Council	Agenda Item 17 (2)
25 July 2019	Brighton & Hove City Council

DEPUTATIONS FROM MEMBERS OF THE PUBLIC

(1) Deputation concerning the need for affordable housing is NO EXCUSE to devastate wildlife on the 'urban fringe.'

Spokesperson – Becky Hobbs

The balance between nature and humans envisioned in city plan part 1 is not being adhered to in the list of housing allocations in city plan part 2 as it currently stands. Yes, the Conservative government says we must build but we can choose where is sensible for Brighton. There is no need to build on wildlife in order to make affordable homes, we can make affordable homes elsewhere on already concreted areas and converting empty buildings and brownfield sites, etc, and that is why it is completely unacceptable to build on the green 'urban fringe.' Moreover 'mitigation measures' very often do not work in practice, so do not think they make new buildings less damaging to wildlife! The decision by planning committee members on 10th July to approve seven storey blocks of 242 flats obliterating Coldean Wildlife, was not about whether or not to build affordable homes, but whether or not to needlessly devastate essential wildlife habitat and local green space and make money for Hyde. There are alternative, already concreted sites within the city's boundaries where the Joint Venture Partnership could build instead, such as at Brighton General Hospital, where they could build 800 flats!

Please take steps to ensure Coldean wildlife to the east of Coldean Lane is not built on and /or revoke the planning decision to devastate precious wildlife and local green space at Coldean. Moreover please see petition text in the supplementary pages of this deputation, signed by over 965 people (even though it was only started a short time ago) which asks the council to remove this Coldean site from the list of allocated sites in the Urban Fringe allocations in the City Plan Part 2, and instead designate it a Local Nature Reserve and Local Green Space (the land fulfils the criteria for the latter, as described in the National Planning Policy Framework 2019, page 29) as soon as possible, so it remains protected wildlife habitat, now and for future generations. The wonderful land at Coldean should never have been put on a list of allocated housing. This is part of a number of wildlife habitats and green spaces which have needlessly and wrongly ended up on the list of housing allocation sites on city plan part 2. City plan part 2 is now in the soundness stage where it can be changed with evidence. There is abundant evidence why wildlife habitat and green spaces should be removed from the list of housing allocations in city plan part 2 and instead the council can look again, more creatively and wilfully, at making affordable housing within the city's boundaries on already concreted areas, empty/derelict buildings and brownfield sites. We will be providing evidence. Please, Save Coldean Wildlife, and also save all the other wildlife and green spaces on the 'urban fringe' by removing them from the list of allocated housing, and instead think more creatively how to add to the list already concreted sites and empty buildings within the city's boundaries. Please see (in the supplementary pages of this deputation) the list so far (still in early stages, will be added to) of potential alternative sites where the council could build affordable housing without building on wildlife habitat and local green spaces. There are lots, which could easily cover more than enough of the affordable homes the council has been told it must build. Let's take off the green spaces and wildlife from City Plan Part 2 and instead make the needed affordable housing by focusing more, and more creatively, on the many potentially suitable sites within the city's boundaries. then the council can ask the government to re-approve it, so we would still have an approved city plan and could therefore, hold any developers to account for any proposed developments, and retain control.

We do NOT have to choose between wildlife and affordable housing! We must take care of both! The council thankfully listened to the local community who opposed the plan to build housing on Whitehawk Hill Nature Reserve; do the right thing for Coldean Wildlife too!

Supporting Information:

List of alternative potential sites to make affordable homes without devastating wildlife on the 'urban fringe':

- -at Brighton General Hospital, space for 800 flats.
- 4000 empty homes in Brighton (<u>https://www.theargus.co.uk/news/16373633.more-than-4000-brighton-homes-are-empty-despite-housing-crisis/</u>
- -the old Argus building by Asda in hollingbury; the old gas works in Kemptown (although this may take time as the land may be contaminated) and next to that a site which the council are using as a dumping ground for old iron bits from Madeira drive and the sea front); -site to the west of Portland Street (near North Street, in Brighton centre); a site next to Preston Park, London road, on the left as you go out of Brighton, which has been empty for years, and Hyde housing years ago seemed to be going to do something with it but nothing has happened.
- -Lots of empty homes on top of shops around Brighton;
- -building up, i.e. many more houses on the same amount of land, so long as this will not put birds at risk of crashing into the buildings.
- -there are areas of expansive and privileged housing in several areas of Brighton and Hove which are really spread, out with a lot of space, low number of inhabitants compared to the number of bedrooms, and lots of private garden space and lots of shared communal spaces between houses. The council could buy some of the private property in this area from those that are willing, intensify use of the space, and turn it into very many more council houses (there are precedents for this, e.g. https://www.standard.co.uk/news/burchills-move-stirs-up-the-neighbours-217180970.html),

Petition text

Petition to council: Please protect wildlife at Coldean!

