs to be drastically reduced in order to keep traffic levels manageable.</p>		
<p><b>Existing buildings</b>  <b>Mithras House</b> should be replaced with more suitable building fit for purpose</p>	<p>Alan Cowen, Head of Health and Safety Dept, University of Brighton</p>	<p>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 does not therefore seek or cover this development option.</p>
<p><b>Mithras House</b> 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).</p>	<p>ID 13 - Received via consultation portal (respondent did not register name)</p>	<p>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.</p>
<p><b>Mithras House</b> 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.</p>	<p>ID 12 - Received via consultation portal (respondent did not register name)</p>	<p>Noted. See response above.</p>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<p><b>Moulsecoomb Station:</b> 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 &amp; 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><b>Barracks buildings:</b> 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>



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<p><b>Barracks buildings:</b> The "Crimean War" building is not listed, but the brief says that this and the Mannoek 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 reprove 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>	<p>Defence Infrastructure Organisation (Ministry of Defence)</p>	<p>The "Crimean 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> <p>See above.</p>
<p><b>Barracks buildings:</b> 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>	<p>Phyllis McDonald</p>	<p>Noted.</p>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<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><b>Barracks buildings:</b> 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><b>Barracks buildings:</b> 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>

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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><b>Barracks buildings:</b> 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><b>Barracks buildings:</b></p>	IDs 2, 6, 9, 18, 19 20 -	Noted, but see response above.

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<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>	

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<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><b>Barracks buildings:</b>                      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>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<p>the exterior. We will create new jobs, opportunities &amp; business for Brighton that we are currently losing to London. We will submit a full proposal if there is further interest from the Council.</p>		
<p><b>Trees and vegetation</b> Vegetable growing areas not sustainable – better targeted at purpose-built allotments</p>	<p>Alan Cowen, Head of Health and Safety Dept, University of Brighton</p>	<p>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).</p>
<p>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.</p>	<p>Wendy Worrall</p>	<p>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</p>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<p><b>SNCI</b> 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>the sites.. Any decisions around existing trees and flora will need to be considered within this wider context.</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>

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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>		



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<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><b>SNCI</b> 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>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<p>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.</p>		
<p><b>Healthy living</b> 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.</p>	<p>Alan Cowen, Head of Health and Safety Dept, University of Brighton</p>	<p>Noted. The brief seeks a Health Impact Assessment (HIA) as part of any major planning application for the development area.</p>
<p><b>Sustainable development (general)</b> Laudable. Is the council prepared to enforce environmental measures when developers complain of more investment up front to implement them?</p>	<p>Susannah Hagan</p>	<p>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.</p>
<p>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</p>	<p>Brighton &amp; Hove Friends of the Earth</p>	<p>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</p>

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<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 &amp; 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 &amp; 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>

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<p>such development must do all it can to ensure this does not increase, and indeed should contribute to its reduction.</p>		
<p><b>Recreation, play space and sports provision</b> Suggest inclusion of skateboard area or similar</p>	<p>Wendy Worrall</p>	<p>Noted – further details of play areas will be considered at the masterplanning stage. Welcome support.</p>
<p>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.”</p>	<p>Sport England</p>	
<p><b>Infrastructure</b> <b>Water and wastewater disposal:</b> 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.</p>	<p>Southern Water</p>	<p>Noted. References will be added as requested.</p>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<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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Topic	Respondent name	Proposed council response
<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> <p><b>Other issues</b> 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>	<p>Brighton Society</p>	<p>As a significant landowner in the city the council as local planning authority often makes planning decisions on council-owned sites.</p>

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<b>Topic</b>	<b>Respondent name</b>	<b>Proposed council response</b>
<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&amp;H</p>	<p>ID 3 - Received via consultation portal (respondent did not register name)</p>	



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<b>Issue</b>	<b>Proposed Response/Action</b>
<p>Increase emphasis on <b>carbon reduction</b> and making development an exemplar of sustainability and <b>zero carbon</b> development (B&amp;H Friends of the Earth; City Sustainability Partnership Working Group)</p>	<p>Text will be added to brief to reflect emerging planning policy approach of seeking zero carbon development.  <b>Add new text to brief</b></p>
<p>Add references to other <b>sustainability</b> projects and documents – e.g. bid for Biosphere Reserve, Sustainable Communities Strategy (B&amp;H FoE)</p>	<p>Text will be added as requested.  <b>Add new text to brief</b></p>
<p>Drop references to outdated policy guidance and objectives (Local Plan, Tall Buildings SPG, Preston Barracks SPG) Continued requirement for <b>18,600 sq m of employment floorspace</b> will discourage development. (B&amp;H Regency Society)</p>	<p>Local Plan and Tall Buildings SPG remain relevant, as does objective of seeking 18,600 sq m of employment floorspace as an ideal objective, although brief provides for a more flexible approach in light of other material considerations. It would be appropriate to drop the Preston Barracks SPG once the planning brief has been adopted.  <b>No change to brief</b></p>
<p>Concern that site has <b>inadequate capacity</b> to accommodate volume of development proposed whilst remaining 'human' in scale. (B&amp;H Reg Soc)</p>	<p>The quantum of development proposed would result in a medium density development that would be appropriate given the site's inner city (but not central) location and the scarcity of land availability in the city.  <b>No change to brief</b></p>
<p>Don't want an iconic statement, want <b>legibility and connectivity</b>.</p>	<p>Agreed – the brief does not seek an iconic development. Legibility and connectivity are essential elements of the</p>

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Issue	Proposed Response/Action
(B&H Reg Soc)	<p>brief.</p> <p><b>No change to brief</b></p>
Encourage <b>open competitions</b> to ensure high quality of urban design and architecture (S Hagan)	<p>Noted. The brief requires a high quality of design. The method by which designers are appointed will, however, be a matter for the development partners.</p> <p><b>No change to brief</b></p>
Oppose tower blocks (A Mead). <b>Tall building</b> on central square would be out of scale with retained <b>Mannock Building</b> (Brighton Society)	<p>Noted – if one or more larger blocks of around 18 storeys are included in proposals (as suggested in brief) these would need to meet the justification and tests set out in the Tall Buildings SPG, as explained in the brief. Issue re scale in relation to Mannock Building will depend on whether this (and Crimea War Building) are retained in future development plans.</p> <p><b>No change to brief</b></p>
Need to protect existing amenities of <b>Saunders Park View</b> residents (light and on street parking) (K Cutajar)	<p><b>No change to brief</b></p> <p>Agreed, although the parking issue will require more attention at the masterplanning stage.</p> <p><b>Add new text to brief</b></p>
General or conditional support for <b>pedestrian bridge</b> , but	<p>The nature of any bridge will need to be further assessed at</p>

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<p>reservations or opposition to an enclosed structure/building (A Cowen, B&amp;H Reg Soc, A Mead, S Hagen) or reservations re any type of bridge and that solution should be found 'at grade' (B'ton Soc)</p>	<p>the masterplanning stage, in order to take on board the issues that are already highlighted in the draft brief, along with the concerns of respondents.</p> <p><b>No change to brief</b></p>
<p>General support for improved at grade <b>crossing facility</b> on Lewes Road, although some reservations - either that a High Street Kensington-style example may be unachievable (S Hagen) or that a more strategic approach to traffic management in the area would be necessary. (B&amp;H FoE, B'ton Soc, B&amp;H Reg Soc)</p>	<p>It is recognised that traffic management will need to extend to a wider area than that covered by the brief, if a successful at grade solution can be found that is truly pedestrian friendly, without creating dangerous conditions (on the one hand) or gridlock (on the other).</p> <p><b>No change to brief</b></p>
<p>General support for new <b>student accommodation</b>, with some observing that this could free-up family housing elsewhere in city and some emphasising need for this to be carefully considered in terms of impacts on other residents (existing and proposed). (B&amp;H Reg Soc, A Mead, S Hagen, S Kirby MP, B&amp;H FoE)</p>	<p>Noted.</p> <p><b>No change to brief</b></p>
<p>Would welcome opportunity to work as development partner and provide <b>co-operative housing</b> in Mannock Building - Housing Co-ops have access to new government funding. (Starlings Housing Co-op)</p>	<p>Noted – this will be a decision of the development partners.</p> <p><b>No change to brief</b></p>
<p><b>Car parking</b> should be reduced to improve sustainability of</p>	<p>The brief attempts to strike a balance between</p>

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<b>Issue</b>	<b>Proposed Response/Action</b>
<p>schemes (B&amp;H FoE) or should be retained or increased to allow for operational needs of university and/or protect or improve the parking situation of existing residents in the surrounding residential area.</p>	<p>sustainability and economic viability. However, the car parking figures are recommended to deletion and more emphasis being placed on the need to reduce car dependency and achieve sustainable transport solutions, including a reference to the recently successful Sustainable Transport Fund Bid to provide a series of improvements along the Lewes Road corridor.</p>
<p>Various comments concerning <b>development scenarios</b> – some positive, some negative, some scenarios preferred over others. (S Hagen, B&amp;H FoE, B'ton Soc, A Cowen, B&amp;H Reg Soc, W Worrall, I&amp;J Dennie)</p>	<p><b>Add new text to brief</b> Noted – the brief highlights that the scenarios are for illustrative purposes to explain possibilities and that none are definitive.</p>
<p>Wider <b>transport issues</b> haven't been addressed (e.g. existing problems with Vogue Gytratory), support for cycling (B&amp;H FoE, B'ton Soc). Park and Ride will be necessary (S Hagen), too much parking (FoE), covered <b>parking</b> presents security risks (A Cowen).</p>	<p><b>No change to brief</b> Traffic Impact Assessments and solutions will need to accompany any planning applications – it is entirely possible that these will need to look beyond the boundary of the development area. Covered parking will be necessary in order to meet the development potential of the area – security of these facilities will be an operational issue that can be factored in at the design stage.</p>
<p>Replace <b>Mithras House</b> (A Cowen), don't add floor to Mithras, in order to protect amenities on Dewe Road residents; retain existing <b>historic barracks buildings</b> (P</p>	<p><b>Add new text to brief</b> University has no plans at present to replace Mithras House, although the brief does not actively seek to retain it and it remains a theoretical possibility for the future should the</p>

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<b>Issue</b>	<b>Proposed Response/Action</b>
<p>McDonald, B'ton Soc, and unidentified others), don't retain existing historic barracks buildings (Defence Infrastructure organisation, S Hagen)</p>	<p>university choose to follow this option. Brief needs to be changes to refer to need to protect amenities of Dewe Road in connection with any potential future change to Mithras House. Brief requires existing historic barracks buildings to be considered for reuse, although viability and maximising potential of site are other factors that require consideration. Masterplanning and viability studies will need to resolve this issue.</p>
<p>Preserve existing <b>trees and flora</b> on barracks site (W Worrall), protect and enhance ecological qualities of Watts Bank SNCI, and take care with siting of new development (Natural England)</p>	<p><b>Add new text to brief</b> Existing trees and flora may be retained where appropriate and this does not compromise development. New development will require a high standard of landscaping and tree planning, in accordance with planning policy. Particular care will need to be taken to maximise potential end environmental and ecological aspects relating to SNCI.</p>
<p>Support <b>play areas</b> (Sport England), should include skateboard area (W Worrall)</p>	<p><b>Add new text to brief</b> Noted. Details relating to play areas will be dependent on the communities served – these issues will require more detailed consideration at masterplanning stage.</p>
<p><b>Sustainable drainage system</b> may be appropriate but would first require thorough investigation to avoid risk of</p>	<p><b>Add new text to brief</b> Noted – additional information re drainage and water will be inserted in accordance with request.</p>

