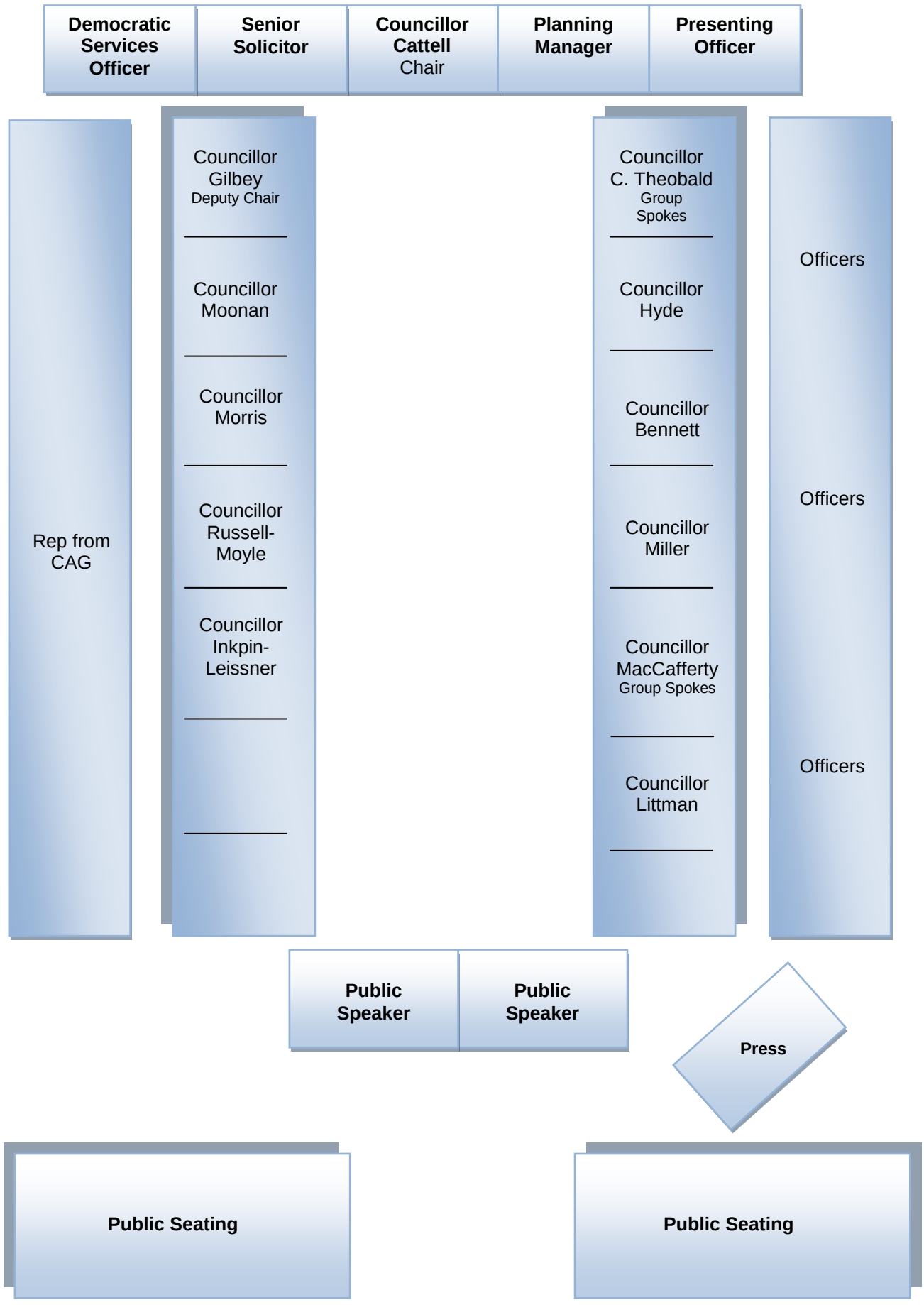
Brighton & Hove City Council

Planning Committee

Title:	**Planning Committee**
Date:	**27 September 2017**
Time:	**1.00pm**
Venue	**Council Chamber, Hove Town Hall, Norton Road, Hove, BN3 4AH**
Members:	**Councillors:** Cattell (Chair), Gilbey (Deputy Chair), C Theobald (Opposition Spokesperson), Mac Cafferty (Group Spokesperson), Bennett, Hyde, Inkpin-Leissner, Littman, Miller, Moonan, Morris and Russell-Moyle **Co-opted Members:** Jim Gowans (Conservation Advisory Group)
Contact:	**Penny Jennings** Democratic Services Officer 01273 29-1065/29-1354 planning.committee@brighton-hove.gov.uk

	**The Town Hall has facilities for wheelchair users, including lifts and toilets**
	**An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter and infra red hearing aids are available for use during the meeting. If you require any further information or assistance, please contact the receptionist on arrival.**
	FIRE / EMERGENCY EVACUATION PROCEDURE **If the fire alarm sounds continuously, or if you are instructed to do so, you must leave the building by the nearest available exit. You will be directed to the nearest exit by council staff. It is vital that you follow their instructions:** • **You should proceed calmly; do not run and do not use the lifts;** • **Do not stop to collect personal belongings;** • **Once you are outside, please do not wait immediately next to the building, but move some distance away and await further instructions; and** • **Do not re-enter the building until told that it is safe to do so.**

Democratic Services: Planning Committee



AGENDA

Part One **Page**

51 PROCEDURAL BUSINESS

(a) Declaration of Substitutes: Where Councillors are unable to attend a meeting, a substitute Member from the same Political Group may attend, speak and vote in their place for that meeting.

(b) Declarations of Interest or Lobbying

(a) Disclosable pecuniary interests;
(b) Any other interests required to be registered under the local code;
(c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare
(i) the item on the agenda the interest relates to;
(ii) the nature of the interest; and
(iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

(d) All Members present to declare any instances of lobbying they have encountered regarding items on the agenda.

(c) Exclusion of Press and Public: To consider whether, in view of the nature of the business to be transacted, or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

NOTE: Any item appearing in Part 2 of the Agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls.

(d) Use of mobile phones and tablets: Would Members please ensure that their mobile phones are switched off. Where Members are using tablets to access agenda papers electronically please ensure that these are switched to ‘aeroplane mode’.

52 TO CONSIDER AND DETERMINE PLANNING APPLICATIONS

MAJOR APPLICATION

A BH2017/00492,Preston Barracks, Mithras House, Watts Building, Lewes Road, Brighton - Full Planning, Outline Application, Watts Parcel **1 - 116**

Preston Barracks Parcel - Demolition of existing buildings and construction of (B1) 7 storey Research Laboratory; Student Accommodation (Sui Gen) providing 534 bed spaces within three blocks of 13, 11 and 15 storeys; 369 (C3) residential units consisting of 45 studio apartments, 111one-bed, 192 two-bed and 21 three-bed units in eight blocks; Block A (8-10 storeys), Block B (9-10 storeys), Block C (7 storeys), Block D (7-9 storeys), Block E (2-3 storeys), Block F (2-3storeys), Block G (4 storeys) and Block J (4-10 storeys); 264 sq.m ground floor workshop space (B1), 301 sq.m ground floor flexible commercial floorspace (A1, A3 or B1), and 334 sq.m (GIA) ground floor retail floorspace (A1/A3) (Block A); with associated ancillary development. Provision of 156 parking spaces in the podium including 22 wheelchair user spaces, 8 car club spaces, 10 residential parking spaces serving block J, cycle parking, public realm works and

Mithras Parcel - Demolition of existing building (Steam House) and construction of a mixed use Campus Development consisting of Student Accommodation (C1) providing 804 bed spaces within five blocks; Block 1 (10 storeys), Block 2 (18 Storeys), Block 3 (10 storeys), Block 4 (12 storeys) and Block 5 (9 storeys); 596 sq.m of services including student's union and welfare facilities (Sui Gen), 898 sq.m (GIA) gymnasium (D2), and associated ancillary development, including provision of 13 disabled parking spaces serving the student accommodation, cycle parking, public realm works and landscaping improvements (Five buildings will be provided with heights ranging between 9 storeys and 18 storeys).

Lewes Road - Installation of new signalised crossroads and 'T' Junction; pedestrian crossings and footway improvements; erection of pedestrian /cyclists bridge crossing Lewes Road.

(Outline Application)
Watts Parcel - Removal of existing Watts House temporary building and erection of a 6 storey (D1) Academic Building for a Business School consisting of 6,400 sq.m of floorspace, linked canopy and provision of 600 space multi-storey car park to the rear (maximum 8 storey equivalent height) with associated ancillary development, including provision of cycle parking, access and servicing road, public realm and landscaping improvements landscaping.
RECOMMENDATION – MINDED TO GRANT

PLANNING COMMITTEE

Ward Affected: *Moulsecoomb and Bevendean and Hollingdean and Stanmer*

Members are asked to note that plans for any planning application listed on the agenda are now available on the website at:

http://www.brighton-hove.gov.uk/index.cfm?request=c1199915

The City Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public. Provision is also made on the agendas for public questions to committees and details of how questions can be raised can be found on the website and/or on agendas for the meetings.

The closing date for receipt of public questions and deputations for the next meeting is 12 noon on the fifth working day before the meeting.

Agendas and minutes are published on the council's website www.brighton-hove.gov.uk. Agendas are available to view five working days prior to the meeting date.

Electronic agendas can also be accessed through our meetings app available through www.moderngov.co.uk

Meeting papers can be provided, on request, in large print, in Braille, on audio tape or on disc, or translated into any other language as requested.

WEBCASTING NOTICE

This meeting may be filmed for live or subsequent broadcast via the Council's website. At the start of the meeting the Chairman will confirm if all or part of the meeting is being filmed.

You should be aware that the Council is a Data Controller under the Data Protection Act 1988. Data collected during this web cast will be retained in accordance with the Council's published policy (Guidance for Employees' on the BHCC website).

Therefore by entering the meeting room and using the seats around the meeting tables you are deemed to be consenting to being filmed and to the possible use of those images and sound recordings for the purpose of web casting and/or Member training. If members of the public do not wish to have their image captured they should sit in the public gallery area.

If you have any queries regarding this, please contact the Head of Democratic Services or the designated Democratic Services Officer listed on the agenda.

For further details and general enquiries about this meeting contact Penny Jennings, (01273 29-1065/29-1354, email planning.committee@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk.

Date of Publication - Tuesday, 19 September 2017

ITEM A

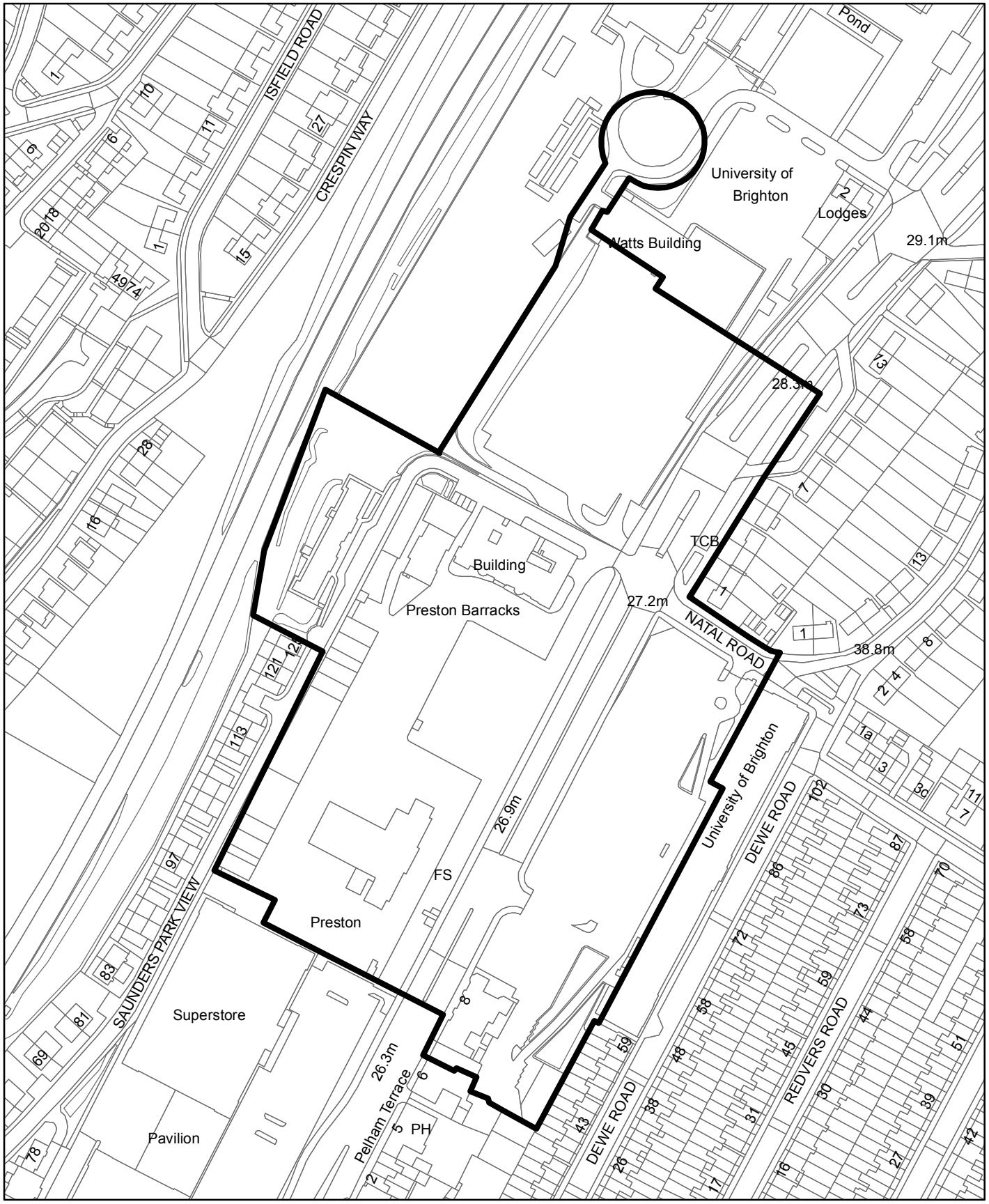
Preston Barracks, Mithras House, Watt Building, Lewes Road, Brighton

BH2017/00492

Full & Outline Planning

DATE OF COMMITTEE: 13th September 2017

BH2017/00492 Preston Barracks, Mithras House, Watt Building Lewes Road, Brighton



Brighton & Hove City Council

N

Scale: 1:2,200

(c) Crown Copyright. All rights reserved. Licence: 100020999, Brighton & Hove City Council. 2017.

No:	**BH2017/00492**	**Ward:**	**Hollingdean and Stanmer**
App Type:	**Full Planning**		
Address:	**Preston Barracks, Mithras House and Watts Building, Lewes Road, Brighton**		
Proposal:	**(Full application) Preston Barracks Parcel Demolition of existing buildings and construction of (B1) 7 storey Central Research Laboratory, Student Accommodation (Sui Gen) providing 534 bedspaces within 3 blocks of 13, 11 and 15 storeys, 369 (C3) residential units in 8 Blocks with a range between 2 and 10 storeys with associated ancillary development, parking, public realm works and landscaping.** **Mithras Parcel Demolition of existing building (Steam House) and construction of a mixed use Campus Development consisting of Student Accommodation (Sui Gen cluster flats) providing 804 bed spaces within five blocks, Block 1 (10 storeys), Block 2 (18 Storeys), Block 3 (10 storeys), Block 4 (12 storeys) and Block 5 (9 storeys), 596 sq. m of services including students union and welfare facilities (Sui Gen), 898 sq. m (GIA) gymnasium (D2), and associated ancillary development, including provision of 13 disabled parking spaces serving the student accommodation, cycle parking, public realm works and landscaping improvements.** **Lewes Road Installation of new signalised crossroads and T Junction, pedestrian crossings and footway improvements, erection of pedestrian and cyclists bridge crossing Lewes Road.** **(Outline Application) Watts Parcel Removal of existing Watts House temporary building and erection of a 6 storey (D1) Academic Building for a Business School consisting of 6,400 sq. m of floorspace, linked canopy and provision of 600 space multi storey car park to the rear (maximum 8 storey equivalent height) with associated ancillary development, including provision of cycle parking, access and servicing road, public realm and landscaping improvements.**		
Officer:	Mick Anson, Sarah Collins, tel: 292354 Or 292232	**Valid Date:**	24.02.2017
Con Area:	N/A	**Expiry Date:**	16.06.2017
Listed Building Grade:	N/A	**PPA/EOT:**	01.11.2017
Agent:	NTR Planning Mr Mark Hoskins Clareville House 26-27 Oxendon Street London SW1Y 4EL		
Applicant:	University Of Brighton & Cathedral (Preston Barracks) Momentum Lewes Road Lewes Road Brighton BN2 4GL		

1. RECOMMENDATION

1.1 That the Committee has taken into consideration and agrees with the reasons for the recommendation set out below and resolves to be **MINDED TO GRANT** planning permission subject to a s106 agreement on the Heads of Terms set out below and the following Conditions and Informatives:

1.2 **S106 Heads of Terms**

Affordable Housing 15% at tenure split of 55% social/affordable rent and 45% Intermediate (shared ownership). Affordable Housing to be ready for occupation prior to 50% occupation of private residential accommodation.

1.3 Open Space and Recreation - Contribution of £1,782,271:

- Allotment/Food Growing £76,859 to be spent on Stanmer Park and/or Saunders Park, and/or local allotments;
- Children's Equipped Play Space - £21,942 to be spent on Stanmer Park and/or Saunders Park, and/or Hollingbury Park and/or Farm Green;
- Amenity Greenspace - £30,813 to be spent on Wild Park and/or Stanmer Park and/or Saunders Park, and/or St Peters Church, and/or Carden Park, and/or Farm Green.
- Outdoor Sport - £613,081 to be spent on Wild Park, and/or Stanmer Park and/or Saunders Park, and/or St Peters Church, and/or Carden Park, and/or Farm Green.
- Natural/Semi-Natural - £240,515 to be spent on Tree planting and sustainable drainage features, for all streets and greenspaces linked to the Lewes Road and Ditchling Road from Stanmer to St Peters Church
- Parks and Gardens - £549,161 to be spent on Wild Park, and/or Stanmer Park and/or Saunders Park, and/or St Peters Church, and/or Carden Park, and/or Farm Green, and/or Woodvale Cemetery.
- Indoor Sport/Gym - £249,900 to be spent on Moulsecoomb Community Leisure Centre

1.4 Education - Contribution of £83,298:

- Nursery – £83,298 towards improving facilities and/or expanding capacity at the following local nurseries:
    - Cherry Tree Nursery, Brentwood Road, and/or
    - New Beginnings Pre-School, Coombe Road Primary School, Milner Road, and/or
    - One World Nursery, Moulsecoomb Campus, Lewes Road, and/or
    - St Joseph's Pre-School Playgroup, Davey Drive, and/or
    - Little Stars Childcare, Bear Road.

1.5 Local Employment Scheme - Contribution of £371,010 towards the city-wide coordination of training and employment schemes to support local people to employment within the construction industry.

1.6 Sustainable Transport - Contribution of £255,000 towards sustainable transport in the immediate vicinity of the site. This will be allocated to:

- Cycle facility improvements on routes leading to and from the development site, including, the provision of advanced stop lines on Sanders Park View signalised junction and pedal cycle parking facilities at Moulsecoomb railway station.
- Pedestrian facility improvements on routes connecting the site to local amenities and facilities including adjacent residential areas, Coombe Road Primary School, Moulsecoomb railway station and local shops and facilities. Improvements shall include, but not limited to, the upgrade of the existing pelican crossing to a puffin outside Moulsecoomb library and dropped kerbs and tactile paving and junction treatments.
- Controlled Parking Zone – a contribution towards two consultation events for a Controlled Parking Zone in the local area and, if supported by local residents, the implementation of a CPZ.

1.7 Framework Travel Plan - To cover the entire development site with specific travel plans for each land use. The specific travel plans to include:

- Travel Plan update for University to include details of a permit system for car parking users that firstly prioritises access for disabled staff and students, multi-occupancy vehicles, staff based upon geographical location and ability to use alternative modes of travel and only then issue permits to other users once all of the above users have been issued permits.
- Residential Travel Information Packs for student residential and residential units.
- Residential Travel Information Packs for each first residential unit which should include:

    - Offer the provision of free grants towards the purchase of a bicycle (value of £150, one per dwelling for the first occupants of each dwelling only)
    - Offer the provision of Brighton & Hove bus season tickets (one annual bus pass per dwelling for the first occupants of each dwelling only) or contribution towards rail season tickets
    - Offer 2 years membership to Enterprise Car Club (one per dwelling for the first occupants of each dwelling only)

- Membership to Brighton & Hove Bike Share scheme
- Provide local public transport, walking and cycling maps.
- Student Residential Travel Information Packs on a continuous basis for each occupier which should include:

    - Taster public transport tickets for Brighton & Hove buses (1 month long)
    - Local public transport, walking and cycling maps
    - Details of Brighton & Hove Bike Share scheme
    - Information and advice on road safety

1.8 Car Club - To provide a minimum of 8 car club bays on the Preston Barracks site in addition to the 2 years membership for each residential unit.

1.9 S278 Agreement **-** To be submitted and agreed with the Highway Authority prior to the commencement of the highway works

1.10 Construction Environmental Management Plan (CEMP) - To be submitted and agreed prior to the commencement of works.

1.11 Employment and Training Strategy - Minimum of 20% local employment for the demolition (where appropriate due to the specialist nature of the works) and construction phase.

1.12 Review Mechanism of Viability – To be undertaken by the developer:

- Following review, any uplift to be spent on further contribution towards affordable housing up to maximum of 40%

1.13 Walkways Agreement under section 35 of the Highways Act 1980 should be entered into, and:

- The Furlong, the pedestrian access through The Field, the extended section of Saunders Park View and the foraging area, the route from Saunders Park View to Moulsecoomb Station and the Bridge shall remain accessible to the public at all times; and
- Details of route improvements from the extended section of Saunders Park View outside Block J to Moulsecoomb Station including lighting, landscaping and maintenance details, to be submitted prior to commencement of the residential development above slab level. Once agreed with the LPA, the route improvements shall be implemented prior to the completion of construction works on the Preston Barracks site.

1.14 Phasing Plan - The Phasing Plan shall be implemented accordingly, and:

- The CRL shall be completed and ready for occupation prior to first occupation of the student and the residential accommodation on the Preston Barracks site;
- The s278 and utilities works shall be completed prior to first occupation of the student and the residential accommodation on the Preston Barracks and the Mithras sites;
- No fewer than 500 parking spaces to be available for use at the Mithras and Watts sites at any point in time during the construction phase;
- The Multi-Storey Car Park shall not be brought into use until the existing parking areas on the Mithras and Watts sites have been removed from use for the parking of vehicles, except for vehicles related to the ongoing construction of the development; and
- The Business School shall be ready for occupation prior to first occupation of the student accommodation on the Mithras site.

1.15 Ecological Mitigation/Enhancement of SNCI - Including Information Boards and Tree Replacement Planting on SNCI adjacent to the site. Details to be submitted to and agreed in writing by the LPA prior to commencement of residential development above slab level and implemented within 6 months of completion of the Preston Barracks parcel of development.

1.16 Student Accommodation - To cover management and occupation and include:

- Student Accommodation and Estate Management Plan; and
- Occupancy restriction to students studying at a Higher Education Establishment in the City.

Conditions:

1. The development hereby permitted shall be carried out in accordance with the approved drawings listed below.
Reason: For the avoidance of doubt and in the interests of proper planning.