We object to the approval of the planning application for buildings which would devastate wildlife at Coldean, and we wish to safeguard this essential wildlife habitat and local green space at Coldean, now and for future generations.

We the undersigned petition Brighton and Hove City Council to remove the Coldean site from the list of allocated sites in the Urban Fringe allocations in the City Plan Part 2, and instead designate it a Local Nature Reserve and Local Green Space (as described in the National Planning Policy Framework) as soon as possible, so it remains protected wildlife habitat, now and for future generations.

There are alternative large empty buildings around Brighton (e.g. at Brighton General Hospital) which the council could turn into affordable homes (800 in the case of Brighton General Hospital) therefore it's clear that to make affordable homes it is completely unnecessary to build on the green space and wildlife. The land was notified as a Local Wildlife Site in 2017 in recognition of its woodland and grassland habitats. The proposal would mean destroying woodland and felling trees to build a new entrance road which would split the strip of woodland that runs parallel to Coldean Lane in two, with devastating effects on the wildlife. It would also mean building on the field, obliterating lots of wildlife, their homes and foraging ground. The woodland and field include many plant species and are essential habitat for wildlife sandwiched between Varley Halls and very busy, fast roads, many of whom are legally and policy protected species, such as bats, hedgehogs, lizards, slow worms. badgers, foxes, rabbits, butterflies, lots of invertebrates who massively contribute to the environment, and many different birds, including owls, and others. Some of the birds breed and make nests in the trees and on the ground, and 3 (song thrush, tawny owl and dunnock) are listed as having severe red and amber conservation status. The woodland is Priority Habitat Deciduous Woodland and provides critical habitat for wildlife. Splitting the woodland in two would cut vital connectivity and put the wildlife at very high, frequent risk of road traffic accidents.

Localised areas of the field (about 1 hectare of it) have an affinity with Calcareous Grassland, and there is 'good potential to create new areas of native species rich calcareous grassland where chalk substrates can be exposed and seeded' (Preliminary Ecological Appraisal, PJC, 2018). Lowland Calcareous Grassland is a Habitat of Principal Importance and classified as Priority Sussex Habitat. Within Sussex, this type of habitat is mostly found within the South Downs; it has reduced rapidly in recent years and is now only an estimated 3% of the South Downs. The Sussex Biodiversity Partnership aims to maintain and expand the range of Lowland Calcareous Grassland in Sussex. Moreover 'there is an area of lowland calcareous grassland immediately north of the site' and 'any development of this site would also likely result in adverse impacts on any areas of lowland calcareous grassland habitat adjacent to the site, e.g. through increased surface run-off and increased disturbance/tramping/littering from potential increases in recreational use of the area' (PJC, 2018). So, the proposed development would destroy not only Priority Habitat Deciduous Woodland but also be likely to negatively impact the Lowland Calcareous Grassland (i.e. Habitat of Principal Importance and a Sussex Priority Habitat) on next door land.

Increased vehicle movement and parking on local roads would be expected, and traffic on Coldean Lane would get substantially more clogged up, polluting the air even more and putting human residents, especially school children, at risk. It is well documented that green space is vital for people's physical and mental health. The visual impact of the proposed buildings would be unpleasant as they would replace a green view of nature with high blocks of flats and concrete.

Today, wildlife in this very densely urbanised area of the U.K. are increasingly endangered by destruction of their habitats. Globally, land mammal mass is made up of 96% humans and the farmed animals (Attenborough, 2019), and insects and ecosystems who we rely on are massively threatened by climate change, so we must stand up for wildlife now or there will be none left. If we do not, soon it may be many human lives in the UK imperilled due to climate change and because we have not protected wildlife there will no longer be an ecosystem left that can support us. At present, the land provides precious sanctuary for wildlife - this is a space to cherish, protect and stand by.