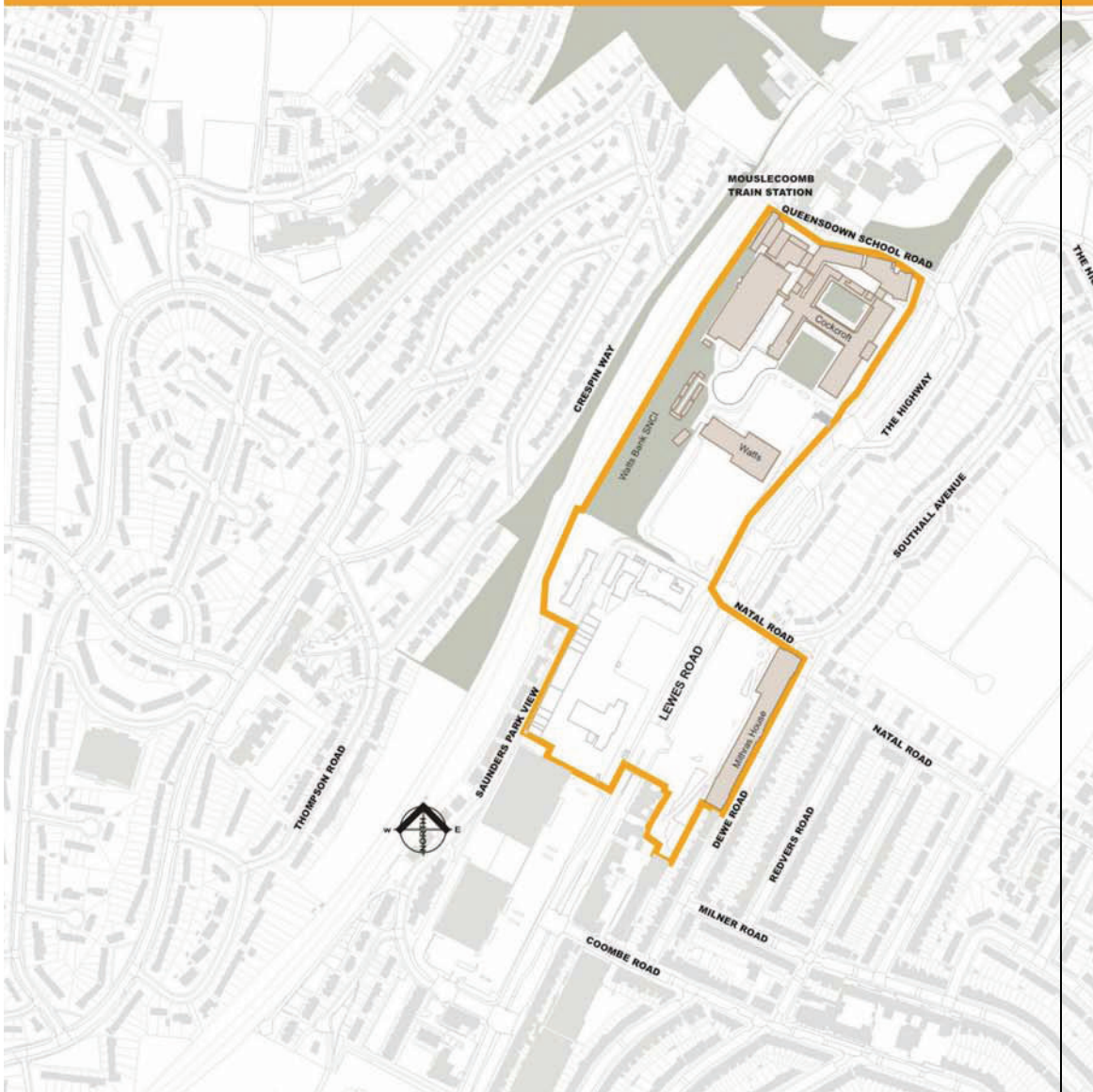
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**Lewes Road (Preston Barracks and University of Brighton) Draft Planning Brief – Summary of key representations received and resulting actions**

<b>Issue</b>	<b>Proposed Response/Action</b>
<p>contamination to <b>aquifer</b>; brief should highlight Ofwat's view that developer will need to finance provide new <b>sewerage</b> infrastructure; request that new paragraphs are inserted into document to inform developer's of water and drainage issues and their requirements (Southern Water).</p> <p>Brief should explain how conflict of issue will be resolved between council's role as <b>local planning authority</b> and as <b>landowner</b> of barracks site, where it will be seeking to maximise profits (B'ton Soc)</p>	<p><b>Add new text to brief</b></p>
	<p>The council has a statutory duty to ensure its planning decisions are impartial. Its constitution ensures transparency of decision making.</p> <p><b>No change to brief</b></p>

# Draft Planning Brief

## Lewes Road (Preston Barracks and University of Brighton)



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## Lewes Road (Preston Barracks and University of Brighton)



Location of the Planning Brief area within Brighton &amp; Hove



Preston Calvary Barracks around 1850



Toll gate outside Preston Barracks 1857

## I. Introduction

This planning brief has been prepared by Brighton & Hove City Council, in partnership with the University of Brighton, in order to guide the future development of the former Preston Barracks site, along with land on the university's adjacent Watts Building site and the nearby Mithras House site. Before forming a partnership with the university, the council had previously been focussing on Preston Barracks as a stand-alone project and seeking the development of the site for a mixture of employment floorspace, housing and shops – albeit with an emphasis on employment.

As a large brownfield site, Preston Barracks is of significant importance to Brighton & Hove. With precious few such sites available in the city, it offers a rare opportunity to deliver a genuine mixed-use development capable of generating substantial employment and inward investment opportunities. It was the strength of this case, together with the risks posed by potentially unacceptable development, which led to the city council's decision, supported and funded by SEEDA, to take up the opportunity to purchase the site from the Ministry of Defence.

The University of Brighton has been an important stakeholder throughout the process to date; an involvement that predates site acquisition. The University is an adjacent land owner, with a keen interest in the site and its successful development, but more importantly is a leading education establishment that makes a direct and substantial contribution to the city's growth and prosperity.

The council and the university are therefore pleased to be working as partners on this planning brief, which seeks to realise a shared vision for the site:

*"Working in partnership with the University and unifying Preston Barracks with the adjacent university property on both sides of the Lewes Road (which in essence doubles the area for development) has the potential to secure wider objectives of the emerging LDF; most notably supporting the need to provide appropriate accommodation for students and strengthening the links between the universities, business and local communities through sharing facilities and developing local opportunities for training and learning."*

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## Lewes Road (Preston Barracks and University of Brighton)

Each of the key planning documents reflects the important relationship between Preston Barracks and the University campus; an importance which stems from not just their geographical proximity, but the potential to build strong academic links, with support to local businesses, and the creation of an innovation centre, encouraging embryonic enterprise.

The University's aspirations for the renewal and development of its Moulsecoomb campus, through the improvement of the facilities and the setting in which they are provided, sits well with both the vision for Preston Barracks, as well as the wider strategies for Lewes Road and the Academic Corridor. A joint approach to the development of a wider site offers the prospect of a better integrated development capable of satisfying all parties.

”

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## 2. Reason for preparing brief

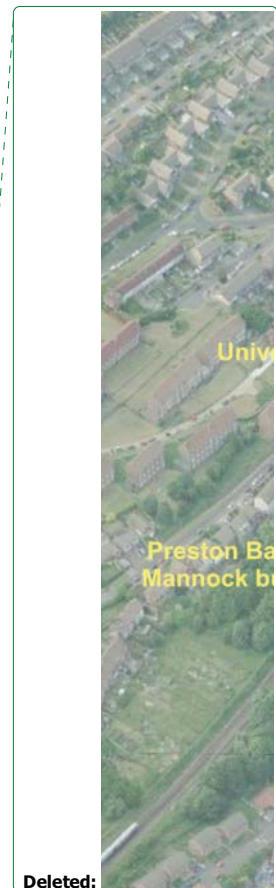
Following the preparation of Supplementary Planning Guidance (SPGBH 14, adopted in 2003) and an extensive [development](#) competition, the council worked in partnership with a preferred development consortium in seeking an acceptable development proposal on the Barracks site. Despite the considerable efforts of the preferred developer and the examination of numerous scheme options aimed at assembling an acceptable and financially viable scheme, the city council concluded in March 2009 that it was unable to support the developer's final scheme proposals. At a council cabinet meeting on 12 March 2009, it was agreed that preferred developer status should be withdrawn and that it was now appropriate for the council to explore alternative delivery arrangements with interested parties.

The university and the council decided that a new partnership between the two organisations, that cast a wider net to include the university's landholdings in the area, had the potential to meet both organisations' needs, while creating a unique sense of place where higher education, employment floorspace, student housing, residential and commercial uses could combine to create an exciting land use mix that would benefit the local area as well as the city as a whole.

Following a study to determine the physical capacity of the three sites to accommodate development, the council and the university have worked in partnership to produce this planning brief.



Location plan of the [development area](#)



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 Planning Brief

### 3. Status of this planning brief

This planning brief has been prepared in order to provide a means of interpreting national planning policy guidance and adopted and emerging planning policy in respect of the Preston Barracks site as set out in the Local Plan and the Supplementary Planning Guidance Note (see below) within the changed context of considering its development as part of a wider development package that includes the university's sites occupied by the Watts and Cockcroft Buildings and Mithras House. Planning briefs can be prepared rapidly in response to development pressures and changes in situation, although they do not necessarily have the same status as adopted planning policies and related documents. Nevertheless, the fact that this planning brief will be the subject of widespread community and stakeholder consultation should afford it status as a valid material consideration in the planning process. It takes due account of national planning guidance and adopted development plan policies and applies them to the development aspirations of the council and the university with regard to the Preston Barracks, Watts/Cockcroft and Mithras House sites.

### 4. Planning policy context

The brief has been prepared within the following planning policy context:

#### 4.1 National context

National planning guidance notes and planning policy statements are prepared by the government after public consultation, to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. The following national planning policy [guidance notes and statements](#) are particularly relevant in the preparation of this brief:

- Planning Policy Statement 1: Delivering Sustainable Development
- Planning Policy Statement 3: Housing
- Planning Policy Statement 4: Planning for Sustainable Economic Growth
- [Planning Policy Guidance Note 13: Transport](#)
- [Draft Planning Policy Statement: Planning for a Natural and Healthy Environment](#)

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## 4.2 Local context

The Brighton & Hove Local Plan (2005) is the adopted local development plan for the city and covers the area of this brief. The following policies are particularly relevant in informing this brief:

- EM 2 - Sites identified for high-tech and office uses (1.8 ha of the Preston Barracks site)
- EM 9 – Mixed uses and key mixed use sites (18,600 sq m of Preston Barracks site)
- EM 17 – Preston Barracks
- EM 18 – University of Brighton

The council has produced the following supplementary planning guidance notes that are also particularly relevant in informing this brief:

- SPGBH 14 – Preston Barracks. This document is discussed in further detail below.
- SPGBH 15 – Tall Buildings. This document provides the criteria for the consideration of tall building proposals and identifies the area covered by this brief as the centre of a 'corridor' where potential may exist for tall buildings, subject to meeting the criteria in the SPG.

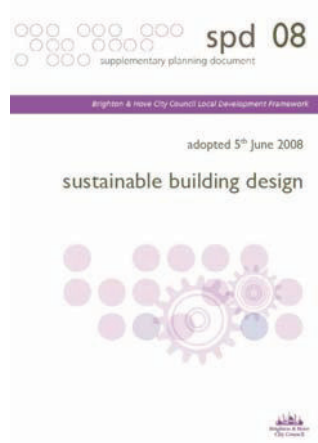
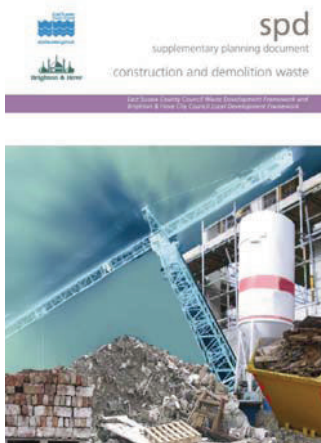
The council's emerging development plan for the city, intended to replace the Brighton & Hove Local Plan, is the Local Development framework (LDF). The development area covered in this planning brief forms part of the wider "Lewes Road Area", subject of policy DA3 in the emerging Core Strategy. The strategy for the wider development area is to further develop and enhance the role of Lewes Road as the city's academic corridor by supporting proposals which:

- improve secondary, further and higher education provision in the Lewes Road area;
- facilitate improved appropriate transport infrastructure that provide choice including travel by bus, walking and cycling;
- secure improvements to the townscape and public realm;
- improve air quality in the Lewes Road area; and
- deliver the amounts of development as set out in the policy.