Plan Type	Reference	Version	Date Received
Floor Plans Proposed	0195-SEW-ZZ-02-DR-A-001002		12 September 2017
Floor Plans Proposed	0195-SEW-ZZ-03-DR-A-001003		12 September 2017
Existing Floor Plans	0195-SEW-ZZ-04-DR-A-000104		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-04-DR-A-001004		12 September 2017
Floor Plans Proposed	0195-SEW-ZZ-04-DR-A-001010		10 February 2017

Floor Plans Proposed	0195-SEW-ZZ-05-DR-A-001005		12 September 2017
Floor Plans Proposed	0195-SEW-ZZ-06-DR-A-001006		12 September 2017
Floor Plans Proposed	0195-SEW-ZZ-06-DR-A-001007		12 September 2017
Floor Plans Proposed	0195-SEW-ZZ-06-DR-A-001008		12 September 2017
Floor Plans Proposed	0195-SEW-ZZ-06-DR-A-001009		12 September 2017
Floor Plans Proposed	0195-SEW-ZZ-10-DR-A-001010		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-10-DR-A-001011		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-10-DR-A-001012		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-10-DR-A-001013		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-14-DR-A-001014		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-15-DR-A-001015		10 February 2017
Roof Plan Proposed	0195-SEW-ZZ-18-DR-T-001018		10 February 2017
Existing Floor Plans	0195-SEW-ZZ-GF-DR-A-000100		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-GF-DR-A-001000		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-GF-DR-A-001001		12 September 2017
Site Layout Plan	0195-SEW-ZZ-GF-DR-T-000100		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-GF-DR-T-0001000		10 February 2017
Existing Section	0195-SEW-ZZ-ZZ-DR-A-000200		10 February 2017
Existing Section	0195-SEW-ZZ-ZZ-DR-A-000201		10 February 2017
Existing Section	0195-SEW-ZZ-ZZ-DR-A-000202		10 February 2017
Existing Elevations	0195-SEW-ZZ-ZZ-DR-A-000300		10 February 2017
Sections Proposed	0195-SEW-ZZ-ZZ-DR-A-001200		12 September 2017
Sections Proposed	0195-SEW-ZZ-ZZ-DR-A-001201		12 September 2017
Sections Proposed	0195-SEW-ZZ-ZZ-DR-A-001202		12 September 2017
Sections Proposed	0195-SEW-ZZ-		10 February 2017

	ZZ-DR-A-001203		
Sections Proposed	0195-SEW-ZZ-ZZ-DR-A-001204		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001300		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001301		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001302		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001303		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001304		10 February 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001305		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001306		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001307		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001308		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001309		12 September 2017
Elevations Proposed	0195-SEW-ZZ-ZZ-DR-A-001310		10 February 2017
Existing Section	0195-SEW-ZZ-ZZ-DR-T-000200		10 February 2017
Existing Elevations	0195-SEW-ZZ-ZZ-DR-T-000300		10 February 2017
Block Plan Proposed	0195-SEW-ZZ-ZZ-DR-T-000999		10 February 2017
Landscaping Proposed	221-L00		10 February 2017
Landscaping Proposed	221-L01		10 February 2017
Landscaping Proposed	221-L02		10 February 2017
Landscaping Proposed	221-L03		10 February 2017
Landscaping Proposed	221-L04		10 February 2017
Tree Survey	221-L05		10 February 2017
Other	221-L10		10 February 2017
Other	221-L11		10 February 2017
Roof Plan Proposed	221-L13		10 February 2017
Floor Plans Proposed	MCB-HSL-00-00-DR-A-ZZ-01000		10 February 2017
Elevations Proposed	MCB-HSL-00-00-DR-A-ZZ-02000		10 February 2017
Sections Proposed	MCB-HSL-00-00-DR-A-ZZ-03000		10 February 2017
Existing Floor Plans	MCB-HSL-00-00-DR-A-ZZ-E1000		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-00-DR-A-ZZ-		10 February 2017

	01000		
Elevations Proposed	MCE-STL/HSL-00-00-DR-A-ZZ-02000		10 February 2017
Elevations Proposed	MCE-STL/HSL-00-00-DR-A-ZZ-02002		10 February 2017
Elevations Proposed	MCE-STL/HSL-00-00-DR-A-ZZ-02003		10 February 2017
Elevations Proposed	MCE-STL/HSL-00-00-DR-A-ZZ-02004		10 February 2017
Site Layout Plan	MCE-STL/HSL-00-00-DR-A-ZZ-E1000		10 February 2017
Existing Elevations	MCE-STL/HSL-00-00-DR-A-ZZ-E2000		10 February 2017
Existing Section	MCE-STL/HSL-00-00-DR-A-ZZ-E3000		10 February 2017
Existing Section	MCE-STL/HSL-00-00-DR-A-ZZ-E3001		10 February 2017
Existing Section	MCE-STL/HSL-00-00-DR-A-ZZ-E3002		10 February 2017
Existing Section	MCE-STL/HSL-00-00-DR-A-ZZ-E3003		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-01-DR-A-ZZ-01001		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-02-DR-A-ZZ-01002		10 February 2017
Sections Proposed	MCE-STL/HSL-00-02-DR-A-ZZ-03001		10 February 2017
Sections Proposed	MCE-STL/HSL-00-02-DR-A-ZZ-03002		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-03-DR-A-ZZ-01003		10 February 2017
Sections Proposed	MCE-STL/HSL-00-03-DR-A-ZZ-03003		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-		10 February 2017

	00-04-DR-A-ZZ-01004		
Sections Proposed	MCE-STL/HSL-00-04-DR-A-ZZ-03004		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-05-DR-A-ZZ-01005		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-06-DR-A-ZZ-01006		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-07-DR-A-ZZ-01007		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-08-DR-A-ZZ-01008		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-09-DR-A-ZZ-01009		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-10-DR-A-ZZ-0101		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-11-DR-A-ZZ-01011		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-12-DR-A-ZZ-01012		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-13-DR-A-ZZ-01013		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-14-DR-A-ZZ-01014		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-14-DR-A-ZZ-01015		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-16-DR-A-ZZ-01016		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-16-DR-A-ZZ-01017		10 February 2017
Floor Plans Proposed	MCE-STL/HSL-00-16-DR-A-ZZ-01018		10 February 2017
Roof Plan Proposed	MCE-STL/HSL-00-16-DR-A-ZZ-01019		10 February 2017

Elevations Proposed	MCE-STLHSL-00-00-DR-A-ZZ-02001		12 September 2017
Floor Plans Proposed	MCE-STLHSL-00-04-DR-A-ZZ-01004		12 September 2017
Site Layout Plan	MCW-HSL-00-00-DR-A-ZZ-01000		10 February 2017
Sections Proposed	MCW-HSL-00-00-DR-A-ZZ-03000		10 February 2017
Site Layout Plan	MCW-HSL-00-00-DR-A-ZZ-E1000		10 February 2017
Existing Section	MCW-HSL-00-00-DR-A-ZZ-E3000		10 February 2017
Existing Floor Plans	0195-SEW-ZZ-01-DR-A-000101		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-01-DR-A-001001		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-01-DR-A-001001		12 September 2017
Site Layout Plan	0195-SEW-ZZ-01-DR-T-000101		10 February 2017
Demolition Plan	0195-SEW-ZZ-01-DR-T-000102		10 February 2017
Block Plan Existing	0195-SEW-ZZ-01-DR-T-000103		10 February 2017
Location/block/floor plans and elevation prop	0195-SEW-ZZ-01-DR-T-001005		10 February 2017
Floor Plans Proposed	0195-SEW-ZZ-02-DR-A-001002		10 February 2017
Sections Proposed	SK170612-MCW-301		12 September 2017
Sections Proposed	SK170612-MCW-303		26 June 2017
Sections Proposed	SK170612-MCW-303		26 June 2017
Other	SK170615-MCW-101		12 September 2017
Site & Landscape Parcel Plan	0195-SEW-ZZ-00-DR-A-501000		13 September 2017
Swept Path Analysis Refuse Vehicle and Pumping Appliance	33132/5501/SK078	Rev B	14 September 2017

2. The development of the following parcels of the site hereby permitted shall be commenced before the expiration of three years from the date of this permission.
a) Mithras Site
b) Pedestrian Bridge
c) Block J
d) Podium Residential
e) Block A
f) Central Research Laboratory
g) Student Blocks 6 – 8
Reason: To ensure that the Local Planning Authority retains the right to review unimplemented permissions.

3. The development of the following parcels of the site hereby permitted shall be commenced before the expiration of three years from the date of this permission or two years from the approval of the last of the reserved matters as defined in condition 4 below, whichever is the later.
Reason: To ensure that the Local Planning Authority retains the right to review unimplemented permissions

4. Details of the reserved matters set out below ("the reserved matters") in respect of the following parcels of land shall be submitted to the Local Planning Authority for approval within three years from the date of this permission:
a) Business School
b) Watts Site Canopy
c) Multi Storey Car Park
d) Internal Route of Access Road West of Business School Square.
(i) layout;
(ii) scale;
(iii) appearance;
The reserved matters shall be carried out as approved.
Approval of all reserved matters shall be obtained from the Local Planning Authority in writing before any development is commenced.
Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 (as amended) of the Town and Country Planning Act 1990.

5. No development above ground floor slab level of any individual phase (as set out below) of the development hereby permitted shall take place until samples of all materials to be used in the construction of the external surfaces of the:
a) Business School
b) Watts Site Canopy
c) Multi Storey Car Park
d) Access Road
e) Mithras Towers 1 - 5
f) Pedestrian Bridge
g) Block J
h) Podium Residential
i) Block A

j) Central Research Laboratory
k) Student Blocks 6 – 8 have been submitted to and approved in writing by the Local Planning Authority, including (where applicable):
i) Samples of all brick, render and tiling (including details of the colour of render/paintwork to be used)
ii) Samples of all cladding to be used, including details of their treatment to protect against weathering
iii) Samples of all hard surfacing materials
iv) Samples of the proposed window, door and balcony treatments
v) Samples of all other materials to be used externally
Development shall be carried out in accordance with the approved details.
Reason: To ensure a satisfactory appearance to the development and to comply with policies QD14 of the Brighton & Hove Local Plan and policies CP12 and CP15 of the Brighton and Hove City Plan Part One.

6. Prior to first occupation of the following phases of the development hereby permitted a scheme for the storage of refuse and recycling shall have been submitted to and approved in writing by the Local Planning Authority.
a) Business School
b) Mithras Towers 1 - 5
c) Block J
d) Podium Residential
e) Block A
f) Central Research Laboratory
g) Student Blocks 6 – 8
The scheme shall be carried out in full as approved prior to first occupation of the individual phase of development and the refuse and recycling storage facilities shall thereafter be retained for use at all times.
Reason: To ensure the provision of satisfactory facilities for the storage of refuse and to comply with policy QD27 of the Brighton & Hove Local Plan.

7. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no windows, dormer windows, rooflights or doors other than those expressly authorised by this permission shall be constructed without planning permission obtained from the Local Planning Authority.
Reason: To safeguard the amenities of the occupiers of nearby properties and to comply with policies QD14 and QD27 of the Brighton & Hove Local Plan.

8. Prior to first occupation of the of the following phases of the development hereby permitted a plan detailing the positions, height, design, materials and type of all existing and proposed boundary treatments shall have been submitted to and approved in writing by the Local Planning Authority. The boundary treatments shall be provided in accordance with the approved details prior to first occupation of the development and shall thereafter be retained at all times.
a) Business School
b) Mithras Towers 1 - 5

c) Block J
d) Podium Residential
e) Block A
f) Central Research Laboratory
g) Student Blocks 6 – 8

Reason: To enhance the appearance of the development in the interest of the visual and residential amenities of the area and to comply with policies QD15, HE6 and QD27 of the Brighton & Hove Local Plan and CP12 and CP15 of the Brighton and Hove City Plan Part One.

9. With the exception of the demolition works to Preston Barracks and Watts Campus (but not on the Mithras Site) as hereby approved under the Framework Demolition Management Plan (dated 13.09.2017), the development hereby permitted shall not be commenced and no other operations shall commence on site in connection with the development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening, or any operations involving the use of motorised vehicles or construction machinery) until the following Method Statements have been submitted to and approved in writing by the Local Planning Authority:

i) An Arboricultural Method Statement, to include a detailed Tree Protection Plan and Tree Works Specification and means for their implementation, supervision and monitoring during works;

ii) A Construction Method Statement to include details on how, amongst others, excavations, materials storage, drainage, servicing and hard surfaces will be managed and implemented to provide for the long-term retention of the trees;

No development or other operations shall take place except in complete accordance with the approved Arboricultural and Construction Method Statements.

Reason: As this matter is fundamental to protecting the trees which are to be retained on the site during construction works in the interest of the visual amenities of the area and to comply with policies QD16 of the Brighton & Hove Local Plan and CP12 of the Brighton and Hove City Plan Part One.

10. Except those works permitted under Condition 8, no development or other operations on the following sites shall commence on site in connection with the development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening, or any operations involving the use of motorised vehicles or construction machinery), until a detailed Levels Survey, which provides for the retention of trees on the site, has been submitted to and approved in writing by the Local Planning Authority. No alterations in site levels shall take place, except in complete accordance with the approved Survey. The Survey shall include existing and proposed spot levels at the base of and around the crown spreads of all trees specified for retention.

a) Preston Barracks
b) Watts Business School
c) Mithras Student development

Reason: As this matter is fundamental to protecting the trees which are to be retained on the site during construction works in the interest of the visual

amenities of the area and to comply with policies QD16 of the Brighton & Hove Local Plan and CP12 of the Brighton and Hove City Plan Part One.

11. Unless otherwise agreed in writing by the Local Planning Authority, the following non-residential buildings hereby approved a BREEAM Building Research Establishment issued Post Construction Review Certificate shall be submitted within 6 months of occupation confirming that:
i) Business School
ii) Mithras Towers 1 - 5
iii) Central Research Laboratory
iv) Student Blocks 6 – 8
have achieved a minimum BREEAM New Construction rating of 'Excellent' and have been submitted to, and approved in writing by, the Local Planning Authority.
Reason: To ensure that the development is sustainable and makes efficient use of energy, water and materials and to comply with policy CP8 of the Brighton and Hove City Plan Part One.

12. None of the following residential parcels hereby approved shall be occupied until each residential block built within that site parcel has achieved an energy efficiency standard of a minimum of 19% CO2 improvement over Building Regulations requirements Part L 2013 (TER Baseline).
a) Podium residential
b) Block A
c) Block J
Reason: To ensure that the development is sustainable and makes efficient use of energy to comply with policy CP8 of the Brighton and Hove City Plan Part One.

13. None of the following residential parcels hereby approved shall be occupied until each residential unit built within that site parcel has achieved a water efficiency standard using not more than 110 litres per person per day maximum indoor water consumption.
a) Residential Podium
b) Block A
c) Block J
Reason: To ensure that the development is sustainable and makes efficient use of water to comply with policy CP8 of the Brighton and Hove City Plan Part One.

14. Prior to the first planting season following occupation of the Residential Podium, the food growing areas shown on the approved plans as part of the on-site open space and recreation provision shall be created using soil imported to BS 3882 Topsoil grade in order to be suitable for edible planting.
Reason: In order that the food growing areas meet an acceptable standard and would be capable of providing suitable food growing/allotment space in accordance with policies CP7, CP8 and CP16 of the Brighton and Hove City Plan Part One.

15. Within 3 months of occupation, the ground floor commercial units hereby approved on The Furlong shall demonstrate that they have obtained a Green lease agreement (which requires the incoming tenants to achieve a certified BREEAM Fit Out 'very good' standard) which shall be submitted to, and approved in writing by, the Local Planning Authority.
Reason: To ensure that the development is sustainable and makes efficient use of energy, water and materials and to comply with policy CP8 of the Brighton and Hove City Plan Part One.

16. Evidence should be submitted in respect of the following buildings/parcels of land:
d) Preston Barracks
e) Watts Business School
f) Mithras Student development
to demonstrate that the energy plant/plant room for the Preston Barracks heat network has capacity to connect to a future District Heat Network in the area. Evidence should demonstrate the following:
a) Energy centre size and location with facility for expansion for connection to a future district heat network: for example physical space to be allotted for installation of heat exchangers and any other equipment required to allow connection;
b) A route onto and through the site: space on the site for the pipework connecting the point at which primary piping would come onto site with the on-site heat exchanger/ plant room/energy centre. Proposals must demonstrate a plausible route for heat piping and demonstrate how suitable access could be gained to the piping and that the route is protected throughout all planned phases of development.
c) Metering: installed to record flow volumes and energy delivered on the primary circuit.
Reason: To ensure that the development is sustainable and makes efficient use of energy and incorporates renewal energy in order to comply with policy CP8 of the Brighton and Hove City Plan Part One.

17. Prior to commencement of each of the following phases of development:
a) Business School
b) Multi Storey Car Park
c) Access Road
d) Mithras Towers 1 - 5
e) Pedestrian Bridge
f) Block J
g) Podium Residential
h) Block A
i) Central Research Laboratory
j) Student Blocks 6 – 8

A. a) A site investigation report documenting the ground conditions of the development and incorporating chemical and gas analysis identified as appropriate by the desk top study in accordance with BS10175; and, unless otherwise agreed in writing by the local planning authority,

b) a detailed scheme for remedial works and measures to be undertaken of the development to avoid risk from contaminants and/or gases when the site is developed and proposals for future maintenance and monitoring. Such a scheme shall include nomination of a competent person to oversee the implementation of the works.

B. a) The phases of the development above hereby permitted shall not be occupied or brought into use until there has been submitted to the local planning authority verification by a competent person approved under the provisions of condition 17 A b) that any remediation scheme required and approved under the provisions of condition 16 A b) has been implemented fully in accordance with the approved details (unless varied with the written agreement of the Local Planning Authority in advance of implementation). Unless otherwise agreed in writing by the Local Planning Authority such verification shall comprise:

- Built drawings of the implemented scheme;
- Photographs of the remediation works in progress;
- Certificates demonstrating that imported and/or material left in situ is free from contamination.

Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition 17 A b).
Reason: As this matter is fundamental to the acceptable delivery of the permission to safeguard the health of future residents or occupiers of the site and to comply with policy SU11 of the Brighton & Hove Local Plan.

18. If, during development, contamination not previously identified is found to be present at the site then no further development on the phases set out in Condition 17 above (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a method statement to identify, risk assess and address the unidentified contaminants.
Reason: To safeguard the health of future residents or occupiers of the site and to comply with policy SU11 of the Brighton & Hove Local Plan.

19. Glazing and ventilation installed within the build shall meet the requirements laid out in RAMBOLL report (Ref: UK11-21633), dated February 2017 submitted with the application. Internal noise levels shall meet BS8233:2014 requirements (35 dBLAeq, day and 30 dBLAeq, night in bedrooms). The approved installation shall be retained and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to a variation.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies SU10 and QD27 of the Brighton & Hove Local Plan.

20. Noise associated with plant and machinery incorporated within any part of the development shall be controlled such that the Rating Level, measured or calculated at 1-metre from the façade of the nearest existing noise sensitive

premises, shall not exceed the existing LA90 background noise level. Rating Level and existing background noise levels to be determined as per the guidance provided in BS 4142:2014.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies SU10 and QD27 of the Brighton & Hove Local Plan.

21. The Party Ceilings/Floors between any commercial units / workshops and the residential and student accommodation shall be designed to achieve airborne sound insulation values of at least 5dB higher than that required by Approved Document E performance standards.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies SU10 and QD27 of the Brighton & Hove Local Plan.

22. The Party Ceilings/Floors between the plant rooms, substation, refuse storage areas, car parks, and cycle storage and the residential and student accommodation should be designed to achieve airborne sound insulation values of at least 5dB higher than that required by Approved Document E performance standards.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies SU10 and QD27 of the Brighton & Hove Local Plan.

23. Prior to occupation of the Preston Barracks site, a management plan with regards to timings for deliveries and collections on the site shall be submitted to and approved in writing by the Local Planning Authority. The approved timings for deliveries and collections shall be maintained and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to a variation.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies SU10 and QD27 of the Brighton & Hove Local Plan.

24.

a) Prior to the commencement of development above Level 1 of the following parcels (as set out below), details of the external lighting of the site (including the appearance of lamps, columns and fittings etc) shall be submitted to and approved in writing by the Local Planning Authority. These details shall include the predictions of both horizontal illuminance across the site and vertical illuminance affecting immediately adjacent receptors. The lighting installation shall comply with the recommendations of the Institution of Lighting Professionals (ILP) "Guidance Notes for the Reduction of Obtrusive Light" (2011,) for zone E3, or similar guidance recognised by the council.

a) Business School
b) Multi Storey Car Park
c) Access Road
d) Mithras Towers 1 - 5

e) Pedestrian Bridge
f) Block J
g) Podium Residential
h) Block A
i) Central Research Laboratory
j) Student Blocks 6 – 8

b) Prior to occupation of or the bringing into use of each of the above phases, the predicted illuminance levels shall be tested by a competent person to ensure that the illuminance levels agreed in part a) are achieved. Where these levels have not been met, a report shall be submitted to the Local Planning Authority for approval to demonstrate what measures have been taken to reduce the levels to those agreed in part a) above.
The approved installation shall be maintained and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to a variation.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies QD25 and QD27 of the Brighton & Hove Local Plan.

25. The external areas proposed within the domain of the commercial units under residential Block A, the Central Research laboratory and Student Building 8 cafeteria/retail, Preston Barracks shall not be permitted to be used in relation to its commercial use and/or social events and activities except between the hours of 07.00 to 22.00.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies SU10 and QD27 of the Brighton & Hove Local Plan.

26. The ground floor commercial units under residential Block A, Preston Barracks shall not be operational except between the hours of 07:00 to 23:00.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies SU10 and QD27 of the Brighton & Hove Local Plan.

27. No development on the following parcels of land (excluding demolition, ground works and vegetation and tree clearance approved under this consent) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the Local Planning Authority.
a) Preston Barracks
b) Watts Business School
c) Mithras Student development

The CEMP (Biodiversity) shall include the following:
a) Risk assessment of potentially damaging construction activities;
b) Identification of “biodiversity protection zones”;

c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
d) The location and timing of sensitive works to avoid harm to biodiversity features;
e) The times during construction when specialist ecologists need to be present on site to oversee works;
f) Responsible persons and lines of communication;
g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person;
h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP (Biodiversity) shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.
Reason: To increase the biodiversity of the site, to mitigate any impact from the development hereby approved and to comply with Policy CP10 of the Brighton and Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

28. No development shall take place until written confirmation of the implementation of an ecological design strategy (EDS) addressing the rescue and protection of reptiles from the Preston Barracks and Watts sites that has taken place has been submitted to and approved in writing by the Local Planning Authority. The EDS shall include the following:
a) Persons responsible for implementing the works;
b) Details of initial aftercare and long-term maintenance;
c) Details for monitoring and remedial measures;
d) Details for disposal of any wastes arising from works.

The EDS shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.
Reason: To increase the biodiversity of the site, to mitigate any impact from the development hereby approved and to comply with Policy CP10 of the Brighton and Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

29. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the Local Planning Authority prior to the occupation of the following phases of the development:
a) Preston Barracks
b) Watts Business School
c) Mithras Student development

The content of the LEMP shall include the following:
a) Description and evaluation of features to be managed;
b) Ecological trends and constraints on site that might influence management;
c) Aims and objectives of management;
d) Appropriate management options for achieving aims and objectives;

e) Prescriptions for management actions, together with a plan of management compartments;
f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period;
g) Details of the body or organisation responsible for implementation of the plan;
h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.
Reason: To ensure the long term management of habitats, species and other biodiversity features in accordance with Policy CP10 of the Brighton and Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

30. No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.
Reason: In order that the development contributes to and enhances the natural and local environment by preventing both new and existing development from contributing to unacceptable levels of water pollution and to comply with policy SU9 of the Brighton and Hove Local Plan.

31. Piling and investigation boreholes using penetrative methods shall not be carried out other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.
Reason: The site lies on Head Deposits across the site which are underlain by the Lewes Nodular Chalk bedrock (designated a Principal Aquifer). The site is within the Source Protection Zone 1 for the Lewes Road abstraction which is approximately 400m south west of the site and to comply with policy SU9 of the Brighton and Hove Local Plan.

32. No development shall take place above foundation levels until a detailed design and associated management and maintenance plan of surface water drainage for the phases set out below using sustainable drainage methods has been submitted to and approved in writing by the Local Planning Authority. The approved drainage system shall be implemented in accordance with the approved detailed design prior to the building commencing.
a) Business School
b) Multi Storey Car Park
c) Access Road
d) Mithras Towers 1 - 5
e) Pedestrian Bridge

f) Block J
g) Podium Residential
h) Block A
i) Central Research Laboratory
j) Student Blocks 6 – 8

The final detailed design of the surface water drainage should:

- Demonstrate the drainage strategy provides betterment as per the SFRA section 6.2.2 - developers should strive to achieve 'greenfield' runoff rates but as a minimum reduce existing runoff by 50%.
- Show the results of the Ground Investigation Survey (Feb 2017)
- Provide an appropriate soakaway test in accordance with Building Research Establishment Digest 365 (BRE365). Details of the results will need to be provided.
- Provide appropriate calculations to demonstrate that the final proposed drainage system will be able to cope with both winter and summer storms for a full range of events and storm durations.
- Demonstrate that the surface water drainage system is designed so that flooding does not occur on any part of the site for a 1 in 30 year rainfall event, and so that flooding does not occur during a 1 in 100 (+40% allowance for climate change) year event in any part of a buildings or in any utility plant susceptible to water.
- Provide a comprehensive maintenance plan for the final drainage system in a formal maintenance plan. This should describe who will maintain the drainage, how it should be maintained and the frequency needed to monitor and maintain the system for the lifetime of the development.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal in accordance with Policy CP11 of the Brighton and Hove City Plan Part One.

33. The stained glass windows in The Steam House building on the Mithras House site shall be salvaged and retained prior to its demolition. Details of a scheme for their future use, display or archiving shall be submitted to and approved in writing by the Local Planning Authority and thereafter retained.
Reason: In the interests of preserving a feature of local historic and architectural interest and to comply with policy CP12 of the Brighton and Hove City Plan Part One.

34. Prior to first occupation of each phase hereby permitted as set out below:
a) Business School
b) Multi Storey Car Park
c) Mithras Towers 1 - 5
d) Block J
e) Podium Residential
f) Block A
g) Central Research Laboratory
h) Student Blocks 6 – 8

Details of all secure cycle and motor cycle parking facilities, including allocations, together with internal wheeling ramps on stairwells and lifts (including the dedicated cycle lift to Block J) to be provided for the occupants of, and visitors to that phase of the development above shall have been submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be fully implemented and made available for use prior to the first occupation of that phase of the development by the allocated users and visitors and shall thereafter be retained for use at all times.
Reason: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than private motor vehicles and to comply with policies TR14 of the Brighton & Hove Local Plan and policy CP9 of the Brighton and Hove City Plan Part One and SPD 14 Parking Standards.

35. Details of the provision, location and design of a minimum (set out below) of 30 Bike Share spaces and the specification of bikes to be provided shall be submitted to and approved in writing by the Local Planning Authority prior to the completion (excluding soft landscaping) of each of the following sites:
a) Preston Barracks site - 20 spaces and bikes
b) Mithras site – 10 spaces and bikes
Reason: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than private motor vehicles and to comply with policies TR14 of the Brighton & Hove Local Plan and CP9 of the Brighton and Hove City Plan Part One.

36. Prior to the first occupation of each of the following parcels of land (set out below), a Delivery & Service Management Plan shall be submitted to and approved in writing by the Local Planning Authority:
a) Preston Barracks
b) Mithras Site
c) Business School

The Management Plans shall include details of the types of vehicles, how deliveries will take place and the management and co-ordination of delivery and servicing movements, times and frequencies along the Furlong. All deliveries shall thereafter be carried out in accordance with the approved plan.
Reason: In order to ensure that the safe operation of the development and to protection of the amenities of nearby residents, in accordance with polices SU10, QD27 and TR7 of the Brighton & Hove Local Plan.

37. Prior to commencement of use of the following car parks hereby approved, details in the form of a Parking Management Plan to include space allocation between users shall be submitted to and approved in writing by the Local Planning Authority:
a) Preston Barracks podium parking
b) Watts Multi Storey Car Park
c) Mithras Site parking

Reason: To ensure that adequate parking provision is retained and to comply with policy CP9 of the Brighton and Hove City Plan Part One and SPD14 (Parking Standards).

38. The following car parks or areas set out below shall be available for use prior to occupation of the buildings which they will serve. The number of car parking spaces shall not exceed the following maximum figures whilst the minimum number of disabled spaces set out below should be provided and be available at all times. Details of circulation, signing and lining including the marking out of disabled bays shall have been submitted to the Local Planning Authority for approval prior to the car parks and parking areas being brought into use.

Parking zone	Maximum overall car parking provision (including disabled parking)	Minimum Disabled User Spaces
Preston Barracks podium car park	156	22
Watts Multi Storey Car Park	551	17
Mithras site	0	19
Saunders Park View	0	8

Reason: To ensure that adequate parking provision is retained and to comply with policy CP9 of the Brighton and Hove City Plan Part One and SPD14 Parking Standards.

39. Prior to first occupation or bringing into use of the following buildings and parcels of land, detailed layouts and designs of all pedestrian routes serving them shall be submitted to the Local Planning Authority for approval and thereafter be retained for use at all times.
a) Preston Barracks
b) Mithras Site
c) Business School

Reason: To ensure that convenient, accessible and attractive pedestrian routes are provided for the development and which link to adjoining areas and to key public transport facilities and to comply with policies TR7 of the

Brighton and Hove Local Plan and CP9 of the Brighton and Hove City Plan Part One.

40. Prior to commencement of construction of the following car parks, full details shall have been submitted to the Local Planning Authority for approval of a minimum number of and location of electric vehicle charging points with full manufactures specification and the location and minimum number of passive electric charging points within the proposed car parks hereby approved:
    a) Preston Barracks podium parking –A minimum of 16 or 10% of the total parking spaces with Electric Vehicle Charging and 24 or 15% of the total passive Electric Vehicle Charging points.
    b) Watts Multi Storey Car Park – A minimum of 55 or 10% of the total parking spaces with Electric Vehicle Charging points and a further 55 (10%) passive Electric Vehicle Charging points

    These facilities shall be fully implemented and made available for use prior to the occupation of the development hereby permitted and shall thereafter be retained for use at all times.
    Reason: To encourage travel by sustainable modes of transport, to mitigate the impacts of the development on air quality and to implement measures to reduce fuel use and greenhouse gas emissions and to comply with policies SA6, CP7, CP9, CP12, CP13 and CP15 of the Brighton and Hove City Plan Part One, SU9 of the Brighton and Hove Local Plan and SPD14 (Parking Standards).