An important element of [the wider](#) Lewes Road Area is a strategic allocation for 445 units of residential accommodation, as well as 24,800 sq metres of employment and education floorspace. The above residential requirement in particular was not envisaged in the adopted local plan or SPG. The area covered in this planning brief would be expected to provide a significant proportion of the above strategic allocation.

Additional local planning policy guidance that is particularly relevant to any development in the area covered by this brief is provided in the following Supplementary Planning Documents:

- SPD 03 – Construction and Demolition Waste
- SPD 08 – Sustainable Building Design
- SPD 11 – Nature Conservation and Development



## 5. Status of Preston Barracks Supplementary Planning Guidance (SPGBH 14)

The Preston Barracks SPG (adopted by the council in 2003) remains a material consideration in respect of development proposals, although its objectives are focussed on the Preston Barracks site alone. This planning brief provides a wider context by which the overall objectives to secure employment opportunities and benefit the city's economy of the SPG can be realised by considering the site's future development within the wider development context that includes the university's Watts/Cockroft Buildings and Mithras House sites. There are a number of reasons why the SPG alone no longer provides the most effective and relevant planning policy context for the consideration of development proposals. The changed circumstances that justify and have informed the preparation of this planning brief are explained below.

## 6. Material changes since Local Plan and SPG adopted

The context for local planning authorities making planning decisions is set out in Section 38(6) of the Planning & Compulsory Purchase Act 2004 which explains that planning applications should be determined in accordance with the development plan unless 'material considerations' indicate otherwise. There are a number of material considerations that have arisen since the Local Plan was adopted in 2005 and the SPG was adopted in 2003, which have informed the contents and this planning brief. These are as follows:

### 6.1. London Road & Lewes Road Regeneration Strategy (LR2)

In 2007 the council approved the London Road & Lewes Road Regeneration Strategy (known as LR2) as a background paper to the emerging Local Development Framework Core strategy. The LR2 strategy includes the following overall vision in respect of the area it covers:

*"To provide strong and attractive gateways to the city and create distinctive quarters which strengthen and enhance the overall character of the city"*



The LR2 vision for Lewes Road itself is to create:

*“a neighbourhood of knowledge and enterprise within the academic corridor, focussed around the university”.*

The key LR2 proposals within the development area that is covered by this planning brief are:

- relocating Moulsecoomb Station to the southern end of the Moulsecoomb Campus of the University of Brighton to improve its accessibility and place it at the heart of the growth hub;
- developing the knowledge economy by encouraging entrepreneurship of graduates through business start up support;
- creating a vibrant balanced residential neighbourhood in this accessible location to bring life to the streets and assist viability of local shops and services.

## 6.2. Local Development Framework Core Strategy

The emerging Core Strategy and policy DA3 is discussed in 4.2 above. Further work is being undertaken on Core Strategy strategic allocations and the status and future of the document is uncertain following recent changes in government planning policy and the emerging localism agenda. Nevertheless, the document does represent the council's most recent statement of planning policy intention, derived following a number of statutory consultation exercises, and is therefore a material consideration in the planning process. It should also be noted that the Core Strategy has been formulated within the context of more recent government planning policy guidance than the adopted Local Plan and therefore represents a more up to date distillation of planning policy. These factors are reflected in this planning brief.

## 6.3. Financial viability

As explained earlier, over a number of years in the last decade the council's then preferred developer was unable to provide a financially viable development proposal that would meet the requirements of the local plan or the SPG in respect of the Preston Barracks site. Consequently, the council decided to consider afresh how its economic development-led aspirations for Preston Barracks might be realised.

## 6.4. New partnership opportunities

An opportunity to realise the broad aspirations for Preston Barracks has presented itself through the more recent shared vision of the council in partnership with the University of Brighton and in looking to realise a wider mixed use development beyond the boundaries of the Preston Barracks site alone. A study was jointly commissioned by the council and the university in order to determine the physical capacity of the combined sites to accommodate development, based on the emerging aspirations of the partners. The site capacity study demonstrated that a high

density development could accommodate significantly more development than the minimum requirements. One of the purposes of this planning brief is to establish a level and density of development that is appropriate within the context of the sites and the wider area and to set out guidelines for land use mix, building heights, massing, density, and phasing.

### 6.5. Economic factors

Since 2008 there has been a significant downturn in the national economy and this has had a direct and profound negative effect on the development industry and the viability of many development projects. Even before the downturn, when the economy was considered buoyant, employment floorspace (land use category B1) developments were proving to be extremely difficult to realise in the city, as evidenced by the lack of success in securing an employment-led development on the Preston Barracks site. The university's intention to provide a new academic building housing a business school provides the opportunity for the economic development considerations that lie at the heart of Preston Barracks planning policies to be considered in a wider and more flexible context.

In the light of the above factors, this planning brief takes a more flexible approach in meeting the employment-led objectives for the Preston Barracks site, although it should be emphasised that achievement of the original objectives, whilst capable of refinement, must remain an integral consideration, given that the emphasis on employment generation was a critical factor in justifying the original investment from Brighton and Hove's SRB Programme to promote the regeneration objectives of the council, the local Regeneration Partnership and SEEDA.

### 6.6. Sustainability factors

As members of the local strategic partnership for the city, both the council and the university are seeking to play their part in achieving the objectives of the LSP's Sustainable Community Strategy, which includes targets on reducing the city's ecological footprint and its carbon emissions. This commitment is reflected in the local bid to achieve Biosphere Reserve status (a UNESCO designation) within the city and beyond, including linkage into the South Downs National Park. The preparation of this planning brief provides the opportunity to reflect these more ambitious sustainability objectives, through seeking a zero carbon development within the area that it covers.

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### 6.7. Wider Development Opportunities – A Shared Vision

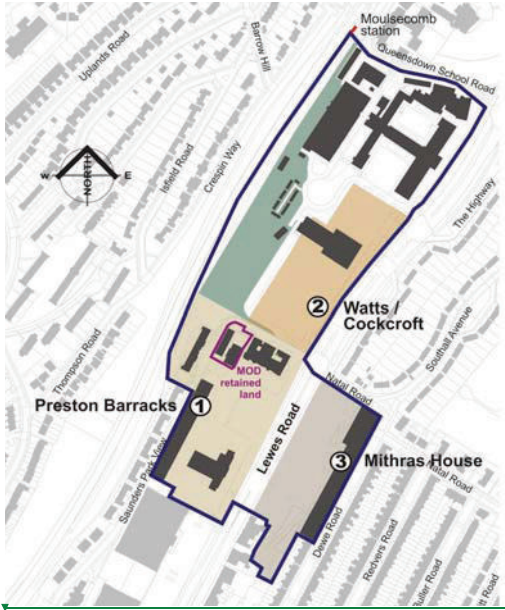
Working in partnership with the university and unifying Preston Barracks with the adjacent university property on both sides of the Lewes Road (which in essence doubles the area for development) has the potential to secure wider objectives of the emerging LDF: most notably supporting the need to provide appropriate accommodation for students and strengthening the links between the city's two universities, business and local communities through sharing facilities and developing local opportunities for training and learning.

The development partners have had two clear options to consider in the development of these sites. The first of these options was to consider accommodating university-related development wholly or largely on the university's landholdings, with employment, residential and other development being focussed on the Preston Barracks site. From a logistical perspective, this approach would be easier to achieve and would not necessitate the need for a partnership. The alternative approach that the council and university have chosen to adopt is to work together to provide a far more mixed development across the three sites that integrate the university into the wider community, to provide a strong and identifiable city quarter for the benefit of all. This will better help to achieve the strategic and land use objectives of the LDF Core Strategy.



Achieving this is integral to the shared vision of the development partners and is the basis for this planning brief.

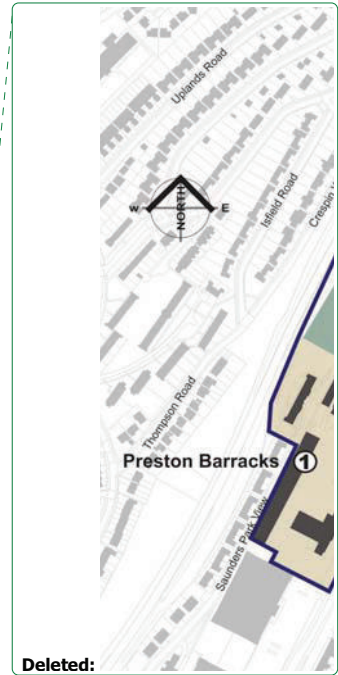
7. Development area description



Planning Brief boundary

The development area is situated approximately a mile and a half to the north east of the city centre. It lies in a dry flat-bottomed valley, beside the south coast railway line and the main A270 (Lewes Road) which is the direct route to the city centre from the north east and links the site to the A27 trunk route. The A27 forms the major east west route along the Sussex coast and links to the A23/M23 to London and Gatwick Airport. Moulsecomb Station, on the main east west coastal railway, is within walking distance of all parts of the overall development area covered by this planning brief.

The development area covered by this brief comprises three distinct landholdings lying either side of the Lewes Road. These sites are shown on the above plan and are described below.



7.1. Development site 1: Preston Barracks

The former Preston Barracks site (shown above) is north east of and adjacent to the Pavilion Retail Park and south east of Saunders Park View, a single aspect residential road which is set up on the valley side, above and overlooking the main part of the Preston Barracks site. Lewes Road forms the south eastern boundary of the site. This site is the same as that covered by SPGBH 14, as referred to earlier in this brief. To the north east of the site is the university's Moulsecomb campus. It should be noted that the 0.2 ha 'MOD Area' that includes the white 'Crimean War' building (a structure that apparently dates back to the late eighteenth century, before the Crimean War) continues to be MoD ownership and used by the Territorial Army for operational purposes. This land will not be released unless an alternative location and facilities can be provided elsewhere to the MoD's satisfaction.

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### 7.2. Development site 2: Watts / Cockcroft

Known as the Moulsecoomb campus of the University of Brighton, this site (partly shown above) comprises a series of academic buildings dating back to the 1960s (Watts and Cockcroft Buildings) but also incorporating more modern buildings dating from the 1990s and 2000s. The Faculties of Arts and Science and Engineering (Schools of Arts & Media and Computing, Engineering & Mathematics) are based in the Watts Building and Science and Engineering is housed in the Cockcroft Building. The site includes significant areas of surface car parking. Much of the western portion of the site comprises the Watts Bank, a sloping area of natural habitat that is identified in the Local Plan as a Site of Nature Conservation Importance (SNCI, policy NC4) as well as part of an urban 'greenway' (policy QD19).

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### 7.3. Development site 3: Mithras House

This site (shown above) lies on the opposite side of the road to the Watts and Cockcroft Buildings and Preston Barracks sites. It is home to the university's Brighton Business School, as well as the Faculty of Arts (School of Architecture & Design) and the university's main administrative functions. Mithras House is a former industrial building dating from 1939 and is set back from and above the Lewes Road, behind areas of tiered car parking.

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## 8. Development principles

Development proposals should be guided by the following principles:

### General

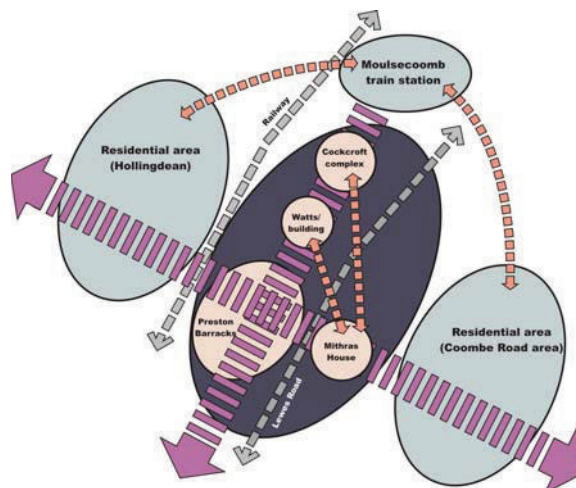
- Development should aim to be zero carbon<sup>1</sup> or, where that cannot be achieved, carbon neutral<sup>2</sup>, in order to act as an exemplar for sustainable development within and beyond Brighton & Hove and assist with the city's bid to achieve UNESCO Urban Biosphere Reserve status.
- Development sites should be integrated in a legible and accessible neighbourhood to form a true sense of place that straddles and connects the two sides of the Lewes Road.
- Buildings should be of a high quality design and combine to form a coherent development cluster that provides a visually attractive north eastern gateway into the city.
- Development should be phased to provide a viable and successful community at each stage of completion, with each subsequent phase enhancing and contributing to the overall development.
- Development proposals should aim to provide for the overall floorspace levels set out in this brief.
- Suitable facilities to decant car parking should be provided at each development phase, in order to ensure no net loss of car parking for the university.
- The local topography and changes in levels should be utilised creatively, to create an accessible and visually attractive environment.
- The existing Ministry of Defence facilities will need to be accommodated either on or off site to the satisfaction of the MoD.
- Development should provide for a sustainable community, including public transport improvements and employment and training opportunities for the local community.
- Development should integrate urban greening and nature conservation enhancement

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<sup>1</sup> Zero carbon development is development that has a very high standard of energy efficiency and uses low and/or zero carbon technologies so that once the building is in operation, it emits no net annual carbon dioxide (CO<sub>2</sub>) emissions from space and water heating, lighting and use of appliances.

<sup>2</sup> Carbon neutral development refers to the provision of off site payments (where zero carbon is not achieved on site). Further planning advice on this is included in the council's Sustainable Building Design Supplementary Document (SPD 08).

## Land use mix

- Land uses should be mixed to ensure that the less financially-attractive development components (such as employment floorspace) are combined with the more commercially-attractive elements (such as retail).
- Proposals should prioritise the delivery of development that assists in meeting the economic and educational needs of the city.
- New housing should be integrated with existing housing wherever possible, to create sustainable neighbourhoods.
- Student housing should be located apart from other forms of residential, to ensure that it is properly integrated into the overall scheme.

## Place making

- A distinctive mixed use neighbourhood should be created, that integrates and connects with the wider area, in particular the residential areas of [Saunders Park View](#), Hollingdean on the west side of the valley and the Coombe Road area on the east side of the valley, Moulsecoomb station and existing neighbourhoods to the south and north.
- The frontage of the Lewes Road should be strengthened through the introduction of buildings that provide active frontages and which house business and retail uses.
- Development proposals 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 to attract and encourage visitors/users to spend time in and enjoy the area.
- A legible environment should be provided throughout and beyond the development area, through the application of careful urban design to create a range of distinct destinations linked by easily navigable routes, active frontages and high quality hard and soft landscaping.
- The easy, safe and convenient passage of pedestrian movements across the Lewes Road should be provided, to link the Preston Barracks and Mithras House sites and help achieve an integrated neighbourhood.
- The academic building housing the business school should be located in a prominent position within the development area.
- Opportunities should be maximised to integrate distinctive urban greening techniques such as green roofs, green walls and naturalistic landscaping to achieve an urban realm which promotes human health and a high quality of life.

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## Existing buildings

### *Preston Barracks*

- Both the 'Crimean War'<sup>3</sup> and Mannock buildings are undesignated (but potential) heritage assets, the qualities of which should be fully assessed and their retention considered in development proposals.
- Should the retention of either one or both of these buildings constitute a major physical or financial constraint to realising the development objectives of this brief, maximum advantage should be taken to optimise the potential to create strong routes and linkages through the site and the wider development area covered by the brief.

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<sup>3</sup> The 'Crimean War' building, the adjacent rifle range and associated land around these structures are owned by the Ministry of Defence and in operational use by the Territorial Army. Incorporation of these buildings and this area into any development proposal would be subject to agreement and a land deal with the MoD.

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Lewes Road (Preston Barracks and University of Brighton)



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"Crimean War" Building (MOD facility) and Mannock Building

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## 9. Land use

### 9.1 Amount of floorspace

The amount of development sought by this planning brief is detailed below and has been derived following a detailed capacity study of the development area. It reflects a level and quantum that is considered viable and environmentally appropriate within the context of the site's location and surrounding area. A higher quantum of floorspace may be achievable through increasing the heights of some buildings, subject to normal planning policy considerations, if the overall place-making and sustainability objectives of this brief are met and they deliver increased levels of employment floorspace in line with Local Plan and LDF Core Strategy policies.

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Use requirements (estimated)	Estimated area in sq m
<b>University</b>	
Business School & Conferencing	8,000
Student accommodation (750 bed spaces)	24,007
Facilities provided in Mithras House	8,050
<b>MOD</b>	
<u>Potential</u> MOD reprovision	1,299
<b>Other</b>	
Innovation Centre (B1)	2,735
Other employment (B1)	7,865
Housing (318 units)	27,126
	14,837
<b>Additional uses</b>	
Central square (mixed-use, flexible use)	Area not specified
Student services	Area not specified
Retail, cafes and other commercial	Area not specified
Community services	Area not specified
Leisure	Area not specified
Employment	Area not specified
<u>Car parking</u>	<u>Area not specified</u>

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### 9.2 Employment Floorspace

Based on both adopted and emerging planning policy (the Local Plan and the LDF Core Strategy) the local planning authority would be seeking 18,600 sq m net addition of employment floorspace as part of any development package. It is acknowledged, however, that this has proved to be a significant challenge to the previous preferred developer in terms of viability. Nevertheless, development proposals that are unable to provide this quantum of floorspace across the development area will need to successfully demonstrate why it cannot be provided and provide other employment benefits arising from the proposal. The combined employment total of 10,600 sq m as proposed above should be considered within the context of the need to make a convincing planning case regarding an overall employment package that is acceptable to the local planning authority. Any additional development that might be achievable within the development area, that is not identified, will be expected to pay due regard to the need to

provide for employment needs, in keeping with Local Plan and emerging LDF Core Strategy policy objectives of achieving 18,600 sq m of employment floorspace.

There is known to be demand for high quality, well-located modern office accommodation to meet the needs of larger businesses, from those already in Brighton & Hove and from others looking to relocate in the city. There is also growing demand for modern but affordable business accommodation to meet the needs of local businesses and potential inward investors. The majority of this demand is from the office based sector and focusing around the digital media sector which is growing significantly. An additional dimension which may attract business to this location would be the opportunity to work in close proximity to the knowledge and expertise of the university in arts/culture, digital and environmental sciences, technology and business.

Office developments with a floorplate of around 500 sq metres are considered to be most appropriate, as these have the ability to be sub-divided to meet demands from smaller businesses, as well as meeting the requirements of larger businesses. Demand from outside the city is typically from businesses currently operating in the south east (mainly London area) looking for a more favourable and cost effective working environment.

The responsibility for the design and funding of the innovation centre would rest with either the development partner delivering the balance of the employment space, or an additional party with sole interest in the design, build and operation of the centre. The successful interlinking of spaces with the university would be a vital design consideration. Agreeing and securing the necessary financing mechanisms requires careful thought and planning, including the balance of public, private and other forms of support and the type of spaces and resources that would be provided within the centre. Further consultation with the local business community to establish what type of provision would work for them is also needed to fully determine the role of this facility. It will also be necessary to determine the type of centre that will best meet local needs and not unnecessarily compete with floorspace elsewhere in the city.

Incubator Space - New and growing small businesses require affordable business space and also flexibility of tenure. Short leases / licenses to these businesses are important in order to allow them to develop their business without the burden of long leases. Units of around 50 sq metres – 100 sq metres are required. Hove Technology Centre is a prime example of this type of space, that works well in supporting new and embryonic business growth.

As mentioned above, development proposals that are unable to provide the 18,600 sq m of employment floorspace (as sought by the Local Plan and the emerging LDF Core Strategy) across the development area will need to successfully demonstrate other well argued employment-related benefits to the local planning authority (e.g. the proposed academic building housing the Business School). The inclusion of an innovation centre and/ or flexible managed workspaces suitable for business start-ups would help greatly in providing a package of employment/economic development uses that would be considered favourably by the local planning authority.

### **9.3 Business School**

The university requires a new academic building to house its business school of 8,000 sq metres that articulates and signals a new 21<sup>st</sup> Century vision of business and innovation. Associated with the business school (either within the same building or in a nearby building) would be spaces to stimulate innovation and business creation and where the city, business and the university might interface. The business school is expected to play an important role in the overall urban design of the development area. Its location should be carefully considered so that it contributes successfully to the overall development mix, adding vibrancy and attractiveness to the overall public realm and built form.



### 9.4 Housing

Although the adopted Brighton & Hove Local Plan seeks only 10 units of housing (on a small area of land to the rear of the site) the Strategic Housing Land Availability Assessment that was undertaken to inform the Local Development Framework assumed that the Preston Barracks site would be coming forward with 200 units.

Whilst there is currently no planning policy status for 200 residential units, the city's housing pressures, coupled with the established desire for a mixed use development with a mix of tenures, confirms the need for the scheme to incorporate at least this level of housing. Work on assessing the capacity of the site in conjunction with other land uses proposed in this brief would suggest that 300 units or more is achievable, although the total number is subject to the types and size of units that are proposed.

The need for family housing in the city is particularly important, as is affordable housing - , these should be provided for in any development proposal, with details on the mix of tenure and unit sizes agreed through discussion with the council, in accordance with local planning policies.

There are a number of locations within the development area where housing may be appropriate and contribute positively to the overall development mix, including the Preston Barracks site (where new housing can provide an eastern edge to Saunders Park View) as well as areas within the university's sites.

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Above: Gladstone Row, Brighton. Thirty one town houses and commercial offices.



Right: Varley Halls, University of Brighton. Allotments proposed to supply canteen and potentially students in the future.

Below: One Brighton. Zero carbon, zero waste development composed of 172 residential units.



### 9.5 Student housing

The provision of student residences should have an additional benefit of releasing housing elsewhere, thereby benefitting the overall supply of residential accommodation in the city. The university requires 750 bed spaces of purpose-built student accommodation within the development area, providing a range of internal layouts to cater for the diverse needs of students, including a range of bed sizes, internal facilities and a mix of communal and ensuite bathrooms. New accommodation should be distributed in a number of separate locations across the development area in order to avoid the creation of a 'student ghetto'. It is also important that student housing is located apart from other forms of residential in order to create a complementary balance of activities across the site.

### 9.6 Retail and other commercial uses

Retail and other commercial uses such as offices with retail frontages, cafes, bars and restaurants have the potential to contribute greatly to the making of place as well as serving the needs for the newly created neighbourhood and wider community. Such uses, however, should be ancillary in terms of the overall land use mix and should be phased to assist the realisation of less profitable elements of the overall development proposed, in particular the employment-related uses. The clustering together of ancillary retail and commercial uses is encouraged, where they can form the edges to areas of public realm, including those that provide key linkages between destinations within the development area. Large food-based superstores [and retail warehouses](#) are not considered appropriate elements of any development proposals.

Although retail forms part of the development mix, an overall quantum of retail floorspace has not been specified in the table. The retail components of mixed use proposals will be assessed against relevant planning policies and be expected to be enabling elements in bringing forward employment floorspace and other important elements in creating the sense of place envisaged in this planning brief.

### 9.7 Community/social uses

The inclusion of land uses such as doctors and dentists premises, or other social amenities, would help provide for the local community and help to secure the required sense of place.

## 9.8 Public realm

Development should provide high quality spaces that are accessible to both university users and the wider community. New buildings and land uses should be located in such a way as to create well used, safe, vibrant people friendly spaces for the benefit of all. Hard and soft landscaping materials, along with planting, should all be carefully considered to provide a legible environment of consistently high quality across the development area and assist with 'greening' the Lewes Road.



Above: New Road, Brighton and Chiswick Park, London



Below: New England Quarter Greenway, Brighton



### Greenway

The Watts Bank is designated in the Local Plan as a Site of Nature Conservation Importance (SNCI). It also has considerable potential to provide an informal recreational area for the new neighbourhood, as well as a new natural green space route to Moulsecomb Station. Development proposals should incorporate measures to make the Watts Bank an accessible and well used green space for all and enhance its nature conservation importance. New buildings and routes outside the SNCI should be carefully considered so that they integrate visually with the greenway. Planting and landscaping should take into account the need to strengthen its ecological qualities. Care will need to be taken with the siting of any development adjacent to the SNCI. Different types of development (e.g. residential, business, academic) bring their own impacts that will require different solutions in the design in order to protect its ecological qualities. Further guidance can be found in the Sustainability section of this planning brief, as well as the council's Nature Conservation and Development Supplementary Planning Document (SPD 11).