41. Prior to first occupation of the podium residential development hereby permitted, details of an additional publically accessible lift to be located between blocks B & C on the Preston Barracks site should be provided to enhance the pedestrian accessibility of the development between the Furlong and Saunders Park View.
    Reason: To ensure that convenient, attractive and fully accessible pedestrian routes are provided within the development and to comply with policy CP9 of the Brighton & Hove City Plan Part One.

42. Prior to first commencement of use of the following car parks, full details including the location of and the design and specification of motorcycle parking shall be submitted to the Local Planning Authority for approval.
    a) Preston Barracks podium parking minimum 16 spaces
    b) Watts Multi Storey Car Park minimum 30 spaces

    These facilities shall be fully implemented and made available for use prior to the occupation of the development hereby permitted and shall thereafter be retained for use at all times.
    Reason: To encourage travel by alternative means and to accommodate for the demand for motorcycle parking from the development and to comply with policy CP9 of the Brighton and Hove City Plan Part One and SPD14 (Parking Standards)

43. Prior to first occupation of the Watts car park hereby permitted, details of an enhanced pedestrian access route from the development hereby approved

through to Moulsecoomb railway station which provides a clear and dedicated pedestrian route that is safe and fully accessible shall be submitted to the Local Planning Authority for approval. These facilities shall be fully implemented and be retained for use at all times.
Reason: To ensure that convenient, attractive and fully accessible pedestrian routes are provided from within the development to key public transport facilities and to comply with policy CP9 of the Brighton and Hove City Plan Part One.

44. Prior to occupation of Block J, a scheme shall be submitted to the Local planning Authority for approval and be implemented, setting out highway works to Saunders Park View to remove the existing green metal railings, re-surface the carriageway on the adopted highway, remove the existing white bollards and Armco crash barrier around the existing turning head between properties 117 and 119 and implement dropped kerbs and tactile paving on the footpath either side of the existing turning head.
Reason: To ensure that suitable footway provision is provided to and from the development and to comply with policies TR7 of the Brighton & Hove Local Plan and CP9 of the Brighton and Hove City Plan Part One.

45. Within the student buildings set out below, all corridors and stairwells together with those communal kitchen/lounge/diners at Level 10 and above (as shown on the approved plans) shall be fitted with motion controlled infrared light switching with timers. Details of the specification, location and times of operation shall be submitted to the Local Planning Authority for approval prior to the development above podium level.
a) Preston Barracks Student Blocks 6; 7 & 8
b) Mithras House Tower Student Blocks 1; 2; 3; 4 & 5

Reason: In order to mitigate the impact of lighting from within the tall buildings hereby approved on the setting of the natural background and to comply with policies QD27 of the Brighton and Hove Local Plan and CP12 and SA5 of the Brighton and Hove City Plan Part One.

46. Prior to occupation of each of the following:
a) Ground floor commercial or workshop units, The Furlong
b) The Student Union, Mithras Podium
c) Central Research Laboratory

Details of the appearance of any required extract plant or equipment that would face onto The Furlong or the Lewes Road shall be submitted to and approved in writing by the Local Planning Authority and shall be implemented in accordance with the approved details.
Reason: To enhance the appearance of the development in the interest of the visual amenities of the area and to comply with policies QD15 of the Brighton & Hove Local Plan and CP12 of the City Plan Part One.

47. Prior to occupation of the following buildings details of the provision of photovoltaics on the roofs shall be submitted to and approved in writing by the

Local Planning Authority and shall be implemented in accordance with the approved details:

a) Business School
b) Block J
c) Podium Residential
d) Block A
e) Central Research Laboratory
f) Student Blocks 6 – 8

Reason: To ensure that the development is sustainable and makes efficient use of energy to comply with policy CP8 of the City Plan Part One.

48. Prior to occupation of the following buildings, details of the construction of the chalk grassland and wildflower green roofs shall have been submitted to and approved in writing by the Local Planning Authority. The details shall include a cross section, construction method statement, the seed mix, and a maintenance and irrigation programme. The roofs shall then be constructed in accordance with the approved details and shall be retained as such thereafter.

a) Block C
b) Block D
c) Block J
d) Student Blocks 6 & 7

Reason: To ensure that the development is sustainable and enhances the ecological value of the site and open space provision and to comply with policies QD15 of the Brighton and Hove Local Plan and CP7; CP8; CP10 and CP16 of the Brighton and Hove City Plan Part One.

49. A signage strategy shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the following sites:

a) Preston Barracks
b) Mithras Site
c) Watts Site

To include details of the location of informational, warning and directional signage within the site and around the perimeter of the development hereby approved together with the planned location of commercial signage on individual units which shall include:

a) Information, location and availability of car parking spaces including car club spaces hereby approved.
b) Information signage or site maps indicating location of residential and student blocks, business and community premises and amenity areas.
c) Information on location and availability of all staff, visitor and bike share cycle spaces.
d) Information, location and availability of servicing and delivery locations and restrictions
e) Directional signage and distance information for location of public transport facilities including bus, train and taxi pick-ups.

f) Information and directional signage for pedestrian movements, footways and road crossing points between all parts of the development hereby approved

The scheme shall be implemented fully in accordance with the approved details.
Reason: To ensure safe, consistent, coordinated and efficient wayfinding around the sites and to avoid unnecessary and visually harmful signage clutter and to comply with policies TR7, TR9, TR14, QD5, QD12 and QD27 of the Brighton & Hove Local Plan DA3, CP12 and CP13 of the Brighton and Hove City Plan Part One.

50. No vehicular movements nor any loading or unloading of vehicles shall take place on The Furlong, Preston Barracks between the hours of 10.00 and 16.00 hours Monday to Saturdays and not at any time on Sundays, Bank or Public Holidays. Exceptions will be made in the case of a special occasion or event for which loading and unloading necessary for the event shall be permitted between these hours on no more than one occasion per calendar month.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to safeguard The Furlong for use for open space and recreation purposes and to comply with policies SU10 and QD27 of the Brighton & Hove Local Plan and CP16 of the Brighton and Hove City Plan Part One.

51. No development shall take place above the ground floor slab level of the following buildings until 1:20 scale elevations and sections of the ground floor shop fronts and commercial ground floor frontages have been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in strict accordance with the agreed details and maintained as such thereafter.
a) Podium Residential
b) Block A

Reason: To ensure a satisfactory appearance to the development and to comply with policy CP12 of the Brighton & Hove City Plan Part One.

52. No development shall take place above the ground floor slab level of the following buildings until sample 1:20 elevations and sections of the elevations which shall include each window type, window reveals, cladding or brickwork and entrances have been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in strict accordance with the agreed details and maintained as such thereafter.
a) Business School
b) Mithras Towers 1 - 5
c) Block J
d) Podium Residential
e) Block A
f) Central Research Laboratory
g) Student Blocks 6 – 8

Reason: To ensure a satisfactory appearance to the development and to comply with policy CP12 of the Brighton & Hove City Plan Part 1.

53. Within 3 months of the date of this permission, floor plans and elevations shall be submitted to the Local Planning Authority for approval for the provision of a Class D1 medical centre on the Preston Barracks site with a minimum floorspace of 900-1000 sq m. Best endeavours shall be used for a period of at least 12 months from the commencement of construction on site (excluding demolition and site clearance) to reach agreement with a Class D1 medical provider and for no other use for occupation on of the medical centre space (subject to approval of the details by the Local Planning Authority). Should reasonable evidence be provided by the applicant that an occupier for a medical facility could not be secured after the stated period of negotiation, then use of the Preston Barracks site may be implemented in accordance with the hereby approved plans for the uses permitted by this approval.
Reason: The provision of community facilities within the Lewes Road corridor is a local priority identified under Policy DA3 of the Brighton and Hove City Plan Part One. The location of a medical centre on the Preston Barracks site would make a significant contribution towards this strategic objective.

54. Prior to occupation, in accordance with the submitted GL Hearn report and daylight tables dated 4th September 2017, the internal surface finishes of the habitable rooms within the residential and student blocks on the Preston Barracks site hereby approved shall be specified as a light surface finish for the floors or floor coverings, white painted ceilings and white painted walls with windows frames completed to meet the following values for the purposes of achieving minimum daylight values:

- Frame correction factor of 0.8,
- Floor reflectance of 0.4, (Cream Carpet),
- Ceiling reflectance of 0.85, (White Paint),
- Wall reflectance of 0.7, (White Paint, weighted for reasonable level of obstruction)'
- Below working plane factor of 0.4 (i.e. the floor reflectance).

Reason: In order that the new student and residential accommodation would achieve satisfactory daylight levels and standards of accommodation in the interests of the amenity of the occupants and to comply with policy QD27 of the Brighton and Hove Local Plan.

55. i) No demolition or development shall take place on the following sites until the developer has secured the implementation of a programme of archaeological work, in accordance with a Written Scheme of Archaeological Investigation which has been submitted to and approved in writing by the Local Planning Authority. The Investigation shall include a standing record of the buildings referenced in a) and b) below
a) Preston Barracks including Mannock House
b) Mithras Site including The Steam House

ii) The development of the following sites hereby permitted shall not be brought into use until the archaeological site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition [i] and that provision for analysis, publication and dissemination of results and archive deposition has been secured, unless an alternative timescale for submission of the report is first agreed in writing with the Local Planning Authority.
a) Preston Barracks
b) Mithras Site

Reason: This pre-commencement condition is imposed because it is necessary to ensure that the archaeological and historical interest of the site is safeguarded and recorded to comply with policy HE12 of the Brighton & Hove City Plan Part One.

56. The Combined Heat and Power (CHP) plants hereby approved on the Mithras and Preston Barracks sites shall be of an Ultra-Low Emission Design and shall each not exceed 10mgNOx/Nm3 and be fitted with selective catalytic reduction unless otherwise agreed in writing by the Local Planning Authority.
Reason: The site is close to an Air Quality Management Area, to mitigate the impacts of the development on air quality and to implement measures to reduce greenhouse gas emissions and to comply with policies DA3, SA6, CP8, and CP18 of the Brighton and Hove City Plan Part One and policy SU9 of the Brighton and Hove Local Plan.

57. 10% of the affordable housing units to be provided and 5% of the overall housing units shall be wheelchair accessible dwellings and shall be completed in compliance with Building Regulations Optional Requirement M4(3)(2b) (wheelchair user dwellings) prior to first occupation and shall be retained as such thereafter. All other dwellings hereby permitted shall be completed in compliance with Building Regulations Optional Requirement M4(2) (accessible and adaptable dwellings) prior to first occupation and shall be retained as such thereafter. Evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.
Reason: To ensure satisfactory provision of homes for people with disabilities and to meet the changing needs of households and to comply with policy HO13 of the Brighton & Hove Local Plan.

58. No demolition shall take place on the following phases until a written Site Waste Management Plan for the demolition phase, confirming how demolition waste will be recovered and reused on site or at other sites, has been submitted to and approved in writing by the Local Planning Authority. The Plan shall be implemented in strict accordance with the approved details.
a) Preston Barracks
b) Mithras Site
c) Watts Site

Reason: To ensure that the development would include the re-use of limited resources, to ensure that the amount of waste for landfill is reduced and to comply with policies WMP3d of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan and SU13 of the Brighton & Hove Local Plan and Supplementary Planning Document 03 Construction and Demolition Waste.

59. No construction shall take place on the following phases until a written Site Waste Management Plan for the construction phase, confirming how construction waste will be recovered and reused on site or at other sites, has been submitted to and approved in writing by the Local Planning Authority. The Plan shall be implemented in strict accordance with the approved details.
a) Preston Barracks
b) Mithras Site
c) Watts Site

Reason: To ensure that the development would include the re-use of limited resources, to ensure that the amount of waste for landfill is reduced and to comply with policies WMP3d of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan and SU13 of the Brighton & Hove Local Plan and Supplementary Planning Document 03 Construction and Demolition Waste.

Informatives:

1. In accordance with the National Planning Policy Framework and Policy SS1 of the Brighton & Hove City Plan Part One the approach to making a decision on this planning application has been to apply the presumption in favour of sustainable development. The Local Planning Authority seeks to approve planning applications which are for sustainable development where possible.

2. The applicant is advised that accredited energy assessors are those licensed under accreditation schemes approved by the Secretary of State (see Gov.uk website); two bodies currently operate in England: National Energy Services Ltd; and Northgate Public Services. The production of this information is a requirement under Part L1A 2013, paragraph 2.13.

3. The water efficiency standard required under condition 12 is the 'optional requirement' detailed in Building Regulations Part G Approved Document (AD) Building Regulations (2015), at Appendix A paragraph A1. The applicant is advised this standard can be achieved through either: (a) using the 'fittings approach' where water fittings are installed as per the table at 2.2, page 7, with a maximum specification of 4/2.6 litre dual flush WC; 8L/min shower, 17L bath, 5L/min basin taps, 6L/min sink taps, 1.25L/place setting dishwasher, 8.17 L/kg washing machine; or (b) using the water efficiency calculation methodology detailed in the AD Part G Appendix A.

4. he applicant is advised that details of the BREEAM assessment tools and a list of approved assessors can be obtained from the BREEAM websites (www.breeam.org).

5. The applicant is advised that under Part 1 of the Wildlife and Countryside Act 1981 disturbance to nesting birds, their nests and eggs is a criminal offence. The nesting season is normally taken as being from 1st March - 30th September. The developer should take appropriate steps to ensure nesting birds, their nests and eggs are not disturbed and are protected until such time as they have left the nest.
The applicant is advised that they must apply to stop up any land that is currently adopted highway that the footway bridge footings are located upon under Section 247 of the Highways Act 1980. The applicant is advised to contact the Department for Transport's National Transport Casework Team (nationalcasework@dft.gsi.gov.uk) for further information.

6. The applicant is advised that they must apply for a license for any part of the building or structure that overhangs the adopted (public) highway under Section 177 of the Highways Act 1980. The applicant is advised to contact the Council's Streetworks Team (permit.admin@brighton-hove.gov.uk 01273 290729) for further information at their earliest convenience to avoid any delay.

7. The applicant is advised that they must enter into a Section 278 Agreement under the Highways Act 1980 for all the proposed highway works on Saunders Park View and Lewes Road with the Highway Authority prior to any works commencing on the adopted highway. The drawing entitled, "Possible Lewes Road Highway Layout Incorporated Masterplan" (Drawing Number 33132/5501/SK010). 31.

8. The Local Planning Authority would welcome details of the design and location on that site of a commemorative plaque to Major Edward 'Mick' Mannock which could be installed within a reasonable period prior to hand over of the site following completion of the construction works.

9. The applicant is advised to contact the East Sussex County Archaeologist to establish the scope for the Written Scheme of Archaeological Investigation as required by condition 55.

10. The applicant is advised that a formal application for connection to the public sewerage system is required in order to service this development. To initiate a sewer capacity check to identify the appropriate connection point for the development, please contact Southern Water, Southern House, Sparrowgrove, Otterbourne, Hampshire, SO21 2SW (tel 0330 303 0119), or www.southernwater.co.uk

11. The applicant is advised that an agreement with Southern Water, prior to commencement of the development, the measures to be undertaken to divert/protect the public water supply main. Please contact Southern Water, Southern House, Sparrowgrove, Otterbourne, Hampshire, SO21 2SW (tel 0330 303 0119), or www.southernwater.co.uk

2. SITE LOCATION AND DESCRIPTION

2.1 The application site, named 'Momentum Lewes Road (MLR)', consists of four parcels of land:

1) The former Preston Barracks Site;
2) The University of Brighton Mithras House car park;
3) The University of Brighton Watts Building car park, and
4) The Lewes Road itself, within which works are proposed to be undertaken under S278 of the Highways Act (1980), including the proposed pedestrian and cycle bridge.

2.2 The masterplan site area covers 5.32 hectares, is classified as 'brownfield land' and is allocated for redevelopment under City Plan Part One policy DA3.1. The site lies approximately 0.4 miles north of the Lewes Road District Centre and approximately 300 metres walking distance (from the Watts car park) to Moulsecoomb railway station.

2.3 <u>Preston Barracks parcel and context</u>

Taking each parcel in turn, the Preston Barracks site lies on the west side of Lewes Road and currently contains the Ministry of Defence (MOD) Mannock Building, a former parade ground and a brick built firing range at the northern end. At the north-western corner of the site, and set at a higher level up the valley slope, is a 3 storey social housing block owned by BHCC and run by Amicus Horizon Housing Association. A row of garage units is set into the valley slope below Saunders Park View, which are currently occupied for various small-scale light industrial and commercial purposes, as well as Community Transport vehicles and small office. These tenants occupy the site on the basis of short term lease agreements. A small area of the site is used for car parking associated with these existing businesses. At the southern end of the site is the former Territorial Army building currently in use as 'The Field', a temporary use currently tenanted by a variety of community and creative enterprises. All of these existing buildings and structures are to be demolished as part of the proposed development. However, the 18th century MOD Napoleonic Building which is still occupied and adjacent to the Mannock Building falls outside the development site area is to be retained.

2.5 The Preston Barracks site is flanked to the west by the residential dwellings fronting Saunders Park View, which consist of 2-storey terraced residential properties with a relatively uninterrupted view over the application site due to their elevated position on the valley slope. Further up the valley slope to the west is the railway line which runs north/south and trains connect the nearby Moulsecoomb Station with Brighton and to the north with Lewes and stations further east. Unrestricted, on street parking presently takes place along Saunders Park View. No controlled parking zone (CPZ) is in operation within those streets surrounding the application site. Immediately to the south of the Preston Barracks site is the Pavilion Retail Park.

2.6 Mithras parcel and context

The Mithras site parcel, on the opposite (east) side of Lewes Road to Preston Barracks, extends up to the frontage of Mithras House, which sits approximately 9 metres above Lewes Road level, and includes the University of Brighton car park in front of Mithras House, and the University's Steam House at the southern end which contains student union offices, student welfare, chaplaincy and prayer facilities. Steam House is proposed for demolition as part of the application. The car park, accessed from Lewes Road, provides 264 car parking spaces.

2.7 The Mithras site is bounded to the east by the University's four storey Mithras House building, which dominates the site due to its scale and its prominent elevated position. Beyond the south-eastern corner of the Mithras Site are the two storey terraced residential properties of Dewe Road, which back onto the site. To the north of the site is Natal Road and two storey houses beyond, and to the south is a commercial retail parade fronting Lewes Road.

2.8 Watts parcel and context

The Watts Site parcel lies north of the Preston Barracks site on the west side of Lewes Road and consists of a second University car parking area which provides approximately 276 spaces and serves the adjacent 8 storey Watts Building and the 10 storey Cockcroft building amongst other academic buildings to the north of the site. The site extends up to the 'Watts Bank' Site of Nature Conservation Importance (SNCI) to the west and north of the Watts Building. The Watts Annex building, a modular temporary construction located within the Watts car park is proposed to be demolished. This building presently accommodates academic support services for staff and academic space for the University, all of which are to be relocated.

2.9 Lewes Road parcel

The Lewes Road (A270) is the main road leading into central Brighton from the A27 and from outlying areas such as Stanmer and Falmer. A stretch of approximately 320m of the Lewes Road falls within the masterplan site.

3. APPLICATION DESCRIPTION

3.1 The planning application was submitted as a hybrid application (part full, part outline), with detailed proposals submitted for the Preston Barracks, Mithras and Lewes Road parcels, and outline planning permission sought for the proposals on the Watts site, with all matters reserved except for access west of Business School Square and landscaping in relation to the new Business School and the new multi-storey car park. Parameter plans have also been submitted which indicate the maximum proposed height and footprint for both

the business school and the car park to enable proper assessment of the likely impact for the Environmental Impact Assessment.

3.2 Environmental Impact Assessment

The development proposed falls within Schedule 2 (10(b) Infrastructure projects – Urban Development Projects) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended in 2015), and as such an Environmental Impact Assessment (EIA) should be carried out and an Environmental Statement (ES) was submitted in support of the application. The Local Planning Authority provided a Scoping Opinion, dated 10th August 2016, setting out the items that should be included within the Environmental Statement.

3.3 Accordingly, the ES submitted in support of the planning application covers the following topics:

- Demolition and Construction Environmental Management
- Socio-Economics
- Ground Conditions
- Water Resources
- Ecology
- Transport and Accessibility
- Air Quality
- Noise and Vibration
- Daylight, Sunlight and Overshadowing
- Wind
- Lighting
- Cumulative Effects
- Townscape, Landscape Visual and Heritage Impact Assessment
- Archaeology

3.4 Planning Application Documents

The following documents were submitted in support of the application:

- Planning Statement (including Student Accommodation Justification Report, Central Research Laboratory (CRL) Socio-Economic Report and Sequential Retail Assessment)
- Environmental Statement (see above)
- Design and Access Statement
- Tall Buildings Statement
- Sustainability and Energy Assessment
- BHCC Sustainability Checklist
- One Planet Living Action Plan (for the Preston Barracks parcel)

- Health Impact Assessment
- Tree Survey and Arboricultural Assessment
- Statement of Community Involvement
- Affordable Housing Statement
- Viability Assessment (for the Preston Barracks and Lewes Road parcels)

3.5 The Proposals

Taking each land parcel in turn, the development proposed is as follows:

3.6 Preston Barracks parcel (Full Application)

The existing buildings and structures on the site are to be demolished and the site is to be redeveloped to provide the following:

3.7 Residential (Use Class C3)- 369 dwellings consisting of - 45 x studio units, 111 x one bed units, 192 x two bed units, and 21 x 3 three bed units. The accommodation is to be provided in eight blocks: Block A (8-10 storeys), Block B (9-10 storeys), Block C (7 storeys), Block D (7-9 storeys), Block E (2-3 storeys), Block F (2-3 storeys), Block G (4 storeys) and Block J (4-10 storeys).

3.8 Purpose Built Student Accommodation (PBSA) (Use Class Sui Generis) – 534 bed spaces provided in three blocks: Block 6 (13 storeys), Block 7 (11 storeys) and Block 8 (15 storeys). The accommodation is arranged into 420 x 'cluster beds' (each with its own en-suite bathroom and with a communal lounge/kitchen/diner and separate study room on each floor) and 114 self-contained studios.

3.9 Office (Use Class B1) – Central Research Laboratory (CRL) of 7 storeys in height (4,638 sqm GIA) to facilitate the start-up and development of creative and digital enterprises.

3.10 At the base of some of the towers, commercial uses are proposed, consisting of:

- Workshops (264 sqm GIA) (Class B1),
- Flexible commercial floorspace (301 sqm GIA) (Class A1/A3/B1), and
- Retail floorspace (334 sqm GIA) (Class A1/A3).

3.11 Car Parking - A basement car park beneath the podium is proposed, providing 156 car parking spaces, which includes 22 wheelchair user spaces (11 for residents, 3 for CRL and 8 for students) and 8 car club spaces. 10 on street parking spaces are proposed for the Saunders Park View road extension to serve residential block J (2 x standard residential and 8 x disabled spaces).

3.12 Cycle parking – 672 spaces are proposed within the podium and Block J, 223 spaces are proposed in student Blocks 6 and 7, and 135 spaces are proposed in student block 8.

3.13 Landscaping/Public Realm/Saunders Park View highway works - The site is to be re-graded to address the level changes from Saunders Park View down to Lewes Road. This involves constructing a podium to the east of Saunders Park View which is to contain the basement car park, and stepped and ramped pedestrian access is provided from Saunders Park View through the site to Lewes Road. Behind the Lewes Road frontage blocks, the land is to be raised by approximately 1.5m to create 'The Furlong' which would run parallel to Lewes Road and provide an alternative pedestrian route (with limited vehicular access for refuse collection and servicing at certain times of the day). The Furlong would also have stairs and ramped access to both Lewes Road and to Saunders Park View. Saunders Park View is to be extended to provide access and parking to the front of Block J, but would remain a cul-de-sac, with a ramped pedestrian only access proposed to link Saunders Park View with the development to the North.

3.14 Design and Appearance -
The buildings on the Preston Barracks site are primarily oriented on an east-west axis in order to maximise daylight. The separation distances between the buildings vary between approximately 9m and 23m between facing windows. For the buildings with smaller separation distances, such as between blocks B and C and C and D, where possible, facing windows have been offset to avoid direct overlooking. Where this has not been possible, windows are proposed to be obscure glazed.

3.15 As part of the masterplan, one of the stated key principles is to provide a common architectural language. For example, all the buildings on the site use metal framed windows in a dark grey colour. The residential and student buildings are consistent in brick facing, chosen for its durability and possibilities for variation. The predominant material is red and white brick: the taller residential buildings are white, chosen to help reduce perceived mass and compliment the other buildings within the masterplan and existing buildings such as the Cockcroft building to the north of the site. Red brick elevations have been chosen to contrast with the white brick to create markers along The Furlong, such as the corner of Mannock Square and the steps to The Field. The use of red brick in Saunders Park View on Blocks E to G is to reflect the existing houses in the road. The red brick is laid mainly in stretcher bond, with stack bonded brick used around windows and for the parapets. Block J is predominantly faced in white brick in either stretcher bond or stack bond, and again projecting hit and miss brickwork is used. A timber

effect vertical cladding panel in dark grey is used for balcony recesses and the upper floors where the building steps back.

3.16 The CRL building has its own unique palette of materials to reflect its different function as an office building intended to attract creative design and technology businesses. Full height glazing is proposed at ground and first floors and stairwells to help activate the building onto the Lewes Road and The Furlong and corrugated grey metal cladding covers much of the external walls to provide a simple, industrial feel to the exterior, punctuated by accents of bright yellow metal cladding and internal blinds.

3.17 The three student blocks of 11, 13 and 15 storeys have simple square footprints and the facades are split into three sections with amenities at the base, cluster rooms in the middle sections and articulated tops for the studio flats. Student Block 7 on the corner of the site adjacent to the bridge is clad in expanded mesh over solid metal panels (colour: silver-gold), whereas Blocks 6 and 8 are clad in white brick (in double stretcher bond) to create continuity with the residential blocks on the site and the white brick clad student blocks on the Mithras site. Block 7 is treated differently to the other two blocks due to its more prominent position. However, all three blocks are articulated at the upper floors with projecting vertical panels of the expanded mesh cladding, with alternate solid metal panels in silver-gold, to express the different use of the upper floors and to reflect light to make the buildings appear lighter when viewed against the sky and to give them an elegant and interesting look.