### Topography

Changes in land levels should be carefully considered and development proposals should respond positively and creatively to the challenge of the local topography, in order to provide for ease of access through the site and to create an interesting and stimulating townscape. The fairly steeply sloping nature of the valley sides poses design challenges but also presents creative design opportunities. For example:

- the creation of 'underground' car parking areas without the need for expensive excavation, particularly on the Preston Barracks and Mithras House sites;
- the utilisation of roofscapes as areas of public realm and green spaces on some buildings, to create routes through the site that provide transitional levels on either side of the valley;
- bridges connecting and providing routes for pedestrians and cyclists in certain areas (e.g. between the Watts Bank parkway walk and new development on the Watts site and across the Lewes Road)



## Lewes Road (Preston Barracks and University of Brighton)



*Creative use of vertical connections making it easy for people to move in and across sites (top and left), Use of steps as seating, providing places for people to meet, watch and be seen (below right); incorporation of green links (below left).*



### Linkages

A legible series of routes and spaces should be created through the development area in order to enable easy, logical and convenient navigation through and beyond the new neighbourhood. It is particularly important that any overall masterplan for the development area realises the potential of Moulsecomb Station. If moving the station closer to the central focus of the development area (in line with the LR2 proposal) is not viable or achievable, alternative means of improving its connectivity should be realised. Watts Bank has the potential to provide a new pedestrian and cycle link to the site, in combination with other improvements to connect through to Hollingdean. Other routes could flow through existing academic buildings to improve connectivity between the station and the Mithras House site. A considered approach as to how the public-facing elements of the university are incorporated into the proposals is also key to ensuring the creation of a sense of place and reinforcing the integration and accessibility of the university into the community.



*Flexible use of public space. Jubilee Square, Brighton.*



### 9.9 “Bridging” the Lewes Road

Improving connectivity between the eastern and western elements of the development and wider area is a key objective of this planning brief. In essence, this means that development proposals will need to provide acceptable (and possibly innovative) solutions to providing safe and convenient pedestrian access across the Lewes Road which, at this point along its route, is a busy dual carriageway. Whilst the Lewes Road will continue to play the role of a major distributor of traffic, this should not be to the exclusion of significantly improving pedestrian access. There are two key ways in which the eastern and western sites might be better connected: at grade (i.e. at street level) or above street level. An ‘at grade’ solution should be provided as a minimum measure. It is possible that a combination of solutions, both at and above grade, could be utilised.

#### *At grade*

In recent years, providing for the needs of the pedestrian has increasingly become a central consideration of street and public realm design in urban areas. There are many examples of good practice on how busy roads can be reconfigured to meet the dual needs of pedestrians without compromising traffic flow, with High Street Kensington in London and Ashford ring road being two such instances in the UK. Removing barriers to movement, provision of generous central reservations and thoughtful use and configuration of surface materials and street furniture can all be used in providing for the needs of the pedestrian and improved connectivity across busy roads.

#### *Above grade*

The sites forming the development area are located on opposite sides of a fairly steeply sloping valley, with Lewes Road situated on the valley floor. The natural topography presents both challenges and opportunities for innovative design solutions in linking the eastern and western sides of the development area. The following possibilities might be explored:

- A foot and cycle bridge spanning the Lewes Road, providing improved east west linkages across the sites and beyond.
- A structure spanning the road, creating a major landmark and gateway and providing an identity to the academic corridor or ‘avenue’, the local neighbourhood and the city as a whole. Any such design option would need to be carefully explored with due regard to the issues associated with the construction of the highway - and executed to meet various concerns including visual impact, urban design and the local pedestrian environment on the Lewes Road.



Lewes Road (Preston Barracks and University of Brighton)



Lewes Road



Above: High Street Kensington, London. Example of de-cluttering, removal of obstacles to pedestrian movement, cycle parking provision etc. Recorded accidents have been considerably reduced following implementation.

Left: O'Connell Street, Dublin. De-cluttering and creation of an outdoor 'room' framed by lime trees (image: www.cabe.org.uk).



Above: Cycle and foot bridge, Copenhagen, Denmark

Top right: Cycle and foot bridge, Gibbs Street, Portland, USA



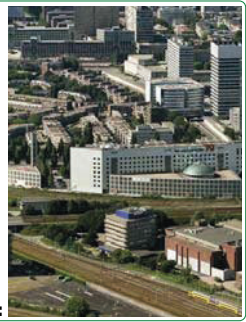
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Lewes Road (Preston Barracks and University of Brighton)

Bottom right: Building spanning road, The Hague, Netherlands



Below: a combined bridge and building – Ponte Vecchio, Florence,



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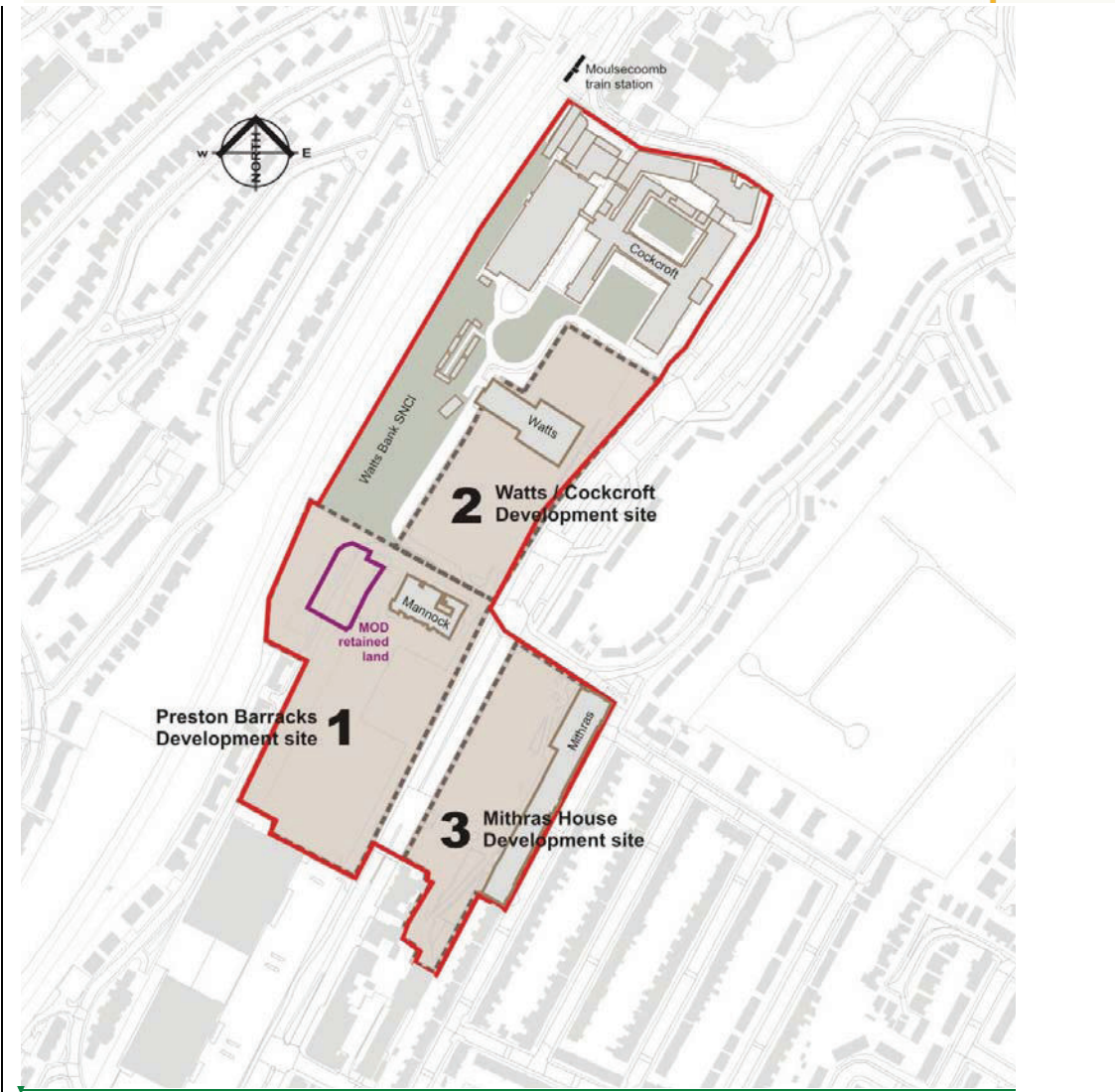
## 10. Development scenarios

The overall objective of this planning brief is to provide guidance on a land use mix, built forms and urban grain that combine to create a successful neighbourhood and a central development core that integrates the wider area. Rather than creating distinct and separate areas of land use across the three sites, the intention is to provide a vibrant mix whilst minimising the potential for conflicting uses to act as bad neighbours.

This brief sets out three scenarios in order to suggest how the above objective might be met. It should be noted that the associated conceptual diagrams are intended to stimulate an imaginative approach to the design process and should not be interpreted as providing a definitive set of arrangements for land uses and open spaces. There are further potential scenarios that might meet the objectives of this brief. The scenarios in this brief are informed by the following assumptions:

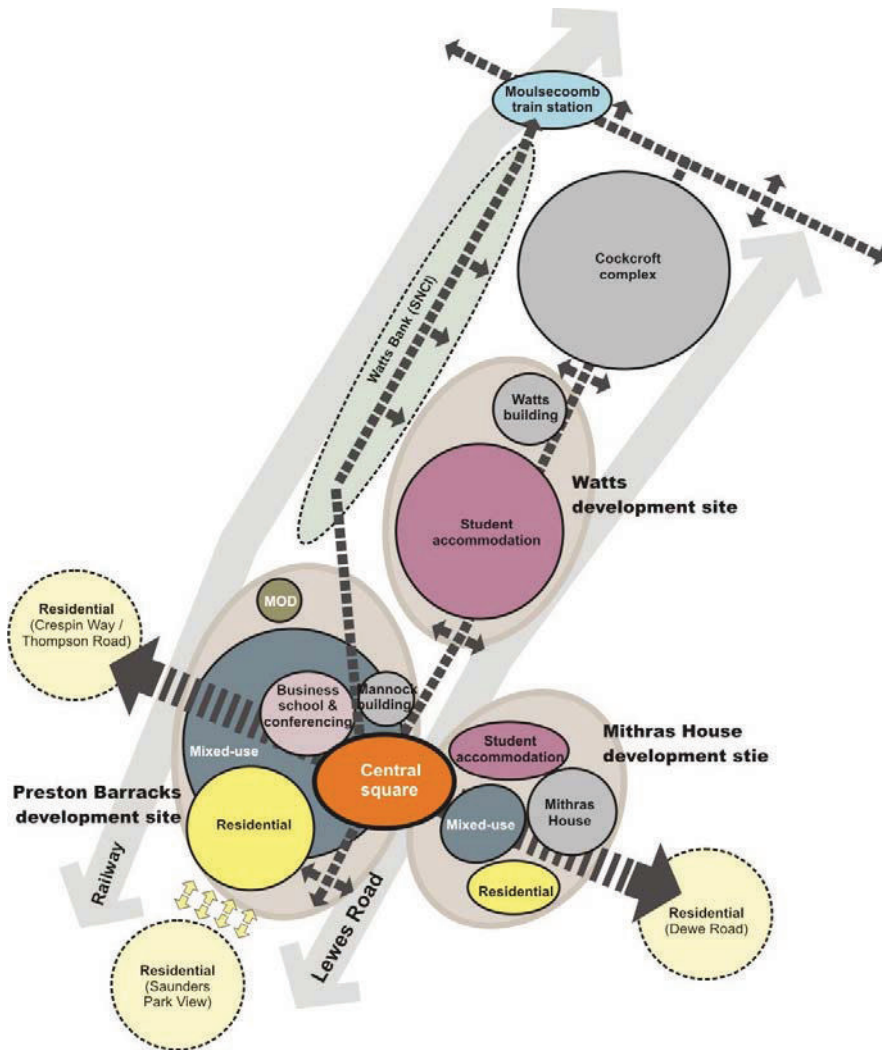
- University and other uses are mixed together to help create a diverse, dynamic and complementary mix across the sites;
- The need to establish good east-west links across Lewes Road that enables users, residents and visitors to move easily across the three development sites;
- Creation of a 'central square' on and around the Preston Barracks site;
- Student accommodation is provided;
- Mithras House is retained in university use;







10.1. Scenario A



Existing	Proposed	Public realm priorities
University buildings	Development areas	Central square (flexible use)
Mannock building	Business school & conferencing	Knit new and existing residential areas
Watts Bank SNCI	Student accommodation	Establish new, well-defined east-west links
Surrounding residential areas	Mixed use (employment, retail, leisure, services)	Establish new routes within and across development sites
	Residential	
	Car parking facilities	
	MOD facilities	

Lewes Road (Preston Barracks and University of Brighton)

Description / Objectives

- Diverse range of uses provided within the two development sites on different sides of Lewes Road (Preston Barracks-Mithras House).
- Student accommodation provided exclusively on Watts/Cockcroft site.
- Central square is chiefly located on the Preston Barracks site but spans across Lewes Road into Mithras House site.
- Mannock Building (Preston Barracks) is retained and integrated into design of central square and routes are established across the various sites.
- Watts building is integrated into routes to Moulsecomb Station (option to include route cutting through ground floor of building).

Quantum of development

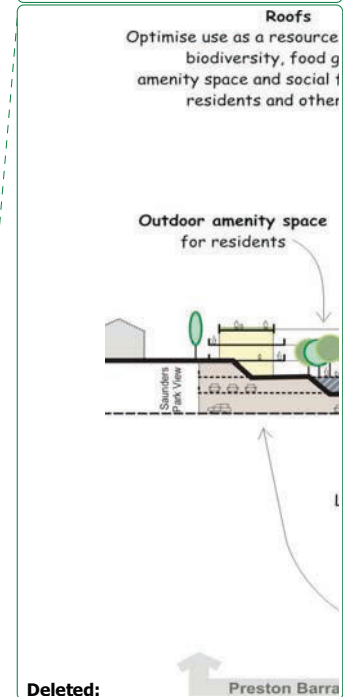
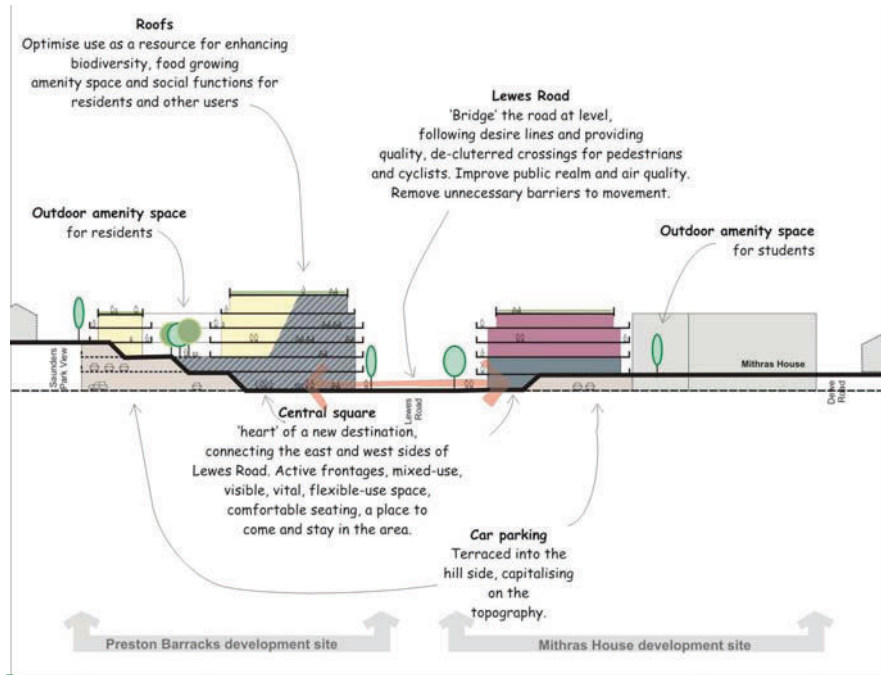
Use mix	Area (sq m)	Units	% total
<b>1. Preston Barracks</b>			
Business School & Conferencing	8,000		100%
Innovation Centre	2,735		26%
Employment	3,250		31%
Residential		212	67%
Leisure			-
Retail			70%
Community services			-
Car park			-
MOD reprovision	1,299		100%
Central square			75%
<b>2. Watts and Cockcroft</b>			
Student accommodation		500	67%
Student services			-
Retail			20%
Car park			-
<b>3. Mithras House</b>			
Employment	4,615		44%
Mithras House	8,050		44%
Student accommodation		250	33%
Housing		106	33%
Retail			10%
Car park			-
Central square			25%

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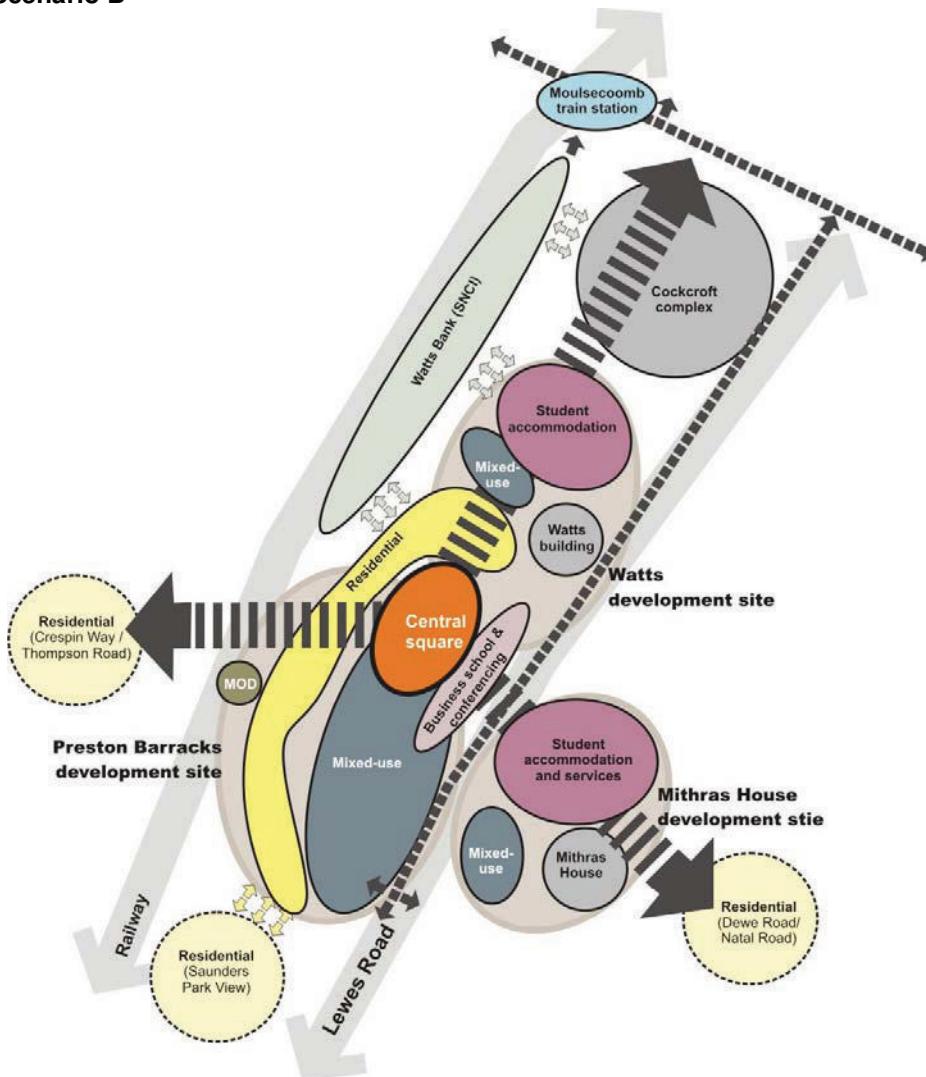
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Scenario A section. Please note this diagram is neither accurate nor prescriptive section. Its aim is to communicate a range of principles and ideas that should be further explored in the context of the masterplan for the Planning Brief area. It should not be interpreted literally.

10.2. Scenario B



Existing	Proposed	Public realm priorities
University buildings	Development areas	Central square (flexible use)
Mannoek building	Business school & conferencing	Knit new and existing residential areas
Watts Bank SNCI	Student accommodation	Establish new, well-defined east-west links
Surrounding residential areas	Mixed use (employment, retail, leisure, services)	Establish new routes within and across development sites
	Residential	Establish visual and physical links with SNCI
	Car parking facilities	
	MOD facilities	

**Description / Objectives**

- Diverse range of uses provided within the two development sites on the west side of Lewes Road (Preston Barracks and Watts/Cockcroft).
- Some non-University uses provided on University land.
- Student accommodation provided partly on Watts/Cockcroft site and partly on Mithras site.
- Central square located in partly on Preston Barracks site, partly on Watts/Cockcroft site.
- Mannock building (Preston Barracks) removed.
- Watts building integrated into routes to Moulsecomb Station (option to include route cutting through ground floor of building).

**Quantum of development**

Use mix	Area (sq m)	Units	% total
<b>1. Preston Barracks</b>			
Business School & Conferencing	4,000		50%
Innovation Centre	2,735		26%
Employment	7,865		74%
Residential		212	67%
Leisure			-
Retail			56%
Car park			
MOD reprovision	1,299		100%
Central square			50%
<b>2. Watts and Cockcroft</b>			
Business School & Conferencing	4,000		50%
Residential		106	33%
Student accommodation		250	33%
Car park			
Retail			28%
Community services			-
Central square			50%
<b>3. Mithras House</b>			
Mithras House	8,050		44%
Student accommodation		500	67%
Retail			15%
Car park			
Student services			-