3.18 <u>Mithras parcel (Full Application)</u>
The site is to be cleared, including the demolition of the Steam House, and the following development is proposed:

3.19 Purpose Built Student Accommodation (PBSA) (sui generis) - 804 bed spaces provided within five blocks: Block 1 at the northern end (10 storeys), Block 2 (18 Storeys), Block 3 (10 storeys), Block 4 (12 storeys) and Block 5 at the southern end (9 storeys). All the accommodation is arranged into ‘cluster beds’ (each with its own en-suite bathroom and with a communal lounge/kitchen/diner and separate study room on each floor).

3.20 Student facilities - 596 sqm (GIA) student services including student’s union and welfare facilities (sui generis), proposed on the ground floor of Blocks 3, 4 and 5.

3.21 Gymnasium - 898 sqm (GIA) gymnasium (Class D2) proposed on the ground floor of blocks 1 and 2 to replace the smaller gym currently within the Cockcroft building to the north of the Watts site, for the use of students and

local residents (both new residents within the development and those within existing communities).

3.22 Car Parking - 13 disabled parking spaces serving the student accommodation. Cycle parking – 536 secure, undercover spaces are proposed within the student buildings. 78 visitor cycle spaces are proposed in the public areas around the site parcel.

3.23 Public realm/Landscaping works – the existing vehicular ramp from Lewes Road across the frontage of Mithras House is to be retained and a new set of steps is proposed up to the main entrance to the Mithras House, positioned between Blocks 2 and 3 with a pedestrian square provided between these blocks. A podium area is proposed to the rear of Block 2 at Mithras House entrance level which is to be connected to all five Blocks via a high level walkway and would provide step-free access to the proposed pedestrian/cycle bridge across Lewes Road.

3.24 Design and Appearance –
The five towers would have 20 x 20m square footprints with chamfered top corners and sloping roofs to animate the building profiles on the Lewes Road frontage and when seen from longer views. Roof top plant equipment and clutter would be hidden beneath an open brick screen, with the exception of a small number of flue pipes to Blocks 2 and 4. The towers are varied in height and are separated with minimum gaps of 14m. The tallest tower on the site, Block 2 (18 storeys) is positioned on the north side of the new public space and is positioned 39m from Block 3 to the south, to maximise daylight in the public space. The towers are set back a minimum of 4.7m from the back edge of the pavement along Lewes Road and a minimum of 27m from Mithras House.

3.25 The towers are connected by a two storey podium with a break between Towers 2 and 3 to provide the square at road level and access to the steps up to Mithras House. The podium contains the gym and student services, the entrances and concierges to the student accommodation, plant rooms and the bin and cycle stores. Between the towers the podium roof provides amenity space and large light wells provide natural light and ventilation into the podium. The student accommodation can also be accessed from this podium level.

3.26 The typical floor layouts of the five student accommodation towers consist of 2 sets of 8 cluster bedrooms (16 bedrooms per floor) each with en-suite shower rooms and 2 communal kitchen/lounges per floor. Each core provides a stairwell and two lifts.

3.27 The facing material of Towers 1, 3, 4 and 5 is white brick (stretcher bond with panels of projecting hit and miss brickwork) which extend across the roofs, to provide architectural consistency across the site and to reflect the predominantly white vernacular of Brighton. The window design consists of a fixed glazed panel with an adjacent louvred ventilation grille, in aluminium with an anodised gold finish. The tallest tower (Block 2) however is expressed with different external materials, to create a moment of difference, to mark the adjacent public space and to add colour.

3.28 The façade material to Block 2 is a reflective glazed tile (glazed brick or rainscreen system, stack bonded) of a variety of colours, using pale, almost white/pale blue tiles at the top and across the roof of the building and gradually darker tiles of earthier red and green tones lower down building, and the reflective tiles would extend in part across the podium frontage of all 5 towers but is interrupted with white brick to allow the other towers' elevations to 'reach the ground'. The reflective tile would pick up colours of the surrounding environment to help integrate the building into the local context. The windows of Block 2 are 'double height', with each window unit connecting two floors, using dark grey anodised metal frames and panels separating the floors, fixed glazing panels and louvred ventilation grilles at the top of each window. This design is stated to emphasise and express the verticality of the building. At the base of Block 2 fronting onto the public space, architectural features in gold metal finish the facade to the public space, consisting of an angled canopy which visually chamfers the building at the base, echoing the chamfer at the top, and corresponding pillars which wrap around the corner of the building to address the Lewes Road frontage. These features are echoed in a more muted form on the other side of the public square at the base of Block 3.

3.29 <u>Watts parcel (Outline Application)</u>
The existing Watts House temporary building is to be demolished and the site redeveloped to provide:

- A new academic building (Use Class D1) to relocate the University of Brighton Business School currently situated within Mithras House, which would front onto Lewes Road, be a maximum 6 storeys/28m in height and have maximum 6,400 sqm (GIA) floor space;
- A Multi Storey Car Park (MSCP) to the rear of the site, to provide a maximum of 551 car parking spaces, 330 cycle spaces, a bin store and plant room, and maximum 8 storeys/24m in height;
- A public space south of the Business School with associated landscaping improvements, to link the footbridge with the Watts and Preston Barracks sites;

- A repositioned access onto the Lewes Road and new service road to the MSCP and to continue along the back of the MSCP to service the Watts, AEC and Cockcroft buildings to the north.
- A linked external canopy to connect the Business School to the Watts, AEC and Cockcroft buildings to the north, forms part of the vision for the Business School, but is indicative only and not to be assessed as part of this application.

3.30 The Business School is aligned in order to maximise its frontage onto Lewes Road, to create a strong interactive frontage, to showcase the University's activities and to provide a bold gateway building for the Moulsecoomb campus. The building would comprise a mix of dedicated business school learning spaces, flexible general purpose formal learning spaces for use by the wider campus, informal learning spaces, areas for the business school staff and a spacious enterprise hub covering much of the ground floor and some of the first floor, to encourage engagement with wider industry and business. There are two main access points into the building – one on the north elevation and one on the south elevation, positioned close to the Lewes Road frontage. The access to the south is linked to the lower public square and Lewes Road level by steps and an adjacent ramped access, laid out in a horseshoe shape with a central landscaped area with trees. A third access is proposed on the west elevation in order to activate the space between the building and the MSCP.

3.31 Although only reserved matters, the indicated external appearance of the Business School and the canopy have influenced the landscaping design which is not a reserved matter and is to be assessed within this application. The use of triangular shapes in a repetitive grid-like pattern and white and gold colours on the canopy and the elevations of the Business School are reflected in the proposed paving around the Business School, which consists of a triangular/diamond-shaped grid pattern made of faceted cast in-situ concrete divided by metal strips (gold colour). This would extend up to the steps and ramp up to the Business School.

3.32 The MSCP is positioned behind the Business School, to reduce the presence of vehicles at the campus and create a more pedestrian friendly environment, and is provided in order to replace the existing surface level car parks on the Mithras and Watts sites. Two vehicular access points are proposed on the south and west elevations for flexibility of use, and three pedestrian entrances are proposed on the east (at the nearest point to the new public square), north (at the nearest point to entrance to the Watts building) and west (at the northern end to link to the other campus buildings to the north and Moulsecoomb station beyond) elevations.

3.33 Lewes Road parcel (including proposed highways works to be implemented under Section 278 of the Highways Act)

Improvements to highways infrastructure including: the installation of a new signalised junction at the Natal Road junction and junction immediately to the south of the Watts car park; a new signalised 'T' Junction at the southern end of the Preston Barracks site; the provision of new pedestrian crossings and footway improvements (all within the immediate vicinity of the application site); together with the erection of a footbridge (for pedestrians and cyclists) crossing Lewes Road, from the northern end of the Mithras site to the northern end of the Preston Barracks site.

3.34 One of the main purposes of the bridge would reduce current and future pedestrian trips at the nearby signal crossing at the University's new site access, further lessening delay and allowing better management of this new junction.

3.35 The bridge alignment has been informed by research by Space Syntax to maximise neighbourhood connectivity and accessibility by the public. On its western end the bridge would land directly in the public domain through a generous staircase and public lift to the Preston Barracks site and newly created large public space which would straddle the University access road connecting to the Watts site. To the east the bridge would connect onto the Mithras podium top providing a connection to Natal Road or directly into Mithras House and the student accommodation buildings.

3.36 The underside of the bridge on the Mithras site would incorporate the northern extent of the ground floor, although a generous pavement area would be provided under the bridge along the Lewes Road. The underside of the bridge on the Preston Barracks site would provide Bike Share parking facilities. The bridge would be a simple, slim profile structure whilst providing a 4m width for pedestrians and cyclists, extending much wider at both ends to provide welcoming entrances.

3.37 Its external appearance would continue the architectural language of the wider scheme, reflecting the metallic finishes on student Block 7 (the nearest building to the bridge lift) and Blocks 6 and 8 at the upper floors, as well as Mithras Square, the Business School and canopy, and in the paving areas around the Business School and in the central parts of The Furlong. The main body of the bridge would be finished in dark grey painted steel (using durable paint with no maintenance required for up to 12 years), metal balustrading on the top to a height of 1.5m, timber handrail, and gold coloured cladding on the inside walls of the bridge. The bridge would be paved to match the paving on the Mithras podium and the Business School square paving for continuity. The lift would have a glass exterior clad in vertical metal panels or fins, to echo the

balustrading whilst allowing views into the lift to allow natural surveillance in the interest of public safety. Lighting would be integrated into the base of the inside walls and in the balustrading to avoid obtrusive lighting columns.

3.38 Design/Layout/Landscaping of the Masterplan

The Design & Access Statement submitted in support of the application provides details of the design evolution, which is summarised in the section on 'Pre-application Discussions" (after the Planning History section below). The Design & Access Statement is a large document and should be referred to for the detailed analysis and proposals.

3.39 In terms of public spaces, the masterplan layout is designed to provide a series of linked spaces addressing the significant level changes within and across the wider site, to provide better connectivity and legibility for pedestrians. Mannock Square on the Preston Barracks site provides a setting for the Napoleonic building and provides a new pedestrian access to the building. Each public space has a different function and characteristic but with common themes in terms of materiality, planting, lighting and way-finding to provide a coherent and legible public realm.

3.40 A new pedestrian connection to link Saunders Park View and the rest of the site to Moulsecoomb Station is proposed, with the existing campus service road connected by a new stretch of shared-surface to the rear of the Napoleonic Building. Following the implementation of this connection, the residents of Saunders Park View as well as other residential areas in the locality would have a direct route to the station through the University Campus.

3.41 As part of the wider connectivity of the scheme and to promote healthy living, a publicly accessible 1km fitness route would be provided linking all three sites and incorporating outdoor gym equipment where possible. This route takes the form of a figure of eight and would link into the existing running trail through the neighbouring Wild Park.

3.42 The landscaping proposals seek to incorporate a variety of opportunities for outdoor activity to include fruit picking and allotment gardening, outdoor meeting and study areas, play and games areas for children and adults, and spaces for pop-up and one-off community events. It is intended that such activities will appeal to the existing wider community as well as future residents and students within the new development.

3.43 The strong existing tree line along the Watts site frontage onto Lewes Road is to be retained and a pedestrian thoroughfare provided behind, to form a campus feel. On the Preston Barracks site the buildings would form an urban

edge along the road, with formal groups of street trees. Along the Mithras site frontage, the proposed buildings would be set back to create a broad pedestrian zone, with the existing trees retained (with the exception of one tree which requires removal to facilitate the pedestrian bridge) and would be supplemented with additional birch trees.

3.44 The scheme would provide increases in the biodiversity value of the site whilst mitigating any negative impacts of the development. A range of habitat types recognised as locally important would be incorporated through new planting, green roofs and the introduction of trees.

3.45 The Watts Bank SNCI features a range of habitat types and important species, and would create a new area of woodland and scrub planting to the rear of Block J, which would be largely inaccessible to residents, to provide a new secluded habitat utilising many of the species existing within the SNCI.

3.46 Proposals for external lighting are provided within the technical appendices to the ES. The lighting scheme aims to ensure suitable lighting levels to external spaces whilst avoiding excessive light spill, particularly in areas of high biodiversity value which have been kept free of lighting. Feature lighting is proposed to delineate and express important spaces and features.

3.47 Maintenance of the landscaping would be undertaken by the University of Brighton on their own sites, and by a central management company at Preston Barracks.

4. RELEVANT HISTORY

4.1 Preston Barracks Site

{**BH2015/02789** Application for a temporary use on the site consisting of a change of use from disused military building (Sui Generis) to mixed-use retail (A1), cafe/restaurant (A3/A4), offices (B1) and community/leisure (D1/D2) for a temporary period of 5 years (part retrospective). Granted 02/09/2016

BH2004/02383/FP Application for a change of use of redundant MOD garages for storage and ancillary offices for a temporary 18 month period. Granted 15/09/2004 (until 17th March 2006)

BH2000/02016/GD/FP Application for the erection of a 2.1m high palisade fence and store room, replacement of tile hanging with timber cladding and creation of new vehicular access. Granted 04/10/2000

BH1999/02441 Application for the erection of a two storey building at the west end of the site, together with a covered link to existing buildings in connection

with use of the site by the South East TAVR (Territorial Army). Refused 23/12/1999 due to the historic value of the Napoleonic Building, which was proposed for demolition.

4.2 Watts Site

BH2015/02004 Application (to north of Watts Building) for demolition of existing buildings and construction of a part two, part three storey building providing a new Advanced Engineering Centre (D1) incorporating landscaping, access works and other associated alterations. Granted 26/11/2015

BH2015/00898 Application for the erection of first floor and extension of existing ground floor temporary classrooms to be used for a period of four years. Granted 30/06/2015

BH2013/02849 Application for the erection of temporary classrooms on an existing car park to the south west of the Watts Building. Granted 20/12/2013 (until 01/02/2016)

BH2004/03801/FP Application for the erection of student accommodation comprising 228 bedrooms. Refused 21/03/2005 on grounds that it would adversely affect a Site of Nature Conservation Interest, as well as resulting in an unjustified loss of urban open space.

BH2004/01688/FP Application for the erection of student accommodation comprising 228 bedrooms with associated communal and administrative facilities, cycle and refuse storage and 6 no. disabled parking spaces. Refused 01/09/2004 because of the potential adverse impact on the nature conservation features of the SNCI, and an insufficient demonstration that the proposal could not be located elsewhere. Appeal Dismissed

BH2003/01817/FP Application at Watts Bank for the provision of 4 no. student accommodation blocks (234 rooms) with associated communal and administrative facilities, cycle and refuse storage and 6 No. disabled parking spaces. Refused 05/09/2003 for the following reasons:

- The proposal would adversely affect a Site of Nature Conservation
    - Importance;
- The proposed design, scale, height and massing failed to take into account
    - their surroundings, resulting in excessive and overbearing development out
    - of keeping with existing buildings;

- The siting, height and appearance would fail to preserve a strategic ribbon
    - of green open space; and
- The proposal did not adequately express the intention to be car-free, assess potential walking/cycling routes or consider problems of capacity or provision to services, infrastructure or car parking.

4.3 Mithras site

No relevant planning history

5. PRE-APPLICATION DISCUSSIONS

5.1 Chapter 12 of the Design & Access Statement sets out the pre-application consultation exercise carried out with local residents and organisations, Council Officers and Members and the Design: South East Review Panel (DSERP), as well as the police, students and staff at the University of Brighton and other local stakeholders.

5.2 Discussions and feasibility studies for the scheme began in 2015. At this point the uses currently proposed were included, but configured differently. The academic uses were concentrated on the west side of Lewes Road, connected to the Watts campus with a canopy (covered walkway), and a new academic building was proposed to the south of the Watts building. Student accommodation was located on the Mithras site and many alternative forms of massing were explored. On the Preston Barracks site the Mannock building was proposed to be retained and built upon to provide the Central Research Laboratory (CRL) office space, and student housing was proposed to create a solid frontage onto the Lewes Road. No bridge was proposed at this stage.

5.3 Officers advised that the student housing on both sides of Lewes Road was too linear and needed more relief and porosity, and building over the Mannock building was questioned as it could create a physical barrier between the Preston Barracks and Watts sites. In addition, the Officers suggested that the apartment blocks proposed opposite the existing houses in Saunders Park View should be reduced in height. In response the CRL was relocated to the Lewes Road frontage and the Mannock building was proposed for demolition, and the blocks fronting onto Saunders Park View were reduced in height.

5.4 In March 2016 the Officers were consulted on a further evolved scheme which included a 3 storey continuous podium on the Mithras frontage with 5 towers extending from it up to a maximum of 15 storeys. The tallest tower on the Preston Barracks site was 18 storeys (on the frontage at the northern end) and the Watts site development appeared similar to the current scheme. The LPA considered the Mithras student accommodation presented as too bulky and questioned the location of the 18 storey tower.

5.5 In April 2016 a further revised scheme which introduced the bridge over the Lewes Road was presented to Officers. The purpose of the bridge was to improve the link between the student facilities and accommodation on the Mithras site with the teaching facilities on the Watts site. This scheme also replaced the apartments on Saunders Park View with houses and reduced the depth of the blocks at the end of Saunders Park View. The podium across the Mithras site was reduced to 2 storeys. In response, Officers queried the position of the bridge and how the public spaces across the sites would connect and feel. Further justification for the tallest tower was sought.

5.6 Later in April two public exhibitions were held: one on the site in the Field building and one in the city centre, Churchill Square, which attracted 485 attendees and 140 surveys. Most of the respondents were generally in favour of the scheme, but concerns were raised about the impact on parking and traffic congestion in the area; the need for affordable housing; the effect of additional students in the area; the heights and density of the buildings, and the proposed demolition of the Mannock building. These issues were taken into account in the evolution of the design.

5.7 In June 2016 the scheme, which now included long views, was presented to the Design: South East Review Panel (DSERP), who generally welcomed the distribution of uses and the improved access to Lewes Road. However they questioned the arrival spaces at both ends of the footbridge and were not convinced by the strategy for the location of the tallest buildings. The Panel also sought more visual connections between the Mithras and Preston Barracks sites to create more vistas through the development and enhance the spaces around the buildings. They also asked for further details of the landscaping.

5.8 In response the massing of the scheme was reviewed and the tallest elements were moved more centrally into the scheme to reduce the impact on long views, and the footbridge landings were relocated to provide public access. In addition, some buildings were repositioned and broken up to improve east west permeability and increase light received in the public spaces between the towers.

5.9 Planning workshops were held in July, August and September with Officers which included discussion on alternative bridge designs and positions, alternative massing and heights to the development on the Mithras and Preston Barracks sites, increasing separation distances between buildings, façade material options and architectural detailing, and landscaping proposals. In response Officers continued to raise concern over the impact of the tallest tower (18 storeys, now on the Mithras site) on views from the Round Hill conservation area, but supported the modern approach to the

architecture of the business school on the Watts site. The use of textured facades on the Mithras site and varying elevational treatments was welcomed.

5.10 The scheme was presented to the Design: South East panel for the second time in October 2016. The panel welcomed the improvements made to the layout, massing and circulation since the previous review, and stated that *"the local views and impact on the townscape are now well resolved", "the architectural development is promising"* and *"we like the emphasis given to the CRL building."* However they felt that care needed to be taken with building profiles, colours and silhouettes and block J (at the end of Saunders Park View) needed a more simplified profile. The relocated bridge landing on the Preston Barracks site was welcomed but more work was needed to address the square between the business school and the bridge. The panel also supported the aspiration to achieve BREEAM Excellent for the scheme.

5.11 A further public exhibition was held in November 2016 on the revised scheme in the Field building on the site. There was support for the footbridge, the landscaping and public spaces and the managed student housing; requests were made for a pre-school or nursery and a community space/hub on the site, and criticisms were made of the height and density and spacing between the buildings.

5.12 The MOD were also consulted on the scheme before submission and welcomed the integration of the Napoleonic building into the landscaping scheme with the low wall and hedging proposed, and welcomed the new square proposed to the front of the building.

5.13 The proposals were presented at a pre-application briefing to Planning Committee and Ward Councillors on 13 December 2016. Members' feedback included the following points:

- General support for the long-awaited redevelopment of the site;
- Concern raised over inadequate parking for the residential uses and questioned whether the MSCP could be shared by residents;
- Concern over CPZ's extent and effectiveness and whether residents would support it;
- The south elevation of the development should be improved with more articulation;
- Concern over the shortfall in B1 office use, although did not object to the additional housing or student units;
- The preferred option for the design of the CRL building gave a mixed reaction;
- The vistas created across the Lewes Road between the two main sites was appreciated;

- Improvements to pedestrian route from the site to Moulsecoomb station and the canopy to improve access around the campus were welcomed but need to provide lighting to reflect the likely level of usage;
- The landscape strategy, the permeability and improved access to Saunders Park View residents, the landscaped bridge and the greening of the MSCP were welcomed;
- General agreement that the materials would need to be high quality and to the gradual lightening of tones in the tallest tower elevations;
- Limited concern was raised about the height of the tallest block and its impact on skyline and the SDNP; and
- Pressing need for affordable housing was raised although members acknowledged there was a viability issue.

6. REPRESENTATIONS

6.1 **Seventy six (76)** responses have been received objecting to the proposed development for the following reasons:

Impact on Traffic, Public Transport and Parking

- The development proposed will increase traffic on Lewes Road which is already very busy.
- The development will increase traffic on Saunders Park View which will mean children can no longer play in the street and will be dangerous to residents.
- The increase in traffic will increase air pollution
- The multi storey car park will encourage use of the car and will undo the recent improvements to public transport
- Many are doubtful that the new students will be properly restricted from having a car – if they aren't allowed to use the multi-storey car park they will park on local roads.
- Insufficient parking spaces provided - the development will exacerbate the existing difficulties with finding a parking space in the area and overspill parking on grass verges in the area. Requests for public consultation on controlled parking zones in the area.
- There are currently no parking restrictions therefore preventing new residents from obtaining permits won't help.
- The development would put added pressure on the local buses which are already at capacity.
- The visually impaired and disabled people could struggle with shared pedestrian and vehicular use in plazas

6.2 Appearance

- The tower blocks are not in keeping with the appearance and character of the local area.
- The towers are uninteresting and should be more iconic for Brighton.
- The development is too tall and overbearing and much higher than existing buildings nearby.
- The buildings should be no taller than surrounding buildings such as Mithras House – many residents set a maximum of 8 storeys.
- The development is too dense and represents overdevelopment.
- The towers will dominate views across the valley
- The chamfers on the corners of the taller buildings are ill-conceived.
- The development does not reflect local street patterns or local context.
- Mannock Building should be preserved and reused, not demolished.

6.3 Impact on wildlife

- The development will impact negatively on existing green spaces – the Watts Bank wildlife and trees on Preston Barracks will be affected
- The applicant should consider the Local Biodiversity Action Plan
- Many have requested that Saunders Park should be improved through this development – café, toilet and play facilities should be improved and wildlife enhancement
- There are insufficient green spaces proposed – should be more trees, green walls and green roofs as well.

6.4 Amenity

- The development will result in loss of light to nearby residents.
- The development will cause overlooking to nearby residents.
- The influx of students to the area will be noisy for local residents, especially at night-time when it is relatively quiet at present.
- The increase in student population will increase litter and anti-social behaviour in the area.
- The development will cause a wind tunnel effect along Lewes Road

6.5 Impact on balance of community from increase in student population

- The area already has too much student accommodation and HMOs and the proposed number of student units far exceeds the City Plan allocation.
- There is no evidence that building purpose built student accommodation reduces the number of HMOs.
- The proposals are likely to increase student numbers and increase number of HMOs.

- The development is likely to result in oversupply of student accommodation and vacant units given the exceedance of the DA3 requirement and due to other student accommodation being built in the area
- The additional students will unbalance the community and overwhelm the other residents
- The additional students will put pressure on local infrastructure, including GP surgeries.

6.6 Increase in Crime

- The opening up of the cul-de-sac in Saunders Park View and improved access to Lewes Road would encourage crime in Saunders Park View. Residents have requested secure access to Saunders Park View for residents only.

6.7 Lack of Community Use

- There is nowhere for local residents to meet at present and no community hall or meeting space for the local community is proposed.
- There is no community worker for the area and no tenants or residents association, therefore there is a lack of communication between residents, students, visitors and families.
- The proposed use of a gym and trees provided for fruit picking are not enough for the local community.
- There is no space provided for local artists' studios that should be supported in this city.

6.8 **Fourteen (14)** responses have been received commenting on the proposed development as follows:

- A community meeting space/youth centre/library should be provided
- More NHS facilities – doctors and dentists – to cope with additional population
- Controlled Parking Zones to be introduced in Coombe Road and other roads close to the site.
- Contributions towards Coombe Road Primary School.
- Contributions towards improving Saunders Park
- Improvements should be made to Moulsecoomb railway station, including improved access for the disabled.
- Developer to provide more planting, trees and green spaces/green walls/green roofs on the site.

- The proposed housing should be prevented from being converted into student accommodation/HMOs.
- The proposed housing should be larger family units and fewer 1 bed flats.
- The new retail units should be let to local businesses
- Would like cafes provided and business space for arts industry including those currently on the site in the Field.
- Would like secure bike storage facilities on the site and plenty of seating in the public areas.
- More recycling facilities in the area.
- CCTV and measures to tackle late-night noise given the influx of students into the area
- For residents to be given regular updates during the construction process and for the LPA to control the hours of operation/construction.
- More information should be provided on how the students will be looked after and what times of the year they will reside on the site.
- Local residents should be allowed to convert to HMO if they wish to move out of the area due to noise/disturbance from existing neighbouring HMOs.
- Students should be encouraged to use nearby forested areas.

6.9 **Four hundred and eighteen (418)** responses have been received supporting the proposed development for the following reasons:

- The development will breathe life into a stagnant part of Lewes Road that has lain derelict for many years
- The development will help regenerate the area, support local businesses and provide new jobs and income for the city.
- The development will provide much needed and affordable student accommodation which will strengthen the education sector and reduce the demand for the use of houses for students (HMOs), freeing them up for families.
- The purpose built student accommodation will be easier to supervise and support students and students will benefit from living close to teaching space
- Brighton's economy benefits significantly from the two universities so the development should be supported
- The development will help the University to compete with other universities along the South coast.
- The development will provide much needed housing on a brownfield site.

- The Business School will be good for the University
- The CRL building will provide much needed accommodation for small/start-up businesses in the creative sector and will improve employment diversity with good links to the University

- The development will bring improvements to local facilities and transport
- The proposed buildings are architecturally impressive and will raise design standards in Lewes Road.
- The design will sit well within its surroundings and provide an impressive gateway to the city.
- The new public spaces are welcomed
- The development will bring the area into the 21st century

6.10 **Councillor Tracey Hill** supports the application, a copy of the letter is attached.

6.11 **Councillor Daniel Yates** supports the application, a copy of the letter is attached.

6.12 **Brighton Society:** Objects for the following reasons:

- The submissions are excessive and confusing and badly organised on the public register;
- Poor design – dense, closely-packed cluster of unimaginative boxy buildings will dominate the Lewes Road;
- The towers will create dark, sunless canyons;
- Design should have taken reference from horizontal emphasis of Mithras House and the surrounding landscape and townscape;
- A scheme with lower-rise longer buildings with more generous public spaces such as the Regency squares in Brighton, would have achieved similar density – were any other options considered?
- Concerned that long views of the site will be impacted from the valley slopes and the South Downs National Park;
- Object to the absence of an Environmental Impact Analysis (however one was submitted with the application);
- The bridge is boring and disappointing;
- Materials palette is confusing.