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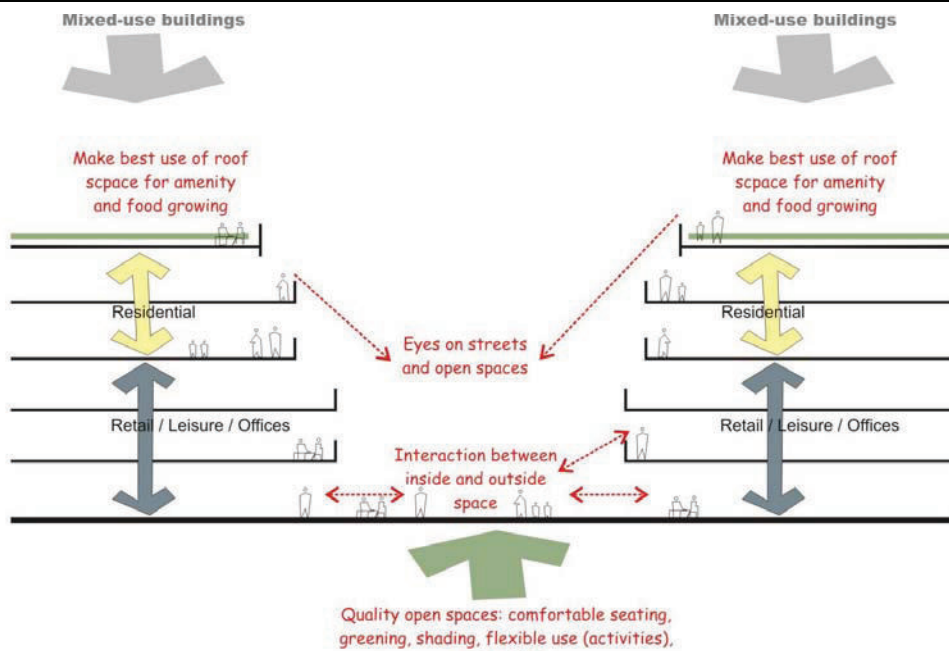
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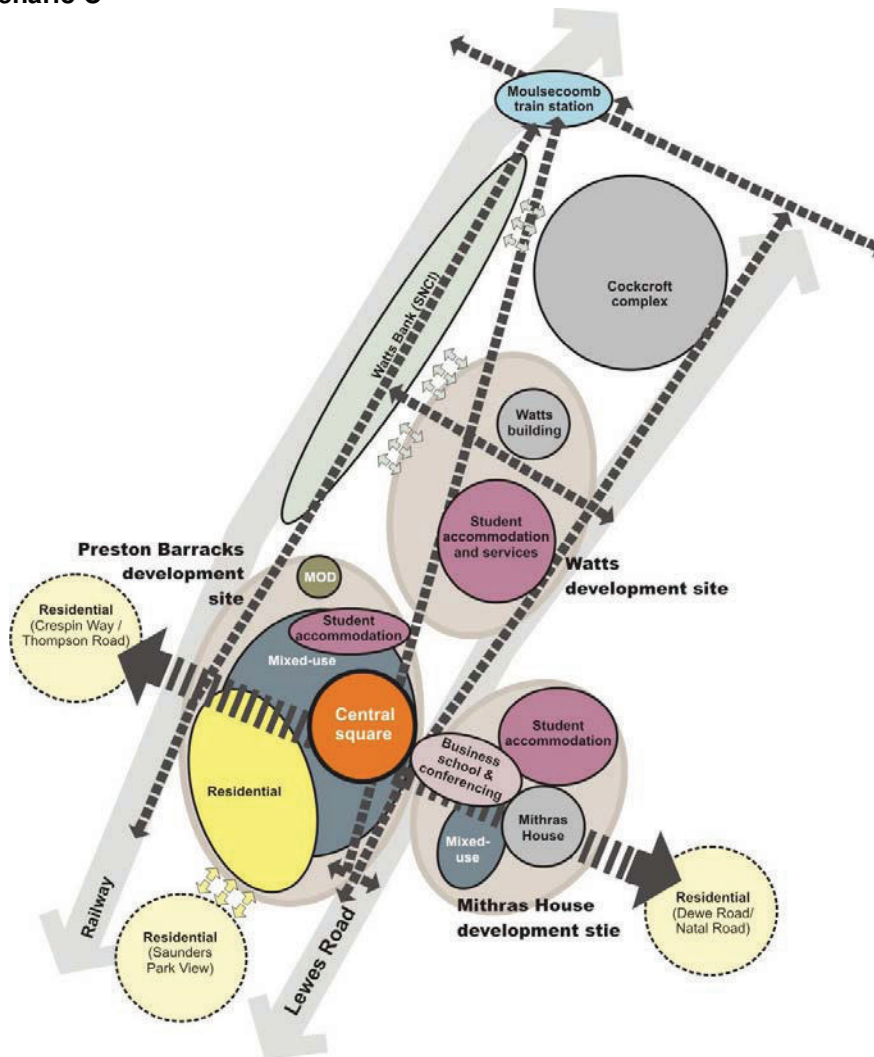
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This section applies to all 3 scenarios. Its aim is to communicate a range of principles and ideas that should be further explored in the context of the masterplan for the Planning Brief area. It should not be interpreted literally.



10.3. Scenario C



Existing	Proposed	Public realm priorities
University buildings	Development areas	Central square (flexible use)
Mannock building	Business school & conferencing	Knit new and existing residential areas
Watts Bank SNCI	Student accommodation	Establish new, well-defined east-west links
Surrounding residential areas	Mixed use (employment, retail, leisure, services)	Establish new routes within and across development sites
	Residential	Establish visual and physical links with SNCI
	Car parking facilities	
	MOD facilities	

Lewes Road (Preston Barracks and University of Brighton)

Description / Objectives

- University uses provided mainly within University land (Watts/Cockcroft and Mithras).
- Option for link across the Lewes Road (between Preston Barracks and Mithras House sites) to be established at level via a building that will contain the University's Business School.
- Student accommodation provided mainly on University land (partly on Watts/Cockcroft site and partly on Mithras site) with a portion also provided on Preston Barracks.
- Central square located on Preston Barracks.
- Mannock building retention and Watts building 'cut through' route are optional.

Quantum of development

Use mix	Area (sq m)	Units	% total
<b>1. Preston Barracks</b>			
Innovation Centre	2,735		26%
Employment	4,615		44%
Residential		318	100%
Leisure			-
Retail	-		70%
Student accommodation		100	13%
Car park			
MOD reprovision	1,299		100%
Community services			-
Central square			100%
<b>2. Watts and Cockcroft</b>			
Student accommodation		325	43%
Car park			
Student services			-
<b>3. Mithras House</b>			
Mithras House	8,050		44%
Business School & Conferencing (over Lewes Rd)	8,000		56%
Student accommodation		325	43%
Retail	-	-	30%
Car park			
Employment	3,250	-	31%

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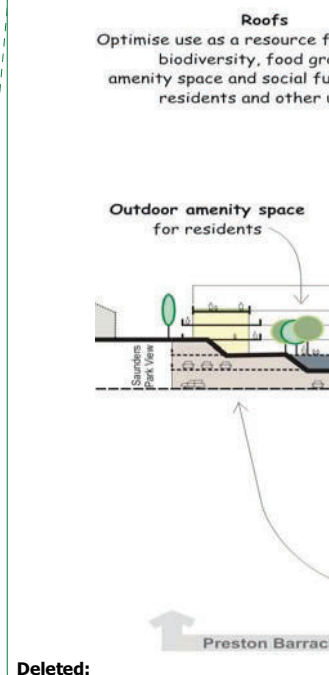
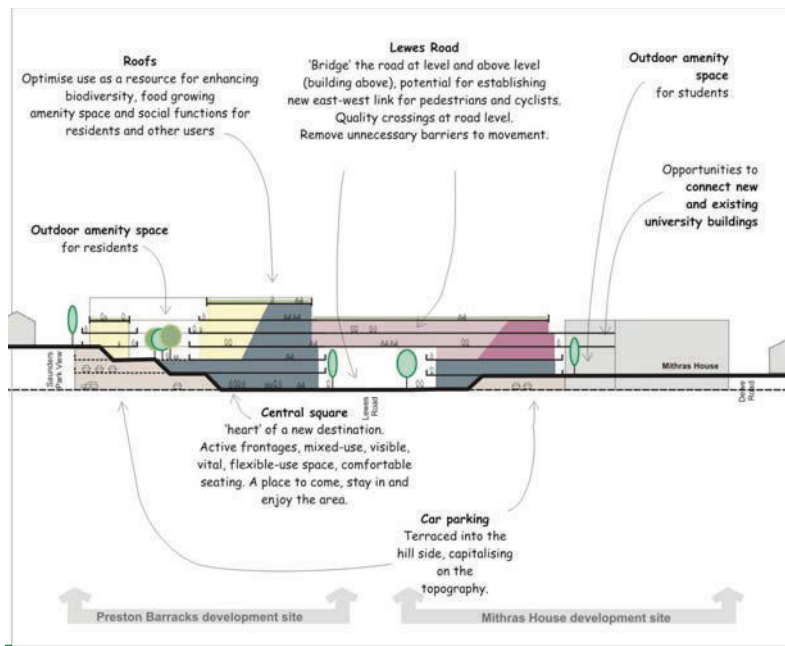
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Scenario C section. Please note this diagram is neither an accurate nor prescriptive section. Its aim is to communicate a range of principles and ideas that should be further explored in the context of the masterplan for the Planning Brief area. It should not be interpreted literally.



## 11. Heights, bulk and massing

*Watts car park:* Building heights of around 5 storeys are considered appropriate, with an upper limit of around 8 storeys, following the precedent established by the existing Watts Building.

*Preston Barracks:* Proposed development on Preston Barracks has a similar profile to that proposed for the Watts car park site, with an indicative height of around 6 storeys and an upper limit of 8 storeys.

*Heart of the site:* One or possibly two buildings taller than the heights referred to above may be appropriate adjacent to the central 'square' that is envisaged as providing the heart of the development. Any such buildings should act as distinctive and attractive landmarks to the overall development, as well as performing a visual 'gateway' role to this part of the urban area for traffic entering and leaving the city along the Lewes Road. The upper limit for these buildings is considered to be around 18 storeys, although the precise height would be subject to a more detailed consideration of the rationale for taller buildings as set out in the council Tall Buildings SPG (SPGBH 15) which identified the potential of this area for taller buildings.

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*Mithras House surface car park:* Development on the car park is shown indicatively as around 6 storeys.

*Mithras House:* Development of an additional floor to Mithras House would be acceptable in principle, subject to design considerations and an appropriate setback to avoid a harmful impact on nearby housing in Dewe Road.



Above: Lace Market Square regeneration, Nottingham.

Right: Coin Street Community Builders, London

Below: Checkland Building, University of Brighton (Falmer)



## 12. Transport

### Sustainable transport

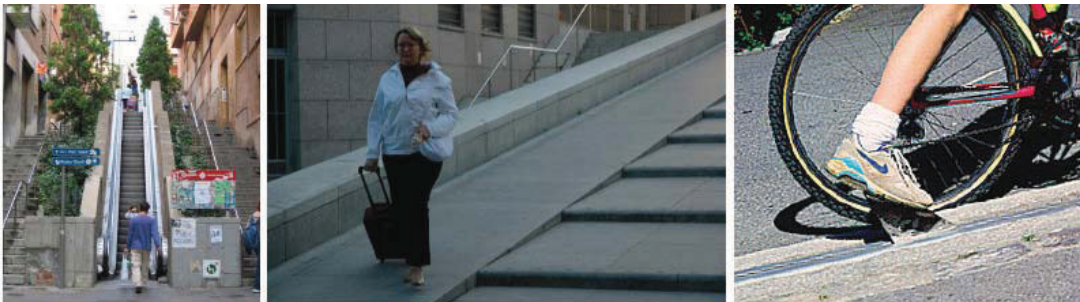
Improvements to sustainable transport in the wider area are key to realising the development potential and aspirations of this brief.

The development area is situated alongside the A270, part of a 'sustainable transport corridor' as defined in policy TR 4 of the Local Plan. The A270 is well served by local bus operators, as well as long distance bus operators who provide limited stop buses from north east Sussex and Kent, with a regular 20-minute frequency service throughout the working day.

A cycle route runs along the Lewes Road through the development area, linking the city centre to the Falmer university campuses and Lewes. Cycling should be strongly encouraged as a means of commuting to the site. Local Plan policy TR13 (Cycle network) and its supporting text sets out the requirements for development proposals that affect the cycle network. Cycle infrastructure in the wider area needs to be improved e.g. around the Vogue Gyratory) to help realise the development potential and aspirations of this brief, as well as assist in securing air quality improvements in the Brighton Air Quality Management Area.

The development area is near to Moulsecoomb Station and one of the important objectives of this brief is to make the station more accessible. The station provides access to the east west South Coast railway line, which links all the coastal settlements with a 20 minute frequency commuter service in both directions throughout the working day, as well as providing the rail link to Brighton and trains to all parts of Britain.

The site is therefore well positioned to draw in employees from both the city and the surrounding hinterland by a range of sustainable transport. Any development proposals should support and enhance the use of public transport through consideration and provision of bus stops, passenger shelters and real time information within the development area. Any planning application should include a Transport Assessment and Transport Plan for occupiers and users of the development.



Facilitating pedestrian and cycling movement between different grades.



*Cycling lane, New York, USA.*

*Raised pedestrian crossing and unified surfaces, Copenhagen, Denmark.*

### Car and Cycle Parking Standards

The locality benefits from good sustainable transport linkages and funding from the Sustainable Transport Fund has been secured by the council to provide a series of improvements along the Lewes Road corridor between 2011-2014, to encourage and provide further modal shifts away from the car to more sustainable forms of transport. Parking levels should therefore be kept low across the development area, although it is recognised that some car parking provision will be necessary. The full standard for parking for disabled drivers should be met on site. Cycle parking and facilities such as secure cycle storage, showers and changing rooms will be required as set out in the parking standards in Brighton & Hove Local Plan Policy TR12 (Cycle access and parking). Further guidance on the accessibility of the site to public transport and parking guidance and standards for development are set out in Chapter 1 of the Brighton & Hove Local Plan and in SPG Note 4, 'Parking Standards'.