6.13 **Brighton MET College and University of Sussex:** Support the application.

6.14 **Bricycles:** Object The multi-storey car park is excessive and unnecessary with the good public transport and cycling facilities in Lewes Road.

6.15 **Brighton & Hove Buses**: Object to the application on the basis that the two signalised junctions will cause increased traffic congestion. In addition, significant stretches of bus lane will be removed in both directions to create new right turn and left turn lanes to access the development. The bus lanes were introduced in 2013 and have successfully reduced bus journey times

and increased bus ridership. To remove a significant section in both directions will undermine the reliability of the bus network.

6.16 **Community Transport:** Comment Requesting developer contributions to assist in their relocation to an alternative site and to support their work as they are a not for profit organisation.

7. CONSULTATIONS

7.1 **External**

7.2 **Brighton & Hove Archaeological Society:** Comment

The proposed development is on land that has been severely terraced in the past. However the Brighton and Hove Archaeological Society consider that some vestiges of archaeology may remain. The Society would suggest that you contact the County Archaeologist for his recommendations.

7.3 **B&H Clinical Commissioning Group:** Comment

The proposed Preston Barracks redevelopment is of a size, scale and mixture that will require a significant amount of infrastructure support. At the present time there is no health provision included in the planning application and this development should not proceed without an appropriately sized and population relevant health element.

7.4 This is a strategic site for north central Brighton and its development will create a huge demand for additional health services from general practice (to enable growth in services to meet both existing surplus and the newly created need) and focused primary care (sexual health and substance misuse services) to community health services and provision for mental ill health. Also, with ambulance response times in the city suffering due to severe congestion throughout much of the day, the addition of an ambulance post would be hugely beneficial.

7.5 The areas adjacent to the site are already very needy and relatively health resource poor. Without suitable health components included in the proposed scheme the situation would only worsen which would have an even greater negative impact on the health of local communities. There are no alternative sites where we can plan, commission, build up and provide the amount of health services the entire area requires now and will require in the future.

7.6 Brighton and Hove Clinical Commissioning Group would expect, as a minimum, to see included within the proposed scheme (and to provide sustainability for the local population and the development itself):

- General practice

- Additional primary care services to meet the needs of the local population
- Community health space
- Mental health provision
- A post for the ambulance service

7.7 The 2016 update of the 2013 Brighton and Hove Joint Strategic Needs Assessment confirmed Brighton & Hove remains one of the most deprived areas in the South East having a younger than average population with significant health needs and inequalities across the whole age range. This part of the city, together with surrounding wards, demonstrates high levels of multiple deprivation with a profile of particular overall health need and the most concentrated student population.

7.8 The inclusion of health provision in this proposed scheme will provide Brighton and Hove Clinical Commissioning Group with the long awaited opportunity to align what we need to do in healthcare with clear, identified health need. We have so few geographically specific chances to make significant improvements to the services we are able to offer our individual neighbourhoods and, strategically, for our population as a whole, that we have to make the most of this one. Therefore, for us, the addition of health provision in this proposed scheme is a vital consideration for this exciting planning application.

7.9 **County Archaeologist:** Comment

The proposed development is situated within an Archaeological Notification Area defining the site of Napoleonic barracks on Lewes Road. These barracks originate in the late 18th century. It is unfortunate that the planning application includes such a limited consideration of the site's heritage assets and in particular the standing buildings proposed for demolition (as I understand it Mannock and Steam House). A building is shown on the site of the Steam House on the 1st Edition Ordnance Survey. This is in spatial association with a number of other structures. Indeed it is entirely possible that the current Steam House now contains elements of previously free – standing structures of 19th century (or even earlier) origin. In light of their clear historic and potential architectural interest, both Mannock and Steam House will require standing building recording prior to their demolition.

7.10 Although the site has clearly been subject to modern development, the survival of below ground (buried) archaeological remains associated with the use of the site as a 18th and 19th century barracks and perhaps earlier periods stretching back to the prehistoric era should also be considered.

7.11 In the light of the potential for loss of heritage assets on this site resulting from development the area affected by the proposals should be the subject of a programme of archaeological works. This will comprise the recording of structures proposed for removal prior to their demolition and enable any archaeological deposits and features, disturbed during the proposed works, to be adequately recorded. These recommendations are in line with the requirements given in the NPPF paragraph 141**.** Recommend conditions.

7.12 **County Ecologist:** Comment
The proposed development lies immediately adjacent to the Watts Bank SNCI and is in close proximity to the Crespin Way Local Wildlife Site (LWS). There should be no encroachment into the SNCI and measures should be taken to prevent impacts on the LWSs during construction, to be set out in a Construction Environmental Management Plan (CEMP).

7.13 Habitats within the site currently comprise hard standing, buildings, amenity grassland, semi-improved grassland, scrub, introduced scrub and trees. The proposed development will result in the loss of all on-site habitats. This is acceptable given the proposed landscape scheme which will provide a net increase in habitat areas and includes chalk grassland green roofs, new planting areas, hedgerows and significant tree planting. Sea buckthorn should be included within the landscape scheme.

7.14 Indirect impacts of the proposed development include increased disturbance, light pollution and predation on the SNCI and LWS and its species, and overshadowing. The mitigation measures proposed within the Environment Statement are appropriate and acceptable. In particular, the proposal to bring the adjacent SNCI into positive management through the implementation of the existing Watts Bank management plan and to provide information boards is welcomed. It is recommended that management of the SNCI and of newly created habitats on site is combined into a Landscape and Ecological Management Plan (LEMP).

7.15 A timetable of works should be provided that demonstrates that mitigation measures required to avoid harm to protected species have been incorporated into the construction schedule. This could be provided within a CEMP.

7.16 It is not possible to comment on whether bat and reptile surveys were conducted in accordance with best practice guidance as full survey data has not been provided. The following comments are based on the information provided.

7.17 The development site qualifies as a Key Reptile Site, as it supports an exceptional population of common lizard and a good population of slow worm. The adjacent Watts Bank SNCI also supports a good population of slow worm and a low population of common lizard. As the reptile habitat on site will be lost to development, and animals cannot be relocated onto the adjacent LWS, translocation off-site will be required; this would be to a suitable area of Wild Park through agreement with the City Parks team. The receptor site must be made suitable for the acceptance of relocated animals prior to any trapping taking place. Funding for the long term management of the receptor site must be secured.

7.18 The proposal to provide a Reptile Mitigation Strategy and an Ecological Enhancement Plan for the receptor site is welcomed. It is recommended that these and the monitoring strategy are combined into an Ecological Design Strategy for the protection of reptiles.

7.19 Whilst no evidence of bat roosts was recorded on site, three buildings retain some potential to support bats. Pre-demolition surveys will therefore be required for those buildings to inform appropriate mitigation.

7.20 There were relatively low levels of bat activity across the site, but it is likely that the adjacent Crespin Way LWS and railway corridor will provide foraging, commuting and potentially roosting habitat. Artificial light can negatively impact on bats through e.g. causing disturbance at the roost, affecting feeding behaviour, avoidance of lit areas and increasing the chances of bats being preyed upon. It is therefore recommended all lighting design should take account of national guidance.

7.21 Whilst there was no evidence of badger setts on or immediately adjacent to the proposed development site, the site offers some foraging habitat and badgers have been reported on site. Best practice working methods should be employed to ensure protection of badgers during construction and development boundaries should be made permeable to badgers. Updated badger surveys of the site and the adjacent LWS should be carried out prior to demolition to inform appropriate mitigation.

7.22 The proposed landscape scheme will provide new foraging habitat to benefit hedgehogs. Boundaries around and within the development should be made permeable to hedgehogs.

7.23 A list of suitable conditions is recommended to ensure the protection and enhancement of the ecological conditions of the site and surroundings.

7.24 **East Sussex Fire and Rescue:** Comment

Please ensure that access and facilities for the East Sussex Fire and Rescue Service (ESFR) are provided in accordance with B5 of the Approved Document B Vol 2 of the Building Regulations 2010. The plans deposited do not show sufficient detail on access and facilities arrangements for the Fire Service. When considering active fire safety measures for all types of premises, including residential and domestic buildings, ESFR would recommend the installation of sprinkler systems.

7.25 **Highways England:** No objection
Highways England's formal recommendation is that we offer no objection subject to Brighton and Hove City Council securing sufficient contributions from the strategic developments in the Brighton and Hove City Plan (BHCP) to deliver the highways mitigation associated with the A27 and associated junctions required by the BHCP.

7.26 **Natural England:** Comment
Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites.

7.27 The proposed development is for a site within or close to a nationally designated landscape namely South Downs National Park. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below. Your decision should be guided by paragraph 115 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks.

7.28 This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application.

7.29 **National Planning Casework Unit:** Comment
Acknowledge receipt of the environmental statement relating to the above proposal and confirm have no comment to make on the environmental statement.

7.30 **Regency Society:** Support
Although the proposals are disappointing in some respects, the Society is minded to support them for the following reasons:

- They develop a valuable piece of land that has lain derelict for far too long,
- They will enhance the facilities of the University of Brighton
- They will provide much needed student housing, thus taking pressure off conventional housing in the area
- They will reinforce the idea of an academic corridor linking the Steine to Falmer
- They will contribute positively to the economy of the City.
- We have no objection to them on conservation grounds - the site does not fall within a conservation area and the proposals will not affect any of the City's heritage assets. (We understand that the surviving Regency Period barracks fall outside of the site boundaries and will remain the property of the M.o.D.)

7.31 Even as they stand the proposals will considerably improve what has become a depressing urban corridor.

7.32 We do not have a problem with the proposed heights of the buildings. The site lies in the bottom of a valley and falls within an area that has been ear-marked for tall buildings (SPGBH15 of 2004). Inevitably the development will be visible from other parts of the City and from various points on the Downs, though we don't consider that this will necessarily pose a problem. Indeed it could add a point of interest to the City's profile and act as a marker for the 'academic corridor'.

7.33 We applaud the proposals for a system of routes that link the various teaching and research buildings and connect the Mithras campus to the Watts/Cockcroft campus and ultimately to Moulsecoomb railway station. The insertion of small landscaped piazzas along the routes is particularly to be welcomed as is the construction of a footbridge across the Lewes Road. The initial designs for the Management School with its cavernous entrance and its canopied loggia are intriguing.

7.34 The proposals have been criticized by others for their potential to increase traffic on Lewes Road. We note however, that the number of parking places has not increased significantly and that provision of student housing on the site will reduce the number of student journeys.

7.35 We have a number of concerns, but we hope that, with the encouragement of the Planning Committee, these can be resolved by the developer as the design develops:

- The drawings submitted are all to a very small scale and provide only scant detail of materials. It is not possible to evaluate the true appearance

of the buildings. If permission is granted it should be made conditional upon the timely submission and approval of more detailed drawings.

- Some of the three-dimensional drawings (perspectives etc.) in the submission are misleading – they distort the relationship between vertical and horizontal dimensions, widening out the spaces between buildings and shrinking their height. These should be corrected and resubmitted or withdrawn.
- The external corridor referred to as 'The Furlong' runs between two lines of tall buildings. It will be in shadow for much of the day and will act as a wind tunnel. We believe that the environment would be improved if one block could be omitted in order to create an open space and allow more sun-penetration.
- The two sides of the development have been designed by different architects and therefore lack any sense of unity. That to the East, the Mithras Parcel, consist of five square blocks that are organised in an orthogonal fashion and relate well to the north-south axis of Lewes Road. They have simple forms that are enlivened by the chamfering of corners. That to the West, the Preston Barracks Parcel, consists of buildings that are canted at odd angles and exhibit arbitrary changes of material and detail. The layout exhibits a contrived casualness and the elevational treatment lacks consistency or authenticity. We urge the developer to bring more unity to the two parcels and to reduce arbitrariness of the elevational treatment on the west side.
- We welcome the provision of the foot and cycle bridge across Lewes Road but are concerned that the lines of tall building will act as a wind tunnel and subject bridge users to high winds and driving rain. We recommend the provision of some form of protective screen and canopy to the south side of the bridge.
- We believe that a group of buildings of such a size and significance should become a valued part of the City's built heritage. Unfortunately the present proposals lack the necessary gravitas or urban presence to convince us that this will be the case. We hope that, as the design progresses, it will develop increased refinement and sophistication.

7.36 **Scotland Gas Networks:** No objection

7.37 **Southern Water:** No objection
Request that should this application receive planning approval a condition is attached requiring details of the proposed means of foul and surface water sewerage disposal.

7.38 **Sussex Police (Designing out crime):** Comment.

Given such a large development as this, it would be impossible to provide in depth advice for all aspects of this application in one document. Therefore, will provide broad advice now with more in depth pertinent crime prevention advice being delivered once the development has been phased or reaches reserved matters. No specific advice offered but generic references made to published guidance.

7.39 **Sussex Police and Crime Commissioner:** Object.
A financial contribution for essential policing infrastructure would be required to make this development acceptable in planning terms.

7.40 **UK Power Networks:** No objection

7.41 **Internal**

7.42 **Arboriculturalist**: Comment
Welcomes the changes to form the new service roundabout have been removed from the scheme. Raises detailed comments on submitted tree root investigation report. Recommends conditions.

7.43 **Education:** Comment
The calculation of the developer contribution shows that we would usually be seeking a contribution of £610,449.60 towards the cost of nursery, primary and secondary provision if this development was to proceed. However in this instance the most local primary schools have a considerable amount of surplus capacity and this is anticipated to continue for the foreseeable future and therefore we will not be seeking a contribution towards primary provision for this development.

7.44 With regard to the secondary provision, the development is in the current catchment area for Brighton Aldridge Community Academy. At the present time there is surplus capacity but this is not expected to continue to be the case. Secondary pupil numbers in the city are currently rising and it is anticipated that all secondary schools will be full in a few years' time. At the present time the council is expecting that a new secondary school for the city will open in either 2018 or 2019 and it will be necessary to revisit the catchment areas in the city. As a consequence we would be seeking a contribution in respect of secondary provision of £253,802.40 if this development was to proceed. The money would be spent at either Brighton Aldridge Community Academy or on the new secondary school.

7.45 Contribution for Nursey Education £166,596.00
Contribution for Primary Education £0.00
Contribution for Secondary Education £253,802.40

Contribution for Sixth Form Education £0.00
Total £420,398.40

7.46 **Economic Development:** Comment
The development will enhance the area greatly through the delivery of a mix of residential properties, student accommodation, university facilities and much needed B1 employment space that will generate employment opportunities during construction and post completion. The additional development of the Mithras and Watts sites will further maximise the use of the university land and facilities with the potential for further job creation for local residents.

7.47 The Site Wide Masterplan Development Overview indicates that the development would deliver a total of 1338 student units (beds), and 369 private residential dwellings. The appropriateness of delivering an increased number of housing and student units on this site should be considered against key objectives of the allocation for employment-led redevelopment and the other requirements of the policy. The proposal indicates the provision of 4902 sq.m of dedicated B1 employment space, with the potential for an additional 301 sq.m of flexible space, which could also be designated as Class A1 or A3 uses. This allocation of B1 employment space falls far short of the council's expectations for this site, as stated in the City Plan. Due to the shortage of prime B1 office space in the city, a substantial reduction in employment space on this development will impact on the potential for business growth, inward investment and resultant economic benefits for the city. The proposal is therefore currently not wholly compliant with the City Plan.

7.48 In the event this proposal or any amended proposal is approved, an Employment and Training Strategy will be required which should include the developer's commitment to using an agreed percentage of local labour. It is proposed for this development that the minimum percentage of 20% local employment for the demolition (where appropriate due to the specialist nature of the works) and construction phase is required. Also, if approved, in accordance with the council's Developer Contributions Technical Guidance, City Regeneration requests a contribution of £371,010 through a S106 agreement, towards the delivery of the council's Local Employment Scheme. The contributions are based on the number of residential dwellings created, student accommodation and quantity of floor space for the range of non-residential user classes, stated as A1/A3/B1/D1/D2/Sui Generis.

7.49 **Environmental Health:** No objection
Contaminated Land
The desktop study risk assessment undertaken has been found to been scientifically robust and allow for the application to proceed with associated conditions. Clarification will be required in respect of soils import for food

growing and children's play areas. The assessment of gas risks is discussed through the reports and would expect to see a robust and targeted risk assessment for carrying out further gas monitoring. Such work should be in line with the appropriate national standards e.g. CIRIA C665. It is noted that the Lewes Road parcel is a highway and therefore a site investigation is not applicable as there will be no receptors. However the applicant may benefit from geotechnical data in support of the bridges and loads to be placed.

7.50 Reports have not identified widespread contamination in the soil on the Preston Barracks site itself, but highlighted elevated concentrations of arsenic, lead, zinc and mercury within made ground. While there are some potential pathways for contaminants, the reports conclude that contamination can be dealt with during redevelopment. RAMBOLL conclude that further investigation and risk assessment will need to be undertaken for the whole site in order to inform the need for any possible remediation in relation to the end use of residential with consumption of home grown produce. The report suggests such an investigation can be secured by condition, and a phased contaminated land condition is therefore recommended.

7.51 The reports have not identified any previous investigations at the Mithras House or Watts sites. However the submitted reports suggest that due to previous, potentially contaminative uses at the Mithras House parcel, that further investigation would be necessary. Again this should be secured via condition and are recommended.

7.52 <u>Noise</u>

In order to control environmental noise break in to the proposed buildings, suitable façade insulation is required and proposed. As environmental noise levels vary throughout the site, the applicant has split the site into three areas each requiring a different level of protection in terms of glazing and ventilation in order to ensure habitable rooms meet BS8233:2014 requirements. These levels of protection should be conditioned for completeness. These comments should be read in conjunction with the air quality specialist report, which may require further works with regards to ventilation, where there may be a known adverse air quality issue.

7.53 Given the size and scope of the project it is understandable that at this stage it is not known precisely what machinery or plant will be contained within the end build.

For that reason RAMBOLL have suggested that the future plant installed, achieves a combined noise level that has a maximum rating level no higher than the representative background, at the nearest noise sensitive receptor.

7.54 While this condition is slightly below our normal standard, it is noted that background levels that have been found in some areas are very low, and will likely be hard to meet as they are. It is also appreciated that the background level recorded could well be lower than when completed when there are a lot more uses on the site. This proposal is therefore agreed, and a bespoke condition is recommended.

7.55 Given the mixed uses of the site, specifically between ground floor commercial operations such as the cafés and workshops and residents above, we would expect a higher level of insulation in order to protect future residents. Additionally there would also be a concern about insulation levels between plant rooms, electrical substation, refuse storage areas, car parking, and cycle storage and the residents situated above these. These issues may be dealt with through a condition for increased sound insulation.

7.56 Additionally, rubbish and recycling collections, especially those involving glass, and commercial deliveries can cause disturbance. A condition for times that collections and delivery can take place at the site should be applied via a condition. There also will be the need for deliveries to the proposed commercial operation, and times for deliveries to these are recommended in order protect future residents.

7.57 The applicant should be aware that experience has taught the department that where there are gyms and residential accommodation in close proximity there are typically issues with flanking transmission, especially with free weights areas and impacts such as treadmills etc. As the accommodation surrounding these uses will be student rooms, it is for the university to address and ensure that sufficient safeguards are built into the design process. The same is applicable in terms of student unions and student halls above, where one might reasonably expect music, people noise and therefore mitigation built in to ensure the accommodation above is capable of being rested and slept in.

7.58 It is noted that there are some habitable spaces placed next to lift shafts and stairwells. In these cases the applicant is reminded that noise levels will need to comply with guidance levels given in BS 8233:2014.

7.59 A noise assessment regarding the potential for increased road traffic noise levels has been carried out. It is noted that some of the smaller roads are not included in the assessment as the road traffic levels are not high enough to allow for predictions. However given the low traffic levels to start, and the predicted increases in traffic levels, no further examination is seen as necessary. For those roads predicted, there is no significant impact overall and as such no further action is deemed necessary.

7.60 However there is a draft plan which outlines:
The proposed scope of works, with commencement and completion dates;
A description of proposed works;
Likely plant and equipment that will be involved;
Proposed hours of work,
Potential Environmental Impacts and mitigation that could be put in place are
Contractors responsibilities and Best practicable means / BPM
It is also noted that the construction noise assessment calculations and assumptions and the light pollution report feed in further information with regards to creating a working CEMP.

7.61 It would be expected that for such a large site, that this would include construction site noise monitoring during the build. We would also expect the end developer / contractor to submit a section 61 application

7.62 Lighting
An outline lighting scheme has been designed, showing a worst case scenario in terms of lighting impact on existing and proposed residents. The internal and external lighting for the finished scheme is jointly considered to have a negligible adverse impact to the majority of existing residents. In two locations there may be a minor adverse impact, and in one location a moderate adverse impact. However these are based on worst case scenarios. Overall the proposed scheme is not considered to have a significant impact.

7.63 The applicant is advised that in terms of future proofing there may be additional mitigation measure that they may consider putting in place. For example the use of zonal lighting and controls, so that if there are complaints or a need to manage a specific area, this is more achievable and less costly. A condition is recommended to ensure the final lighting plan is submitted prior to installation.

7.64 Air Quality
Recommend approval with a series of transport and air quality compensation and mitigation measures:

- Combined Heat and Power (CHP) emissions to be ultra-low NOx possibly achieved with Selective Catalytic Reduction regular checks and maintenance. Cross check with the London Guidance on CHP.
- Minimise vehicular emissions through the Air Quality Management Area.
- Routing of construction traffic to the north in order to avoid the Quality Management Area (Lewes Road-Vogue Gyratory and Hollingdean Road).

7.65 **Heritage**: Comment

There are no designated heritage assets on or immediately adjacent to the site. The ES has identified two non-designated heritage assets on the site, which were referred to in the 2011 Planning Brief; The Napoleonic Building (of 1794-1801), which is the last remaining building from the original military barracks and largely served as the hospital, but much altered; and the Mannock Building of c1938, which was built as an Officers' Mess in very late Arts and Crafts style.

7.66 There are a number of designated heritage assets within the wider vicinity of the site, as set out in the ES. Of these the most relevant to the proposals are:

- Hollingbury Hillfort – a scheduled monument, being a slight univallate hillfort dating to the Early Iron Age together with three earlier bowl barrows.
- Moulsecoomb Place – listed grade II as a large detached house of 1790 with a south wing of 1913, set in substantial grounds.
- Round Hill Conservation Area – a largely residential late- Victorian area notable for its long terraces of houses on rising ground with long views to the Downs to the east. Two of the groups of terraces in Round Hill Crescent are grade II listed.
- Woodvale Cemetery – a grade II registered park and garden, being a burial ground laid out and consecrated in 1857.

7.67 The Environmental Statement has satisfactorily demonstrated that there would be no effect on the setting of Hollingbury Hill Fort, Moulsecoomb Place or Woodvale Cemetery, in the way that these heritage assets are experienced, due to matters such as distance, topography, existing built development and tree belt screening.

7.68 The proposed development would impact on the character and appearance of the Round Hill Conservation Area, and its setting, by virtue of the impact on long views towards the downland skyline of the SDNP to the north east. This impact is illustrated in the ES views from Richmond Road and Prince's Road (9W, 9S, 10W and 10S). The Round Hill Conservation Area Character Statement notes that "*it is in the long views of the conservation area that its greenness can be appreciated - a characteristic not evident from the streets within the area".* The impact in these views would be medium in each case and would cause some harm in each case, having regard to the significance of long views set out in the Character Statement and the clear relationship of the conservation area to the downland topography.

7.69 From Richmond Road the development would largely obscure the distant vista of green downland and would emphatically break the horizon line; there

would be no intervening tree screening mitigation in summer. From Prince's Road, where there is a much more expansive view of the distant downland, the sheer scale of the proposed development would be very evident, its verticality and block-like massing contrasting with and partly obscuring the horizontal terraces. The green downland towards the horizon would nevertheless largely remain visible. The tallest building here would align with the horizon line but if the viewer were to move eastwards down the hill it would soon break the horizon line, though would subsequently be screened by the trees at the foot of the hill in summer.

7.70 The harm to the conservation area in each case would be less than substantial under the terms of the NPPF. The roof profile of the Mithras House side blocks, sloping at a similar angle to the horizon line, would help to mitigate the harm. Nevertheless a reduction in height of the blocks on the Mithras House side could significantly reduce or eliminate this harm and in this respect it is noted that the number of residential units and student rooms proposed clearly exceeds the requirements of policy DA3. It is considered that is it has not currently been demonstrated that the harm to the Round Hill conservation area could not be avoided or further mitigated whilst still achieving a viable development that secures the public benefits required by policy DA3.

7.71 Of the non-designated heritage assets the Napoleonic Building, which does not form part of the application site, would be retained. It has been much altered externally and its original wider context has been lost. Its surviving special interest is largely historic, in terms of its evidential value. Its setting was long ago substantially harmed by the loss of all other 18th and 19th century barracks buildings and the erection of later 20th century redevelopment that paid it no heed. The proposed development would rather swamp this 2 storey building, only mitigated a little by new public space to the east of it. Overall, though, there would be no further harm to the building's setting.

7.72 The Mannock Building of c1938 would be demolished. This building is attractive in its own right and has modest historic interest as part of the barracks' historic development, but its Arts and Crafts design is a very late example of that style, somewhat old-fashioned for the late 1930s, and the building has limited townscape value. Nor does it have any particular relationship with the Napoleonic Building. It would be difficult to successfully integrate this building into a large scale modern development of the type proposed and which is needed to regenerate this long-vacant eyesore site. It is therefore considered that the limited harm arising from the loss of this building would be outweighed by the wider urban design benefits of the masterplan and in meeting the aims of policy DA3. The important historic

association of the building's name is intended to be retained in the naming of the new public square and a plaque should also be installed on one of the nearby buildings to commemorate Major Edward 'Mick' Mannock and so give meaning to the square's name.

7.73 **Housing:** Comment

The city-wide Housing Strategy adopted by Council in March 2015 has as Priority 1: Improving Housing Supply, with a commitment to prioritise support for new housing development that delivers a housing mix the city needs with a particular emphasis on family homes for Affordable Rent. The council has an Affordable Housing Brief based on evidenced housing needs in the city. Affordable housing in the city is provided through Registered Provider partners who are members of the city's Affordable Housing Development Partnership. The council does not recognise any alternative rent or ownership products at this time.

7.74 This response is provided by Housing Strategy to outline where the scheme does and does not meet the Affordable Housing Brief and current policy CP20 regarding provision of affordable housing. CP20 requires 40% of properties to be developed as affordable housing on site in schemes of more than 15 units. Developers are required to prove where it is not viable for them to meet this policy provision.

7.75 This application includes 369 self-contained residential properties (as well as 804 student bedspaces in a mixture of studios and cluster flats). The application form itself does not indicate the affordable provision but it is outlined in supporting documents provided as part of the application. The Affordable Housing Statement states that 'despite viability challenges the Applicant has made a commitment to provide a minimum of provision of 15% affordable housing'.

7.76 The Affordable Housing Brief requires 40% of units to be affordable. In this development of 369 residential units this would equate to 148 properties – in a split of 81 as Affordable Rent and 67 for Shared ownership (with the AHB tenure split applied).

7.77 Affordable housing units should be indistinguishable from market housing in the scheme's overall appearance. The scheme will need to meet Secure by Design principles as agreed by Police Architectural Liaison Officer.

7.78 The council requires 5% (18 units at this scheme) of all housing in new developments to meet wheelchair standards and 10% of affordable housing. The Council's wheelchair accessible standard requires that it meets national

technical standards Part 4 M4(3)2b –'meet the needs of occupants who use wheelchairs' at build completion (i.e. at time of letting/ sale).

7.79 To ensure that all new homes developed are of a good standard that is flexible, adaptable and fit for purpose, our Affordable Housing Brief offers support for schemes that meet the new nationally described space standards.

7.80 Up to date assessment of housing needs shows that although greatest need (numerically) is for smaller one and two bed properties there is significant pressure on larger family sized homes, and the AHB scheme mix is based on this.

7.81 **Private Sector Housing:** Comment
Some of the layouts of the self-contained flats in, for instance, Block J or Block C are unacceptable because escape from the bedroom is via the living room/kitchen. The design of these flats would need to be altered to form partitions and doors that would allow escape from bedrooms without having to pass through the high fire-risk living room/kitchen. Alternatively, sprinkler or water mist systems could be provided.

7.82 **Planning Policy:** Initial Comment
The application site has been underutilised and largely vacant for approximately two decades; it is a key strategic allocation in the City Plan Part One and one of the few large brownfield sites within the city. Its delivery is crucial to achieving the objectives of the Lewes Road Development Area Policy DA3 and it is therefore welcomed that a proposal for a comprehensive redevelopment has reached the planning application stage. The Council's objectives for the redevelopment are set out in the Planning Brief (2011) and City Plan Part One Policy DA3.

7.83 The provision of 369 residential units will make a significant contribution towards the City's housing target as set out in City Plan Policy CP1. It is a higher number of units than that envisaged in Policy DA3, however the figure set in the policy is not a maximum and the provision of extra units as a further contribution towards the housing target is supported. The proposed under-provision of affordable housing will need to be subject to independent viability testing by the District Valuer. It is acknowledged that the applicant has stated that the final quantum and tenure mix is to be agreed through further discussion with the Council, having regard to policy and scheme viability.

7.84 The quantum of residential development and Purpose Built Student Accommodation (PBSA) proposed would exceed the policy requirements set out in DA3, and although this is welcomed in principle, the far greater increase in PBSA skews the mix of housing types somewhat. However, the need for

PBSA in this location resulting from the present under-provision at the University of Brighton's Moulsecoomb Campus of approximately 2000 bedspaces against the University's target is recognised. The development is not linked to an increase in student numbers, and the potential occupants would continue to be housed elsewhere in the City if this accommodation was not provided. Whilst there is no evidence that any conversions of HMOs back to family housing in the neighbouring area would occur as a direct result of this development, an increase in the supply of PBSA of this magnitude is likely to reduce the pressure on the local housing market.

7.85 The separation of the two types of housing, with no mixed blocks, is welcomed. A plausible future outcome resulting from the provision of PBSA on this scale is a reduced need for further conversions to HMO. Therefore whilst it is acknowledged that the level of PBSA provision is significantly in excess of the City Plan allocation, the opportunity for this very suitable site to provide a greater contribution towards meeting the unmet need for PBSA is welcomed in principle. A formal agreement with the educational establishment(s) whose students will occupy the rooms should be secured to ensure compliance with City Plan Policy CP21 criteria 6.

7.86 The expansion of university facilities is supported by City Plan Policy CP2 which recognises their role as major employers, with this location in particular supported through Policy DA3.

7.87 With regard to employment floorspace, the provision of a Central Research Laboratory (CRL) is supported and meets the policy requirement for an innovation centre, with the increased floorspace against the policy requirement being particularly welcomed. The significant benefits of the CRL are recognised, particularly with regard to the suitability of the location and potential links to the adjacent university. However there remains a significant under-provision of B1floorspace against the policy requirement in DA3 and the Planning Brief. A lack of office space will constrain the city's ability to retain its businesses as they grow and expand. Providing sufficient employment space as part of the mixed use employment-led redevelopment of this strategic allocation is important to help address identified future business needs and is required alongside the delivery of new office space in the city centre.

7.88 The need for additional B1 office floorspace in the city is set out in the Employment Land Study Review, and there is currently a shortfall against the projected supply in the period to 2019. Whilst it is recognised that the primary location for this demand in the city centre, as noted in the Employment Land Study Review and confirmed through evidence supplied by the applicant, this does not necessarily mean such provision in alterative locations would not be

viable and therefore the failure to meet the policy requirement is not considered to be justified.

7.89 The site is located in the Lewes Road tall buildings corridor as identified in SPGBH 15 (Tall Buildings), which is centred on this site and the university campus. The development of tall buildings in this location is therefore considered to be acceptable in principle, subject to detailed design and amenity considerations and the effect on views from the South Downs National Park.

7.90 It is not clear to what extent the need for new community facilities has been considered and further information should be supplied in order to address the requirements of Local Plan Policy HO21.

7.91 A comprehensive Site Waste Management Plan should be submitted once a contractor is appointed, setting out expected quantities of different waste materials, on-site measures taken to ensure waste is segregated and sustainably managed, and targets for recycling, reuse and recovery of waste materials. This requirement should be secured by condition.

7.92 Further Comment - Support

The previous policy comments requested that the applicant's view that a higher level of employment floorspace than that proposed should be independently tested by the District Valuer in order to verify the applicant's view that this would be unviable. This additional comment is provided in response to the viability assessment of the scheme that has now been received from the District Valuer.

7.93 The viability assessment demonstrates difficulty in providing a viable scheme that would incorporate a policy compliant level of employment floorspace as well as the provision of an element of affordable housing affordable housing. Given this context, and the overriding need for affordable housing in the city, the proposed employment floorspace provision can be supported in planning policy terms.

7.94 **Public Art:** Comment

To make sure the requirements of local planning policy are met at implementation stage, it is recommended that the inclusion of a proposed artistic component scheme would be detailed as part of the planning conditions relating to the public realm

7.95 **Public Health Team:** Comment

Public Health have reviewed the submitted Health Impact Assessment (HIA). Due to the timescale we have not looked in detail at the full planning application or the EIA.

7.96 We have reviewed whether the submitted HIA complied with current guidance on HIA methodology as well as national and local public health policy and priorities. We have also assessed whether the proposed development is consistent with recommendations made in an HIA rapid appraisal conducted jointly by Public Health and Planning at the masterplan stage in 2012.

7.97 Our review has found that the methodology used to develop the HIA is appropriate; the HIA is mostly comprehensive and generally addresses the expected domains of a HIA. The proposed development also reflects previous recommendations made in the 2012 HIA rapid appraisal.

7.98 The proposed development includes measures to increase connectivity across different sites and for different groups (e.g. pedestrians, wheelchair users, cyclists). It offers open spaces including children's play space, a fitness route, opportunities for health eating and we note that there are no plans to open fast food outlets. The proposed development encourages active travel by providing significant cycling infrastructure such as cycling friendly routes and 1,955 cycling parking spaces. We therefore conclude that these features of the proposed development will promote a healthy weight environment.

7.99 The proposed development offers positive opportunities for social cohesion and social capital through the use of open, play and recreational spaces.

7.100 The London Healthy Urban Planning Checklist recommends including assessment of daylight within Health Impact Assessment. It does not appear that exposure to daylight of the residences was assessed and whether minimum daylight standards are met. Due to the nature and density of the development we recommend this should be considered.

7.101 With regards to access to services, the HIA states that there is a need for an additional 0.69 GP in the local area and that the developers are in discussion with Brighton & Hove CCG though it does not appear that an agreement has been reached thus far. As for access to other services, it is unclear what the impact of the new development may have on demand for school and nursery places. Families, Children and Learning should be further consulted on this impact.

7.102 There are additional areas that we believe should be addressed by other consultees in Brighton & Hove City Council: we note that there are plans to build 779 car parking spaces. In addition, the proposed development will have an impact on air quality with the HIA concluding that "it is anticipated with regards to air quality this will be a Minor adverse health impact".

7.103 Given the location of the development on the Lewes Road corridor where, at the southern end, there have been high levels of air pollution recorded including N02 above EU limits we recommend that the Environmental Protection and transport assessments on air quality and congestion impacts should be taken into account.

7.104 For clarity, we would like to confirm we have not assessed the level of affordable housing and understand that Housing Strategy will respond on this issue.

7.105 Our initial conclusion is that the HIA is comprehensive except for areas noted above. Public Health would require feedback on further assessment by Transport and Environmental Protection of these areas before considering a final recommendation.
We also recommend feedback on service impact is considered from Families, Children and Learning and externally with the NHS CCG.

7.106 **Sustainable Transport:** Initial Comment
The Highway Authority is not currently in a position to be able to support the application and the applicant must provide clarification on the points raised and amend the proposals in line with the Highway Authority comments.
The Highway Authority requires clarification and changes made to the following:

- Pedestrian Access – provision of an additional lift between Saunders Park View and the rest of the Preston Barracks site.
- Cycle Parking – amend cycle parking in building 8 on Preston Barracks, alternative access to cycle parking in building 6 on Preston Barracks, clarification on what is meant by, “Acc bikes”, clarification on shower provision in the CRL, clarification on the level and location of Bike Share hubs, provide an enlarged lift to access the cycle parking on Saunders Park View, provide revised cycle parking in the southern most blocks.
- Disabled Parking – all disabled parking should be designed in accordance with TAL 5/95.
- Servicing – clarification should be provided on the questions raised in the main body of the text.
- Car Club - provide confirmation from Enterprise Car Club that they are agreeable to providing 8 car club vehicles and provide some level of provision that is publically accessible.
- Car Parking – the Highway Authority cannot currently support the proposed level of car parking provided at the University and the proposed increase and would therefore look for the overall level of car parking to be reduced.

- Phasing Plan – a detailed phasing plan which also provides a breakdown of overall car parking levels at each phase of construction should be provided.
- Total Forecast Trips – clarification is required in relation to the forecast trips presented in table 3.6 on page 43 of the TA. Clarification is also sought as to whether the proposed gym is larger than the existing one in Gross Floor Area and whether the general public will be able to use this facility.
- Public Transport – an assessment of the available public transport capacity needs to be undertaken.
- Highway Works – provide clarification on the proposed works to Saunders Park View and whether the land is to remain private or be adopted. Amend the proposed highway works on Lewes Road in line with the Highway Authority comments.

7.107 Travel Plan

This response provides comment on the submitted Residential and Commercial Framework Travel Plan only and should be read alongside wider comments provided by the Highway Authority in relation to planning application reference BH2017/00492. A separate response will be provided for the Academic Framework Travel Plan. The Travel Plan is acceptable for the purposes of the current stage in the planning process. Were the proposed development to be granted planning consent, then it is recommended that a relevant condition be attached to ensure that the applicant updates the Travel Plan with full monitoring data within three months of occupancy and implementation of all the measures outlined.

7.108 Further Comment

The Sustainable Transport Team has specifically addressed pedestrian access, cycle parking, disabled parking, servicing and delivery, vehicular access, car parking, trip generation/highway impact, public transport and the proposed highway works. The applicants have now reduced the multi storey car park by 49 spaces to ensure that no increase in spaces for the University would result. Satisfactory amendments to the Lewes Road scheme related to the signalised junctions, the re-instatement of a 2 metre cycle lane and the continuous bus lane and clarity provided on servicing, loading and on-site provision of car parking, cycle parking satisfactory details of which would all be secured by conditions and S106 agreement or S278 highway requirements.

8. MATERIAL CONSIDERATIONS

8.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan, and all other material planning considerations identified in the "Considerations and Assessment" section of the report

8.2 The development plan is:

- Brighton & Hove City Plan Part One (adopted March 2016)
- Brighton & Hove Local Plan 2005 (retained policies March 2016);
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (adopted February 2013);
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (adopted February 2017).

8.3 Due weight has been given to the relevant retained policies in the Brighton & Hove Local Plan 2005 according to their degree of consistency with the NPPF.

9. POLICIES

The National Planning Policy Framework (NPPF)

Brighton & Hove City Plan Part One

DA3 Lewes Road
SS1 Presumption in Favour of Sustainable Development
CP1 Housing delivery
CP2 Sustainable economic development
CP3 Employment land
CP4 Retail provision
CP5 Culture and tourism
CP7 Infrastructure and developer contributions
CP8 Sustainable buildings
CP9 Sustainable transport
CP10 Biodiversity
CP11 Flood risk
CP12 Urban design
CP13 Public streets and spaces
CP14 Housing density
CP15 Heritage
CP16 Open space
CP17 Sports provision

CP18 Healthy city
CP19 Housing mix
CP20 Affordable housing
CP21 Student housing and Housing in Multiple Occupation

Brighton and Hove Local Plan (retained policies March 2016):

TR4 Travel plans
TR7 Safe Development
TR14 Cycle access and parking
SU9 Pollution and nuisance control
SU10 Noise Nuisance
QD5 Design - street frontages
QD15 Landscape design
QD16 Trees and hedgerows
QD18 Species protection
QD27 Protection of amenity
HO5 Provision of private amenity space in residential development
HO13 Accessible housing and lifetime homes
HO20 Retention of community facilities
HE1 Listed buildings
HE3 Development affecting the setting of a listed building
HE6 Development within or affecting the setting of conservation areas
HE10 Buildings of local interest
HE11 Historic parks and gardens
HE12 Scheduled ancient monuments and other important archaeological sites

East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan

WMP3d Minimising and Managing Waste During Construction, Demolition and Excavation

Supplementary Planning Guidance:

SPGBH15 Tall Buildings

Supplementary Planning Documents:

SPD03 Construction & Demolition Waste
SPD06 Trees & Development Sites
SPD11 Nature Conservation & Development
SPD14 Parking Standards

Planning Brief:

Lewes Road (Preston Barracks and University of Brighton) Planning Brief Sept 2011

10. CONSIDERATIONS & ASSESSMENT

10.1 Planning Policy/Principle of Development:

The City Plan Part 1 Inspector's Report was received in February 2016. The Inspector's conclusions on housing were to agree the target of 13,200 new homes for the City until 2030 as a minimum requirement. It is against this minimum housing requirement that the City's five year housing land supply position is assessed annually. The most recent land supply position was published in the 2016 SHLAA Update (February 2017) which demonstrates a 5.6 year supply position. The Council can therefore demonstrate an up to date housing supply position in accordance with the NPPF.

10.2 The key policy issue with the redevelopment of the Preston Barracks site is unlocking the site which has been vacant for approximately 20 years at the same time as achieving the City Plan's objectives for the site to make a significant contribution towards meeting the needs for housing and employment floorspace in the City identified in the background research.

10.3 The City Plan has identified the site for 300 residential units which would naturally be located on the Preston Barracks parcel as opposed to one of the University owned sites (Watts/Mithras), whereas 369 units are proposed. The provision of 369 residential units will make a significant contribution towards the City's housing target as set out in City Plan Policy CP1.There is no in principle objection to more residential units being provided particularly if it contributes to unlocking the viability of the redeveloping the site provided that other policy requirements can physically be satisfactorily accommodated on the site.

10.4 The main diversion from the policy DA3 site allocation and the proposed scheme is in respect of the imbalance between student housing and the employment requirements. The whole site (3 parcels) policy allocation of 750 student bed spaces would be exceeded by the development of the Mithras site for 804 bedspaces. In addition however, a further 534 bedspaces would be built on Preston Barracks (total: 1338), whilst the employment floorspace proposed would be 4,638 sq. m Gross Internal Area (GIA) in the CRL; 325 sqm B1 workshop space and 372 sq. m. mixed B1/A1/A3 on The Furlong (total: 5,335 sqm) . This would be significantly below the allocation of 10,600 sqm which the applicants (U&I) have consistently stated would be an unrealistic volume to provide in this location away from those parts of the City which would attract B1 employment floorspace thus jeopardising the viability of the scheme. As the Planning Policy Team have confirmed, there is no in principle policy objection to the volume of student housing proposed in particular as there is an identified need for more PBSA in the City to meet current student numbers studying at its Higher Education establishments (policy CP21).

10.5 The location of the provision is in principle acceptable under policy CP21, being in a sustainable position close to the academic sites and on a sustainable transport corridor subject to concerns about over concentration of student accommodation and amenity impacts. This would result in a larger proportion of students in this area than anticipated. However, the need for PBSA in this location resulting from the present under-provision at the University of Brighton's Moulsecoomb Campus, in particular, of approximately 2,000 bedspaces against the University's target is recognised. In addition, it is more appropriate for the students to be accommodated in PBSA where there is structured management and welfare provision which also benefits the wider community co-located with student accommodation in all its formats. The development is not linked to an increase in student numbers, and so a significant proportion of 1st year undergraduates would continue to need housing elsewhere in the City if this accommodation was not provided. Whilst there is no evidence that any conversions of HMOs back to family housing in the neighbouring area would occur as a direct result of this development, an increase in the supply of PBSA of this magnitude would ease the demand on the local housing market subject to no increases in University capacity.

10.6 The volume of student accommodation proposed on the Mithras site by the University of Brighton is not linked to the viability of the Preston Barracks parcel. However, the University of Brighton as joint applicants have maintained that whilst the Mithras site represents a unique opportunity to provide a significant volume of much needed PBSA accommodation which would help to invest in and maintain the attractiveness of the University as a choice for undergraduates. The University have also maintained that the number of units (804) is critical to the funding of such a large development. The complexity of the design required to integrate the new development with the Mithras House building to make the transition of effectively 3 storeys between Lewes Road and Mithras House would add to construction costs. The scale of the scheme and its wider impacts on the townscape, has also led to a more intricate and costly architectural solution including the choice of materials and landscaping in order to seek to mitigate those impacts. The type of student accommodation proposed being cluster flats with shared facilities is a different format to the speculative PBSA built in the City and is designed to keep rents lower than the studios favoured by the speculative developers. A full financial case has not been provided by the UoB to support this and therefore the scheme must be assessed on its planning merits together with the supporting information provided whilst there is no dispute about the need for the University to provide for the accommodation needs of its undergraduates.

10.7 The Planning Policy Team do comment however that "there is not a commensurate increase above the DA3 allocation for general housing

provision, leading to the mix of general and student housing that is proposed to be more skewed towards a higher proportion of student housing than envisaged in the policy." There would be some beneficial regenerative effects of creating a more vibrant mix on the Preston Barracks site of student and residential accommodation with employment with ground floor Class A retail businesses instead of providing all of the student allocation at the Mithras site. The viability of development of the Preston Barracks site itself would be main driver dictating the balance between student accommodation and Class C3 residential on that parcel whilst seeking to secure an affordable housing contribution that is as close to policy compliance as is viable. Whilst the current deficits in PBSA accommodation and market demands remain, its provision enables mixed development proposals to achieve viability more easily linked to achieving other policy objectives such as affordable housing and employment floorspace.

10.8 The provision of the CRL is supported by the site allocation and meets the policy requirement for an innovation centre, with the increased floorspace against the policy requirement being particularly welcomed. The significant benefits of the CRL are recognised, particularly with regard to the suitability of the location and potential links to the adjacent university.

10.9 The development of the employment floorspace proposed would be secured with £7.9m Local Enterprise Partnership funding. The applicant has provided a financial viability assessment and a written response to the LPA's request to justify the shortfall and to seek additional B1 floorspace on site, which sets out that the applicant has been unable to attract a potential occupier for additional B1 floorspace within this development. They advised that providing speculative (not pre-let) office space presents a significant risk to the viability of the scheme, due to the peripheral location (not in the city centre) of the site and would cause significant problems with obtaining funding for the development. The applicant considers that without this funding, the amount of B1 floorspace provision would not be viable either. The viability assessment includes the provision of the LEP grant funding which supports the case that for this development proposal, the LEP funding is critical and notwithstanding, the development would not be able to be fully policy compliant in respect of the City Plan site allocation and maintain viability. The District Valuer has reviewed the viability case and confirmed this to be the case.

10.10 The applicants (U&I) have committed to providing a 15% affordable housing element on site which would be significantly below the 40% policy compliant proportion, however it would meet the tenure mix of 55% social/affordable rent and 45% Intermediate (shared ownership) required under policy CP20 of the City Plan. The scheme will need to provide 5% (18 units at this scheme) of all housing in new developments to meet wheelchair standards and 10% of the affordable housing provision. The Council's wheelchair accessible standard

requires that it meets national technical standards Part 4 M4(3)2b –'meet the needs of occupants who use wheelchairs' at build completion (i.e. at time of letting/ sale). This can be secured by condition.

10.11 **Design:**

Layout

The development proposed is laid out so that it maximises permeability through the site in north-south and east-west directions. This is welcomed as one of the aspirations in the LPA's Development Brief was to improve linkages across and through the site. This also maximises the amount of light received within the development and the public spaces created, and improves the legibility of the area, so that glimpses of destinations can be viewed as you pass through the site.

10.12 The separation of the student accommodation from the residential accommodation into separate towers located on the Mithras site and at the northern end of the Preston Barracks parcel in a cluster form is also welcomed. The CRL Building is also in an appropriate location at the 'heart' of the site, connecting with the University's academic facilities and in a prominent position fronting onto Lewes Road to maximise its visual and physical connection with the local and wider community. The location of the MSCP and the podium parking area for the residential accommodation, out of sight from Lewes Road, is considered appropriate in terms of prioritising the site for pedestrians and cyclists. The location of the residential accommodation close to existing housing in Saunders Park View and extending up the Lewes Road, is considered to be appropriate in terms of integrating the proposed development with existing surrounding uses, and providing natural surveillance within the new public realm and Lewes Road.

10.13 The proposed flexible A Class (retail, café)/ B1 workshop uses are considered to be appropriately located in The Furlong, where higher footfalls should be encouraged and to enliven the public spaces. The student facilities located in the ground floor podium on the Mithras site and the Business School on Watts road frontage, would also help to 'activate' the street scene in this part of Lewes Road, and are welcomed in these locations.

10.14 Access

Due to the layout of the scheme, maximising permeability and favouring pedestrians and cyclists over the car in the public realm, the accessibility of the site would be significantly improved from the current situation. An improved pedestrian link would be created at the northern end of Saunders Park View, connecting it with the University campus and Moulsecoomb railway station further north, which is to be further improved through a Walkways Agreement to be submitted and agreed through the section 106 agreement. Another pedestrian access would be created from Saunders Park

View through the new residential development ('The Field') and down through The Furlong and to Lewes Road, which would also benefit existing residents in Saunders Park View. A further pedestrian link would be created between Saunders Park View and The Furlong via a series of steps alongside the retained MOD Napoleonic Building.

10.15 The Mithras site would provide a new set of steps from Lewes Road up to Mithras House, and the proposed footbridge would connect the podium level of the Mithras accommodation and Natal Road to the west side of Lewes Road, and provide disabled access via the lift on the west side of the bridge.

10.16 The Watts site proposals are in outline only, but the access and landscaping are not reserved matters. The proposed Business School would have pedestrian access on the north, west and south sides of the building, connecting it to the campus to the north, the MSCP to the west, and the student accommodation and services to the south. The land level change from the Business School to the public square and road access to the south would be addressed with steps and a ramp.

10.17 The proposed scheme would improve the accessibility of the site for existing and proposed residents and students, and is considered to successfully address the significant land level changes across the site. However, the pedestrian access between The Field and The Furlong does not provide for disabled access, and therefore Officers consider it would be appropriate to apply a condition requesting that a lift be provided in this area.

10.18 Appearance

The appearance of the buildings is described in the Application Proposals section earlier in this report.

10.19 The appearance of the MSCP and the Business School on the Watts parcel is to be assessed in a separate application for the reserved matters of this part of the development. However, the indicative appearance of these buildings should be noted and assessed to inform the subsequent reserved matters application. It is considered that the indicative use of green walls around the perimeter of the MSCP would be appropriate to help integrate the building into the wider landscape, including the Watts Bank SNCI to the west, and to help soften and reduce the visual impact of this functional building which tends to be quite stark and bland in appearance. The Business School is intended to have a visually permeable ground floor with fully glazed frontage on the Lewes Road frontage. This is important to help activate this University building which is also intended for other university departments and to provide access to all staff and students and as a public through route at times in the ground floor atrium area of the building, and therefore should form part of the reserved matters application. The upper floors are to be clad in a more solid

white material with a textured finish that reflects the angular forms proposed for the external canopy which is to connect the Business School with the external areas of the campus to the north. This connectivity between the treatment of the Business School exterior with other aspects of the Masterplan is welcomed and should form part of the reserved matters application.

10.20 The five towers proposed on the Mithras parcel are similar in appearance to each other, with the exception of Block 2, which is similar in form but is clad in different brick colours. It is considered that this approach is appropriate, given that Block 2 is the tallest building in the scheme, and is a marker building that is sited at the heart of the development, fronting onto Lewes Road, close to the CRL building and adjacent to the new public square in front of Mithras House, 'Mithras Square'. The towers have uniformity in form and profile, with almost square footprints and large chamfers on the Lewes Road frontage at their upper floors. These chamfers not only provide interest and a distinctive character to the towers, but also assist in reducing their visual impact from medium and long views.

10.21 The use of white brick on the towers (apart from Block 2) is considered to be appropriate, in recognition of the prevalent use of white colour in the local vernacular and that this would help integrate the development into the Brighton townscape. In addition, the material has good weathering properties and therefore would be a durable finish for the external walls and roof. The use of the white brick across the roofs and would give the towers a smooth, 'clean' appearance from long views, and hide the clutter of roof plant and lift overruns which are normally exposed on tall buildings.

10.22 The proposed cladding material for Block 2 would draw the eye to this marker building, without it jarring with the surrounding development, owing to its reflective properties which would help the building sit comfortably within its context. This material would also extend across sections of the other towers on the Mithras road frontage, which would also serve to connect Block 2 with the rest of the development and would help to 'ground' the building. The lightening of the coloured cladding as you ascend the building would also help to integrate the building, reflecting the darker urban forms at its base and the lighter sky at its upper floors. During the course of the application the colour of the cladding on the west elevation was adjusted to better reflect the 'green' backdrop of the building when viewed from the South and East, at the request of Officers. The cladding and colours proposed for Block 2 are considered to be acceptable, subject to the submission of samples requested by condition.

10.23 The use of metal features and chamfered corners at the base of Blocks 2 and 3 is considered to appropriately frame the new public space between them, Mithras Square, and adds interest to this part of Lewes Road. The chamfered

corners also connect with the architecture at the upper floors, strengthening the identity of the development.