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### Car Parking Location

With over 6,000 students currently using the university's Moulseccomb facilities, there is significant teaching activity throughout the day and evening through employer-linked courses and the involvement of part-time students. The need for viable and achievable sustainable transport solutions will be central in meeting the operational needs of the university and achieving the brief's aspirations for a zero carbon or carbon neutral development.

Additional car parking is not envisaged in association with new university-related development. In order to secure the development potential of the university sites, existing surface car parking, where re-provided, should be replaced in multi-storey facilities, preferably shielded from view by other development. As referenced elsewhere in this document, creative use of the local topography can help to obscure the visual impact of car parking through the effective creation of basement or undercroft areas, with new development placed above and around.

Deleted: , although with over 6,000 students currently using the Moulseccomb facilities its current level of parking provision would need to be retained (669 spaces).

Any car parking deemed necessary and appropriate to serve development on the former parade ground area of the Preston Barracks site should be screened from view from the Lewes Road and placed behind the buildings or in a dedicated underground or multi-storey car park. Delivery bays and car parking for should be well screened from the public areas.

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### Vehicle access

A new vehicle access will be required to serve the Preston Barracks site. Any such access could use the existing southern entrance to the Brighton University Watts Building site opposite Natal Road, provided suitable measures are introduced to facilitate the increased activity. Alternatively, a new entrance could be sited between the existing southern access to the Watts site and the Pavilion Retail Park, but would be required to facilitate movement in both directions at peak times. The existing access to Preston Barracks is a "reserved access route" to the MoD retained land and would need to be protected if the facility is retained on this part of the site.

The opportunity should be taken to allow for a south west/north east cycle route to pass through the site.

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### Service and delivery arrangements

Consideration should be given to the provision of adequate and appropriate access, routes and areas for delivery vehicles within the site.



### 13. Sustainability

#### *Sustainable building design*

Local Plan policies SU2 and SU13 promote efficiency of development in the use of energy, water, materials and promote reduction in construction waste.

Brighton & Hove's Supplementary Planning Document (SPD) 08 recommends minimum standards for sustainable building design and should be referred to via the Sustainability Checklist which provides further guidance and monitors responses.

#### *Sustainable living*

In recent years, increasingly high environmental standards have been achieved in the city (e.g. the Jubilee Library and the One Brighton development in the New England Quarter). At 'One Brighton' ([www.onebrighton.co.uk](http://www.onebrighton.co.uk)) the concept of ecological 'footprinting' provided a method of analysing and addressing unsustainable living patterns. This approach is supported through the South East Regional Economic Strategy for the 'Diamonds for Investment & Growth' and the council's own commitment to develop a plan to reduce the city's ecological footprint, associated with the use of energy, water, resources and transport. It also reflects the council's ambition to achieve Urban Biosphere Reserve status.

Developers of sustainably-built new development can contribute towards reducing the city's ecological footprint by facilitating ongoing sustainability awareness, education and action to reduce impacts. The aforementioned One Brighton development, for example, employs a 'sustainability integrator' to work strategically with the city and a 'green caretaker' to work with the residential community, supporting and extending good practice. New development should be informed by this experience, considering similar opportunities to promote sustainable living among incoming and existing residents, businesses and visitors, in order to ensure continuous reduction of the ecological footprint of the area.

As part of an approach to minimise resource impacts, sustainable 'retrofitting' and refurbishment of existing development should be fully explored as options before adopting a 'demolish and rebuild' approach in the development area covered in this brief.



*Above: Stonebridge Hillside Hub, Harlesden*

*Right: Vauban district, Freiburg, Germany*



*Below: One Brighton*

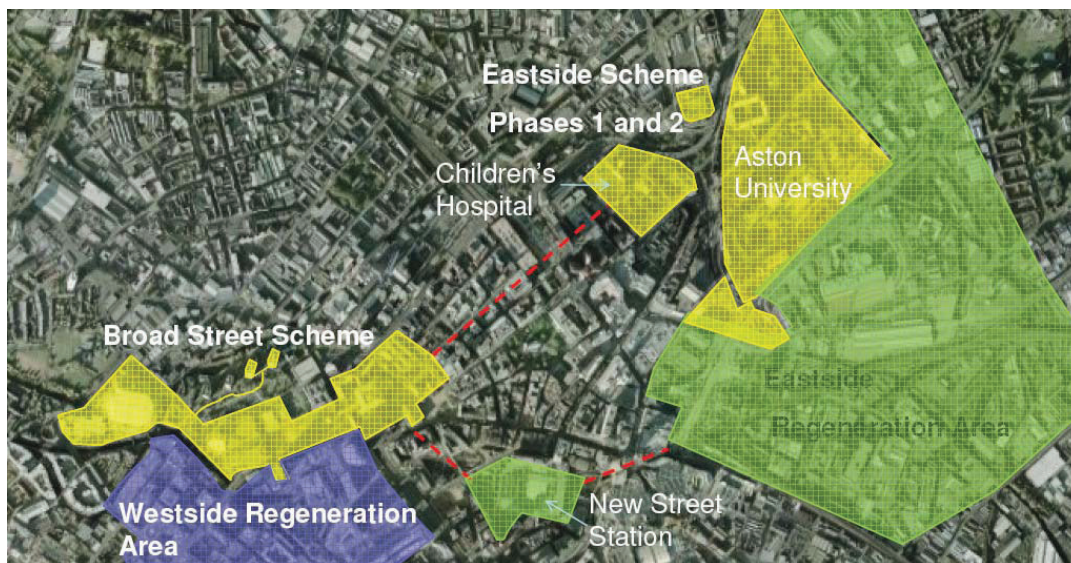


### District heating and Energy Service Companies

Energy Service Companies (ESCOs) have different models of operation, but all usually develop low carbon solutions for local energy generation by designing, building, financing, operating and maintaining energy generating plant, and through managing energy services. Solutions are usually based on combined heat and power generation (e.g. district heating) and/or renewable energy technologies.

ESCOs can work at varying levels, from housing and mixed-use blocks, or to wider development areas, with the potential to retrofit district heating to supply existing development in areas of the city. Their primary purposes would be to:

- benefit tenants and owners by offering lower electricity and heating bills as part of a low carbon option;
- improve social cohesion by reducing fuel poverty; and
- lower dependence on national / regional energy sources that can be susceptible to volatile pricing and long-term availability and involve transmission losses.



Above: Birmingham District Heating Scheme

Examples of successful ESCOs include: Southampton District Energy Scheme (Southampton Geothermal Heating Co Ltd); London Borough of Tower Hamlets (Barkantine Heat and Power); Aberdeen Heat and Power; and Nottingham, Renewable Nottinghamshire Utilities Ltd.

New development proposals in the area covered by this brief are encouraged to explore through feasibility studies the potential to:

- install district heat and power systems and to retrofit for supply to existing buildings; and
- set up ESCOs to supply heat and power to the sections of the development area.

It is important to consider impacts on air quality. Multi Utility Service Companies (MUSCOs) are currently a theoretical model, which could innovate to supply services such as water, waste and telecommunications in addition to heat and/or power. Exploration of this kind of innovation in the development area - aiming to maximise sustainable supply and financial benefit to tenants and residents - would be welcomed.

### Green infrastructure

The emerging Brighton & Hove Green Network (A Green Network for Brighton & Hove, Draft report, May 2008) comprises interconnected green spaces and features which link key 'nodes' in the urban area with the urban fringe and wider countryside. It includes protected wildlife sites and nature reserves, but also promotes the establishment of small pockets of urban green areas, green road verges, street trees, 'green roofs', 'green walls' and naturalistic urban landscaping. Connecting natural green spaces in this way creates a 'super site' capable of supporting more biodiversity, promoting a holistic view of 'green infrastructure' and recognising the collective ecological role of such spaces. It is envisaged that this network will replace Local Plan Policy QD19 (Greenways) via the Local Development Framework (LDF) process. It will also assist with the local bid for Biosphere Reserve status.

The Watts Bank SNCI is part of a wider greenway as identified by Local Plan policy QD19. Development close to the Watts Bank and management of the SNCI itself can enhance its ecological qualities, as well as contribute to the overall sustainability of the new neighbourhood.

Within the development area itself, opportunities should be taken to integrate greening features such as green walls, facade-mounted nest boxes and green roofs on adjacent buildings. These measures can also help improve the ecology of the green network and quality of life, as well as contribute to climate change resilience and adaptation in this location.

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The council's Nature Conservation and Development Supplementary Planning Document (SPD 11) provides further information and advice on how new development can help to protect existing biodiversity, maximise opportunities for incorporating biodiversity features and connect to the green network.



Above: Roof garden, City of London (Image: [www.flickr.com](http://www.flickr.com)).

Right: RISC Edible Roof Garden in 2006 (Image: *Green roofs for urban agriculture*, Hanna Waldbaum).

Below: The Mailbox, Birmingham (Image: [www.esi.info](http://www.esi.info))







### Water quality and wastewater disposal

The development area overlies a major aquifer, the water quality of which must be protected. Construction works and disturbance of previously contaminated sites can contaminate the aquifer. 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.

Arrangements should therefore be put in place:

- during construction stage, to ensure that any contaminants are identified and removed appropriately; and
- during operational stage, through the implementation of sustainable drainage systems which will help to prevent surface water flooding that could contaminate the aquifer.

Southern Water has commented that the existing local sewerage capacity is insufficient to accommodate the anticipated increase in demand arising from development within the area covered by this brief. Development will therefore need to provide off-site sewerage infrastructure in order to connect to the nearest point of adequate capacity. 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 contamination. Alternative drainage of surface water which currently drains to the combined sewerage system would release capacity for foul water drainage and would contribute to meeting the demand from the development, but additional measures may also be required. This would need to be investigated when specific development proposals come forward.

### Health Impact Assessment (HIA)

An HIA would be required to accompany any application for a significant part of the development area. The purpose of an HIA is to ensure that all strategic new developments take every opportunity to contribute to the health and wellbeing of users and residents and the city as a whole.

An HIA:

- sets out the physical, environmental and social impacts (beneficial and detrimental) of the proposed development and its uses, including impacts during construction;
- evaluates health impacts against determinants of health and current health evidence in the light of anticipated users / occupiers of the site and adjacent areas; and
- recommends measures to mitigate against adverse impacts and maximise positive benefits.

In the case of development sites identified in the Land Use section of this document:

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Lewes Road (Preston Barracks and University of Brighton)

- any Environmental Impact Assessment (EIA) carried out for individual sites must pay attention to the health impacts of the development; and/or
- any development involving more than one site would need to undertake a cumulative HIA.



Inviting, attractive, flexible open spaces that can accommodate formal and informal play/exercise/recreation. Above: Judo in Preston Park, Brighton & Hove Take Park. Below: Somerset House fountain, London and Royal Pavilion ice rink, Brighton.



14. Phasing

Development should be phased to provide a viable and successful community at each stage of completion, with each subsequent phase enhancing and contributing to the overall development.

A masterplan will be jointly commissioned by the council and university to set out the development framework for the site and also the environmental, urban design and landscape principles be adopted, to ensure a high quality development is achieved. As the university has access to development funding, it is likely that university-related uses will comprise the first phase of the development, with subsequent phases being implemented in accordance with the masterplan to ensure that the overall objectives of this brief are achieved.

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15. Infrastructure and Planning obligations

Major development will be required to enter into a Section 106 Agreement to provide for or contribute towards works and community infrastructure measures that are necessary and are required by that development.

When such contributions are sought, there will be a requirement to ensure provision is in place and on time to serve development in accordance with the phasing plan. As the objective is to aim for a zero carbon development, there is likely to be a particular need for planning obligations to provide for sustainable transport solutions, as appropriate to the scale of the development proposed.



The likely areas where contributions may be sought include:

- Affordable business accommodation;
- Affordable housing;
- Air quality management;
- Arts & Creative Industries;
- Community safety measures and maintenance;
- Education provision;
- Employment, commercial space retention;
- Employment training programmes;
- Sustainable transport and highway improvements for all road users;
- Other community needs, including engagement, support and community building retention or replacement;
- Phasing Plan;
- Project management monitoring contribution;
- Public realm, environmental improvements & legibility;
- Recreation, play space & sports provision;
- Sustainability and biodiversity; and
- Utilities