10.24 The Preston Barracks parcel has a similar built form to the Mithras towers, in that many of the towers are roughly square in footprint with similar separation distances between them and many are similarly clad in white brick. However, the residential character of the Preston Barracks parcel is identified using red brick, which will be seen in key views into The Furlong. The use of red brick is extended into the Saunders Park View part of the development, which reflects the red brick in the existing houses in SPV and this helps to integrate the development into the surrounding residential uses. The use of trapezoidal window and door openings on the southern elevations of Blocks A and B and across the ground floors of many of the buildings provides the development with a distinctive character and adds interest to these prominent elevations when viewed from Lewes Road to the south of the development. During the course of the application, these elevations of Blocks A and B were revised, as Officers considered that the window openings were not of sufficient size or consistency to reflect their importance in terms of their visual prominence.

10.25 The form and appearance of Block J has different approach to the other residential blocks on the site. The stepped back elevations are considered to reduce the impact of the building, which would otherwise appear bulky and dominant given its elevated position and relatively longer frontage, and also reflect the tiered nature of the wider landscape. The use of white brick on the elevations connects the building with the other buildings on the Preston Barracks and Mithras parcels, whilst the timber panels reflect the set-backs in the building's profile and break up the mass of the building.

10.26 Student blocks 6 and 8 are proposed to be clad in white brick, which would connect them to the Mithras student blocks and some of the residential blocks proposed, and the upper floors of blocks 6, 7 and 8 would be faced in vertical metal cladding, which would break up the elevations and reduce their impact from medium and long views, whilst reflecting the metal features around Mithras Square, the Business School and the proposed bridge. Block 7 would be fully clad in expanded mesh, which would reflect its more prominent position on the Lewes Road frontage and its location close to the Business School and the CRL building.

10.27 The proposed footbridge is also described earlier in the Application Proposals section and its design and appearance is considered to be appropriate in terms of its function and connection with the university buildings, with the use of metal cladding around its sides and base, metal railings along the top, and the vertical metal cladding around the otherwise transparent glass lift car. It would have a smooth, uncluttered appearance, and would be slender in

profile, and would add interest and successfully connect the three development parcels visually.

10.28 The CRL building would have a different appearance to the other buildings, to reflect its different use, and to give it its own identity. The large areas of glazing at the lower floors are welcomed in terms of activating both Lewes Road and The Furlong, and providing natural surveillance. The metal cladding used on much of the exterior is considered to be appropriate given its commercial use and the presence of metal elsewhere in the scheme, and is broken up visually by accents of yellow which also identify the stairwells, entrances and window openings. The appearance of the building is considered to successfully integrate it into the wider site, whilst providing an exciting focal point at the heart of the development. The entrance to the building could be further improved by adding signage that would improve the legibility of the building, but details of signage can be requested by condition.

10.29 Landscaping

The landscaping proposals are set out in the Application Proposals section earlier in this report.

10.30 The landscaping on the Preston Barracks parcel consists of a variety of hard landscaping materials to reflect the residential and pedestrian areas, for example the use of brick paving in The Furlong, and to connect the site with the university buildings on the wider site, for example the use of angular, cast in situ concrete paving divided with metal strip inserts in the central parts of The Furlong. Where possible, the hard landscaping is interspersed with soft landscaping, largely in the form of raised planters and trees, which soften the public squares and spaces. The Furlong serves as both a pedestrian connection and access for service vehicles, therefore soft landscaping has been limited to the central parts of The Furlong. The landscaping has been designed for flexible use, for informal play, as well as more open areas to allow for events, as well as space for tables and chairs for adjacent A Class uses. The Field provides communal gardens, allotment plots and barbequing areas for the private use of the residents in the surrounding Blocks. To the rear of Block J is communal gardens and woodland for the residents' use and to provide a buffer to the railway line, and to the front of Block J is a modest equipped children's play area and a separate foraging area, both for public use.

10.31 On the Mithras site, the landscaping consists of a public square in front of the steps leading up to Mithras House, a raised and accessible podium area around and between the towers, planted terraces connecting the square to the podium level on both sides of the main steps, and new tree planting along Lewes Road. The hard landscaping in the square reflects the materials proposed on the Watts site and the northern part of The Furlong, which

connects the wider masterplan site and strengthens the identity of the University campus. Although due to access requirements and level changes, much of the landscaping is hard, where possible, soft landscaping has been incorporated such as on the terraces, and through tree planting in the square and along Lewes Road, which is also achieved through the generous set-back of the buildings on the frontage.

10.32 The Watts parcel landscaping also predominantly provides pedestrian and vehicular access, but where possible, soft planting has been incorporated, such as the trees proposed within the Business School square, and the raised planting bed proposed in the centre of the ramped access to the Business School. The paving materials reflect the design of the canopy proposed to connect the Business School with the rest of the campus to the north, with cast in situ concrete inlaid with metal strips, and a herringbone brick pattern in Business School square reflects the predominant use of brick in the wider scheme. Some hedge planting is proposed close to the MSCP which would soften the appearance of the vehicular access, and the service road and roundabout to the rear of the MSCP has been amended at the request of officers in order to retain the existing trees.

10.33 The landscaping proposals are considered to work well with the architecture of the scheme, and appropriately denote the various intended uses for the public areas, whilst providing visually connectivity throughout the masterplan area. The materials can be further scrutinised through the submission of samples to be provided by condition. The soft landscaping is considered to be appropriate in this urban location, incorporating new tree planting to soften the Lewes Road frontages, tree planting in the public squares, raised planters including native species, foraging and fruit picking plants and trees for the benefit of the public, and more semi-natural areas away from the heavily trafficked parts of the site and close to the Watts Bank SNCI. However, conditions relating to the protection of existing trees and the maintenance of the landscaping would be required.

10.34 **Townscape/ Visual Impact Analysis:**

A comprehensive Landscape Visual Impact Assessment has been carried out and a set of verified viewpoints agreed with the planning authority has been provided by the applicants. The assessment has considered all of the potentially sensitive buildings and viewpoints within the context of the development. City Plan policy CP12 requires new development to conserve or enhance the city's built and archaeological heritage and its settings and have no adverse impact on the purposes of the National Park where within the setting of the National Park and protect or enhance strategic views into, out of and within the City. The assessment considers the magnitude of change to a

view such as medium or minimal and then whether the change is positive, neutral or harmful.

10.35 The site does not adjoin any conservation areas and the nearest sensitive location of this type is the Roundhill Conservation Area, 800m south west of the site which sits on a hill from where prominent views of the site can be attained. There are no views of the site from Valley Gardens, Preston Park or Stanmer Conservation Areas.

10.36 There are no Listed or Locally Listed Buildings on the site itself or adjacent to the site. Moulsecoomb Place which is Grade II Listed is north of the site but the development would not be seen in context with this building. To the south, The Bus Depot building and The Bear PH on the corner of Lewes Road and Bear Road are both Locally Listed.

10.37 In closer proximity to the site is the Woodvale cemetery part of which is in the Register of Parks and Gardens. Within the wider cemetery are the North Lodge and the Crematorium itself which are both Grade II Listed buildings.

10.38 Other sensitive locations assessed include the South Downs National Park, which is on higher ground to the north and east of the site including Hollingbury Fort to the north and Falmer Hill and Upper Bevendean to the east. Long distant viewpoints within a 5km radius of the site looking towards the site have been assessed from the AONB, for example, at Balmer Huff (north east of the Sussex University campus) and from land north of Woodingdean.

10.39 The site sits in the valley of the Lewes Road which affords medium length views along its length due to the gently curve in the road. Views of the site are gained from the residential neighbourhoods which rise steeply up the valley slopes. In some contexts, the proposed buildings would be seen against the backdrop of the National Park within a 2km radius when viewed across the valley from west to east. Other viewpoints have been assessed looking to the north across Woodvale Cemetery from the Race Course where the development would also be seen against the background of Hollingbury Hill Fort and Moulsecoomb Wild Park.

10.40 From the long range viewpoints up to and over 5km to the north east, the development would either not be seen at all or would be glimpsed hence the magnitude of change in the view would be minimal. Where the change would be more visible from long distance the view would be in the existing context of the city centre's tallest buildings and from closer to the viewer with the University's Cockcroft building. From Falmer Road, Woodingdean, the change would have a medium impact where the whole development would create a

new context for the Lewes Road but against an urban backdrop, this impact would not be considered to be harmful.

10.41 From the National Park within 2km range, the impact from Hollingbury Fort would be minimal as the development would be mostly hidden in the valley and screened by thick vegetation on the golf course above which the urban context of Elm Grove/Hanover would be seen. From footpaths to the southeast of the fort and north of Home Business Park, the development would have a moderate impact against the backdrop of Elm Grove/Hanover would be seen. Due to the existing context of the large scale Cockcroft and Watts buildings, the impact of the proposal would be beneficial by breaking up the horizontal line of those buildings but the size of the buildings would not assimilate into the smaller grain of the existing hillside settlement except where the materials proposed would be darker. However, the impact would not be harmful but would be considered to be neutral.

10.42 The National Park Authority raised concerns about introducing more development into the context of the City skyline when viewed from the National Park but accept that the proposed development would not "create new breaks in the skyline" from these viewpoints. The Authority has also raised concerns that the impact of white coloured elevations and the reflectance of the sun on glazing has not been assessed fully. However the assessments demonstrate that views of the City and the site are dominated by, for example, the white coloured Sussex Heights and Cockcroft buildings, whilst the upper floors of the tallest student blocks on both sites would be clad in darker metallic colours. The tallest buildings including the student blocks have been designed with narrow windows evidenced by the unsatisfactory results of the daylight assessment which has prompted some proposed windows to be widened. The narrowness of the windows would mitigate the impact of sun glare as would the knowledge that since the buildings are orientated on a north east to south west line, the path of the sun would not result in significant sun glare in the direction of the National Park.

10.43 In medium viewpoints from the south across Woodvale Cemetry, the impact of the development would be minor as most of the development would be screened within the valley and by the woodland screen in the cemetery foreground. In views from Elm Grove, the 18 storey Student Tower 2 would be prominent against the backdrop. As a result of the assessment of View 19 which shows Tower 2 against the backdrop of Moulsecoomb Wild Park, the applicants have agreed to amend the south and east materials to the upper floors by continuing some of the darker greens and brown's upwards instead of the lighter paler colours. A revised image has been submitted. It is considered that the impact would be medium but with the change in colours proposed, the roof profile and the quality of the design, the proposal would be

assimilated into the natural contours of the landscape the impact would not be harmful.

10.44 One of the most sensitive views identified from within the urban context is the view from the Roundhill Conservation Area from where the development would be seen prominently against the backdrop of the National Park. The Character Assessment for the Conservation area refers to the views out from the top of the hill which contributes to its character and setting. Two key views from Richmond Road and Princes Road show how Tower 2 would pierce through the ridgeline of the National Park.

10.45 The effect of the change is considered by officers to be major due to the sensitivity of the viewpoint and the backdrop. The Preston Barracks buildings which would be generally lower in scale than the Mithras site would be more closely related to the dominant Cockcroft and Watts buildings due to their siting, in these viewpoints. During the pre-application stage, with these viewpoints in mind, a variety of options for siting the tallest student blocks on the Mithras site to mitigate their impacts were tested. The University of Brighton however has maintained that for financial reasons a critical mass of student rooms (circa 800) are required on site as well as the need to make a significant contribution to providing as much accommodation as possible to meet the demands of its 1st year undergraduates.

10.46 The scheme design would ensure that from the chosen viewpoint, only one tower would pierce the ridge line of the Mithras towers seen in View 9 from Richmond Road. The colours of the elevations would gradually change through the upper floors by alteration of the proportions of darker and lighter bricks so that the lighter coloured top floors would be more integrated into the sky on clear days. In View 9, the profiled roofs of the lower blocks would follow the ridge slope in the background. In View 10 from Princes Road, the towers would not be viewed above the ridgeline and the backdrop would be built urban development and not the undeveloped National Park. It should be noted that the buildings would be visible in a transient view and walking down from the top of the hill, the prominence on the ridgeline would increase before the site disappears from view.

10.47 The Heritage Officer commented that impact in these views would be medium in each case and would cause some harm in each case, having regard to the significance of long views set out in the Character Statement and the clear relationship of the conservation area to the downland topography. From Richmond Road the development would largely obscure the distant vista of green downland and would emphatically break the horizon line; there would be no intervening tree screening mitigation in summer the overall impact of

the development on the setting of the Conservation Area would not cause demonstrable harm as defined by National Planning Policy Framework. The harm to the conservation area in each case would however be less than substantial under the terms of the NPPF. The Heritage Officer noted however that a reduction in height of the blocks on the Mithras site could significantly reduce or eliminate this harm. The applicant's claim that the impact is moderate and beneficial is not agreed with by officers.

10.48 In medium range views north along the Lewes Road, the impact of the scale and heights of the development are seen in context with a number of existing large scale developments such as the Cockcroft and Watts buildings on the University campus which are 10 and 8 storeys respectively and other medium height, large footprint developments that characterise this stretch of the Lewes Road. Consequently the impacts of the development are considered to be moderate in view of the less sensitive location of the Lewes Road. Similarly, the Cockcroft building provides a large scale context when viewing the development towards the south. During pre-application discussions, officers sought to mitigate some of the impacts of the development along the Lewes Road by relocating the tallest 15 storey Student Block (8) into the middle spine of Preston Barracks and by staggering the buildings so that the tallest were screened by shorter buildings in the foreground. It is considered that the quality of the design, materials and the heights of buildings proposed seen in the context of the Lewes Road would have some beneficial impacts by screening the existing buildings with less articulate designs and drawing away attention from them.

10.49 **Transport:**

One of the 4 parcels of land subject of the application is the Lewes Road itself between the south boundary of Preston Barracks up to the junction in front of the Watts site. The key proposals would be the new footbridge and the new access and egress arrangements which include providing two signalised junctions arrangements to provide access to the new car parks.

10.50 The creation of a footbridge is referred to in the Development Brief for this site as a possibility but is not a requirement nor is it a policy requirement under policy DA3. The Transport Policy team do not consider that it is an essential requirement in terms of handling the capacity of mainly University staff or students who would be linked by the bridge between the Watts and Mithras sites or the proposed student accommodation on either side of the Lewes Road. The existing link using the existing signalised pedestrian crossing is already well used. Notwithstanding, the bridge could provide a beneficial feature which enhances the pedestrian journey between buildings by separating users from the road traffic and assisting with the transition between levels from Mithras House entrance to Business School Square using the

proposed lift. In reverse the arrival at Mithras House would be enhanced by the comprehensive landscaping scheme. The location of the Bike Share bikes underneath the bridge landing on Preston Barracks could help avoid a resultant unused and unattractive void.

10.51 The key issues related to the Lewes Road alterations that have been considered in detail have been whether additional signal junctions would have implications to journey reliability for buses and other vehicles. Brighton and Hove buses have objected on this basis and that originally sections of the bus lanes would have been removed and concerns were raised in relation to this matter by the Transport Policy Officer and that the proposed layout reduced the available space for cyclists. Officers have successfully negotiated changes from the layout originally submitted by requiring the applicants to make amendments to the design to enable the provision of a 2 metre wide cycle lane in both directions and by introducing a staggered right turn into the podium car park and the multi-storey car park, it has been possible to maximise the retention of the south bound bus lane. It is intended that the two signalised junctions will be equipped with Microprocessor Optimised Vehicle Actuation (MOVA) and Split Cycle Offset Optimisation Technique (SCOOT) traffic control systems to optimise the performance of the junction and cycle pre-green signals as has been implemented on other signalised junctions on Lewes Road.

10.52 The applicant has assessed the potential impact the development may have upon bus capacity on the Lewes Road corridor. A large proportion of the student residential trips in the peak hours are to be internalised within the site (trips between Mithras student accommodation and the University campus) and given the commercial nature of the bus services any additional patronage will generate additional revenue to support the potential increase in capacity or frequency of existing services.

10.53 In order to assess the impact the development will have on the transport network the applicant has used industry standard software such as TRICS to establish the likely trip generation and modelling software such as LINSIG to the performance of junctions. The applicant has forecast that there will be 205 two way vehicle trips in the AM peak and 209 in the PM peak. At the request of the Highway Authority the applicant undertook junction modelling of a single and dual signalised junction access arrangement. From an operational perspective two signalised junctions reduced the likelihood of opposing flows not having to interact and there being a need for additional phases in the signals and therefore operated more efficiently.

10.54 The applicant concluded that the transport impact of the redevelopment of Preston Barracks is minimal in terms of impact upon the transport network because:

- The University element of the development is primarily a re-assignment of existing trips rather than the generation of new trips
- The majority of the student residential trips will be via foot in the peak hour and internalised within the site
- The percentage increase in traffic as a result of the development is low when compared to existing flows on Lewes Road (6% in the AM peak and 8% in the PM peak).

10.55 Following the approval and construction of the AEC Building on the Watts site, the current Watts car park is currently accessed from the north end of Saunders Park View so it is not an entirely new arrangement although the parking capacity would be increased to 551 from existing levels; as a result of the development of the new multi-storey car park. The south signalised junction is a new junction to serve the podium car park in the Preston Barracks site.

10.56 The transport issues related to this development relate to car parking, public transport and other sustainable means of transport such as walking. cycling, car clubs etc.

10.57 The provision of car parking for the University within the multi storey car park has been reduced following discussions with the applicants on the basis that it is not anticipated that there would be an increase in the numbers of University staff or students arising from the development. Originally 600 car parking spaces were proposed within the multi-storey car park and this was reduced to 551 spaces which is a like for like provision when compared with existing university car parking levels. The provision of car parking in the Preston Barracks podium intended for the residential units, the CRL, disabled bays, car club and motorcycle bays is satisfactory and would meet the policy standards set out in SPD14. The applicant also undertook an on-street parking survey which demonstrated that at the time of the surveys highest recorded parking stress only 62% of available car parking spaces were occupied. To mitigate the potential for overspill car parking in addition to sustainable travel incentives the applicant has agreed to the provision of 8 car club vehicles and subject to the support from local residents the implementation of a controlled parking zone.

10.58 The 22 disabled parking spaces on the Preston Barracks site would meet the policy standards for residential and B1 (CRL) uses. The 8 student disabled

bays proposed are based upon the existing ratio of disabled bays for the University's campus based upon demand. This is currently 1.6% which has been accepted by the Transport Policy Officer. The spaces would all be provided in the podium car park underneath Residential Blocks E, F and G and would serve the whole site with the exception of the Saunders Park residential units which would have 8 on street disabled parking spaces. On the Mithras site, an additional 13 spaces to the 6 disabled bays being retained are proposed which would be satisfactory subject to details of the specifications and layout.

10.59 The numbers of cycle spaces proposed across the whole scheme are 1954 which are split between the 3 sites. On the Preston Barracks site, the student cycle provision (total: 409) is located at the ground and podium floor levels underneath Student Blocks 6 and 7 with two entrances at the front and rear from Lewes Road and The Furlong. Provision for Student Block 8 is at podium level accessed from The Furlong.

10.60 The main central hub of cycle parking would be sited underneath the podium and under Residential Buildings B and C whilst Building D to the north would have separate cycle storage hub (2). Cycle parking within the central hub would serve occupants and visitors to the residential blocks A to G as well as the CRL and the ground floor retail units. In terms of access to the cycle parking, generally it is deemed to be convenient and logical. The on-street cycle parking located in the public realm is appropriately located within The Furlong and outside the main entrance to the CRL building.

10.61 The CRL will have 5 showers (1 accessible) available for use by cyclists.

10.62 There are 2 bike share hubs proposed which would be underneath the bridge at the landing point and on The Furlong between Building D and Student Block 6. The Highway Authority has requested a third to be located on Mithras House to be secured via condition.

10.63 Cycle storage for Saunders Park View residential units (Block J) is located at second floor level (street level + 1). Bikes would therefore be transported one storey only in a lift designed to meet Transport for London (TFL) standards for carrying bikes.

10.64 Cycle parking for the Mithras site would be split between the ground and first floors. Underneath Tower 1 by Natal Road, and Tower 4 and 5 the cycle stores would be accessed from the front at ground level. Tower 5 would also have storage at first floor level at podium level. An additional cycle store would be located at podium level behind Towers 3 and 4.

10.65 The provision of cycle parking meets the standards in SPD14 in terms of numbers and clarification of the type of storage and the access arrangements have been clarified by the applicant. Further details will be required to ensure that the space standards would be achievable and that satisfactory and functional storage would be provided.

10.66 Generally the proposed scheme is considered to have good levels of permeability and pedestrian access throughout the site and between the three parcels of land, especially given the topography of the area. However, some alterations to pedestrian access should be sought.

10.67 The majority of the buildings are accessed from the Furlong or Lewes Road and have level access. Blocks E, F, G and J are accessed from Saunders Park View. Given the topography of the site there is a need for steps and ramps at various locations. Generally the slopes are provided at 1:21 which is acceptable. At some locations steps are provided connecting The Field down to The Furlong between Residential Blocks B and C or Residential Block G and the MOD building which may prevent access for people with a mobility issue. It is considered that infrastructure should be put in place which maximises the permeability and choice of route for people with a mobility issue.

10.68 The Field, which is the area of open space and recreation between Residential Blocks E, F and G (west) and Buildings B, C and D (east) is intended to provide semi-private amenity space for the residential occupiers in the form of food growing areas, informal play and picnic areas. Whilst the two pedestrian link routes between Residential Blocks B and C would be retained at all times, an existing or new resident of Saunders Park View or visitor unable to use the steps would have to walk to the western or eastern end of Saunders Park View to be able to access the Lewes Road. In contrast, new residents of buildings on the podium could use the secure access into the lobbies of residential buildings fronting The Furlong to make the transition from podium to Lewes Road via the internal lifts. An additional lift should be provided to enhance access for all between Saunders Park View and Lewes Road between buildings B & C, this would appear to be the most practical and convenient location.

10.69 The areas of the development where there would be the potential for interaction between pedestrians and vehicles accessing and egressing the site such as ‘Business Square’ to access the multi storey car park and at Mithras House where pedestrians who would access the new steps and the route to the bridge have to cross the service road, require careful consideration of the detailed layouts of construction and design. There are not considered to be any road safety concerns with the design of these

junctions and therefore the Transport Policy Team would not wish to oppose the principle of these junctions but would require detailed design work to be agreed prior to use of the junctions coming into use.

10.70 The enhanced pedestrian links from the site to Moulsecoomb Railway Station, in line with policy DA3, are welcomed. Further details are required and a condition is recommended to secure these.

10.71 The northern section of Saunders Park View which is currently private and within the application site would remain private at the request of the developer and would therefore remain in their ownership and management.

10.72 The servicing arrangements including refuse collections are considered to be acceptable with the majority of Preston Barracks being serviced from The Furlong at restricted times. Vehicles would enter from the new south junction and then could either leave from the north junction or turn around in Mannock Square. No servicing would be permitted between 10am and 4pm to enable The Furlong to be used for its primary purpose as amenity and recreation space without conflict with vehicles. The arrangements for the Mithras site would be for collections to take place via Natal Road from the service road in front of Mithras House. An alternative would be to access and egress from the existing southern entrance to the Mithras site. At the Watts site, the arrangements have been amended by removal of a roundabout that was proposed to the west of the AEC building on higher ground by re-arrangement of the current service road. The drop in levels of 6 metres made it impractical to provide a roundabout without provision of very large retaining walls and likely damage to mature tree roots around the current service road. Vehicles could turn around in front of the Cockcroft building and exit via the new service road to be created between the multi storey car park and the Watts Bank SNCI. A condition will be applied requiring full details of the servicing and delivery arrangements which would be satisfactory in principle.

10.73 **Air Quality:**

Policy DA3 Lewes Road corridor of the City Plan states that for this site sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact. The Lewes Road Planning Brief has similar guidance. The site lies north and in close proximity to the Lewes Road Air Quality Management Area that includes roadside residential to the south of the site including; Pelham Terrace, Coombe Terrace, Lewes Road south of the Gyratory and Hollingdean Road. The main concerns for local air quality as a result of the development are adverse impacts on the Air Quality Management Area; Pelham Terrace and 100m to 1km to the south of Preston Barracks at roadside dwellings parallel with Lewes Road including; Coombe Terrace, South of the Vogue Gyratory and

Hollingdean Road. The Developer's assessment acknowledges a small adverse air quality impact on these parts of the AQMA thus contrary to policy and measures have been secured to mitigate this impact. This assessment however is based upon assumptions about a general improvement in air quality (nitrogen dioxide) between now and 2021 which may be true of much of the City, is not evidenced from local monitors to this development in the past year.

10.74 In response to the Air Quality Officer's comments in conjunction with the Transport Policy team comments, the number of parking spaces in the multi storey car park has been reduced by 49 spaces or 12%. Both applicants have now agreed to increase the number of electric vehicle charging points and the number of passive electric charging spaces ready for conversion in excess of the SPD14 standards. The disruption to bus lanes that would have resulted from the submitted proposals have been avoided by junction re-design and re-providing uninterrupted cycle lanes of an acceptable width would reverse some of the potential harm to air quality that may have arisen.

10.75 Other proposals that would mitigate the air quality impacts would be the car club provision and Bike Share provision. The high level footbridge would reduce exposure to harmful emissions by pedestrians needing to cross the Lewes Road. The new building structures will be set back from the carriageway. This is important so that new residential is not exposed to higher levels of pollution at roadside and road traffic emissions have room to disperse. Nitrogen dioxide concentrations drop off substantially with horizontal and vertical distance from the Lewes Road transport corridor. The proposed buildings closest to the carriageway will not introduce residential land use to a known area of poor air quality, a consideration under policy SU9. Ground floor land use will not have residential in Block A (Preston Barracks side) and Tower 4 (Mithras House side). Other buildings such as those on the Mithras House side will have residential land use set back from the carriageway. As part of the parking management plans, the multi storey car park should avoid the use of a barrier to prevent queuing at peak times. Access to the University car park should be based upon need particularly by geography or access to good public transport links. The Combine Heat and Power (CHP) emissions should be ultra-low NOx.

10.76 Particulate levels (PM_{10} and $PM_{2.5}$) in the area are sufficiently low not to threaten the air quality strategy standards or objectives due to the development (construction or operation). Local tests show ultra-low sulphur diesel in combination with modern diesel particulate traps have helped mitigate sooty and sulphate emissions from road traffic. It is agreed the development impacts on particulate levels will be negligible.

10.77 The submitted Demolition Management Plan which forms part of the application proposes all vehicles for site clearance should arrive and depart to and from the A27 to avoid the AQMA.

10.78 The development is not likely to have any detrimental influence on local air quality to the north of the site with good vehicle flow and dwellings set back from the dual carriageway. It is agreed the development impacts on nitrogen dioxide to the north of the site will be negligible.

10.79 The Air Quality Officer has however recommended approval subject to a series of transport and air quality mitigation measures which are described above.

10.80 **Ecology**:

The Watts site lies immediately adjacent to the Watts Bank SNCI and is in close proximity to Crespin Way LWS which is on higher ground west of the railway line. The County Ecologist has commented that there should be no encroachment into the SNCI and measures should be taken to prevent impacts during construction, to be set out in a Construction Environmental Management Plan (CEMP).

10.81 There are no concerns about the impacts on the limited ecological value of the Preston Barracks and Watts sites except for mature trees given that the landscaping scheme will introduce a net increase in habitat areas and includes chalk grassland green roofs, new planting areas, hedgerows and significant tree planting. Concerns about overshadowing of the Watts Bank SNCI are not supported by the Sunlight assessment where only early morning sunlight would be affected. Indirect impacts identified such as light pollution, increased disturbance can be mitigated. The proposal to provide the service road between the multi storey car park and the SNCI involves cutting into the steep slope of the embankment but this lies outside the SNCI boundary.

10.82 The main impacts would be from vehicles using the secondary car park entrance/exit on the west flank mostly at normal peak hours and service vehicles. The main car park entrance is on the south flank. The proposed development should also be compared with the current site which has an open car park with no attenuation.

10.83 The ecological survey revealed that there are a good supply of protected species (reptiles) on the Preston Barracks site in the central grassed areas and around the amenity fringes close to Saunders Park View. Due to the need to commence trapping and translocation of species prior to the autumn and winter months and the planned construction timetable, it has been necessary to begin the process prior to any planning consent. This has been agreed with

the Planning Authority under the supervision of the City Parks team. A relocated site has been agreed (which could not be onto the SNCI itself) and the appropriate habitat (hibernaculum) created in order to assist with the transition to a new location. The Ecologist does not object to the proposals but would wish to see enhancement of the SNCI in addition to the mitigation measures which could be conditioned including provision of educational and interpretative boards. Prior to construction commencing, a Construction and Environmental Management Plan (Ecology) should be required as well. Subject to the required mitigation measures and ecological enhancements proposed, the development would comply with policy CP10 of the Brighton and Hove City Plan.

10.84 **Sustainability**:
The proposed development has responded well to policy CP8 and proposes an exemplary sustainable development. The scheme provides excellent levels of energy efficiency and use of low carbon technologies. The targets set out within City Plan Part One Policy CP8 are met and exceeded, with CO2 emissions associated with the residential portion of the development exceeding the 19% reduction requirement, and the mandatory minimum energy requirements of BREEAM Excellent targeted across the site for the Watts and Mithras parcel student accommodation buildings, the Business School and the CRL building.

10.85 The scheme proposes installation of a low carbon District Heat Network (DHN) to provide energy to the buildings within the development in accordance with policy DA3 Lewes Road (local priority 8) of the City Plan. This will deliver low carbon heat via site wide heat networks using gas CHP. Two systems are proposed, serving the Preston Barracks site and the Mithras site. Indicative drawings have been provided to illustrate the network but final details or variations would be required to be submitted by condition.

10.86 The wider sustainability issues raised in policy CP8 have been fully considered, with consideration given to issues such as reduction of the urban heat island effect with large landscaped areas and roof level amenity spaces, food growing encouraged on The Field and foraging, for example, on The Furlong which is beneficial to human health and the enhancement of wildlife. The use of materials that are sustainable and responsibly sourced, water efficiency and the minimising of waste and encouragement of recycling have also been considered.

10.87 BREEAM certification will be sought for all the main buildings, with Excellent being the development target. The inclusion of Gas fired CHP operation results in the energy calculations demonstrating a 41.7% reduction in the Building Regulations Part L (2013) Target Emission Rate. Available roof areas

on the Preston Barracks and the Watts academic building are proposed to be used for solar photovoltaics. These provide an additional 4.5% reduction in CO2 emissions across the whole development, resulting in an overall reduction in CO2 emissions of 44.4% over the Part L (2013). The total number of panels proposed 490, generating just under 80,000kWh per year, providing 118kWp, offsetting 41 tonnes CO2 annually.

10.88 Non major office development of between 236 – 1000sqm and Non major Retail floorspace between 151 – 999 sq. m is expected to achieve BREEAM 'very good'. It is common practice within the Local Planning Authority that any office development below this threshold be conditioned to achieve a minimum EPC rating of 'B' (energy performance certificate) in order to address policy CP8. This would apply to the ground floor A1/A3 and B1 units in The Furlong which would all fall within this range.

10.89 The Sustainability Statement sets out that some of the areas may be built to Shell & Core only. This will affect the BREEAM certification process, as the incoming tenant would have responsibility for the final certificate. It has been agreed with the applicants to include a condition for a green lease agreement with the incoming tenant of small commercial units for the fit out BREEAM. This has been agreed on other Major developments in the City.

10.90 **Impact on Amenity;**

Privacy

The Watts parcel development would not affect the amenity of any neighbouring residents due to the uses proposed and the distances to the nearest residential uses.

10.91 The Mithras development would potentially cause loss of privacy to existing properties on Natal Road, Dewe Road and fronting onto Lewes Road to the north. Block 5 at its nearest point is approximately 22m from the rear gardens of the nearest properties on Dewe Road and approximately 33m from the houses on Dewe Road. This is considered to be sufficient distance in this urban environment where properties are already overlooked to a varying degree, to prevent a significant increase in overlooking or loss of privacy. To the north, Block 1 would be positioned approximately 20m at first floor level and above from the nearest property on the corner of Natal Road and Lewes Road. The footbridge and ground floor of Block 1 would be slightly closer to this property, approximately 15m away. This is considered to be sufficient distance to avoid significant loss of privacy, given that Block 1 would potentially overlook only the flank wall, not the more sensitive rear wall of this corner property, which is already overlooked to some extent by Mithras House, the elevated parts of Natal Road, and its existing neighbouring properties. Again, in this urban context, it is not considered that the

development proposed would cause significant loss of privacy to this neighbour or the properties beyond it to the north or northeast of the site.

10.92 The Preston Barracks development would potentially cause loss of privacy to existing residents on Saunders Park View. However, the proposed development would be located to the front of these properties which is a less sensitive aspect given the public use of the road. In addition, the development would be positioned at least 14m from the existing SPV properties which would avoid undue overlooking to these properties. Block J would be positioned at its nearest point approximately 10m from the flank of the nearest property in Saunders Park View, number 125. In addition, there would be no flank windows in the south elevation of Block J and no other windows would cause potential overlooking to this property.

10.93 Noise

Potential noise issues and concerns raised by consultees in respect of the proposals would relate to buildings themselves such as plant and machinery, some of the ground floor commercial units in The Furlong, outdoor amenity space, the student accommodation, and traffic noise. The Environmental Health team have identified sources of noise assessed within the Environmental Statement and proposed suitable conditions relating to plant noise and other noise emissions to protect new occupants and neighbouring residents. The impact of noise observed from the current site that is most evident is traffic noise from the Lewes Road which noticeably reduces from the eastern or western boundaries of the site. The proposed buildings would act as a sound buffer for some parts of the site furthest from the carriageway. Further mitigation in the scheme from traffic noise would be that almost all of the new parking areas, unlike now, would be enclosed in the podium or the multi storey car park.

10.94 Conditions are recommended to limit the hours of use of the commercial units on The Furlong and some of the outdoor amenity areas such as roof tops, or the ground floor of Student Block 8, for example. Proposals involving student accommodation raise concerns about noise but in relation to the buildings themselves, they would be subject to management plans and in the case of the Mithras Student accommodation, directly on campus. The siting of the Preston Barracks blocks places them at distance from residents in Saunders Park View and fronting the Lewes Road. The siting of them on the main road would also mitigate noise concerns about uncontrolled late night noise in the vicinity of the accommodation off site.

10.95 Lighting

A comprehensive lighting scheme has been set out in the Design and Access Statement illustrating how the sites would be illuminated in the public realm

and pedestrian routes around the sites. The scheme would be subject to a condition but it is considered that the scheme would ensure safe and secure links around the site would be provided whilst ensuring that lighting would not cause harmful amenity impacts to adjoining residents and the Watts Bank SNCI. In response to officer concerns and the South Downs National Park Authority about the impact of internal lighting on the upper floors of towers against the setting of the background, the applicants have agreed to provide sensor lighting at Level 10 and above in the student accommodation to all communal areas and corridors where those floors would be prominent above the general townscape and where lighting could be left on unnecessarily late at night. This would not apply to individual student rooms or to residential flats where the occupiers are likely to manage lighting as needed. This control on lighting would also have benefits for neighbours on elevated ground close to the student blocks by mitigating lighting impacts.

10.96 **Daylight/Sunlight Impact:**
A full daylight and sunlight assessment was carried as part of the Environmental Assessment which was reviewed by the Building Research Establishment on two occasions.

10.97 The impact of the proposals on neighbouring properties given the scale of the development is less than might have been expected. In part this is due to the topography being set within a valley, below the level of most of the surrounding housing. The other mitigating factor is that the development is adjoined by a number of non-residential buildings such as the Pavilion Retail Park to the south and other buildings which are occupied by the applicants, University of Brighton, as teaching and academic space.

10.98 The residential areas which would be affected are on Saunders Park View (west of the site), The Highway (north of the Mithras site) and Dewe Road (east of the Mithras site). There would be a significant loss of daylight to some windows for 6 dwellings in The Highway, 7 dwellings in Dewe Road and 14 dwellings on Saunders Park View. In most cases the loss of daylight would only be just outside the BRE guidelines and would be classed as minor adverse. In respect of rooms in 4 out of the 14 dwellings on Saunders Park View the relative loss of light to ground floor rooms is slightly greater and could be classed as minor/moderate adverse, although this is partly because of the projecting wings originally built on either side of these respective houses.

10.99 The loss of daylight to all other dwellings would be within the BRE guidelines and could be classed as negligible.

10.100 Most nearby dwellings face within 90 degrees of North so loss of sunlight would not be an issue. 3 properties in Saunders Park View would lose winter sunlight to windows classed as Minor adverse. The loss of sunlight to gardens would be small.

10.101 The original submission assessed by the BRE showed that the main concerns related to proposed daylight to new residential and student rooms with 234 residential rooms and 241 student rooms predicted to have daylight levels below the minimum guidance. Sunlight provision to 65% of lounges of residential units and 52% of student lounges would not meet the guidance with the lower floors most affected by the density and heights of the development.

10.102 The buildings with the worst daylight provision were residential Block C and student Block 6 on Preston Barracks. Student bedrooms on Mithras Site which are in cluster flats requiring less daylight would be acceptable in a large majority of cases would enjoy unobstructed outlooks. The exceptions are 16 bedrooms in the lower podium floor and almost every communal kitchen lounge in each tower block which face either north or south directly onto an opposite student tower and fall significantly below the BRE guidance. The top floor communal kitchen lounges also do not meet the guidance where there is no obstruction implying that the single aspect windows are not large enough to serve the very deep rooms.

10.103 Without a fundamental redesign to the building core and floor layouts, a value judgement needs to be made that it would be preferable for individual bedrooms to enjoy good and very good daylight levels and the lesser used communal areas to only achieve low levels of light. Following the improvements to the Preston Barracks student blocks, 87% of the student rooms and 88% of communal rooms would now achieve the BRE minimum guidance.

10.104 Analysis of the reasons for the numbers of units not meeting the BRE guidance suggested that the windows to both residential and student rooms on Preston Barracks (the worst affected) needed larger windows. Negotiations have resulted in the applicants on Preston Barracks providing larger windows throughout the 3 lowest floors affected and selected upper floor windows to residential and student blocks, which has now resulted in a significantly greater (over 90%) number of rooms achieving the BRE guidance and is now considered to be satisfactory. Modifications to the prominent south facing elevations of Blocks A and B to enhance the design and appearance have also resulted in larger windows. It has been agreed that the walls, ceilings and floors coverings to rooms would be finished in a light colour which affects the

reflectance values positively and contributes to some rooms achieving the minimum guidance.

10.105 **Microclimate**:

The Environmental Assessment included a Wind and Microclimate study which was independently assessed for the Planning Authority by the Building Research Establishment (BRE). Following further clarification of the testing and additional testing carried out by the applicants, the BRE have reported that the study is robust and would properly represent the wind conditions around the proposed development site. No allowance in the results have been made for local factors that Brighton being known for being windy, local people are likely to perceive wind conditions being slightly better than those presented in the study.

10.106 The proposed development is high density and features some very tall buildings (up to 18 storeys) which are proposed to be built close together. At pre-application stage, the effects on the safety of a proposed pedestrian crossing on Lewes Road at the southern end of the site caused by the proposed ten storey residential Block A on Preston Barracks, adjacent to the existing retail park and the Lewes Road has resulted in its profile being altered significantly prior to submission.

10.107 The development would provide more amenity space than at present and the assessment needed to consider whether the space provided would be appropriate for its intended purpose, for example, sitting, strolling or walking. The scheme would provide more amenity space locations where the wind conditions would be improved compared to the existing car parks but that is conditional upon the landscaping scheme proposed. The landscaping scheme would not be a reserved matter so the scheme as proposed would be determined by the Planning Committee. The amenity areas have been assessed as being suitable for sitting in summer and therefore an assumption has been made that the wind conditions during other seasons will not be substantially worse. The BRE and officers have agreed that this is a reasonable approach.

10.108 In respect of the southern road crossing point, it has been determined that as a signalled crossing, that the ‘Walking’ wind conditions criteria are appropriate as people would have a ‘need’ (Walking criteria) to cross Lewes Road and not just a ‘desire’ (Strolling criteria). The limited time waiting to cross would not change the perception of the wind conditions.

10.109 The BRE are satisfied that in terms of the likely impact on vehicular, cyclist and pedestrian safety the review is reasonable. The study shows areas of relatively windy and less windy locations. The windy locations are where they

would be expected to be seen (at the exposed South of the proposed development), and that following mitigation, the presence of the proposed development buildings shelter the site, thus reducing the winds.

10.110 **Health Facility:**

One of the local priorities in the strategy for the DA3 Lewes Road corridor is to encourage the development of community facilities. This would being benefits to a wider cross section of the community in addition to the regenerative, educational and employment benefits on the site itself.

10.111 Officers and the applicants have been working closely with the Brighton and Hove Clinical Commissioning Group to investigate the feasibility of providing a medical centre on the Preston Barracks site. Whilst this does not form part of the proposals, the architects have identified an area of floorspace in The Furlong ground floor units with some adaption to provide accommodation that could meet the needs identified by the CCG. Whilst discussions have been taking place at pace during the consideration of the application, the timing of the planning application and the need to commence construction early in 2018 in order to secure the LEP funding for the CRL means that there is insufficient time to reach formal agreements between the parties. All parties are committed to achieving a medical centre as this would provide a much needed medical facility serving the local catchment and it would secure a long term occupier for the commercial elements of the scheme which would help to strengthen the overall viability. The provision of a medical facility would be a welcome provision on site and would meet a strategic policy objective and comply with policies DA3 and CP18 of the City Plan which supports *"joint working with health providers to help deliver…….a citywide integrated network of health facilities that is within reasonable walking distance of public transport."*

10.112 A condition is recommended requiring the applicants to continue engaging with health providers to endeavour to provide an agreed minimum floorspace for a class D1 health facility. After such time, the plans which are approved would be implemented in order to fit into the construction programme.

10.113 **Sustainable Drainage:**

The site lies within Flood Zone 1 with a low probability of flooding from tidal and fluvial sources. The scheme would provide permeable paving in The Field and rain gardens would feature along the frontage of Mithras site as part of the landscaping proposals to be considered by the Committee. In addition, green roofs are proposed on Residential Buildings C, D and J and in between Student Residential Buildings 6 and 7. Soakaways as well as attenuation tanks underneath the podium car park and the Mithras student union garden are proposed. The Mithras and Watts sites currently comprise large expanses

of tarmac with lesser expanses on the Preston Barracks site. The proposals do include significant areas of soft landscaping which is welcomed although much of it is in the form of raised planters, terracing and raised allotments at the podium levels due to underground car parking and low level accommodation. Nonetheless together with the green roofs and rain gardens, the landscaping would provide significant areas of sustainable drainage.

10.114 The Council's Flood Risk Management Officer has no objections but has requested a number of conditions including requirements to demonstrate that drainage could achieve betterment to achieve a minimum of 50% reduction in run-off together with a soakaway test and calculations to demonstrate that the final scheme could cope with summer and winter storm events.

10.115 **Community Transport:**

Community Transport have been occupying the site as a tenant under a various short term leases and have sought a S106 contribution towards helping with relocation for this valuable community service. The site is used as parking and storage with a small office currently in a modular building where operations are managed. Community Transport is a charity which provides travel for children, disabled adults and schools and community groups with transport or day trips. The valuable work done by the charity is recognised but the means of support through S106 would be an inappropriate use of such funding that would not meet the CIL Tests. During the course of the application's consideration, the Council's Property Team have worked hard to assist in identifying suitable sites or premises for the relocation of Community Transport including undertaking site visits and introductions to land owners. It can be reported that a preferred site has been identified which would suit Community Transport and that discussions with the landowner are on-going.

10.116 **Crime and Safety:**

Sussex Police have submitted representations in respect of design guidance and by seeking contributions towards policing the crime that it is considered would be generated by the development. This has been based upon a mathematical formula that extrapolates a predicted number of crimes to be committed by the new occupiers based upon wider crime statistics per head of population. Unfortunately the statistics take no account of the regenerative benefits that bring reductions in crime.

10.117 To date the council's approach for Sussex Police has been secured through direct mitigation through design measures and where appropriate on-site facilities for the police as part of proposed development. Designing out crime is always an important planning consideration that should help to reduce crime arising in new developments. The Sussex Police Designing out Crime

officer was unable to provide any scheme specific advice on this development for how the design and layout has addressed the issue or could be enhanced.

10.118 Notwithstanding, it is considered by officers that the scheme would be generally well designed to minimise opportunities for crime. It would create good permeability with wide attractive pedestrian thoroughfares and good lighting that would benefit from good natural surveillance from ground floor active frontages. All of the spaces have been designed to enable activity to take place in the form of food growing, informal amenity space, active recreation zones, commercial outlets and communal areas in the residential and student blocks which look out to the streets. Entrances to buildings are mostly visible to the street frontages and newly created streets.

10.119 Direct revenue funding has not previously been sought and there would be difficulty justifying that a sum would be used to mitigate the direct impacts of development where it is not possible to show the need for police action is a direct consequence of a specific development. The Planning Authority's Developer Contribution Guidance sets out the Council's priorities for seeking developer contributions which does not include crime prevention. Viability of the scheme is an issue where it is likely that the scheme would not be fully policy compliant in respect of contributions required by the proposals and it is not considered that a special case can be made for contributions towards policing crime can be justified. Discussions are currently ongoing between officers and the Police and Crime Commissioner's office about this issue.

10.120 **Financial Viability**

The applicant for the Preston Barracks parcel submitted a Financial Viability Assessment with the application which was independently assessed by the District Valuation Service (DVS). The DVS concluded that it would not be financially viable to provide more than £1.5 million in financial contributions and 15% affordable housing at 55% affordable rented, but advised that it would be appropriate to carry out a review of viability.

10.121 The applicant for the Watts and Mithras sites has agreed to provide the requested £991,580 in mitigation of the proposed development. No affordable housing requirement is generated by the uses proposed on these parcels. As such, the review of viability set out in the s106 Heads of Terms would not apply to this applicant.

10.122 **Fire and Rescue:**

Whilst not a material planning consideration, in response to the ESFR comments, the applicants have submitted drawings to illustrate that the scheme would enable access and turning areas for refuse and pump appliances on the amended service road access serving the Watts site. Emergency vehicle access would be provided on The Furlong and the existing

Saunders Park View. The Mithras site has existing access in front of Mithras House and from the southern access to be retained. The applicants have tested all of the accesses into the site to ensure that all critical areas can be reached within 18m by fire tenders. The applicants have also submitted Fire Strategy Statements for all three parcels of the site to provide re-assurance on these matters and have confirmed that sprinkler systems would be installed to all of the student accommodation on both sites and all residential blocks above 18m in compliance with the Building Regulations. The CRL would not require a sprinkler system due to its lower height. Notwithstanding, full details would be required under separate legislation.

11. CONCLUSION

11.1 The proposed development of the Preston Barracks site together with the Watts and Mithras sites would provide the delivery of a key strategic site in the City Plan under policy DA3. Preston Barracks has been vacant and underused for a generation due to difficulties in identifying a regeneration scheme that was viable and capable of providing key employment and housing needs as well as providing a new phase in the provision of much needed higher education and student accommodation on site that would meet modern requirements and providing a high quality design approach and addressing the transport and infrastructure needs of the neighbourhood and the Lewes Road corridor.

11.2 In order to achieve those objectives, the proposals as anticipated in the City Plan and the Development Brief (2011) anticipated a very high density development featuring some very tall buildings which would result in challenging environmental impacts to be addressed. These impacts would, it is recognised, transform this part of the Lewes Road corridor to create an almost new neighbourhood which would not entirely conform to the established urban form but in order to meet future needs for the City, higher density schemes as proposed could provide a means of addressing those needs. Some of the environmental impacts of the proposal have been mitigated, in particular the layout and design of the tall buildings has been manipulated in various options to reduce their impacts on the townscape and on the immediate neighbourhood but there are one or two visual impacts which would be harmful but on balance they are in the minority. The impacts on sunlight and daylight have been reduced as much as possible in particular with design changes to enhance the quality of the new accommodation and the site layouts took account of neighbouring dwellings at design stage to minimise impacts. The higher densities would however present challenges for achieving good quality urban space around the buildings and allowing sufficient daylight and sunlight into the public spaces with acceptable climactic conditions. It is acknowledged that these aspects would preferably be

enhanced but is not considered a reason to resist the development overall which was intended to be very high density in the site allocation and development brief.

11.3 The proposed uses on site whilst being in line with policy in land use terms would not wholly meet the aspirations of the City Plan particularly in respect of employment and affordable housing. The key to delivery of this site has been viability and it has now been demonstrated satisfactorily in respect of the Preston Barracks site that the scheme would provide as much affordable housing and other developer contributions as possible. It is acknowledged therefore that the proposals would challenge existing policy requirements in particular employment and affordable housing provision which would be 15%.

11.4 The provision of the CRL would be very welcome and would create a vibrant new place of employment both visually and functionally. Funding for the CRL is critical to the overall funding of Preston Barracks and the very ambitious project timetable including the determination of this application has been dictated by the applicant's need to start to draw down the LEP funding before the end of this year.

11.5 The creation of 369 new residential units would also be welcome and whilst there would be concerns about the density of student development proposed, it is anticipated that with good management of good quality accommodation, the proposals would create an alternative student living experience for students and neighbours to the current existing character of the area which features a high density of unmanaged Houses in Multiple Occupation which has altered the character of the neighbourhoods near this site in a manner that has not been welcomed by many residents.

11.6 There would be many aspects of the development which are welcome and positive principally the regeneration of these underused sites to create a potentially vibrant quarter with high quality sustainably designed buildings. The landscaping proposals and the detailed considerations that have been given to providing a permeable and accessible development linking all three sites together with the bridge, enhanced road crossings and by creating new links with the existing neighbourhoods and key transport nodes and corridors. The open space and landscaping would create a variety of characters and activity opportunities for existing and new residents and occupiers.

11.7 The Business School has the potential to produce an exciting piece of architecture with its canopy to link in with the adjacent recently completed Advanced Engineering Centre on the Watts campus. There would be the possibility of the creation of a medical centre on the Preston Barracks site to benefit the wider community.

11.8 The transport proposals would result in a sustainable development which is less reliant on car parking and car journeys with options for sustainable transport use with over 1000 cycle parking spaces, Bike Share and car share provision, motorbike spaces together with a Travel Plan and parking management for the proposed main car parks proposed.

11.9 On balance, it is considered that the regeneration of this long vacant key strategic site with a high quality designed scheme that meets many of the City Plan objectives and has sought to mitigate the harmful impacts would be acceptable.

12. EQUALITIES

12.1 The proposals would address a number of equalities issues firstly by significantly enhancing access for all across the site with the introduction of podiums on both Mithras and Preston Barracks enabling more gentle gradients to make the large transition currently existing from the Lewes Road to Saunders Park View and the railway station and on the east side up to Mithras House incorporating new lifts for the bridge and on Preston Barracks. Full permeability would also be achieved across the Watts campus through the AEC to the Business School and across to Preston Barracks. The development would meet all policy standards related to wheelchair residential and student units together with disabled car parking standards.

Brighton & Hove City Council

PLANNING COMMITTEE LIST
DATE OF COMMITTEE: 27th September 2017

COUNCILLOR REPRESENTATION

Planning Application - BH2017/00492
Comment reference number: 1061172
I support the planning application

Sender's details
Cllr Tracey Hill
Hove Town Hall
BN3 3BQ

Comment
As a ward councillor, I support the application in general terms. Preston Barracks has been unused for many years and the city needs to make use of this key space to provide much-needed housing and business space.
I support the provision for student housing on this site, alongside general and affordable housing which is in line with our policy and will help to address the chronic shortage of purpose-built student housing for University of Brighton students. It will also alleviate some of the pressure on our residential areas which is leading to over-development of HMOs.
I think it's very important, though, that the general housing on this site is specifically protected from being used for student accommodation. I think there needs to be a specific prohibition on this as a condition of the development, otherwise experience elsewhere suggests that we will find student shared housing cropping up in the general housing provision which is not what it is for.
I support the use of tall buildings in this location to maximise the use of space. But it needs to be recognised that this will impact on local residents in terms of making the area much more built-up, and as part of the development there should be requirements to ensure that there is good quality provision for open spaces and leisure facilities to offset the negative impacts.
There will also be an impact on traffic along the Lewes Road, and alongside every effort being made to promote sustainable travel, we should expect some investment in transport infrastructure to ease congestion as much as possible.
This is a major development and I would expect to see the highest possible standards in terms of sustainable building in order to minimise carbon emissions and bills, as well as environmental impact from the building itself and support of the natural environment.
I have encouraged all residents to make comments on the application, whether positive or negative. I would like to ensure that all comments are listened to and taken into account. If things need to be reconsidered in response to residents, then I will support that happening.

Brighton & Hove City Council

PLANNING COMMITTEE LIST
27th September 2017

COUNCILLOR REPRESENTATION

Planning Application - BH2017/00492

Comment reference number: 1068462
I support the planning application

Sender's details

Cllr Daniel Yates
92 Hodshrove Road
BN2 4RS
Neighbour consultation letter: n/a

Comment

This application offers considerable benefits to the city and the local neighbourhood through the delivery of enhanced education and research space, additional family homes and purpose built student accommodation which may help to reduce the pressure on surrounding communities.
However I believe that to fully mitigate the effect of concentrating over 1100 housing units into this site a number of conditions would ensure that the potential effect of additional parking and traffic would help to alleviate this.
I would ask the committee to consider specifying the student accommodation as a car free development.
Additionally to avoid future on street parking issues relating to student car ownership I would seek officers to consider a specific amount within S106 to allow for a potential future CPZ parking consultation to be undertaken (subject to usual due process obviously) to cover the saunders park rise and coombe road communities.